



SAN LUIS OBISPO COUNTY FARM BUREAU

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May 24, 2016



Ms. Jeanie Townsend
Clerk of the Board
State Water Resources Control Board
12001 1 St., 24th Floor (95814)
P.O. Box 100
Sacramento, CA 95812-0100

Re: Comments to A-2239

Dear Chair Marcus and Board Members:

The San Luis Obispo Co. Farm Bureau, on behalf of our 700 plus agricultural members, would like to express our concern and opposition to the revisions to the East San Joaquin Water Quality Coalition General Waste Discharge Requirements as currently proposed. As stated by State Board in their Fact Sheet, these proposed revisions to the order, which are precedential, “give direction” to all regional water boards even those with successful irrigated lands regulatory programs currently in place. It is not appropriate to require that these regional boards “update their irrigated lands regulatory programs to be consistent with the Proposed Order” which is not applicable to the region.

The Central Coast (Region 3) Regional Water Board has an in-depth, highly effective irrigated lands regulatory order which addresses both surface and ground water quality concerns.

1. The proposed order will make the reporting requirements of Tier 2 and 3 growers apply to all growers. With added requirements such as the reporting of raw data, the nitrogen applied, divided by nitrogen removed, as well as nitrogen applied minus nitrogen removed and the development of nitrogen removed coefficients, it will be a critical /nightmare additional burden on growers.

Regions 3's order is set up in tiers with collection and compilation of raw data as well as reporting requirements based upon water quality vulnerability and reporting of aggregated data.

- Tier 1 reflects those with not or very low potential for nutrient/nitrogen discharge,
- Tier 2 where some nitrogen discharge may exist and
- Tier 3 where there is high potential to discharge nitrogen

Mission Statement:

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Region 3 currently requires Tier 2 and 3 growers to annually calculate and report their nitrate loading risk level and report total nitrogen applied plus other water quality information.

2. Region 3 farming operations are very different from the East San Joaquin Water Quality Coalition area and a one size fits all requirement or requirements are not applicable to our region.

Many growers in Region 3 operate on small acreages (especially in San Luis Obispo County) and do not have the East San Joaquin high nitrogen loading issue.

The higher costs of a certified Nitrogen Management Plan in addition to the current Farm Water Quality Plans plus additional new reporting requirements may well force Tier 1 growers out of business.

3. Region 3 has two very effective and highly successful water quality monitoring programs assessing and protecting water quality, plans that should not be dismantled. These programs were developed with input and assistance of the agricultural community.

The Central Coast Water Quality Preservation Inc. is the surface water monitoring coalition which is doing an excellent job throughout Region 3.

The Central Coast Groundwater Coalition is the highly effective groundwater quality monitoring and reporting coalition which covers many growers, especially the large growers, in the region.

We ask that if the Eastern San Joaquin River Watershed Waste Discharge Requirements General Order is adopted, it must not be a statewide ones-size-fits-all program. The South Central Regional Water Quality Control Board (Region 3) has, in conjunction with agriculture developed a functioning highly effective irrigated agriculture water quality program that fits region 3. We ask this not be changed or dismantled by adopting a program which might be suited for the San Joaquin River Watershed, but is definitely not suited to irrigated agriculture in Region 3.

Sincerely,

DAN SUTTON
President

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