

AgOrder - CRWQCB draft Central coast region, comment

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Date: 1/3/2011 7:37 PM
Subject: CRWQCB draft Central coast region, comment

Hello water board people,

Farm owner and operator Alice Gripp writing as a private citizen here.

I am super ambivalent about your CRWQCB Central Region Draft and I'm busy and your meeting records clearly show, buried deep in your on-line documents, that you don't find farmers' comments useful anyway, but here goes. I love to watch our red-headed woodpeckers banging their heads against solid objects- now I am one of them. Sorry about bad casual grammar.

I agree that N and other pollutants are bad for environment, people,...

They need to be reduced in a efficient logical way that does not lead to highly wasteful iterative versions of the best management practices flavor of the month, wasting time, money, and natural resources and causing the end to agriculture in our region.

BUT your document is totally bi-polar about how to work with farmers to improve things..

The Draft repeatedly states that pollution immediately needs to stop, but then you list Due dates out to 10 years (which seems a pretty reasonable time frame). Which would you enforce, especially since in early 2010 you destroyed all trust with farmers that had been building up under the 2004 Wavier? Should trust be listed as an endangered species???

Specifics, with emphasis on Tier 1 because I thinking that's me

***** somewhere in your document say where e-mail comments should be sent.***** That would have been really helpful. I got this e-mail from am Ag group e-mail. I plan to also fax to SLO because maybe this e-mail is wrong. Sorry I am doing this last minute, but like a typical business person I am very busy at end of year.

Three-month time frame for submission of Quality Assurance Project plan and Sampling And Analysis plan is way too short. I have tried to carefully read that part of your document twice and I have no idea what I am supposed to do because I cannot figure out what I must monitor on my farm and what I can do through cooperative monitoring. I RECOMMEND, AS IN 2004, HAVE UC RUN A SERIES OF CLASSES TO HELP US INCREASINGLY POOR, STUPID FARMERS FILL OUT THE FORMS. THE 15 HOUR UC CLASS I TOOK IN 2004 WAS REALLY HELPFUL WITH BOTH THE FORMS AND LOWERING THE N AND OTHER POLLUTANTS RELEASED BY MY FARM. THE CLASS I ATTENDED REALLY DECREASED THE DISLIKE THE FARMERS HAD FOR THE WATER BOARD. YOU COULD CUT THE TENSION WITH A KNIFE AT THE BEGINNING OF THE FIRST HOUR OF CLASS, BUT THE NICE TEACHER PEOPLE AND THE FREE SANDWICHES REALLY CALMED EVERYONE DOWN BY THE END OF THE FIRST DAY. THERE IS NO WAY TO ORGANIZE AND HAVE THOSE CLASSES IN 3 MONTHS AND LATE SPRING IS A BUSY TIME FOR MANY FARMERS. I ADVISE AT LEAST 6 MONTHS (TO BE READY FOR THE RAINY SEASON) OR PREFERABLY A YEAR, TO ALLOW FARMERS TO ATTEND IN THEIR QUIETER TIMES. And in the obscure links, it sounds like you may not have the database ability to manage us yet. Better to give yourselves a big window and work out the bugs on the early filers.

Explain more clearly in tables which measurements are cooperative and which measurements must be done at a Tier 1 farm. Or maybe I'm just really stupid or missed a critical page or two? UC would be great "translators" and we could all be on the same page and you won't have to explain it 3000 times. I'm all for N test strips- it is a technology I can cope with.

I'm flummoxed by the groundwater measurements if you don't have a well. Is this when you want us to check with our local water supplier to find out the condition of the wells near our farms???? An explicit statement would be helpful.

I actually like the general groundwater measuring concept because unlike runoff, we cannot see it, so we farmers have no idea how much of a problem we are creating, but please give us 5-10 years to experiment how to efficiently and cheaply minimize N into groundwater. If you can get 50-80% improvement cheaply, simply and with a low C footprint, perhaps this is better than 90-100% improvement in expensive, complex, high C footprint mythical Perfectville described on dreaded page 12 (Part B)???? If we didn't have those food safety concerns, I would love to grow big C-sequestering trees with N-rich water or maybe shorter term trees for firewood to lessen use of hydrocarbons.

The power of the Executive Officer and the CCWB to raise Tier level of farms and terminate orders is unchecked and un-balanced. These actions should only be for proven, repeated (at least 2 times) violations in water quality (or crop type). Farmers would not be freely able to voice their complaints and concerns for fear of being up-Tiered or terminated. Are you not in favor of freedom of speech? The rule of law? Due Process?? Same concerns for page 8-9 "IT IS HEREBY ORDERED", points 5-7. Also other rules don't seem to differentiate between a 1 ft piece of tubing getting loose in a huge rain event or a chronic problem of tubing washed into streams regularly. You will have to think of a fair way to differentiate the worst offenders from rare events--best wishes figuring this one from the structure given to you in this Draft.

The Tier is partially determined by Chloropyreathran and Diazanone use. Do you mean non-use from time of enrollment or date of this draft or when??? Luckily we all have our pesticide use records so it will be easy to prove when it was last used. Also the wording of this factor is inexplicably different for Tier 1 and 3a definitions on pages 9 and 11, respectively from those of other Tiers. I don't see a reason for it and the reader wonders why it wasn't used consistently.

I like that smaller farms have it easier in general. A good consequence could be that big agribusiness farms are broken up into smaller possibly more organic possibly more innovative farms. A bad consequence could be that big farms deceptively become small farms. The Draft mentions the Executive Officer is to sort this out, but doesn't give a mechanism to police or appeal (see rant above about Due Process).

It seems like there could be some controversy about that High N crop list, but at least you can fob it off on the UC.

Page 12 of Wavier- Part B: Discharge Prohibitions that Apply to All Dischargers: items 17-28, clearly we should all be in jail and the country should be starving. Even one molecule of N, one Worfrin-killed rat is "contributing" to exceedance of water quality standards. If you reach for only the moon, you might not make any upward progress, but if together playing nice we maybe can get to Mt. Whitney and still be able to eat locally grown produce and allow the Midwest to fresh veg in Winter?? Do we have 0 years or 10 (or 2 or 5) years to improve things??? I cannot tell from your document

Pesticide use during rainy season- It seems like this is unnecessarily restrictive and broad (plus the Ag commissioners think it is their domain). This is where greenhouse and glasshouse growers might be allowed to use them at least? BUT PREFERABLY for all farmers, I more think it should depend on the decay rate of the pesticide and its toxicity in water. I imagine there is quite a variation. One could imagine application could only be made when rain is not predicted for X half-lives. If it does rain sooner, then runoff should be kept on property, but could be done simply, like applied to grassy area or back on fields. No pesticides from Oct (?Sept) to May (June) seems a little extreme and the other solutions seem very very expensive. And recall that winter dormant spray discussion with the Ag commissioner during your comments (how could the questioner not know what a dormant spray is?)

Also about pesticides: because of exotic pests, any farm is subject at any time to have to use a barrage of evil chemicals to eradicate an exotic pest. Immediate extermination of new finds of exotic pests is extremely important. The quick killing of such pest will lead to much less pesticide use later. Don't you wish they would do that for the bed-bug problem?

On a smaller scale, I would prefer to treat a tiny infestation of a pest in the wet winter than a huge infestation in the dry summer. But what is the science on this one??

No mention of nurseries and garden centers except in comments sections. Should we expect some shoe-dropping in this direction in the near future, or are there so few they are insignificant in the big N and pollutant picture for our region? Or maybe it would be their turn in 5 to 10 years?? A problem with outdoor nurseries is many groundwater protection measures might increase runoff during peak rain events, increasing downstream flooding and erosion. Maybe better to have scattered thin canopy trees planted in the ground to drink up N that runs out of pots.

I am concerned that many of your time frames are so short, that the "Best Practices" people use will not really be the truly best practices in the long run, like how we are all stuck with stupid PC's when Mac's are so much better. You do at least mention several times about having farmers and researchers share information and experience, but you don't provide an explicit way to do it. I hope our continuing education will foster it, but I fear people will be so pressed to meet the timetables, that it wouldn't happen (they may feel a bird in the hand is worth 2 in the bush). With 3000 farmers working with you rather than fearing you, progress might be made much quicker. Maybe even sponsor prizes for innovation and key observations. These solutions might be simpler, cheaper, and have a lower C footprint. Okay, this is off topic, but illustrative: I tied for second place in a physics water heater contest using a Ziploc bag and a piece of foil painted black. Everyone else used tons of copper and plastic and welding and time. If you measured heat per dollar or hour, I totally trounced all of them. 3000 of us might well think of simple elegant and cheap solutions for some N and pollutants. I have lots of ideas, but don't know who to tell. I can see otherwise that some farmers might have to go hydroponic, BUT that will take lots of ugly rezoning battles and use a lot of plastic and other resources.

SUMMARY: PLEASE LIST IN AN OBVIOUS PLACE WHERE COMMENTS SHOULD BE SENT. Less N and pollutants good. Groundwater does need to be sampled, but give us lots of time (10 years good) to fix. Upsetting farmers with page 12 is not so useful. I was disappointed there was no mention of the Carbon impact of this Draft Order. The powers of the Executive Director and Water Board are not checked by Due Process. There should be a simple safe procedure to apply pesticides with short half-lives and low water toxicity during the rainy months. It is better to do something well than to do something fast just to feel like you are doing something good. So much N and pesticides have already been released in the past 100 years, that the difference between a 0 year, and 10 year solution don't seem significantly different from a ground water perspective, but is to the viability of farmers and possibly figuring out what are the truly best practices. PLEASE LET THE UC DEVELOP A CLASS TO HELP US FILL OUT THE PAPERWORK AND GIVE US 6-12 MONTHS TO DO IT- YOU DON'T WANT TO WALK ALL 3000 OF US THROUGH THIS IN THREE MONTHS AND IMAGINE THAT FINAL WEEK- THAT FINAL DAY!!!

I really appreciate you reading my comments, which reflect my thoughts, not that of my farm. Yes I know I'm inarticulate- sorry about that.

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