



California Regional Water Quality Control Board Central Coast Region



Linda S. Adams.
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Environmental Protection*

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Edmund G. Brown Jr.
Governor

Public Comments to

Draft Agricultural Order, released 11/19/2010

56: Form Letter - this letter was received from the following 18 individuals:

Name	Date Received
Ashley Escobar	12/30/2010
Betsy Roth	12/30/2010
Dana Rodrigues	01/03/2010
Gary Kobara	01/03/2011
Georgeann Eiskamp	01/03/2011
Jenna Arroyo	12/30/2010
Jerry Rava	12/30/2010
Jerry Rava, II	12/31/2010
John Maulhardt	12/31/2010
Lance Batistich	12/31/2010
Leroy Saruwatari	01/03/2011
Lori McGrenera	12/20/2010
Mark Teixeira	12/31/2010
Melissa Lewis	12/31/2010
Paul Kawaguchi	01/02/2011
Pete Aiello	12/30/2010
Robert Pybas	12/21/2011
Tom Bengard	12/31/2011

From: Donna Rodrigues <drodri7574@aol.com>
To: Ag Order Project Lead Howard Kolb <AgOrder@waterboards.ca.gov>
Date: 1/3/2011 9:33 AM
Subject: Ag Order Comment

Ag Order Project Lead Kolb

I am a sole owner of a flower farm operation that consists of 6 small ranches some leased and some owned by me. These ranches are located in the Coastal zone and some inland, but all are located on hilly terrain that make compliance with these orders impossible due to the natural course of the water runoff and in addition our speciality crops require overhead watering for growth and frost protection. We have tried other systems in the past that have not produced the growth results needed for the marketplace, let alone any frost protection.

As a farm owner and/or operator in the Central Coast region, I have been monitoring the development of a renewed "Conditional Waiver" for discharges from irrigated lands and am writing to express my concern with staff's most recent proposed draft Ag Order.

This draft Ag Order, if implemented without modification, will adversely affect my farming operation, reduce the value of my land and impact my ability to continue farming productively in this region. I am committed to working to improve water quality in the region but firmly believe that any new conditions need to be grounded in science, provide flexibility for different approaches, prioritized to address the most significant concerns first and achievable for growers in reasonable timeframes. I fear the current proposed draft Ag Order is unclear and difficult to understand, is not science or risk based in its assignment of priorities and will be highly impractical if not impossible for agricultural operations like mine.

I would strongly encourage the Central Coast Regional Water Quality Control Board and staff to consider the proposed agricultural alternative as a more pragmatic solution to improving water quality in the region. The "Ag Alternative" encourages growers to work in concert to reduce the discharge of waste in reasonable time frames using practical and proven solutions. The Ag Alternative enjoys broad consensus amongst agriculturalists in the region and if viewed as a baseline could provide a strong starting point for continued or expanded collaboration between the CCRWQB and growers to collaborate on the common goal of improved regional water quality.

The staff draft Ag Order does not foster collaboration, provides no incentives for growers to participate in water quality best management practices and will be difficult to comply with and enforce. It is a punitive proposal that stifles collaboration and innovation. In fact, the "tiering" proposal embodied in the staff draft Ag Order is an example of an arbitrary and punitive approach in that it assigns select operations to high risk Tiers based on size, proximity to surface water and/or crops grown regardless of the actual risk those operations may present. Once in a higher Tier the requirements for an owner/operator are much more stringent and there is no clear path out of that Tier despite the best practices, mitigation measures or improvements present or made by the owner/operator.

I urge you to listen to growers' feedback and suggestions, including mine, and incorporate that feedback into the draft Ag Order. An Ag Order must be designed with achievable objectives and must be a transparent and collaborative process that encourages agricultural stakeholders - as they are uniquely positioned to provide innovative solutions to enhance the regions water quality. The failure to constructively engage growers and landowners will be counterproductive to short and longterm efforts to improve water quality.

Implementation of these water regulations as proposed will effectively put my total farming operation out of business. The physical improvements, monitoring and reporting are cost prohibitive to my small operation. If this is adopted as written I will have no choice but to close down my farming operation and send approximately 100 employees to the the unemployment rolls in Santa Cruz and Monterey Counties.

Further to this I fear that the value of my land will be greatly impacted and I will be unable to lease, develop, or sell properties that I have owned for over 20 years.

This is further evidence of our State of California forcing employers to look to other more business friendly states in order to survive. Unfortunately me for I will be forced out of business and shut down as I have no other options.

Sincerely,

Donna R Rodrigues
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