

## commentletters

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**From:** Sharon Hawley <sjhawley@sbcglobal.net>  
**Sent:** Wednesday, May 11, 2016 9:44 PM  
**To:** commentletters  
**Cc:** Dana Crum; Wendy S.; Sharon Hawley  
**Subject:** Comments to A-2239(a)-(c)



To: Ms. Jeanine Townsend, Clerk to the Board  
RE: Comments to A-2239(a)-(c)

The Crum Family Ranch, LLC, is a member of the San Joaquin County & Delta Water Quality Coalition (SJCDWQC). This letter is being written to **protest** the proposed *Order for the East San Joaquin Water Quality Coalition Waste Discharge Requirement* (ESJ order).

This protest is based on the following points:

1. The knowledge that the proposed ESJ Order is precedent setting for the whole Central Valley and State is distressing. If the proposed requirements are approved our small farm, included in the SJCDWQC, will be required to comply. Many other growers are unaware of the impact of the proposed changes and will have no opportunity to voice their concerns.
2. The proposed requirement to test, monitor, and report all private domestic well data to the regional board on a yearly basis is well beyond the purview of the Irrigated Lands Regulatory Program.
3. The proposed requirement that all field ownership level data be submitted yearly to the Regional Board and made public through the GeoTracker Database is unacceptable. Again this proposed requirement is excessive, costly, and leaves farmers open to private nuisance lawsuits. This view is based on the impact such data accessibility has had on the dairy industry in the last few years.
4. The requirement that all growers, regardless of their designated vulnerability area, have annual Water Quality Coalition reporting requirements is unnecessary. As a grower in a high vulnerability area I know first hand the level of time and cost required to meet the current reporting requirements. Placing this burden on those who farm in a designated low vulnerability area will only add extra work for minimal payback. Energy and focus should remain on the areas that have been identified in the Ground Water Assessment Report as needing the most attention and that have the most potential for mitigation, improved management practices, and long term future impact.

**The potential impact, in time and money, on our farming operation is excessive and unacceptable. Please do not adopt the proposed EJS Order.**

Respectfully yours,  
Wendy Stone  
Dana R. Crum  
Members, SJCDWQC  
cc: Sharon Hawley-Crum