



May 28, 2016

Ms. Jeanine Townsend  
Clerk to the Board  
State Water Resources Control Board  
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P.O. Box 100  
Sacramento, CA 95812-0100

Via: Email to [commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)

Re: Waste Discharge Requirements within the Eastern San Joaquin Watershed  
SWRCB/OCC Files A-2239(a)-(c)

Dear State Water Board Members,

Thank you for the opportunity to provide comments on the Eastern San Joaquin Water Coalition Irrigated Lands Regulatory Program Draft Order.

I'm a fourth-generation member of a farming family in the Salinas Valley. Our farm supports the five families of the owners and over 700 employees. Our farm consists of a total of 44 individual ranches which vary in size; some are contiguous and some are not. The smallest of these ranches is 5 acres in size and several are 18 acres. The total number of blocks or fields on our farm is 436 with an average size of 13.3 acres each. Some of these blocks get broken down even further for multiple staggered plantings, and as we plant through the year the average size of each individual planting is about 8 acres. We average about 2.2 crops per acre per year and all of these crops have differing maturities (or days from planting to harvest). The fastest maturing crops that we grow are harvested approximately 29 days after planting; many others are harvested 50 to 65 days after planting, leading to the multiple crops planted on a given acre of ground in a year. We currently raise 27 different crops and the total number of individual plantings for us in one year's time is 1,500. Also, this isn't a "plant in the spring/harvest in the fall" scenario; our single biggest planting week of the year is the last week of July.

There are two main areas that I wanted to comment on in this letter. The first involves irrigation method reporting and irrigation management. As I understand it, the East San Joaquin Irrigated Lands Program proposes to include irrigation management in a nitrogen management plan including calculations based on irrigation methods, anticipated irrigation applications, and crop evapotranspiration rates. It is

common for our operation to use two different irrigation methods depending on the size of the crop; for example, we use sprinklers to germinate the crop and then drip irrigation after the plants are established. With the 27 different crops that we grow that would be in all stages of maturity all through the year, the large number of small fields, in addition to multiple small ranches, when coupled with the fluid nature of what we grow, when we grow it, and where we grow it, I truly believe that including this requirement in the order would set us up for failure. This issue gets even more complicated with the fact that in our operation there are 29 different soil types amongst our fields. It is also unclear to me how multiple irrigation methods would be included in calculations of water applied to crops.

The second area I would like to comment on is field level location reporting. The large number of small blocks and ranches in our operation and others like it on the Central Coast and in Region 3 would really lead to data overload. I believe that trends in water quality, whether they are improvements or not, would get lost in the continuous interpretation of individual data points on all of the small blocks and individual plantings. Please remember that in our family's farm operation there are 436 blocks averaging 13.3 acres in size and we have 1500 individual plantings per year.

Lastly, I don't believe there are enough technical experts, certified crop advisers, or other consultants qualified to carry out this regulation effectively. The potential amount of data collection and reporting involved, the development of irrigation and nutrient management plans with our multiple small fields and plantings, and the scrutiny of individual field level location data that may have nothing to do with water quality trends is laying the groundwork for a very unworkable situation where growers really may be being set up to fail. I don't believe a "one size fits all" state template fits the unique nature of Region 3's coastal vegetable production.

Again, thank you for your consideration of these comments. We are very concerned with the precedential nature of the proposed order and it's ramifications for the future of Central Coast agriculture. It is not a good fit for the complexities we deal with every day in Region 3. It is our family's hope that this is taken into account before the final regulation is put in place.

Sincerely,

A handwritten signature in black ink, appearing to read 'CP', with a long horizontal line extending to the right.

Colby Pereira  
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