

Jackson Land & Cattle, L.P.  
6835 N. Vasco Rd.  
Livermore, CA 9455

(5/4/16) Public Workshop  
Eastern San Joaquin General Order  
Deadline: 5/18/16 by 5:00 pm



May 3, 2016

Jeanine Townsend  
Clerk to the Board  
State Water Resources Control Board  
1001 I Street, 24th Floor  
Sacramento, CA 95814  
P.O. Box 100  
Sacramento, CA 95812-0100  
Email: [commentletters@waterboard.ca.gov](mailto:commentletters@waterboard.ca.gov)

RE: East San Joaquin Water Quality Coalition Proposed Order

Dear Board Members,

I am a grower in San Joaquin County and belong to the San Joaquin County and Delta Water Quality Coalition. I have great concerns about the Proposed Order for the East San Joaquin Water Quality Coalition. Our agriculture operation currently is just starting to implement the regulations that the Central Valley Regional Water Quality Control Board imposed in 2014. These new regulations include filling out Farm Evaluation Plans, Nitrogen Management Plans and Nitrogen Summary Reports and submitting the information to the Coalition for evaluation.

This Proposed Order would increase the paperwork for all growers and would increase the fees a grower would have to pay the Coalition in order to collect and process the doubling if not tripling amount of paperwork. Paperwork does not address water quality issues. Education of growers, research and more efficient use of fertilizers will address water quality issues.

I also have concerns about how all the Nitrogen Management Plans will be certified. There are not enough nitrogen and irrigation specialists available to do the plans under the current Order. If the proposed Order is adopted, the number of growers requiring a certified Nitrogen Management Plan would double if not triple. How are we supposed to comply with the new regulations if there are not the qualified professionals to certify the plans?

I encourage the Board to let the current Orders be implemented. Growers are becoming more educated by taking Nitrogen Self Certification Classes, more research on nitrogen efficiencies are being conducted and the Coalition is analyzing information to help determine those areas of concern. The proposed changes would be costly and burdensome to family farmers throughout the state and not improve water quality.

Thank you,

John R. Jackson  
Partner