

January 3, 2011
Electronically Submitted to: AgOrder@waterboards.ca.gov
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Jeffrey S. Young, Chairman of the Board
California Regional Water Quality Control Board
Central Coast Region
895 Aerovista Place, Suite 101
San Luis Obispo, CA 93401

Re: California Regional Water Quality Control Board, Central Coast Region Draft Order No. R3-2011-0006 ("Draft Ag Order"), dated November 2010 Conditional Waiver of Waste Discharge Requirements for Discharges from Irrigated Lands

Dear Honorable Chairman Young:

I have reviewed the Central Coast Region Draft Ag Order and the Proposed Alternative Order and would like to provide my feedback.

We own a 16 acre vineyard in San Miguel, and we are not located near an impaired water body. We utilize drip irrigation between May and October to water the vineyard. From October to May, we do no irrigation at all. We have no tailwater, we utilize good farming practices such as cover crop and we are mindful of what we use for fertilizers and pesticides.

We fully support the ag waiver program that was implemented in 2004 by the Regional Water Quality Control Board. It was a good education vehicle and a very collaborative effort between growers and a regional agency. The new draft ag order has a very different approach. It seems to penalize all growers with new and costly compliance mandates regardless of the impact.

Given the importance of vineyard agriculture and the economic benefit it brings to San Luis Obispo County, it seems to me the Water Board should be working with the growers that truly impact water quality thru incentives instead of a punitive approach by assuming all growers are violators. Burdening small growers with costly compliance regulations will not address the water quality issues identified in the ag order. And, it is one more financial hurdle to overcome in an industry that is already suffering.

Please consider the following changes to the Draft Ag Order:

- An exemption from additional monitoring and requirements should be available for farming practices and operations that are not contributing to water quality degradation.
- Basing the tiers on location and size has no practical bearing on potential contribution to poor water quality. The tiers should be based upon whether there is probable cause for pollution to be transported. Farming operations that do not result in tailwater (i.e. drip irrigated vineyard operations) and are closely monitored for input requirements to the specific plant needs, should be exempt from a tiered approach.
- Dischargers who do not cause tailwater, as is the case for vineyards, should not be subject to receiving water monitoring.
- The requirements for well water monitoring go beyond what is necessary to carry out the order to address pesticides, sediment, and nutrients associated with agricultural discharges.
- Depth to groundwater monitoring should be eliminated from the order.

- Any well testing should be associated specifically to the constituents in question. Additionally, this information should remain proprietary and not be submitted to the Control Board for public record. Particularly, if you are not contributing to the concerns meant to be addressed through this order. The groundwater reporting requirements are over-burdensome and unnecessary.

Although the Alternative Ag Proposal is more rigorous than necessary, it does acknowledge improvements already made over the years and has a more positive approach toward working together for continuous improvements.

I urge you to consider extending the dialogue and comment period to the end of January to allow more growers the time to review these lengthy documents and provide input. .

Regards,
Lee and Lorraine Steele, Owners
Estrella Farms
San Miguel, CA