

## commentletters

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**From:** Christy McKenzie <ccmckenzie@att.net>  
**Sent:** Tuesday, May 24, 2016 5:29 PM  
**To:** commentletters  
**Subject:** Comments to A-2239(a)-(c)



**B. Chris McKenzie**  
PO Box 603  
PLEASANT GROVE, CA 95668  
Office: 916-655-3367  
Cell: 916-709-7885

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May 24, 2016

[Commentletters@waterboards.ca.gov](mailto:Commentletters@waterboards.ca.gov)

Ms. Jeanine Townsend  
SWB Clear of the Board  
State Water Quality Control Board  
PO Box Box 100  
Sacramento, CA 95812-0100

I have operated a small family farming operation for over 45 years in Sutter County and have been attempting to comply with increasing fees and reporting in the PNSSNS IRRIGATED LANDS PROGRAM since its inception. Several years ago I sat through a public meeting where a proposed reporting-and regulatory scheme (Very much like A-2239 9a-c) was presented to an astounded audience. Not only was the proposed budget extreme and the objectives obscure (nearly all ag test areas showed no water quality problems), but it relied on an indeterminate budget to be paid by the farmers and property owners through fees and fines.

At that time it was pointed out that those costs would be clearly too costly for most small properties and burdensome the thin margins facing farmers.

The system proposed duplicates the County by County, State Department of Agriculture and the Department of Pesticide Regulation. The permit/reporting process occurs annually, requires stewardship training, parcel maps, NOI, use reports, onsite inspections, etc. In our case that is 54 individual parcels with multiple entries (5+/-) each season. The county personnel are familiar with the water systems, potential water quality problems, local crops, and the producers. In the event the water board figures out what information they need; utilizing existing county systems, records, and personnel would be efficient and more effective.

USDA/NRCS this is another existing agency already staffed and knowledgeable in each specific area of the State. They are charged improving water efficiency, erosion control, farming and irrigation practices.

County Farm Advisors and University of California Crop Extension: These people are probably the only people in the state with knowledge of crop and site specific nitrogen requirements that could approach that of the farmer.

Please review detailed comments submitted by PNSSNS BOARD OF DIRECTORS 1 through17 attached.

We clearly are being set up to pay the escalating cost of a redundant bureaucracy funded by fees, fines, and taxes. We will clearly be paying ever higher fees, face arbitrary regulations (to generate destructive fines), and have no input, representation, or recourse. California agriculture has to be competitive in the world market. We already have the highest power cost, fuel prices, CARB costs, fertilizer, chemical, labor, and taxes in the Western U.S. taxes. We will clearly be paying ever higher fees, face arbitrary regulations (to generate destructive fines), and have no input, representation, or recourse. California agriculture has to be competitive in the world market. We already have the highest power cost, fuel prices, CARB costs, fertilizer, chemical, labor, and taxes in the Western U.S.

Thank you for allowing me to address my concerns.

Sincerely,

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**B. Chris McKenzie**

cc: Congressman, James Gallagher

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