January 21, 2019

Dr. Jean-Pierre Wolff, Chairman
Central Coast Regional Water Quality Control Board
895 Aerovista Place, Suite 101
San Luis Obispo, CA 93401-7906

RE: Comments on the Central Coast Regional Water Quality Control Board’s (CCRWQCB) “Ag Order 4.0 Conceptual Regulatory Requirement Options”

Dear Chairman Wolff,

The California Strawberry Commission (CSC) was established under state law to represent all the growers, shippers and processors of strawberry fruit in the State of California. The Central Coast is the most sustainable region in the world for the production of strawberries. No other location in the world equals the production levels that are achieved in California. As a result, the relatively small 22,000 acres of strawberry ranches that are within the CCRWQCB, produced over $2 billion (at farm-gate revenue) worth of strawberry fruit in 2018. As a whole, California strawberry fruit production represents 89% of all strawberry production in the United States.

California strawberry farmers are committed to ongoing innovation, progress, and best management practices that will continue our industry’s efforts to preserve the Central Coast as the best place in the world to grow strawberries. To achieve this goal, CSC was selected for a 319h grant from the State Water Resources Control Board to create a Strawberry Certification Program with the goal of improving water quality in the Pajaro, lower Salinas and Santa Maria/Oso Flaco watersheds by reducing non-point source discharge. Collaboration between CCRWQCB staff, UC researchers, and strawberry industry representatives began in 2017 to develop a set of Best Management Practices (BMP) until work was halted in January of 2018 at the request of staff.

Upon review of the Ag Order 4.0 Conceptual Regulatory Requirement Options presented at the November Board meeting, CSC revisited our conceptual plans to establish a strawberry certification program. We believe the targets identified in the certification program pertaining to pesticide use, nutrient management and irrigation practices will address the priorities addressed in the staff options.

The East San Joaquin (ESJ) Order presents an opportunity for education which would be the foundation for the strawberry certification program. We do not anticipate phasing or prioritizing
which strawberry growers will be targeted for this certification program; all strawberry growers will be offered the opportunity to participate in this program and we will increase participation over time by growers implementing these BMPs leading to improved water quality. Outliers are easier brought in by the strawberry industry itself as CSC is uniquely able to communicate with all growers in the region.

*Nitrate/nutrient discharges to groundwater and surface waters*

Previous research has shown that strawberry is a low risk crop for nitrate leaching during the growing season, with an average of 5-10 ppm present in the soil.\(^1\) In the proposed certification program, BMPs address groundwater quality through multiple practices. As one example, a BMP recommends reduction of preplant fertilizer to minimize the risk of leaching nitrates to groundwater aquifers during the winter rainy season. The certificate program shall also include precedential items as defined by the ESJ Order such as A-R and A/R values. It is important that the N values represent a more complete formula accounting for the various ways for which N is held; immediately soluble, living in the plant, and bound chemically to organic matter in the soil.

Strawberry growers pioneered the implementation of sub-surface drip irrigation to optimize irrigation and nutrient application efficiency while protecting water resources, reducing the risk of overwatering, leaching or other potential pathways to contamination of surface waters.

*Minimizing risk of pesticides in surface waters*

Growers implement conservative and careful use of plant health measures focused on integrated pest management (IPM) and prevention. This includes non-pesticide control measures and when necessary, pesticides. Only registered pesticide products vetted and approved by both the US Environmental Protection Agency (US EPA) and the California Department of Pesticide Regulation (CDPR) are used.

Our certification program builds on industries strict compliance with existing state and federal laws, rules, and regulations, and all label requirements. Specifically, our program mitigates risk of plant health materials reaching surface waters by including specific BMPs. As an example, a BMP is included to require proper mixing/loading of pesticides. In addition, CSC has developed an in-house sprayer calibration program to help growers ensure that their equipment is delivering label required

amounts of plant health material. The certification program also incentivizes the use of non-chemical control, particularly integrated pest management and scouting, release of predatory mites, and use of bug vacuums that have been optimized through several years of CSC research.

_Riparian Areas_

Protecting and preserving riparian areas is a key concern for our growers who carefully balance the benefits of riparian areas against the associated food safety risk of harboring pests. When additional mitigations are necessary to prevent the potential for pesticide runoff, pesticide labels (for certain applications) necessitate vegetative buffer zones. A one-size fits all approach for the use of riparian areas could have unintended consciences. The certification program’s BMPs address tradeoffs between those protective needs and increased food safety risks that must be addressed by all fresh produce growers to assure obligations to the market place and consumer health.

_Sediment discharges to surface water_

The certification program proposal includes several BMPs to mitigate the risk of sediment discharge into surface waters causing unacceptable turbidity or transport of organic-bound nutrients or plant health materials. As another example, producers with sites on slopes terrace their rows with the contour of the hillside to promote on-site retention of waters and minimize the risk of sediment transport. Any certification program for strawberries would address existing local requirements for a specific slope percentage when growing strawberries under plastic mulch or in hoop houses. Any determination of a value for slope should also be based upon sound science and data from reputable sources which can be verified.

CSC is committed to a restart of our prior close working relationship with CCRWQCB staff on the certification program, and look forward to creating, vetting and implementing a certification program with strong potential to protect Region 3 water resources while preserving a viable strawberry industry along the Central Coast.

The CSC would like to request 15 minutes to present our proposal at the March 21-22 Board meeting.

Sincerely,

Mark Martinez
VP Public Policy, California Strawberry Commission