



WESTLAWN RANCHES, INC.

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Ms. Jeanie Townsend
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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 farm manager for four privately held companies that grow grapes, almonds, and walnuts, in Fresno county, California. All of our properties are dutifully enrolled in the ILRP under the Kings River Water Quality Coalition. 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 our ability to continue to farm 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 operations are the proposed new requirements for the reporting of farm specific data to the Regional Board. The current model of reporting data to our third party coalition, which then aggregates and reports township level data to the Regional Board, is highly preferable. Township level data should be more than adequate to provide ample information needed for program oversight, to determine the effectiveness of the ILRP, and to determine the performance of the third party coalitions in terms of outreach/education and data collection/reporting. Coalitions and self-representing participants should continue to maintain field level data for future reference or investigations. However, the Regional Board should not concern itself with field level data, unless and until, the aggregated township level data suggest otherwise. Under all circumstances, farm/field level information must be maintained confidential, for the protection of the participants, for the trust in the third-party coalitions, and, quite frankly, for the success of the ILRP itself.

As for the reporting and development of nitrogen use ratios and the like, I believe that this is best left to the experts in our agricultural industry here in California. Our industry is rich with knowledge and expertise in these areas – from academia and private industry, alike – and (through the third party coalitions) these



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leaders should be given the time and resources needed to determine and advise growers on best management practices for crop estimations, nitrogen applications, and irrigation practices, in order to achieve the goals set forth by the ILRP. Simply gathering every individual farmer's data (which may be skewed depending on his/her level of trust in the ILRP process) will not likely ever lead to the development, extension, or use of best management practices for Nitrogen. Rather, the Board may only be gathering an estimate of the status quo, at best. Adding unnecessary complexity to the data collection process will inevitably add cost burdens that must be covered either by coalition assessment increases for we growers, and/or by California's taxpayers.

My desire would be for the Board to take a step back and allow the third party coalition process to solidify and build upon the good works that have already been done.

Thank you for considering my views.

Respectfully submitted,

Gregory T. Berg,

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