

April 29, 2016

Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814
P.O. Box 100
Sacramento, CA 95812-0100
Email: commentletters@waterboard.ca.gov



RE: East San Joaquin Water Quality Coalition Proposed Order

Dear Board Members,

We are growers in San Joaquin County and belong to the San Joaquin County and Delta Water Quality Coalition. We have great concerns about the Proposed Order for the East San Joaquin Water Quality Coalition. Our agriculture operation currently is just starting to implement the regulations that the Central Valley Regional Water Quality Control Board imposed in 2014. These new regulations include filling out Farm Evaluation Plans, Nitrogen Management Plans and Nitrogen Summary Reports and submitting the information to the Coalition for evaluation.

This Proposed Order would increase the paperwork for all growers and would increase the fees a grower would have to pay the Coalition in order to collect and process the doubling if not tripling amount of paperwork. Paperwork does not address water quality issues. Education of growers, research and more efficient use of fertilizers will address water quality issues.

We also have concerns about how all the Nitrogen Management Plans will be certified. There are not enough nitrogen and irrigation specialists available to do the plans under the current Order. If the proposed Order is adopted, the number of growers requiring a certified Nitrogen Management Plan would double if not triple. How are we supposed to comply with the new regulations if there are not the qualified professionals to certify the plans?

We object to the proposal to submit private information on land ownership, location and farming operation. This is a violation of my privacy and I object strongly. The current Coalition data submission on a summarized township basis is sufficient.

We also object to the Drinking Water Supply Well Monitoring and Reporting proposal. Private drinking water regulation should be handled by the County Department of Health.

We encourage the Board to let the current Orders be implemented. Growers are becoming more educated by taking Nitrogen Self Certification Classes, more research on nitrogen efficiencies are being conducted and the Coalition is analyzing information to help determine those areas of concern. The proposed changes would be costly and burdensome to family farmers throughout the state and not improve water quality.

Thank you,

Rosemary and Doug Gamblin