

From: Norman Groot
To: [commentletters](#)
Subject: Comments to A-2239(a)-(c)
Date: Monday, November 20, 2017 7:20:05 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 and landowner, 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, and severely on the Central Coast.

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. Coalitions on the Central Coast are already exceeding expected costs and continue to increase each year, threatening their viability as non-profit organizations.

Given the vast regional differences in California, and the uniqueness of Central Coast agriculture, 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.

Crop rotations, variability in climate by region, many multiples of soil types, and leasehold changes make any attempt to establish an applied/removed ration for Central Coast row crops uniformly for all growers nearly impossible.

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 (especially those excluded from lease contracts).

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. Central Coast growers and landowners have been stung by adverse court and administrative decisions that have released their data into the public domain when specifically promised by regional water board staff that this would not be the case.

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 or specific benefits to justify these new requirements.

Thank you for considering my views.

Sincerely,

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