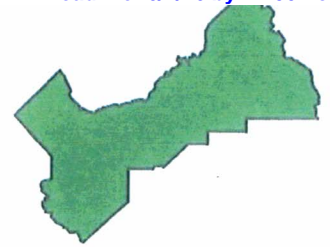


Fresno County
Farm Bureau
Serving agriculture since 1917



May 31, 2016

Ms. Jeanie Townsend
Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
P.O. Box 100
Sacramento, CA 95812-0100
commentletters@waterboards.ca.gov



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

Dear Chair Marcus and Members of the Board:

On behalf of Fresno County Farm Bureau (FCFB), I am writing to express concerns with the State Water Resources Control Board's Proposed Order revising the East San Joaquin (ESJ) Water Quality Coalition's General Waste Discharge Requirements (WDR).

The proposed revisions to the ESJ WDR and the potential impact the changes will have on the already successful cooperative Irrigated Lands Regulatory Program are significant. FCFB has partnered with our coalitions to work with farmers and ranchers to bring them into compliance. This has been an intensive outreach effort; one of the most widespread programs our organization has ever participated in. It has been a long, difficult and costly process, but traction and direction has been gained.

Unfortunately, these proposed changes bring us to an unnecessary crossroads. The revisions seek to undo the goodwill and trust the coalitions and agricultural groups have built with stakeholders. I recommend the Board not accept this proposal and work in partnership with the coalitions to develop an audit protocol that works.

Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read "Ryan Jacobsen", written over a light blue horizontal line.

Ryan Jacobsen
CEO

