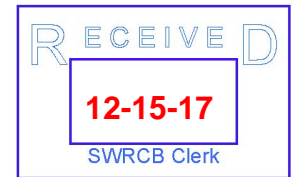


December 12, 2017

Ms. Jeanine Townsend
Clerk to the Board State Water Resources Control Board
1001 1 Street, 24th Floor Sacramento, CA 95814
(email) commentletters@waterboards.ca.gov



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

Ms. Townsend:

The State Water Board should take the same approach as the Sustainable Groundwater Act and let locals develop the program to protect water quality based on groundwater quality conditions. In parts of the Sacramento Valley there are no groundwater basin. Coalition members in these areas shouldn't be required to fill out reports intend to show how they are protecting groundwater quality when

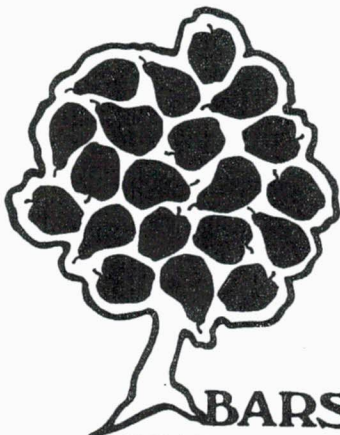
- 1) there is no groundwater basin
- 2) research shows the groundwater quality in the basin is NOT impacted by nitrogen
- 3) the crops in that area do NOT apply nitrogen (e.g. irrigated pasture).

It is neither reasonable nor feasible to add this additional reporting and data management cost to the Member and the Coalition. The value of commodities like irrigated pasture, alfalfa, orchard grass, and wild rice cannot support the increased. Agriculture has other costs, for example water master fees, that all come from the same pocket of the farmer or rancher. Enhanced education and outreach, like proposed in the 1995 California Rangeland Water Quality Management Plan are a more effective means to protecting groundwater basins from impacts of nitrogen.

Sincerely,

A handwritten signature in blue ink that reads "Gael Barsotti".

Gael Barsotti
Manager



BARSOTTI RANCH
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