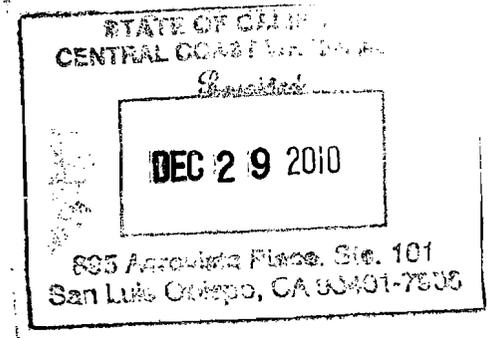


Region 3 Water Quality Control Board

Jeffrey Young, Chair

Angela Schroeter, Agricultural Regulatory Program Manager



I am writing this letter hoping to convince Region 3 Board members to accept Agriculture's proposal for the next 5 year waiver of irrigated discharge as opposed to staff's proposed order. Staff's proposal contains many unexplained provisions that could possibly force valuable resources into areas that may only create mountains of costly and unnecessary paperwork while minimizing positive impacts on water quality. Those "costly and valuable" resources must be directed to avenues that will continue to provide for a constant trend towards improvement, not bankrupting operators in the wake of strict regulatory actions. Ag's proposal does just that.

I am currently contracting with 15 Salinas Valley growers who are producing onions for our annual needs from Soledad in the North to San Ardo in the South. I have worked out a program that minimizes the input of nitrate fertilizer while maximizing yields and quality using drip irrigation and spoon feeding nutrients to the crop at the precise time it is needed with a minimum of water. I am currently contracting 1500 acres of onions to these growers. They have all learned the value of smart scientific farming while saving money on inputs and decreasing their impact on the environment and water quality.

Onions that have an excess of nitrogen at harvest, similar to all other crops, do not have a good shelf life and don't store well. With our improved feeding and watering program we have accomplished, what I believe is the goal of Regional Water Quality staff, eliminating degradation of surface and groundwater quality. These are, for the most part, growers who have over 1000 acres of farmland in their operations and grow cool season vegetables. They have also taken this perception into their other vegetable growing operations, as we have. These operators are much more in tune with improved scientific aspects of farming as opposed to smaller growers who simply don't believe they can afford to invest in technologies like drip irrigation. With many of them it is business as usual. This is what I see and it bothers me to see regulators treat operations of varying sizes differently.

Our operation totals 6000 acres in the King City area of the Salinas Valley and we have been using the quick nitrate soil testing program for over 15 years. I challenge staff to question smaller growers on their use of this technology. I have been an outspoken advocate for the use of the quick nitrate testing

program for many years and am convinced that it can and will accomplish a minimum of two important goals: (1) eliminating wasted applications of nitrate, (which will improve water quality) and (2) saving the grower input costs.

It is very difficult and costly to document changes in groundwater quality based on the improved methods we have been using over recent years. We feel we are doing the right thing for water quality improvement, but it will take many years to realize the positive impacts of our efforts. According to Dr. Thomas Harter, it may have taken upwards of 50 years to attain current nitrate levels in our groundwater and it will most likely take that long to clean it up. That, of course, is based on many factors, such as depth to groundwater and soil types above those aquifers.

We are constantly searching for improved scientific methods for maximizing yields and quality while eliminating negative impacts on water quality and the environment. It is a relatively slow process, but the point is that we are constantly moving in the right direction. I understand staff's concerns that they must be vigilant in their efforts to improve water quality. I am asking staff to visit our operations and experience firsthand what we are doing to justify our claims that we are the true stewards of the land.



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