

From: [Jeff Moresco](#)
To: [commentletters](#)
Subject: Comments to A-2239(a)-(c)
Date: Tuesday, November 21, 2017 6:10:04 AM



Dear Clerk to the Board Townsend,

I am a farmer in Northern California, and have been a coalition member since they were first formed. As a steward of the land, I want to preserve and protect the resources that provide for my family. It seems every year you add another layer of regulation and reporting requirements on us. These requirements take time to complete and report, time that we used to have to spend on the actual raising of crops and animals, or machinery maintenance, or dealing with our finances, or infrastructure maintenance and improvements. What it really does, is it takes time away from our families and our quality of life, because all of the other activities still must occur for us to be successful. Now I am seeing other smaller farmers leave the business more and more the last few years. They are selling out to larger corporate farming interests that are large enough to cover the overhead of hiring a full time staff of people to do the reporting you require. This doesn't necessarily help the ground or surface water resources in any way. The people with a personal attachment to the land are disappearing, and are being replaced by people who look at the land as a business asset. Their motivation is to maximize their return on their investments, not necessarily preserve the asset for future generations. They can comply with your requirements, and generate all the paper and reports you could possibly want, but that really doesn't have much to do with water quality and resource preservation. It seems to me all of your requirements, regulations, and restrictions, actually produce the opposite effect of what you're trying to accomplish. I am following the State Water Resources Control Board's Draft Order revising the East San Joaquin Water Quality Coalition's General Waste Discharge Requirements. As a farmer in California, I am concerned that my operation will be negatively burdened by the Draft Order.

The proposed revisions to the East San Joaquin Waste Discharge Requirements and the impact the changes will have on the currently successful cooperative Irrigated Lands Regulatory Program, which has been in place for over a decade, are significant and costly. Given the precedential nature of the Draft Order, it will not only have a severe impact on agricultural operations within the Central Valley, but on all irrigated agricultural operations throughout the state.

I am particularly concerned about the following:

The Draft Order includes requirements that will disrupt the existing successful irrigated lands regulatory program which has been effective in addressing surface water quality concerns and protecting water quality for years.

The cost of compliance for administration and reporting will significantly increase if the Draft Order is adopted. Under the new Order, reporting requirements will uniformly apply to all growers, whereas currently, reporting requirements vary due to vulnerability designations. In addition to higher costs for individual growers, coalition/third-party costs as well as regional water board costs, will increase due to the new requirements to collect and compile all raw data.

Given the vast regional differences in California, one-size-fits-all requirements applicable to all areas of the state are not appropriate. The Draft Order gives direction to the Central Valley Water Board and all other regional water boards to update or develop their irrigated lands regulatory programs to be consistent. Different areas of the state have different issues and not everyone grows the same crop every year, which will make this Order extremely difficult to implement, especially the nitrogen management requirements, the multi-year nitrogen applied over removed ratios, and the ratio comparisons to calculated target values.

The Draft Order requires each farm to annually monitor all drinking water supply wells on the property. This is problematic, especially because growers may not have legal authority to access landowner or tenant wells.

I also have concerns with the amount of raw data, including field-specific farm evaluation and management practice data and all nitrogen application data by field, that will be submitted to the regional water boards. Not only is the amount of data reported unnecessary, the data, although tied to anonymous identifiers, will now also become

publicly available. Currently, third-parties submit data aggregated at the township level and maintain the raw data which is accessible to the regional water board if needed. This system works and doesn't expose my farming practices to competitors or potentially cause privacy concerns.

The result of these requirements will inevitably lead to increased coalition/third-party costs and state regulatory fees, and the Draft Order does not contain any meaningful cost analysis to justify these new requirements.

Thank you for considering my views.

Sincerely,

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