

From: Chris Morgner
To: [commentletters](#)
Subject: Comments to A-2239(a)-(c)
Date: Saturday, November 25, 2017 4:40:04 PM



Dear Clerk to the Board Townsend,

I have been following the SWR Control Board's Draft Order revising the ESJ Water Quality Coalition's General Waste Discharge Requirements. As a conservationist farmer in Chowchilla, I am concerned about the revision's requirements.

I and my fellow coalition farmers have worked hard to preserve surface water quality and ground water quality. I have taken steps to ensure my ranch is properly irrigated with the finest technology and sustainable methods. My fertilizer is accurately calculated so only what is needed by the current crop is applied through multiple events at the crop's peak demand.

Farming is expensive and time consuming. I love the work and challenge. However, there are new additional costs that show up several times through the year. 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.

I don't even see a cost analysis for the revision.

ENOUGH!

I keep plenty of records to analyse my inputs and yield results and am willing to share with fellow farmers, researchers and regulatory agencies. I do not wish my information to be public. I own my information.

Please consider my practices and views during the upcoming hearings.

Sincerely,

Chris Morgner
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