

commentletters

From: Robert Chrisman <avanguardiawines@gmail.com>
Sent: Thursday, April 28, 2016 5:27 PM
To: commentletters
Subject: Comments to A2239(a) - (c)



Ms. Jeanine Townsend
Clerk of the Board
State Water Quality Control Board
P.O. Box 100
Sacramento, CA 95812

Re: Proposed Draft Order for East San Joaquin containing changes proposed for all California Water Quality Coalitions

As one of the 510 member of the Placer-Nevada-south Sutter-north Sacramento (PNSSNS) Subwatershed group, I am writing at this time to register my vehement objection to the Draft Order and each and every one of its provisions.

First, the inclusion of agricultural enterprises in the foothills for the Irrigated Lands program initially has generally been shown to be unnecessary based on the twelve (12) years of the accumulated measurements and data.

Second, to continue and then increase activities and requirements in this program for entities like ourselves is an egregious overreach, most especially those items which stem from the proposed designation of our vineyard and others like it as a region of high vulnerability, which is demonstrably not the case.

The items referred to above include:

- Increased reporting
- Certification of all plans
- Increased monitoring sites
- Increased regulations
- Private well testing
- Making personal, private, and proprietary information available for public use.

The effect of these changes will be greatly increased costs to small operators ranging from \$4000 to over \$ 10,000 per year, according to the information that has been provided to me by reliable sources. This is unconscionable given that the Board has failed utterly in its responsibility to provide adequate cost-benefit analyses or to consider the vast differences between the water-conscious agricultural modes in use in this area vis-a-vis the typical flood-irrigated Central Valley farming operation.

You can be sure that, if these provisions are adopted and extended to groups like PNSSNS, there will a tremendous amount of resistance and pushback, the like of which you have never seen. Growers are gearing up to scale back the operations of un-elected, administratively-oriented regulators like RQWCB due to various large-scale abuses, of which the adoption of the discussed measures in the foothills would be a prime example. It would not surprise me to ultimately see efforts to eliminate the agency entirely.

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