

From: Ashley Lima
To: [commentletters](#)
Subject: Comments to A-2239(a)-(c)
Date: Monday, November 27, 2017 10:20:04 PM



Dear Clerk to the Board Townsend,

I am convinced that my operation will be negatively burdened by the Draft Order.

I am particularly concerned about the following:

The Draft Order includes requirements that will disrupt the existing successful regulatory program which has been effective in addressing surface water quality concerns and protecting water quality for years. If the system is not broke, do not try to fix it.

The cost of compliance! My water coalition fees will go up substantially. My lab fees for testing will go up. I will have increase costs from my PCA farm adviser because the nitrogen management reporting requirements are too complex for the average farmer to complete on his own. For example:

I am sure the members of the water board could not tell us how much nitrogen their front lawn, backyard lawn and flower beds start with, consume and end with in a year. Farmers can not answer those questions either without help. Lets not forget many farmers have several fields that produce more than one crop each year. If this information is not collected by a scientist then its bound to be so flawed that I consider it incorrect or worthless.

Our population will grow substantially in our life time. A stable food supply keeps us from being dependent on other nations. The average American farmer is retirement age. These increasing regulations are a huge burden on all but especially the young farmers that do not have substantial equity in their land. Punishing regulations and high land costs are making the occupation of farming in California out of reach for young farmers. It is not wise to bite the hand that feeds you and generations to come.

The current system of reporting on the township level gives governmental oversight and personal privacy to the landowner. It is a good system that serves the public need and farmer. Reporting on each individual field is a GROSS invasion of personal privacy that is unnecessary. If no infraction or problem is found on the township level then further inspection is looking for something that doesn't exist. Making all this information public will cause frivolous lawsuits and farmers will go out of business or out of state.

Ultimately agriculture creates enormous revenue for the state of California and jobs for Californians. Our local economies are dependent on it. We already have governmental oversight and safety precautions in place. Our states success in agriculture is a blessing. That blessing is a safe food supply for all of America.

Thank you for your time.

Sincerely,

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