



SANTA CLARA  
COUNTY  
FARM BUREAU

Monday, January 3, 2011

Jeffrey S. Young, Chair of the Board  
Central Coast Regional Water Quality Control Board  
895 Aerovista Place, Suite 101  
San Luis Obispo, CA 93401

**RE: Central Coast Agriculture's Alternative Proposal for the Regulation of Discharges from Irrigated Agricultural Lands**

Dear Chair Young,

Thank you for taking time to review the Alternative Proposal for the Regulation of Discharges from Irrigated Agricultural Lands that was submitted by agricultural organizations from across the Central Coast. The alternative proposal represents a full regulatory program to educate growers about appropriate farm management practices and provide the accountability necessary to achieve water quality results, while requiring minimal resources from taxpayers and the Regional Board. This alternative is supported by a wide variety of agricultural organizations representing over a hundred commodities, parts of eight counties, large and small operations, drip and furrow irrigation, organic and conventional practices, urban and rural farms and other components of the diverse agriculture industry. We urge you to fully consider the alternative proposed by organizations in the agriculture community. Together we have crafted an alternative designed to actually improve water quality based on our understanding that agricultural non-point discharges are best controlled through the implementation of management practices, which will lead to improvements in water quality and will move the industry towards compliance with water quality objectives.

We are confident that you will agree that our Agriculture Alternative, including the following components, is a rigorous regulatory program that will achieve real and significant on-farm results and receiving water improvements.

- Participate in a region-wide monitoring program
- Develop a confidential, proprietary farm water quality management plan (Farm Plan)
- Complete a Farm Water Quality Survey
- Participate in verification of statistically significant sample of Farm Water Quality Surveys
- Implement the Farm Plan and management practices to improve water quality
- Assess the effectiveness of implemented management practices and, when necessary, upgrade management practices
- Participate in the Ag Water Quality Coalition or conduct individual on-farm monitoring, if applicable

As you can see, all the necessary components of an Agricultural Order are present in our Agriculture Alternative. Like the Draft Agricultural Order, the Agriculture Alternative requires a Farm Plan that identifies actual and potential water quality impacts, describes farm water quality practices, and demonstrates that discharges do not contribute to exceedances. The Farm Plan would contain up to four specific sub-plans to address irrigation, pesticides, fertilizer, and sediment so that growers have flexibility in regulation and implementation rather than a one-size-fits-all approach. The Farm Plans are subject to random verification audits and are available for review with proper notice, providing both accountability and transparency. Our Agriculture Alternative contains timelines and milestones that consider legacy issues and are actually achievable, recognizing that farm operators only have the capacity to deal with their own operational inputs or influences on water.

Thank you for your consideration of the Agriculture Alternative, a proposal that demonstrates the Central Coast agriculture community is stepping up to take responsibility for water quality in our own backyards. We look forward to working with the Regional Board and staff to improve the Draft Order to more effectively address water quality impairments on the Central Coast. Please contact Jennifer Williams on our staff at (408) 776-1684 with further inquiries.

Sincerely,



Tim Chiala,  
President

Cc: Russell M. Jeffries, Vice Chair  
John H. Hayashi, Board Member  
David T. Hodgins, Board Member  
Monica S. Hunter, Board Member  
Roger Briggs, Executive Officer  
Michael Thomas, Assistant Executive Officer  
Lisa McCann, Environmental Program Manager  
Angela Schroeter, Agricultural Regulatory Program Manager  
Howard Kolb, Agricultural Order Project Lead