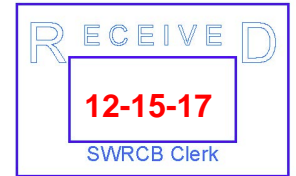


From: Rachel Kasa
To: [commentletters](#)
Subject: Irrigated Lands Draft Order
Date: Friday, December 15, 2017 7:53:53 PM



Dear Ms. Marcus et al,

If the purpose of the draft proposal is to cause small farmers such as myself to go out of farming, it will certainly be successful.

The proposal will significantly alter irrigated lands regulatory programs statewide by:

- Expanding certification and reporting requirements on all growers in all areas;
- Disrupting the existing successful irrigated lands regulatory programs;
- Requiring all management practice and nitrogen application information to be publicly reported on a field-level basis;
- Requiring sampling of all drinking water supply wells and reporting results on a public website; and
- Requiring new nitrogen application accounting requirements and the development of nitrogen removed coefficients and nitrogen applied over removed target values for each crop.

The result of these requirements, if adopted, will inevitably lead to **increased coalition costs and state regulatory fees**, without any meaningful cost analysis to justify these new requirements.

Sincerely,
Rachel Kasa & Anthony da Rosa

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