



May 11, 2016

Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-0100

RE: East San Joaquin Water Quality Coalition Proposed Order

Dear Board Members,

I help run a family farm that operates in San Joaquin and Stanislaus Counties and which belongs to both the San Joaquin County and Delta Water Quality Coalition as well as the East San Joaquin Water Quality Coalition. We farm walnuts, olives for olive oil, and will soon be expanding into almonds again. We consider it a privilege to be stewards of the land, as well as to work alongside each of the 20 outstanding people we employ. My family has been farming in this area since the 1850's. Additionally, I serve on the Production Research Advisory Council for one of the farm commodity groups we participate in. This research council consists of top agronomic researchers, extension personnel, and growers, and seeks to guide in-lab and on-farm research efforts where they can achieve the highest public benefit.

I have great concerns about the Proposed Order for the East San Joaquin Water Quality Coalition. Our farming operation has implemented the regulations that the Central Valley Regional Water Quality Control Board has imposed over the past few months and years. Said regulations are a nonproductive and wasteful paperwork burden to our operation and have little correlation to actual best stewardship practices concerning water and land. And, they come at a very real cost to us in terms of nonproductive use of management time. The Proposed Order will further increase this burden along with the annual fees we will have to pay to the Coalitions. There is an additional aspect of the Proposed Order that threatens to significantly erode trust for, and participation in the overall effort to improve water quality via the ILRP process: that being the proposal to make the information public.

We compete in a global agricultural marketplace. The competition is fierce. Our foreign competitors have much lower labor rates and near-zero regulatory costs. If we value domestically produced food, you really do need to back away from the propositions contained in the Proposed Order. The proposed changes would add further cost and burden to family farmers throughout the state and be highly *counterproductive* toward our mutual goal: improving water, land, and crop quality. Threats and paperwork do not address water quality issues. Research and the continuing education of growers is what will most effectively address water, land, and crop quality issues. I encourage the Board to let the current Order be implemented as is. Growers are becoming more educated, more research into nitrogen efficiency is ongoing, and the coalitions are analyzing information to help identify areas of concern and then act to eliminate such.

Respectfully yours,

Brent Barton, President
Barton Ranch, Inc.