

May 13, 2016

Ms. Jeanine Townsend
Clerk of the Board
State Water Quality Control Board
P.O. Box 100
Sacramento, CA 95812



Comments to A-2239(a) – (c)

Ms. Townsend:

I comment on the above referenced proposal.

Foothills farming is low intensity farming. I am a Mandarin Orange Grower. I follow best management practices, low-pressure, micro-emitter irrigation, hand-applied fertilizer, zero irrigation water runoff. My cropland has a cover crop on it year round. I have a forage project on my land for beneficial pollinators. I have two management plans in place. I participate in a sub-watershed group with an excellent record of tested clean water. [Placer/Nevada/South Sutter/North Sacramento Sub-Watershed Group]

The economic Analysis Report by both SWB & CVRW are flawed.

The proposed cost increases damage my ability to produce affordable food. The proposed Waste Discharge Order is flawed. It is a bureaucratic overreach.

I am a little farmer. My three acres of Mandarins cannot absorb the \$5,000/yr. cost to comply with Plan Certification, Reports, Well-Testing, Additional Surface Water Monitoring Sites, Analysis and Reporting –
let alone the time suck of such compliance.

Does the State Water Board propose the same oversight for city residents, long-documented as water wasters, pesticide and fertilizer over-users? **I find the additional costs and burden associated with these revisions are substantial.**

Please implement the proposed WDO on State Water Board lands. Then apply it to all state-owned lands before imposing on the little people. Be completely transparent with costs. Define the benefits. Publish the results.

Sincerely,

A handwritten signature in blue ink, appearing to read "John R. Miller".

John R. Miller
P.O. Box 517
Newcastle, CA 95658