

From: Tricia Henry
To: [commentletters](#)
Subject: Comments to A-2239(a)-(c)
Date: Tuesday, December 19, 2017 9:00:06 AM



Dear Clerk to the Board Townsend,

I have been following the State Water Resources Control Board's Draft Order revising the East San Joaquin Water Quality Coalition's General Waste Discharge Requirements.

While my ranch is not in the East San Joaquin Water District, I am concerned that my operation will be negatively burdened by the Draft Order.

The proposed revisions to the East San Joaquin Waste Discharge Requirements and the impact the changes will have on the currently 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 Draft Order, it will not only have a severe impact on agricultural operations within the Central Valley, but on all irrigated agricultural operations throughout the state.

I am particularly concerned that the Draft Order includes requirements that will:

Disrupt the existing successful irrigated lands regulatory program which has been effective for years.

The cost of compliance for administration and reporting will significantly increase.

The one-size-fits-all requirements applicable to all areas of the state are not appropriate.

To annually monitor all drinking water supply wells on the property. This is problematic, especially because growers may not have legal authority to access landowner or tenant wells.

The amount of unnecessary raw data required to be gathered and violation of privacy issues.

The result of these requirements will inevitably lead to increased coalition/third-party costs and state regulatory fees, and the Draft Order does not contain any meaningful cost analysis to justify these new requirements.

Thank you for considering my views.

Sincerely,

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