

From: [Brian & Gretchen Paddock](#)
To: [commentletters](#)
Subject: Feedback for WDR Second Draft Order WQ 2018
Date: Wednesday, November 22, 2017 3:05:27 PM



I am writing to express my deep concern of the State Water Board's East San Joaquin Water Quality Coalition's General Waste Discharge Requirements (WDR) ORDER WQ 2018.

This proposal appears to be more politically motivated than address realistic goals and issues concerning our state's water supply.

The second draft order for the East San Joaquin Water Quality Coalition's General Waste Discharge Requirements (WDR) ORDER WQ 2018 is further proof that the requirements they are proposing are not realistic, insensitive to small family farms nor effectively and efficiently address major clean water needs. I farm certified organic and it is not economically sustainable to have the Water Board regularly increase the burden on our operations. Their rules have absolutely no understanding of organic farming nor consider any risk assessment in the rule determination. Do they understand the impact they have? They seem to be more politically motivated than trying to efficiently address real problems. As my Assembly representative, please intercede and be a voice of reason and authority. The draft is too much:

proposal will significantly alter irrigated lands regulatory programs statewide by:

- More certification and reporting requirements on all growers
- Ignores successful irrigated lands regulatory programs;
- Increases nitrogen management reporting
- Requires sampling of all drinking water supply wells and reporting results on a public website
- More nitrogen application accounting requirements

All is see is more government regulation with decreasing results. Enough! Stick with existing testing and well monitoring and address the farmers with exceedances and bad practices. Stop punishing the good guys with the bad guys.

Thank you for the ability to comment

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