

NORTH SAN JOAQUIN WATER CONSERVATION DISTRICT

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May 23, 2016

Ms. Jeanie Townsend Clerk to the Board
State Water Resources Control Board
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P.O. Box 100 Sacramento, CA 95812-0100
commentletters@waterboards.ca.gov



SUBMITTED VIA EMAIL

Chair Marcus and Members of the Board:

Subject: Comments to A-2239(a)-(c)

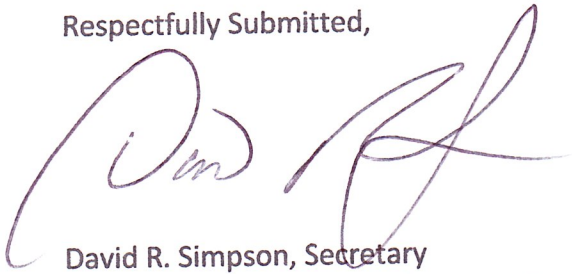
North San Joaquin Water Conservation District (NSJWCD) represents over one thousand family farmers and ranchers on over 150,000 acres of cropland in Northern San Joaquin County. We are opposed to the proposed revisions to the East San Joaquin Waste Discharge Requirements.

Of particular concern to NSJWCD are:

1. The requirement for well testing. San Joaquin County maintains a data base of well test data that gives a current and accurate picture of Nitrate content of drinking water wells. The burden of additional water testing and reporting will not alter our knowledge of the extent or severity of the issue and will do nothing to remove nitrates.
2. The requirement for reporting nitrogen use is unnecessarily burdensome and of questionable value. Little or no supporting research for Nitrogen removal by crop exists to allow meaningful management decisions at the applicator level. It would make more sense to offer training through the existing network of UC Extension crop advisors. In addition, the proposed regulation creates an unnecessary reporting structure that could easily be added to an existing pesticide use reporting administered by the California Department of Pesticide Regulation.

Comments passed on a 5-0 vote at the regular Board meeting of 5-23-2016.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'D. Simpson', written in a cursive style.

David R. Simpson, Secretary
North San Joaquin Water Conservation District