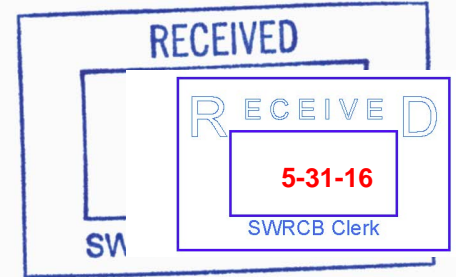


Robert Falconer
PO Box 467
Yolo, CA 95697



May 27, 2016

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

Dear Chair Marcus and Members of the Board,

I write today to oppose the State Boards new proposed regulations to the Irrigated Lands program which would all but take total control of farming practices in the state.

The Irrigated Lands program in general is questionable in that there are so many variables in farming practices depending on soil, topography, crop grown, rainfall and many other factors. In addition fertilization practices today have little resemblance to the past that have been blamed for high nitrates in ground water. I have seen no credible evidence that what has been proposed will measurably result in cleaner ground water.

As questionable as is the current order put forth by the Regional Board, the new proposal from the State Board is far worse. The onerous burden placed on farmers in this one size fits all proposal is staggering. It expects growers to have a level of education and expertise way beyond what is reasonable to expect. We are farmers not soil scientists or chemical engineers.

I am a small almond grower with 25 acres in Yolo County. The level of compliance effort and cost added by this proposal really makes me consider if it is worth trying to farm anymore. In addition, privacy concerns by making public my farming practices and information on my private well frankly makes me question the legal and constitutional grounds of this proposal.

Finally, the Central Valley Regional Board as well as the Coalition groups, farmers, land owners and many others have spent thousands of dollars and hours over the past years trying to come up with a workable program. Then from out of the blue, without the benefit of even evaluating the full effectiveness of the current program, the State Board proposes these sweeping changes drastically increasing the level of burden and cost. This proposal is extremely arbitrary and lays to waste all the hard work put forth in good faith by many parties to date. This is government at its worst. You want to know why many people today have a dim view of government, look no further than this proposal.

Sincerely,

Robert Falconer