



Ms. Jeanie Townsend
Clerk to the Board
State Water Resources Control Board
P. O. Box 100
Sacramento, CA 95812-0100

5/25/2016

Dear Chair Marcus and Members of the Board,

I am writing to strenuously object to your proposed new regulations that you would like to impose on irrigated agriculture.

I farm walnuts, apricots, cherries, peaches, and occasionally sunflowers and safflower. You are now proposing that every farm would have to report NMP to the coalitions not just those in high vulnerable areas. Why? Does one size fit all?

I also object that information that we are asked to report will now be accessible to the general public on a field specific level identified by location instead of having an aggregation of the data reported. These will increase the costs of reporting not only to coalitions but also to the growers. You are also requesting that I report all of my crop yields. This proposal also breaches the confidentiality that I am entitled to as a business owner and violates my First Amendment rights concerning privacy and proprietary information.

You are also proposing that we monitor all drinking water supply wells, including landowner or tenant wells that we have no business monitoring or do not have any authorization to access.

When we discuss fertilizer application of any sort there are many many factors to consider. I will list a few factors that come to mind because all affect crop fertilization. The factors include, but are not limited to, soil type, water, organic composition of the soil and weather make for very complex interactions in the soil. The soil type, the type of fertilizer, air temperature, soil temperature, the ph and mineral/chemical makeup of the soil, the chemical makeup of the water, the ph of the water, the type of plant, the root structure of the plant are all factors that affect fertilizer uptake/utilization. Even different crops uptake fertilizer differently.

Soil and soil nutrients are very complex ecosystems. Farmers, soil scientists and the University Extension continue to experiment, research, and discover more and more about this complex subject and we still don't have all the answers. Yet, you feel you have enough proven concrete scientific information to regulate this subject.

As far as fertilizer uptake, rain fall, etc, there are soil scientists who have spent their working life on this subject and still don't have all the answers. I would suggest you consult with the soil scientists from U.C. Davis, Cal Poly, Fresno State, and U.C. Berkley instead of politicians or the environmental community!

These proposed regulations look like a political shot gun approach in an attempt to satisfy frivolous lawsuits filed by the environmental community. This is a reactionary politically motivated proposal, not a proven scientific solution to what may or may not be a problem caused by California agriculture.

This "solution" is openly targeting a small group of business owners who provide jobs and millions of dollars to California's struggling economy and completely ignores the hundreds of acres of illegally grown marijuana. Every week there are reports of seizures of illegally grown marijuana using banned chemicals and stealing water from California waterways. How are you resolving the question of who is putting chemicals and substances into the water supplies and ground of California? This proposal conveniently ignores this serious issue of illegal use chemicals that are contaminating our water supplies.

This proposal should be dropped because of the reasons stated. I am respectfully requesting that you kill this proposal.

Sincerely,



Stan Lester

cc: Governor Jerry Brown

cc: Senator Lois Wolk

cc: Assemblymember Bill Dodd