

From: ALICE ABATTI
To: [commentletters](#)
Subject: Comments to A-2239(a)-(c)
Date: Monday, November 20, 2017 8:00:07 AM



Dear Clerk to the Board Townsend,

I have been 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 Imperial Valley, 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.

Imperial County's Voluntary program has been successful the past 15 years in address TMDL regarding "dirt in the water".

The cost of compliance for administration and reporting will significantly increase if the Draft Order is adopted. Staff is under the impression that farming practices similar to "cookie cutters".

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 factual-based, nor reasonable; nor 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; and susceptible to cyber attack and data compromise. This is ripe for jeopardizing our country's national security. Are we not facing the same issue with respect to Russia publicity campaign in the 2016 national election?

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.

Agriculture is one of the last "true economic systems of supply and demand without policy manipulations." These additional costs cannot be "passed onto" the consumers; and I am not able to absorb this NEW TAX in my farming operation.

Thank you for considering my views.

Sincerely,

ALICE ABATTI
558 Silverwood St
Imperial, CA 92251
alicemabatti@gmail.com