

Ms. Jeanie Townsend
Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor [95814]
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:

I am a farmer and member of a family farming operation that has farmed in South Sacramento County in excess of 100 years. We currently raise seed and forage crops in the communities of Galt, Herald and Wilton, California. I have been following the State Water Resources Control Board's Proposed Order revising the East San Joaquin Water Quality Coalition's General Waste Discharge Requirements, and I am concerned that my ability to continue to farm will be unnecessarily negatively burdened by the Proposed Order.

The proposed revisions to the East San Joaquin Waste Discharge Requirements and the potential impact the changes will have on the already 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 Proposed Order, it will not only have a severe impact on agricultural operations within the Central Valley, but throughout the state. Of particular concern to my farming operation is that we do not have any waste discharge that leaves any of our ranches. Our operations all have water recovery systems which capture and use runoff water for irrigation. The proposed monitoring and reporting will be a heavy burden for a family farming operation to carry out with no benefit to the intended water quality goal.

Thank you for considering my views.

Respectfully submitted,

Gary McEnerney
McEnerney Farms, Inc., Vice President
McEnerney & Sons, Partner