

Ms. Jeanie Townsend
Clerk to the Board
State Water Resources Control Board
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RE: Comments to A-2239(a)-(c)

Dear Chair Marcus and Members of the Board:

I am a farmer who grows almonds, walnuts, wine grapes, cherries, and raises beef cattle in Oakdale, California located in Stanislaus County. I have been following the State Water Resources Control Board's Proposed Order revising the East San Joaquin Water Quality Coalition's General Waste Discharge Requirements, and I am concerned that my ability to continue to [farm/ranch] will be unnecessarily negatively burdened by the Proposed Order.

The proposed revisions to the East San Joaquin Waste Discharge Requirements and the potential impact the changes will have on the already 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 Proposed Order, it will not only have a severe impact on agricultural operations within the Central Valley, but throughout the state. Of particular concern to my farming operation is:

- Will burden your operation including the cost of compliance.
- Is precedential and would give 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 with the Proposed Order.
- Creates privacy concerns given the requirements for the coalitions to submit all raw data, including field-specific farm evaluation and management practice data identified by location and all nitrogen application data by field, identified by location.
- Upsets the current monitoring and reporting requirements within the existing irrigated lands regulatory program which provide the Regional Water Board with ample information needed to determine the effectiveness of the program regarding water quality concerns in compliance with the Water Code and the State Water Board's policies.
- Requires each farm to monitor its drinking water wells, including land owner or tenant wells that you may not have authority to access.

Thank you for considering my views.

Respectfully submitted,

William R. Jackson
President
V. A. Rodden, Inc.