From: Mr. & Mrs. Wayne Vineyard
To: commentletters
Subject: Comments to A-2239(a)-(c)
Date: Monday, November 20, 2017 8:20:05 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 in California, I am concerned that my operation will be negatively burdened by the Draft Order.
We are a small cattle ranch having about 250 acres of irrigated pasture on the edge of the foothills We have been farming in the area for over 150 years and hope the next generations will be able to continue to farm. The proposed changes would be very hard for small operations like ours to continue to farm profitably.
We comply with the highly successful cooperative irrigated Lands Regulatory Program and see any additional reporting and controlling plans to be costly and counter productive.

We are 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. The cost of monitoring the 3 domestic wells on our ranch would add another burden of trying to farm profitably.
We 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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