



CALIFORNIA WALNUT COMMISSION

101 Parkshore Drive, Suite 250
Folsom, CA 95630-4726
(916) 932-7070
Fax: (916) 932-7071
info@walnuts.org

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To,
Ms. Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
P. O. Box 100
Sacramento, CA95812-0100



RE: State Water Resources Control Board's Draft Order revising the East San Joaquin Water Quality Coalition's General Waste Discharge Requirements (A-2239(a)-(c))

Dear Ms. Townsend;

I am writing on behalf of the more than 4,800 growers who farm California walnuts. The vast majority of these farms are family operations having been run by the families for two or more generations. This industry, combined with walnut processors (handlers) had farm gate revenue of almost \$1billion dollars and employs more than 85,000 individuals directly and indirectly. California walnuts are also one of the state's top exports.

As multi-generational family farms, walnut growers understand the importance of being a good stewards of the land. This includes responsible use of water and maintaining water quality. Further, CWC sponsored production research continues into optimum usage of fertilizers so as to prevent over application. However, we are concerned with the proposed revision to the East San Joaquin Water Quality Coalition's General Waste Discharge Requirements and its impact on farming operations.

We are particularly concerned about the following aspects of the proposal;

PRECEDENTIAL NATURE:

Given the precedential nature of this order, all agricultural operations will be brought under the requirements regardless of their location in the state. Given the significant regional differences in California agriculture, a one-size-fits-all requirements would not be appropriate. A young walnut orchard does not use the same amount of water or nitrogen as a mature one. Consequently, to impose the same set of requirements in both cases would not make any sense. Add geographical and soil type variation in the mix and it would be evident that it will be very difficult to implement this order.

ECONOMIC BURDEN:

We contend that the draft order will significantly add to reporting requirements leading to an increase in compliance cost. This will also lead to higher costs at coalition or third party level as well as for regional water boards to collect and analyze the data.

DATA PRIVACY:

The proposed order requires data monitoring to the field level. And while this data will be tied to anonymous identifiers, it will be publicly available. The current system of third party data collection and aggregation at township level works quite well and this data is available to regional boards when needed.

Considering all the above factors, we would urge the State Water Resources Control Board to reconsider the precedential nature of the proposed draft order.

Sincerely,

A handwritten signature in cursive script that reads "Carl Eidsath".

Carl Eidsath
Technical Support Director
ceidsath@walnuts.org