



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL OCEAN SERVICE

Monterey Bay National Marine Sanctuary
299 Foam Street
Monterey, California 93940

Mr. Jeffrey Young
Chair
Central Coast Regional Water Quality Control Board
895 Aerovista Pl., Suite 101
San Luis Obispo, CA 93401

January 3, 2011

Re.: Comments on the "Draft Conditional Waiver of Waste Discharge Requirements for Discharges from Irrigated Lands"

Dear Chairman Young:

On behalf of Monterey Bay National Marine Sanctuary (MBNMS), I would like to acknowledge the Regional Board staff's effort to revise and improve the prior draft Irrigated Lands Agriculture Order and offer support as this process moves forward. This draft addresses many of the public comments and is responsive to the following recommendations that were outlined in our letter dated April 1, 2010:

MBNMS Comments:	CCRWQCB Response:
Need for further technical review of scientific feasibility	Staff consulted with technical partners and provided citations within supporting documentation
Need for further strategic prioritization of risk	Staff developed a tiered approach for defining risk categories and scaled requirements in accordance with those categories
Need for strategic prioritization of data collection and analysis	Staff developed tiered monitoring requirements that correspond to risk categories and a phased approach to when monitoring data must be reported.
Need for flexibility and recognition of the diversity within the agricultural industry	Staff attempted to provide multiple options for growers to demonstrate compliance with the requirements.

I am encouraged to see that the revised draft supports and rewards collaboration and coordination on the local or regional scale to implement water quality protection and treatment. There should be continued consultation with technical experts on feasible methods for growers to evaluate and minimize their impacts to water quality while meeting the regulatory requirements. We know there is a motivated community of Central Coast growers who have come a long way in their



ability to address these problems and have demonstrated success in improving water quality conditions.

Improving both surface and ground water quality on the Central Coast will require significant resources and commitment from all parties involved to support necessary research, adapt practices, document activities, analyze and report out on data, and ultimately show improvement to water quality conditions. As stated in the Staff report, the MBNMS Condition Report and most recently in the State Water Resources Control Board's Summary of Toxicity in California Waters 2001-2009, we do have significant water quality problems within these watersheds. While much has been done to improve conditions, a more strategic and enforceable approach is necessary to quantify both the efforts and the effectiveness of those efforts. I believe this draft is a step in the right direction.

I would also like to applaud staff for working to improve communication with the many stakeholder groups as this process has unfolded. MBNMS continues to be fully committed to working with the Regional Board, the agricultural industry, and all interested stakeholders to protect and enhance water quality, building upon the collaborative spirit that has been a hallmark of this region. Should you have any questions please contact me at (831) 647-4258.

Sincerely,

A handwritten signature in cursive script that reads "Paul Michel".

Paul Michel

Sanctuary Superintendent