

commentletters

From: Fred Montgomery <almonorchards@yahoo.com>
Sent: Tuesday, May 31, 2016 3:54 PM
To: commentletters
Subject: Opposition to the Proposed Order



Ms. Jeanie Townsend
Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor [95814]
P.O. Box 100
Sacramento, CA 95812-0100
commentletters@waterboards.ca.gov

RE: Comments to A-2239(a)-(c)

Dear Chair Marcus and Members of the Board:

I am a fourth generation farmer who grows almonds and walnuts in the Durham and Chico area of Butte County, California. I have been following the State Water Resources Control Board's Proposed Order revising the East San Joaquin Water Quality Coalition's General Waste Discharge Requirements, and I am concerned that my ability to continue to farm will be unnecessarily negatively burdened by the Proposed Order.

The proposed revisions to the East San Joaquin Waste Discharge Requirements and the potential impact the changes will have on the already successful cooperative Irrigated Lands Regulatory Program, which has been in place for over a decade, are significant and costly. Given the precedential nature of the Proposed Order, it will not only have a severe impact on agricultural operations within the Central Valley, but throughout the state. Of particular concern to my farming operation is:

First: Here in the Northern Sacramento Valley, we are NOT considered to be a "high vulnerability" region.

Second: I am going to be required to participate in a Nitrogen Management Plan that will track my nitrogen usage on my farm. I already monitor my nitrogen needs annually based on orchard by orchard leaf samples. Based on the needs of the trees, I apply only the nitrogen needed to keep each orchard healthy. I certainly don't need a government monitoring program looking over my shoulder to tell me how to do this.

Third: If I choose to monitor my own wells for nitrogen levels, it should be up to me and not required by a third party.

Fourth: Making any of this information available to the general public is a bad idea. Not only is it none of their business, but it will certainly be misinterpreted and cause an unnecessary uproar about how farmers must be overusing fertilizer and poisoning all of the drinking water in the state of California.

Fifth: What I produce on my farm in terms of yield is my business, and I should not be required to report my production amounts to anyone, especially the general public. After all, this is America.

The bottom line is, I don't need another government agency asking me for private information and looking over my shoulder to monitor what I already know how to do. The regulations that continue to be imposed upon agriculture are burdensome, time consuming, and frankly unnecessary in many cases. Farmers are stewards of the land, and we know how to farm efficiently and without waste. Farming wouldn't be profitable otherwise. Please take these thoughts into consideration when deciding on this Proposed Order.

Thank you for considering my views.

Respectfully submitted,

Fred Montgomery
Owner
Almont Orchards Inc.