

**African American Farmers of California
California Citrus Mutual
California Cotton Growers and Ginners Associations
California Farm Bureau Federation
California Grape & Tree Fruit League
California Tomato Growers Association
Nisei Farmers League
Western Agricultural Processors Association
Western Growers
Westlands Coalition**

July 15, 2013

Mr. David Sholes
Central Valley Regional Water Quality Control Board
1685 "E" Street
Fresno, CA 93706

submitted via email to: dsholes@waterboards.ca.gov

Re: Comments on Draft Waste Discharge Requirements for the Western San Joaquin River Watershed

Dear Mr. Sholes:

The agricultural organizations identified above appreciate the opportunity to review and comment on the tentative waste discharge requirements for the Western San Joaquin River Watershed.

I. Nitrogen Management Planning in High Vulnerability Areas

Management planning is one of the key aspects of all farming entities and is a necessity to remain economically viable in producing food and fiber in the Central Valley. The complexity and diversity of how this is done varies by locations, crops, farm size, and rotations. The tentative order states that members in high vulnerability areas must use the Nitrogen Management Plan Template provided by the Executive Officer. We understand the rationale for wanting standardized information, but would also like some flexibility for growers to be able to reduce redundant paperwork requirements. We request the language be changed to indicate that the member must use the approved NMP Summary Report template and that the calculations used to come up with the information in the Summary Report template be consistent with the EO approved template. Growers would then be required to provide documentation similarly to those who fill out the Nitrogen Management Plan Worksheet

Template. We believe this should satisfy the Board's desire to get consistent information and reduce the paperwork burden for growers who are already implementing nitrogen management planning on their farms.

II. Nitrogen Management Plan Worksheet Template

Currently, the agricultural groups and water coalition groups are working with the Regional Board on developing a Nitrogen Management Plan Worksheet. During that process, we identified requirements that are not workable for rotational cropping. The current language requires reporting of final nitrogen planning information from the previous crop year by March and preplanning information for the following crop year. This may be feasible for some permanent plantings, but absolutely is unworkable for rotational crops. For example, a cotton field in 2014 will likely rotate to tomatoes, corn, wheat, etc. in the following years. Cropping patterns change due to overall farm management, market conditions, and water availability from year to year in rotational systems. We have adjusted the worksheet to allow for the preplanning and final nitrogen application for the same crop year. The language in the Draft Order should be changed to align with the proposed template.

III. Sign-up Period

We support the Westside Coalition's request for extended sign-up timelines. The coalition groups are the ones on the ground with the knowledge of what is a reasonable time frame to get their growers educated and enrolled in an efficient manner. We believe the long-term success of the program will be greatly enhanced with an effective initial sign-up campaign.

IV. Cost Impacts

We remain concerned that costs associated with implementing this order will be substantially higher than the Regional Board's estimates. We encourage the Regional Board to continue to look at the costs associated with the program and look for ways to implement the order in more cost effective ways. Many of the potential costs of the program remain unsettled and we will not have additional detailed information until the vulnerability zones are designated, the templates are finalized, and the Management Practices Evaluation Program is approved. We implore the board and staff to work with the impacted community to minimize costs and keep central valley agriculture competitive. We remain committed to working with you to find ways to reduce the burdens placed on growers through on-farm and Third-Party costs.

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V. Conclusion

On behalf of the above listed groups, we appreciate the opportunity to comment on the Draft Waste Discharge Requirements for the Western San Joaquin River Watershed and look forward to continuing to work closely with you to find practical solutions to improving water quality. If you have any questions, please contact Casey Creamer at (559) 252-0684 or casey@ccgga.org.

Sincerely,

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cc: Joe Karkoski, CVRWQCB
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