January 21, 2019

Central Coast Regional Water Quality Control Board
895 Aerovista Place, Suite 101
San Luis Obispo, CA 93401
Submitted via email to AgNOI@waterboards.ca.gov

Re: Comments regarding Ag Order 4.0 and Proposed Options Tables

Dear Mr. Robertson and Water Board Staff:

We are submitting these comments on behalf of Hampton Farming Company, LLC. We grow wine grapes, citrus, avocados, and manage property with various other row crops in the Central Coast region. Hampton Farming Co. supports local charities and nonprofits such as The Food Bank, Make-A-Wish, Vocational Training Center, and the County Fair. We appreciate the opportunity to comment on the development of Ag Order 4.0.

**We strongly oppose the proposal outlined in the Options Tables and urge additional Options that focus on quantifiable milestones instead of numeric limits to be developed based on agricultural stakeholder input, including the Agricultural Alternative Options submission.**

We support the ability to use estimates, rather than measurements, which will better **balance the level of detail with the reporting burden.** Given the diversity of crop types and varieties grown on the Central Coast, we support a range of values when considering crop coefficients for nitrogen removal. We support the ability to estimate applied water, which has been accepted by the Courts in groundwater basin adjudications and other groundwater management agencies.

We are concerned with Ag Order prescribing requirements that are not reasonably feasible to implement given social, economic, or technical constraints. We are particularly concerned with language in the options table limiting or prohibiting the application of certain pesticides and fertilizers and question the Water Board's authority to do so. We are particularly concerned with policies that could compromise food safety, including those that are prescriptive of vegetation or storm water retention. We are also concerned with policies that create a disincentive to utilize irrigation water that is high in nitrate. We are further concerned about policies that undermine conveyance of irrigation and/or storm water to collective treatment locations.

We do not support excluding certain ranches, such as those with a specific slope, from the order. Requirements must also consider the dynamic land tenure and rotation of operators and crops on the Central Coast.

Growers on the Central Coast remain committed to continuing to improve water quality. We urge the Water Board to carefully consider the concerns of growers in our region and appreciate the opportunity to comment on the development of Ag Order 4.0.

Sincerely,

Jim Stollberg

Managing Partner