

**From:** Tobin Barth  
**To:** [commentletters](#)  
**Subject:** Comments to A-2239(a)-(c)  
**Date:** Wednesday, December 13, 2017 9:54:41 AM

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Felicia Marcus,

We farm and process almonds in Yolo County. Farming, irrigating and fertilizing almonds is very different from tomatoes or corn or rice. Most almonds are irrigated with drip irrigation or micro sprinklers and fertilizer is applied through the irrigation system. There is no runoff. There is little waste. There is little excess nitrates that flow past the root zone. Permanent crops and trees and vines are very different than other crops. Additionally, each county, or area, around the state is negotiating different levels of nitrates in groundwater. Our ranch has very low risk of any issues with groundwater contamination whereas the farms around Salinas and in the San Joaquin Valley pose serious threats to the groundwater. There is such an amazing variance between areas around the state. The recent changes and decisions you are about to make do not consider any of these differences.

Adding an irrigation plan onto the nitrogen management plan is cumbersome and excessive. It just creates work for farmers who are sustainable and non-wasteful by nature. It also creates work on the government side which is completely unnecessary and costly. You're going to make us pay for that and we don't want to.

Adding a certification requirement for the Nitrogen management plan is excessive. Almost every farmer has a PCA (pest control adviser) who helps with fertilization decisions and calculates desired nitrogen applications during the season. Farmers don't need someone else telling them how to do it. Furthermore, fertilizer is expensive. Why would a farmer apply more than the crop needs and waste money and time?

Having a third party auditor checking all the information and matrixes and calculating A/R ratios is ridiculous. It's unnecessary and creates a huge workload that will cost farmers millions of dollars. This extra oversight is just government feeding government or government feeding an unnecessary business.

We completely disagree about the surface water and domestic well water monitoring and testing. The current system for surface water monitoring is sufficient. A new system would be overkill and so very costly. Testing domestic well water is not your concern. Farmers and ranchers have been taking care of their own water supply for centuries. What gives you the right to govern that? What gives you the right to come into someone's home, invade their privacy and well being and test their water? What gives you the right to delve into the life blood of a farm and prod, poke and test? You have no right!!! Don't you think we would start dying if there was a problem? Don't you think farmers and ranchers can take care of themselves? I think we can.

Also, having to report on a field level is an invasion of our privacy. We completely and wholeheartedly object.

Please stop pushing your agenda and politics on farmers and ranchers. We are naturally sustainable. What would we have if we ruined our water and land? We would have nothing so we preserve and protect and nurture what we have. Please leave us alone. Please don't hamper us. You need to eat. Please help us grow crops and our children.

Sincerely,

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