



May 28, 2016

Ms. Jeanie Townsend  
Clerk to the Board  
State Water Resources Control Board  
1001 I Street, 24<sup>th</sup> Floor [95814]  
P.O. Box 100  
Sacramento, CA 95812-0100  
[commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)



RE: Comments to A-2239(a)-(c)

Dear Chair Marcus and Members of the Board:

Thank you for the opportunity to comment on the above referenced order. Our family farms cut flowers in northern San Diego County, California. We 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 are very concerned that our ability to continue to farm will be unnecessarily negatively burdened by the Proposed Order. Although we aren't experts in conditions in the Central Valley we are concerned that the actions taken will be precedential and expanded to all regions throughout the state. We believe that the conditions in San Diego County region are vastly different from those of the San Joaquin Valley and as such should not be burdened with the same requirements. As an example:

- Only 2% of the acres within the county of San Diego are in irrigated agriculture.
- Groundwater is extremely limited due to the hydrologic and geologic nature of the region as as such 97% of the domestic water supply is from sources other than groundwater.
- With the price of water in our area exceeding \$1500/acre foot, we and all growers in our area have invested heavily in irrigation efficiency technology and conserve water aggressively.

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 operation is:

- All farmers would have to participate in outreach events, update their farm evaluation annually, have certified Nitrogen Management Plans (NMP), and submit NMP summary reports to the coalition. ***Previously, this was only required for growers in high vulnerability areas.***
- Nitrogen application data and management practice implementation data now must be reported on a field-specific level, identified by location. With almost 200 separate fields representing 40 different and unique crops on our 400 acres of production makes this a tracking nightmare if not an impossibility!
- The data submitted will be grower specific. Thus, all Farm Evaluation data and Irrigation and Nitrogen Management Plan data will now be accessible to the general public. ***Previously, the Nitrogen Task Force recommended only an aggregation of the data should be submitted.***
- **Grower costs (especially those of us that farm small acreages) will increase dramatically and unnecessarily as reporting requirements now apply to all growers.**

Thank you for considering my views.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Michael A Mellano".

Michael A Mellano  
Mellano & Company  
VP Farming & Production