

Jimmerson, Chris@Waterboards

From: jclary@cleanwater.org
Sent: Monday, September 16, 2013 4:50 PM
To: Jimmerson, Chris@Waterboards
Cc: Karkoski, Joe@Waterboards; RC; Phoebe Seaton
Subject: Comments on Delta and San Joaquin draft order
Attachments: TLB Tentative WDR EJ comm April15.pdf; ESJR_Draft_order_EJ_comm.pdf

Categories: Ecase filed

Joe and Chris

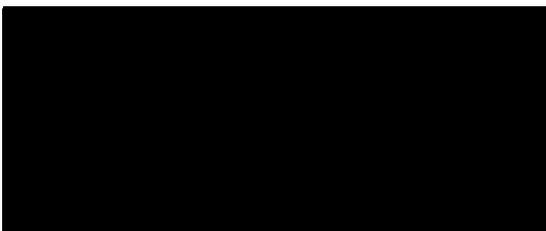
In reviewing the Delta order, the problems seem to be pretty much the same as those in prior orders, so I'm attaching those comments so they can be added by reference. In addition, I notice two unique changes of concern:

1. The Groundwater Quality Assessment Report is being split into two sections with and ETA of one year and two years for Phase one and two respectively. Given the elongated time frame for these orders and the fact that timelines are already at least a year longer than those in the San Joaquin order, this is pretty troubling
2. We already had a problem with allowing the Executive Officer to reduce reporting requirements for Farm Evaluations and Nutrient Management Plans in Year 3 of reporting; this order goes one step further and allows the EO to reduce Farm Evaluation submittal in Year One. I don't understand the logic of allowing this for this specific order, and in fact totally disagree with it.

Thanks for accepting the comment.

Sincerely,

Jennifer Clary
Clean Water Action



Dear Mr.

As a farmer in San Joaquin County and a steward of the land, I am deeply concerned with the direction the Regional Water Quality Control Board is taking regarding water quality. As farmers, we work every day to grow food that feeds the world, contributes to our local economy and do so in a way that protects natural resources.

Until recently, we have been operating under a waiver to the waste discharge requirements and have seen water quality improve. We are very concerned about the implications the new waste discharge requirement as the administrative draft of this document that has been released is not practical for producers, particularly, the requirement of a certified Nitrogen budget.

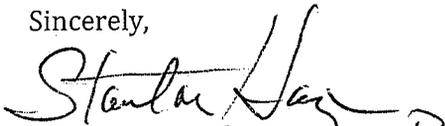
The requirement of maintaining a certified Nitrogen budget is nothing more than additional paperwork for growers that has no meaningful purpose and will be cost prohibitive for most farmers.

Creating a Nitrogen budget wastes precious resources on process rather than progress. The application of Nitrogen is only done when conditions require it and at the bare minimum levels. To give a more rounded picture of the amount of Nitrogen applied; it makes more sense for growers to only report the amount of Nitrogen they actually applied at the end of a growing season.

Additionally, a certified Nitrogen budget could potentially be cost prohibitive, depending on who has the authority to certify such a plan. The administrative draft of the WDR falls short on the specificity of this part of the requirement. I recommend that the Board create a comprehensive program for self-certification of growers. There are many benefits to moving to a self-certification program, the first of which is that it would be more cost effective for the grower because they wouldn't incur the cost of having another party certify the plan. There is also the additional benefit of having the opportunity to educate growers about groundwater discharge, which wouldn't exist if they were paying someone else to certify the budget.

As a grower, I would like to work with this new regulation. However, the idea of an inconsequential guideline is nothing short of nonsensical and at the very least, it should not be at my expense.

Sincerely,



RECEIVED
ACRAMENTO
CVR/WQCB
13 SEP 16 PM 1:16

Dear Mr. Longley,

As a farmer in San Joaquin County and a steward of the land, I am deeply concerned with the direction the Regional Water Quality Control Board is taking regarding water quality. As farmers, we work every day to grow food that feeds the world, contributes to our local economy and do so in a way that protects natural resources.

Until recently, we have been operating under a waiver to the waste discharge requirements and have seen water quality improve. We are very concerned about the implications the new waste discharge requirement as the administrative draft of this document that has been released is not practical for producers, particularly, the requirement of a certified Nitrogen budget.

The requirement of maintaining a certified Nitrogen budget is nothing more than additional paperwork for growers that has no meaningful purpose and will be cost prohibitive for most farmers.

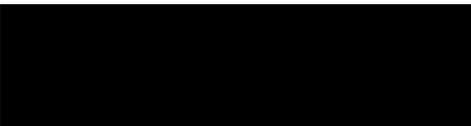
Creating a Nitrogen budget wastes precious resources on process rather than progress. The application of Nitrogen is only done when conditions require it and at the bare minimum levels. To give a more rounded picture of the amount of Nitrogen applied; it makes more sense for growers to only report the amount of Nitrogen they actually applied at the end of a growing season.

Additionally, a certified Nitrogen budget could potentially be cost prohibitive, depending on who has the authority to certify such a plan. The administrative draft of the WDR falls short on the specificity of this part of the requirement. I recommend that the Board create a comprehensive program for self-certification of growers. There are many benefits to moving to a self-certification program, the first of which is that it would be more cost effective for the grower because they wouldn't incur the cost of having another party certify the plan. There is also the additional benefit of having the opportunity to educate growers about groundwater discharge, which wouldn't exist if they were paying someone else to certify the budget.

As a grower, I would like to work with this new regulation. However, the idea of an inconsequential guideline is nothing short of nonsensical and at the very least, it should not be at my expense.

Sincerely,

Charles Starr



RECEIVED
SACRAMENTO
CVR/WQCB
13 SEP 16 PM 1:16

Dear Mr. Longley,

As a farmer in San Joaquin County and a steward of the land, I am deeply concerned with the direction the Regional Water Quality Control Board is taking regarding water quality. As farmers, we work every day to grow food that feeds the world, contributes to our local economy and do so in a way that protects natural resources.

Until recently, we have been operating under a waiver to the waste discharge requirements and have seen water quality improve. We are very concerned about the implications the new waste discharge requirement as the administrative draft of this document that has been released is not practical for producers, particularly, the requirement of a certified Nitrogen budget.

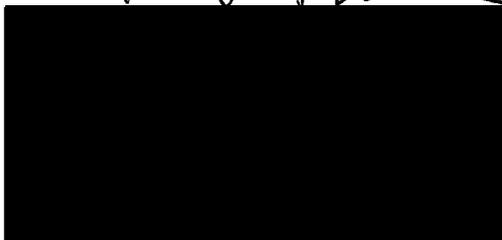
The requirement of maintaining a certified Nitrogen budget is nothing more than additional paperwork for growers that has no meaningful purpose and will be cost prohibitive for most farmers.

Creating a Nitrogen budget wastes precious resources on process rather than progress. The application of Nitrogen is only done when conditions require it and at the bare minimum levels. To give a more rounded picture of the amount of Nitrogen applied; it makes more sense for growers to only report the amount of Nitrogen they actually applied at the end of a growing season.

Additionally, a certified Nitrogen budget could potentially be cost prohibitive, depending on who has the authority to certify such a plan. The administrative draft of the WDR falls short on the specificity of this part of the requirement. I recommend that the Board create a comprehensive program for self-certification of growers. There are many benefits to moving to a self-certification program, the first of which is that it would be more cost effective for the grower because they wouldn't incur the cost of having another party certify the plan. There is also the additional benefit of having the opportunity to educate growers about groundwater discharge, which wouldn't exist if they were paying someone else to certify the budget.

As a grower, I would like to work with this new regulation. However, the idea of an inconsequential guideline is nothing short of nonsensical and at the very least, it should not be at my expense.

Sincerely,



13 SEP 16 PM 1:19

RECEIVED
ACRAMENTO
CVR/WQCB

Dear Mr. Longley

As a farmer in San Joaquin County and a steward of the land, I am deeply concerned with the direction the Regional Water Quality Control Board is taking regarding water quality. As farmers, we work every day to grow food that feeds the world, contributes to our local economy and do so in a way that protects natural resources.

Until recently, we have been operating under a waiver to the waste discharge requirements and have seen water quality improve. We are very concerned about the implications the new waste discharge requirement as the administrative draft of this document that has been released is not practical for producers, particularly, the requirement of a certified Nitrogen budget.

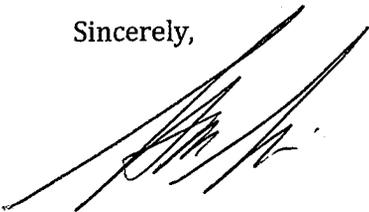
The requirement of maintaining a certified Nitrogen budget is nothing more than additional paperwork for growers that has no meaningful purpose and will be cost prohibitive for most farmers.

Creating a Nitrogen budget wastes precious resources on process rather than progress. The application of Nitrogen is only done when conditions require it and at the bare minimum levels. To give a more rounded picture of the amount of Nitrogen applied; it makes more sense for growers to only report the amount of Nitrogen they actually applied at the end of a growing season.

Additionally, a certified Nitrogen budget could potentially be cost prohibitive, depending on who has the authority to certify such a plan. The administrative draft of the WDR falls short on the specificity of this part of the requirement. I recommend that the Board create a comprehensive program for self-certification of growers. There are many benefits to moving to a self-certification program, the first of which is that it would be more cost effective for the grower because they wouldn't incur the cost of having another party certify the plan. There is also the additional benefit of having the opportunity to educate growers about groundwater discharge, which wouldn't exist if they were paying someone else to certify the budget.

As a grower, I would like to work with this new regulation. However, the idea of an inconsequential guideline is nothing short of nonsensical and at the very least, it should not be at my expense.

Sincerely,



RECEIVED
CORAMMENTO
CVR/WDCB
13 SEP 16 PM 1:19

Dear Mr. Longley

As a farmer in San Joaquin County and a steward of the land, I am deeply concerned with the direction the Regional Water Quality Control Board is taking regarding water quality. As farmers, we work every day to grow food that feeds the world, contributes to our local economy and do so in a way that protects natural resources.

Until recently, we have been operating under a waiver to the waste discharge requirements and have seen water quality improve. We are very concerned about the implications the new waste discharge requirement as the administrative draft of this document that has been released is not practical for producers, particularly, the requirement of a certified Nitrogen budget.

The requirement of maintaining a certified Nitrogen budget is nothing more than additional paperwork for growers that has no meaningful purpose and will be cost prohibitive for most farmers.

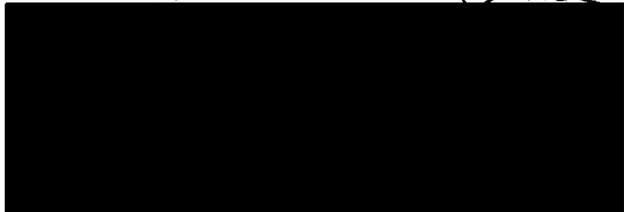
Creating a Nitrogen budget wastes precious resources on process rather than progress. The application of Nitrogen is only done when conditions require it and at the bare minimum levels. To give a more rounded picture of the amount of Nitrogen applied; it makes more sense for growers to only report the amount of Nitrogen they actually applied at the end of a growing season.

Additionally, a certified Nitrogen budget could potentially be cost prohibitive, depending on who has the authority to certify such a plan. The administrative draft of the WDR falls short on the specificity of this part of the requirement. I recommend that the Board create a comprehensive program for self-certification of growers. There are many benefits to moving to a self-certification program, the first of which is that it would be more cost effective for the grower because they wouldn't incur the cost of having another party certify the plan. There is also the additional benefit of having the opportunity to educate growers about groundwater discharge, which wouldn't exist if they were paying someone else to certify the budget.

As a grower, I would like to work with this new regulation. However, the idea of an inconsequential guideline is nothing short of nonsensical and at the very least, it should not be at my expense.

Sincerely,

Michael Lee



RECEIVED
GRAHNSANTO
CVR/WQCB
13 SEP 16 PM 1:19

Dear Mr. Longley,

As a farmer in San Joaquin County and a steward of the land, I am deeply concerned with the direction the Regional Water Quality Control Board is taking regarding water quality. As farmers, we work every day to grow food that feeds the world, contributes to our local economy and do so in a way that protects natural resources.

Until recently, we have been operating under a waiver to the waste discharge requirements and have seen water quality improve. We are very concerned about the implications the new waste discharge requirement as the administrative draft of this document that has been released is not practical for producers, particularly, the requirement of a certified Nitrogen budget.

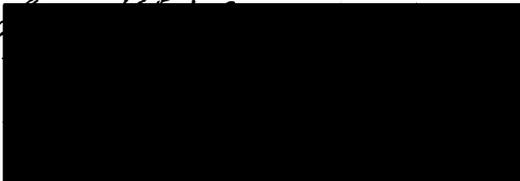
The requirement of maintaining a certified Nitrogen budget is nothing more than additional paperwork for growers that has no meaningful purpose and will be cost prohibitive for most farmers.

Creating a Nitrogen budget wastes precious resources on process rather than progress. The application of Nitrogen is only done when conditions require it and at the bare minimum levels. To give a more rounded picture of the amount of Nitrogen applied; it makes more sense for growers to only report the amount of Nitrogen they actually applied at the end of a growing season.

Additionally, a certified Nitrogen budget could potentially be cost prohibitive, depending on who has the authority to certify such a plan. The administrative draft of the WDR falls short on the specificity of this part of the requirement. I recommend that the Board create a comprehensive program for self-certification of growers. There are many benefits to moving to a self-certification program, the first of which is that it would be more cost effective for the grower because they wouldn't incur the cost of having another party certify the plan. There is also the additional benefit of having the opportunity to educate growers about groundwater discharge, which wouldn't exist if they were paying someone else to certify the budget.

As a grower, I would like to work with this new regulation. However, the idea of an inconsequential guideline is nothing short of nonsensical and at the very least, it should not be at my expense.

Sincerely,



13 SEP 16 PM 1:20

RECEIVED
SACRAMENTO
COURT HOUSE

Dear Mr. *Longley,*

As a farmer, protecting water quality is an essential part of what I do each day. Many of us are farmers, working every day to grow food that feeds the world, contributes to our local economy, and protects the environment.

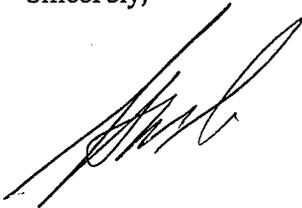
Until recently, we have been operating under a waiver to the waste discharge requirements that was to address water quality in our region. We are very concerned about the new WDR, specifically the enforcement capabilities.

The administrative draft of the WDR requires that growers keep farm management plans, nitrogen management plans, nitrogen summaries, and sediment/ erosion control plans on at the principle place of business for the operation.

For many growers in San Joaquin County, the principle place of business for the operation is the family home. It is inappropriate for any agency to require that a farmer grant access to their home available and produce these documents upon demand. Understandably, this is a significant invasion of privacy.

The enforcement section of the WDR must be rewritten to be more specific in what is required of growers and narrowed in a way that does not permit officials access to a family's home.

Sincerely,

A handwritten signature in black ink, appearing to be "John", written over a horizontal line.

RECEIVED
SACRAMENTO
CVRW/CCB
13 SEP 16 PM 1:14

Dear Mr. Longley,

I am a farmer in San Joaquin County and believe there is a better way to address water quality in our region.

Until recently, we have been operating under a waiver to the waste discharge requirements that were working and served to educate growers in on water quality.

Growers in San Joaquin County fastidiously meet and comply with an ever-growing number of requirements and regulations. Our goal is to ensure that the new waste discharge requirements are implemented in a way that is understandable and accessible to every day growers.

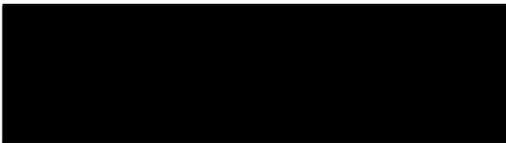
To maintain compliance with the myriad of existing regulations, many growers rely on a variety of measures to stay up to date with the latest rules and regulations. However, the administrative draft of the WDR precludes the use of existing, widely utilized software because it calls for per crop/ per parcel reporting. This is a radical departure than how a grower would usually report, which is by APN number. Because of this discrepancy, the Nitrogen summary cannot be done with the same software that is widely available and affordable to growers. It is imperative that the regulation is implemented in a way that interfaces with current practices.

Further, you must realize that remote areas within our county mandate the use of paper forms for reporting and thus, paper forms need to be available and accessible as well.

For these reasons, we urge the Board to reconsider the per crop/ per parcel reporting requirement and to have paper forms available upon request.

Sincerely,

Charles Starr



RECEIVED
SACRAMENTO
CVR WOCB
13 SEP 16 PM 1:15

Dear Mr.

As a farmer, I must question the direction of the Regional Water Quality Control Board with the new WDR.

I believe any requirement to report a farm management practice is inappropriate and will not improve water quality. The first of which is that farm management practices are personal to a grower. You would not ask other businesses to disclose their trade secrets, and it is no different to ask growers to make their management practices common knowledge.

I fear that this information may be compiled and used to create region- wide standardization of Nitrogen application for specific crops. This would be short sighted as Nitrogen application not only depends on the crop, but also the soil type.

San Joaquin County has such a diverse topography that farm management is always going to be distinctive, depending on the particular crop and location.

It is because of these factors that I feel the scale heavily tips in favor of not requiring growers to report farm management practices and we suggest the Board strike this from the WDR.

Sincerely,



RECEIVED
SACRAMENTO
CVR/WQCB
13 SEP 16 PM 1:16

Dear Mr. Longley,

I am a farmer in San Joaquin County and believe there is a better way to address water quality in our region.

Until recently, we have been operating under a waiver to the waste discharge requirements that were working and served to educate growers in on water quality.

Growers in San Joaquin County fastidiously meet and comply with an ever-growing number of requirements and regulations. Our goal is to ensure that the new waste discharge requirements are implemented in a way that is understandable and accessible to every day growers.

To maintain compliance with the myriad of existing regulations, many growers rely on a variety of measures to stay up to date with the latest rules and regulations. However, the administrative draft of the WDR precludes the use of existing, widely utilized software because it calls for per crop/ per parcel reporting. This is a radical departure than how a grower would usually report, which is by APN number. Because of this discrepancy, the Nitrogen summary cannot be done with the same software that is widely available and affordable to growers. It is imperative that the regulation is implemented in a way that interfaces with current practices.

Further, you must realize that remote areas within our county mandate the use of paper forms for reporting and thus, paper forms need to be available and accessible as well.

For these reasons, we urge the Board to reconsider the per crop/ per parcel reporting requirement and to have paper forms available upon request.

Sincerely,

Joe Guis



RECEIVED
SACRAMENTO
CYR/WOCB
13 SEP 16 PM 1:17

Dear Mr.

As a farmer, protecting water quality is an essential part of what I do each day. Many of us are farmers, working every day to grow food that feeds the world, contributes to our local economy, and protects the environment.

Until recently, we have been operating under a waiver to the waste discharge requirements that was to address water quality in our region. We are very concerned about the new WDR, specifically the enforcement capabilities.

The administrative draft of the WDR requires that growers keep farm management plans, nitrogen management plans, nitrogen summaries, and sediment/ erosion control plans on at the principle place of business for the operation.

For many growers in San Joaquin County, the principle place of business for the operation is the family home. It is inappropriate for any agency to require that a farmer grant access to their home available and produce these documents upon demand. Understandably, this is a significant invasion of privacy.

The enforcement section of the WDR must be rewritten to be more specific in what is required of growers and narrowed in a way that does not permit officials access to a family's home.

Sincerely,

Phillip Brumley
PHILLIP BRUMLEY



RECEIVED
ACORAHENTO
CVR/WOCB
13 SEP 16 PM 1:17

Dear Mr. *Conley*

I am a farmer in San Joaquin County and believe there is a better way to address water quality in our region.

Until recently, we have been operating under a waiver to the waste discharge requirements that were working and served to educate growers in on water quality.

Growers in San Joaquin County fastidiously meet and comply with an ever-growing number of requirements and regulations. Our goal is to ensure that the new waste discharge requirements are implemented in a way that is understandable and accessible to every day growers.

To maintain compliance with the myriad of existing regulations, many growers rely on a variety of measures to stay up to date with the latest rules and regulations. However, the administrative draft of the WDR precludes the use of existing, widely utilized software because it calls for per crop/ per parcel reporting. This is a radical departure than how a grower would usually report, which is by APN number. Because of this discrepancy, the Nitrogen summary cannot be done with the same software that is widely available and affordable to growers. It is imperative that the regulation is implemented in a way that interfaces with current practices.

Further, you must realize that remote areas within our county mandate the use of paper forms for reporting and thus, paper forms need to be available and accessible as well.

For these reasons, we urge the Board to reconsider the per crop/ per parcel reporting requirement and to have paper forms available upon request.

Sincerely,

Mike Liu



RECEIVED
SACRAMENTO
CVR/WCCB
13 SEP 16 PM 1:17

Dear Mr. Longley,

I am a farmer in San Joaquin County and believe there is a better way to address water quality in our region.

Until recently, we have been operating under a waiver to the waste discharge requirements that were working and served to educate growers in on water quality.

Growers in San Joaquin County fastidiously meet and comply with an ever-growing number of requirements and regulations. Our goal is to ensure that the new waste discharge requirements are implemented in a way that is understandable and accessible to every day growers.

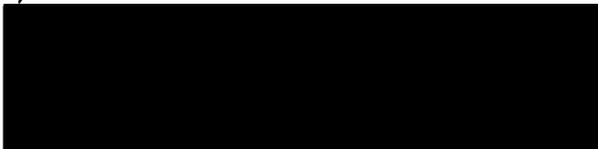
To maintain compliance with the myriad of existing regulations, many growers rely on a variety of measures to stay up to date with the latest rules and regulations. However, the administrative draft of the WDR precludes the use of existing, widely utilized software because it calls for per crop/ per parcel reporting. This is a radical departure than how a grower would usually report, which is by APN number. Because of this discrepancy, the Nitrogen summary cannot be done with the same software that is widely available and affordable to growers. It is imperative that the regulation is implemented in a way that interfaces with current practices.

Further, you must realize that remote areas within our county mandate the use of paper forms for reporting and thus, paper forms need to be available and accessible as well.

For these reasons, we urge the Board to reconsider the per crop/ per parcel reporting requirement and to have paper forms available upon request.

Sincerely,

Karen Cultrera



RECEIVED
PROGRAMENTO
CVR/WOCB
13 SEP 16 PM 1:17

Dear Mr. *Longley,*

I am a farmer in San Joaquin County and believe there is a better way to address water quality in our region.

Until recently, we have been operating under a waiver to the waste discharge requirements that were working and served to educate growers in on water quality.

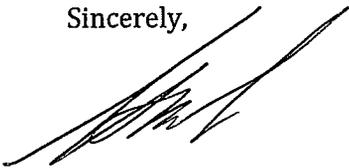
Growers in San Joaquin County fastidiously meet and comply with an ever-growing number of requirements and regulations. Our goal is to ensure that the new waste discharge requirements are implemented in a way that is understandable and accessible to every day growers.

To maintain compliance with the myriad of existing regulations, many growers rely on a variety of measures to stay up to date with the latest rules and regulations. However, the administrative draft of the WDR precludes the use of existing, widely utilized software because it calls for per crop/ per parcel reporting. This is a radical departure than how a grower would usually report, which is by APN number. Because of this discrepancy, the Nitrogen summary cannot be done with the same software that is widely available and affordable to growers. It is imperative that the regulation is implemented in a way that interfaces with current practices.

Further, you must realize that remote areas within our county mandate the use of paper forms for reporting and thus, paper forms need to be available and accessible as well.

For these reasons, we urge the Board to reconsider the per crop/ per parcel reporting requirement and to have paper forms available upon request.

Sincerely,



RECEIVED
SACRAMENTO
CVRW/OCB
13 SEP 16 PM 1:17

Dear Mr.

As a farmer, I must question the direction of the Regional Water Quality Control Board with the new WDR.

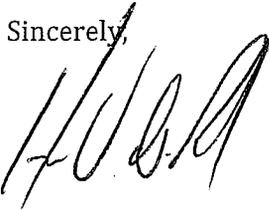
I believe any requirement to report a farm management practice is inappropriate and will not improve water quality. The first of which is that farm management practices are personal to a grower. You would not ask other businesses to disclose their trade secrets, and it is no different to ask growers to make their management practices common knowledge.

I fear that this information may be compiled and used to create region- wide standardization of Nitrogen application for specific crops. This would be short sighted as Nitrogen application not only depends on the crop, but also the soil type.

San Joaquin County has such a diverse topography that farm management is always going to be distinctive, depending on the particular crop and location.

It is because of these factors that I feel the scale heavily tips in favor of not requiring growers to report farm management practices and we suggest the Board strike this from the WDR.

Sincerely,



Henry VanderPl
Escalon

RECEIVED
SACRAMENTO
CYR/WQCB
13 SEP 16 PM 1:18

Dear Mr.

As a farmer, protecting water quality is an essential part of what I do each day. Many of us are farmers, working every day to grow food that feeds the world, contributes to our local economy, and protects the environment.

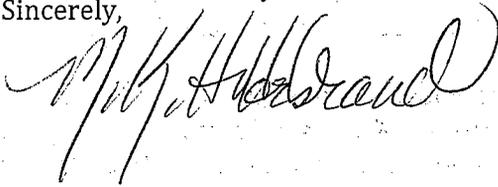
Until recently, we have been operating under a waiver to the waste discharge requirements that was to address water quality in our region. We are very concerned about the new WDR, specifically the enforcement capabilities.

The administrative draft of the WDR requires that growers keep farm management plans, nitrogen management plans, nitrogen summaries, and sediment/ erosion control plans on at the principle place of business for the operation.

For many growers in San Joaquin County, the principle place of business for the operation is the family home. It is inappropriate for any agency to require that a farmer grant access to their home available and produce these documents upon demand. Understandably, this is a significant invasion of privacy.

The enforcement section of the WDR must be rewritten to be more specific in what is required of growers and narrowed in a way that does not permit officials access to a family's home.

Sincerely,



RECEIVED
SACRAMENTO
CVR/WCCB
13 SEP 16 PM 1:18

Dear Mr.

I am a farmer in San Joaquin County and believe there is a better way to address water quality in our region.

Until recently, we have been operating under a waiver to the waste discharge requirements that were working and served to educate growers in on water quality.

Growers in San Joaquin County fastidiously meet and comply with an ever-growing number of requirements and regulations. Our goal is to ensure that the new waste discharge requirements are implemented in a way that is understandable and accessible to every day growers.

To maintain compliance with the myriad of existing regulations, many growers rely on a variety of measures to stay up to date with the latest rules and regulations. However, the administrative draft of the WDR precludes the use of existing, widely utilized software because it calls for per crop/ per parcel reporting. This is a radical departure than how a grower would usually report, which is by APN number. Because of this discrepancy, the Nitrogen summary cannot be done with the same software that is widely available and affordable to growers. It is imperative that the regulation is implemented in a way that interfaces with current practices.

Further, you must realize that remote areas within our county mandate the use of paper forms for reporting and thus, paper forms need to be available and accessible as well.

For these reasons, we urge the Board to reconsider the per crop/ per parcel reporting requirement and to have paper forms available upon request.

Sincerely,

John & Roxann Augap


RECEIVED
SACRAMENTO
CVR/WQCB
13 SEP 15 PM 1:18

Dear Mr. Conroy,

As a farmer, I must question the direction of the Regional Water Quality Control Board with the new WDR.

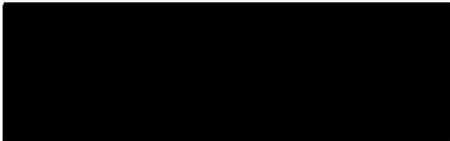
I believe any requirement to report a farm management practice is inappropriate and will not improve water quality. The first of which is that farm management practices are personal to a grower. You would not ask other businesses to disclose their trade secrets, and it is no different to ask growers to make their management practices common knowledge.

I fear that this information may be compiled and used to create region- wide standardization of Nitrogen application for specific crops. This would be short sighted as Nitrogen application not only depends on the crop, but also the soil type.

San Joaquin County has such a diverse topography that farm management is always going to be distinctive, depending on the particular crop and location.

It is because of these factors that I feel the scale heavily tips in favor of not requiring growers to report farm management practices and we suggest the Board strike this from the WDR.

Sincerely,



RECEIVED
ACRAHMENTO
CVRW/COB
13 SEP 16 PM 1:19

Dear Mr.

As a farmer, I must question the direction of the Regional Water Quality Control Board with the new WDR.

I believe any requirement to report a farm management practice is inappropriate and will not improve water quality. The first of which is that farm management practices are personal to a grower. You would not ask other businesses to disclose their trade secrets, and it is no different to ask growers to make their management practices common knowledge.

I fear that this information may be compiled and used to create region- wide standardization of Nitrogen application for specific crops. This would be short sighted as Nitrogen application not only depends on the crop, but also the soil type.

San Joaquin County has such a diverse topography that farm management is always going to be distinctive, depending on the particular crop and location.

It is because of these factors that I feel the scale heavily tips in favor of not requiring growers to report farm management practices and we suggest the Board strike this from the WDR.

Sincerely,

Kerry Waters



RECEIVED
SACRAMENTO
CVR/WCOB
13 SEP 16 PM 1:19

Dear Mr. *Conley*

As a farmer, protecting water quality is an essential part of what I do each day. Many of us are farmers, working every day to grow food that feeds the world, contributes to our local economy, and protects the environment.

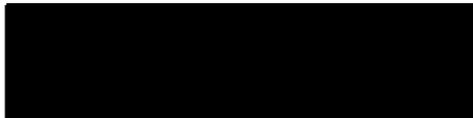
Until recently, we have been operating under a waiver to the waste discharge requirements that was to address water quality in our region. We are very concerned about the new WDR, specifically the enforcement capabilities.

The administrative draft of the WDR requires that growers keep farm management plans, nitrogen management plans, nitrogen summaries, and sediment/ erosion control plans on at the principle place of business for the operation.

For many growers in San Joaquin County, the principle place of business for the operation is the family home. It is inappropriate for any agency to require that a farmer grant access to their home available and produce these documents upon demand. Understandably, this is a significant invasion of privacy.

The enforcement section of the WDR must be rewritten to be more specific in what is required of growers and narrowed in a way that does not permit officials access to a family's home.

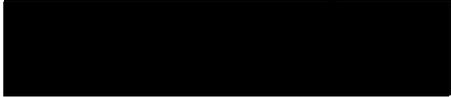
Sincerely,



RECEIVED
SACRAMENTO
SVP/RV/DCB
13 SEP 16 PM 1:18

Steve Senior

Sept 11, 2013



Dear Mr. Cogley

As a farmer, I must question the direction of the Regional Water Quality Control Board with the new WDR.

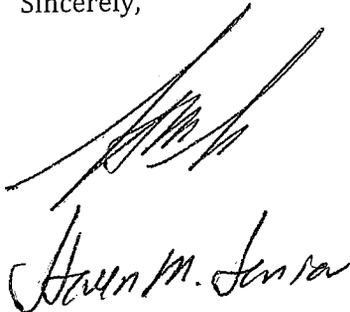
I believe any requirement to report a farm management practice is inappropriate and will not improve water quality. The first of which is that farm management practices are personal to a grower. You would not ask other businesses to disclose their trade secrets, and it is no different to ask growers to make their management practices common knowledge.

I fear that this information may be compiled and used to create region- wide standardization of Nitrogen application for specific crops. This would be short sighted as Nitrogen application not only depends on the crop, but also the soil type.

San Joaquin County has such a diverse topography that farm management is always going to be distinctive, depending on the particular crop and location.

It is because of these factors that I feel the scale heavily tips in favor of not requiring growers to report farm management practices and we suggest the Board strike this from the WDR.

Sincerely,



Steve M. Senior

RECEIVED
SACRAMENTO
CVR/WQCB
13 SEP 16 PM 1:18