

March 3, 2016

Felicia Marcus, Chair  
California State Water Resources Control Board  
P.O. Box 100  
Sacramento, CA 95812-0100

Subject:

Order Revising the Eastern San Joaquin Agricultural General Waste Discharge Requirements

Dear Ms. Marcus

As Central Valley growers regulated by the Irrigated Lands Regulatory Program we the undersigned wish to express our extreme displeasure regarding the State Board's proposed revisions to the Eastern San Joaquin Waste Discharge Requirements. The directive to the Central Valley Water Board and the other Regional Boards to update their irrigated lands regulatory programs to be consistent with this Proposed order is of extreme concern.

The Orders adopted by the Central Valley Regional Board were developed over a period of years with hundreds of man hours put in by Board staff and stakeholders working together to come up with a plan that would achieve the goals of the Board. Working through the process with stakeholders generated the buy-in from the regulated community required to assure success. That buy-in was achieved in large part by having the third party coalitions receive and consolidate grower information and reporting the consolidated information to the Regional Board, thereby protecting farmer's privacy rights.

As farmers we are acutely aware of how sensitive our environment is and are always looking for better ways to protect it. Our livelihoods depend on healthy soil and water. Our practices are constantly improving, becoming more efficient and more protective of the environment. As an industry we supply, California, America and a good percentage of the rest of the world with the highest quality and safest fresh citrus produced anywhere, using less water and fertilizer. We have been moving in the right direction without fanfare or acknowledgement for the last twenty years.

Nevertheless, there are those who seek to demonize agriculture to perpetuate a cause and seek a reason to exist. By succumbing to the public information demands raised by the "Environmental Petitioners", AGUA and CSPA in their appeal, the State Board is doing serious damage to the fragile level of trust that has been established between the Regional Board, the third party coalitions, and those being regulated. If the portion of the revised order requiring that individual grower information be sent to the Regional Board stands it will do irreparable damage to the program and greatly increase the work load on the Regional Board, which will translate to higher and higher costs on family farmers who are already overburdened by the high cost of regulation.

We vehemently disagree that providing this information will improve the Board's ability to measure the effectiveness of the program. We believe the only purpose that will be served is the "Environmental Petitioners" ability to glean and distort information out of context to further their own agenda.

Sincerely,

Signatures Attached

George McGowan  
 Michael D. Dwyer  
 Craig Hummer  
 Guido Allan Lombardi  
 Ronald W. Bepp  
 Paul Bell  
 Justin Rullo  
 Phil Wood  
 Will P. Roth II  
 Kevin Erickson  
 Thomas B. Amato  
 Marcos Amato  
 Henry Owen  
 Rick Lopez  
 Jim Dunt  
 Miss D  
 Jack & Hank  
 KCR.  
 Eric Schreiner

John F. Ever  
 Doug Hudson  
 Matt Fry  
 Jeff Foster  
 Chris M. M.  
 Mark St. John  
 Dan H. H.  
 Steve C. Brown  
 Ken White  
 Ulysses G. Borden  
 John  
 Chris A. Savill  
 Dariusman  
 Gary Long