

From: Penny Walgenbach
To: [commentletters](#)
Subject: Proposed changes to irrigated lands program
Date: Wednesday, November 22, 2017 5:28:26 PM



I am a small acreage landowner in Colusa County and belong to the Yolo County program managed by the Yolo County Farm Bureau. My parcel is 10 acres, I have a home, domestic well, a few sheep, two horses and irrigate some pasture with "ditch water". My land is such that there is never any runoff and I do not apply either commercial fertilizer or pesticides/chemicals to my irrigated ground. I am, simply, a "low vulnerability property". In compliance with current regulations, I attend the trainings, keep the appropriate records, report as required to my coalition program, and pay my annual dues without fail. To make me do more than I already do is ridiculous and a waste of both my time and effort and that of both my coalition and the SWRCB.

I STRONGLY OBJECT to the proposed changes.

1. They will create a huge burden for the majority of landowners who already comply with the current regulations. This will be especially burdensome for the many small acreage landowners like me. Compliance will be time consuming, costly and not beneficial, other than to increase revenue to the DWR.
2. Your new regulations will set a precedent that will mandate these regulations being applied state-wide, regardless of their appropriateness for an individual area and will disrupt the currently successful monitoring programs.
3. The expansion of the nitrogen management plan is not applicable to many small properties and there is no way for small acreages to be provided with a waiver of this requirement.
4. Making the well data publicly available is an invasion of privacy and will likely lead to law suits by multiple environmental activist entities, which will also increase costs to all landowners, large or small.
5. Sampling of all drinking water wells in the state would be a monumental undertaking, expensive, and generally not useful. People in areas of concern should already monitor their own wells and are probably doing so already.
6. Your current regulations, sampling and reporting criteria are sufficient to monitor the majority of the larger landowners who DO apply the vast majority of commercial fertilizers and/or pesticides/chemicals.
7. The proposed regulations do not include any detailed cost:benefit analysis to justify the new requirements.

Landowner, Colusa County