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CC: <aschroeter@waterboards.ca.gov>
Date: 12/29/2010 12:32 PM
Subject: CCRWQCB Request for Public Comments on Draft Agricultural Order
Attachments: Letter to CCRWQCB.doc

Steve Arnold
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December 29, 2010

Central Coast Regional Water Quality Control Board
895 Aerovista Place, Suite 101
San Luis Obispo, California 93401-7906

Re: CCRWQCB Request for Public Comments on Draft Agricultural Order dated
November 19, 2010

Dear Board Members,

I am writing to express my concern with your staff's current draft Ag Order. The draft Ag Order will negatively impact my ability to continue producing, but more importantly, if adopted will negatively impact many of the growers that work hard to provide our population with fresh fruits and vegetables. Beyond jeopardizing our food supply, adoption of the current draft ag order could detrimentally affect the state's economy, as ag to date has played an important role in creating jobs statewide.

I am perplexed as to why the current ag waiver cannot be renewed. Six years ago when the current waiver was implemented there was a spirit of cooperation between the RWQCB and the farm community. Has the monitoring data been studied? Have the sources of water quality problems clearly been identified as being a result of current ag practices? If not, is this a good time to jeopardize jobs and food production by adding burdensome and expensive regulatory demands?

There are so many unanswered questions, and so much activity other than irrigated ag in the watersheds that it seems very punitive to add regulation to commercial farmers region wide when it has not been determined that current ag practices are creating water quality problems.

Lastly, adding well monitoring region wide, even where monitoring has not produced evidence of water quality problems, adds more paperwork and expense to small family farmers such as myself. The problem I see with this regulation is that the data will be meaningless without some history of the management practices or natural baseline

information. I agree with my fellow Farm Bureau Members in making the argument below:

Baseline legacy nitrates are not defined or known. Baseline legacy nitrate loads are necessary prior to measuring possible nitrate loads from farming practices. Further, differing soil types, percolate rates, water table levels, and manner of surface nitrate irrigation application must be considered prior to determining possible nitrate loads due to farming practices.

In closing, I urge you to renew the current ag waiver. If CCRWQCB used it's current resources to identify absolutely the causes of poor water quality, and tackle those issues before creating more regulation for those that are successfully using best management practices, I think we can truly come together to find workable solutions.

Thank you for the opportunity to comment.

Steve Arnold