EAST SAN JOAQUIN DRAFT ORDER #2: CENTRAL COAST IMPACTS

State Water Board Workshop Presentation – December 6, 2017

Presenters:

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VARIABILITY OF CENTRAL COAST CROPS

- 150 CROPS AND VARIETIES GROWN EACH YEAR
- FOUR-YEAR CYCLE OF CROP ROTATIONS
- VARIABLE COASTAL CLIMATIC GRADIENT
- OVER 45 DIFFERENT SOIL TYPES WITH NATURALLY OCCURRING ELEMENTS
- GROUNDWATER QUALITY VARIABILITY
- RECLAIMED WATER UTILIZED ON 12,000 ACRES IN MONTEREY COUNTY

NUTRIENT & IRRIGATION MANAGEMENT



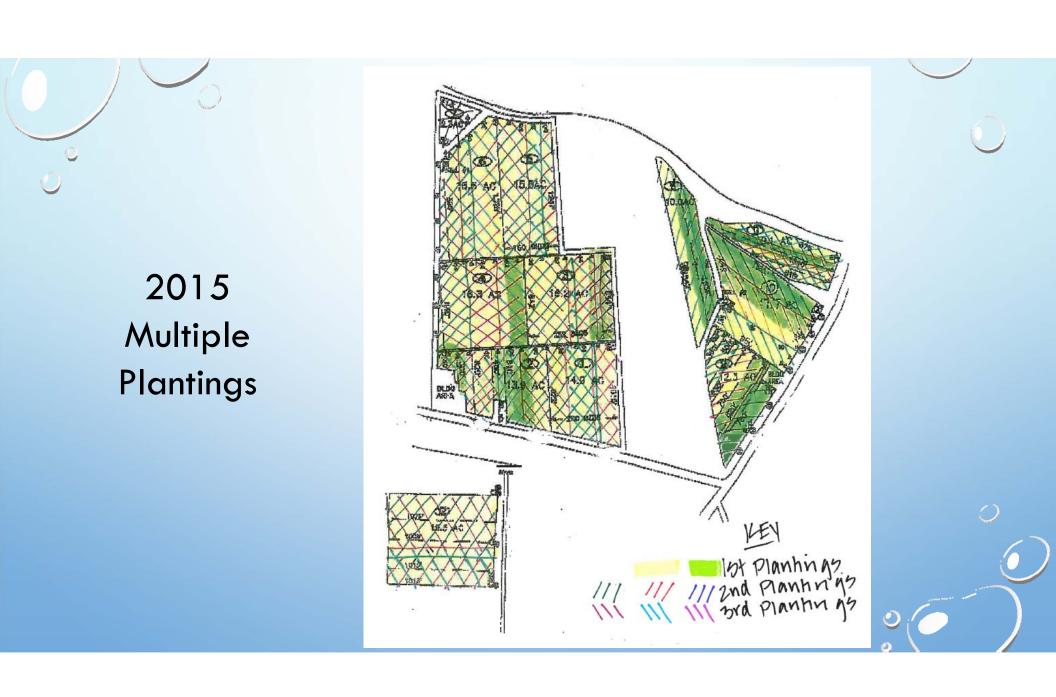


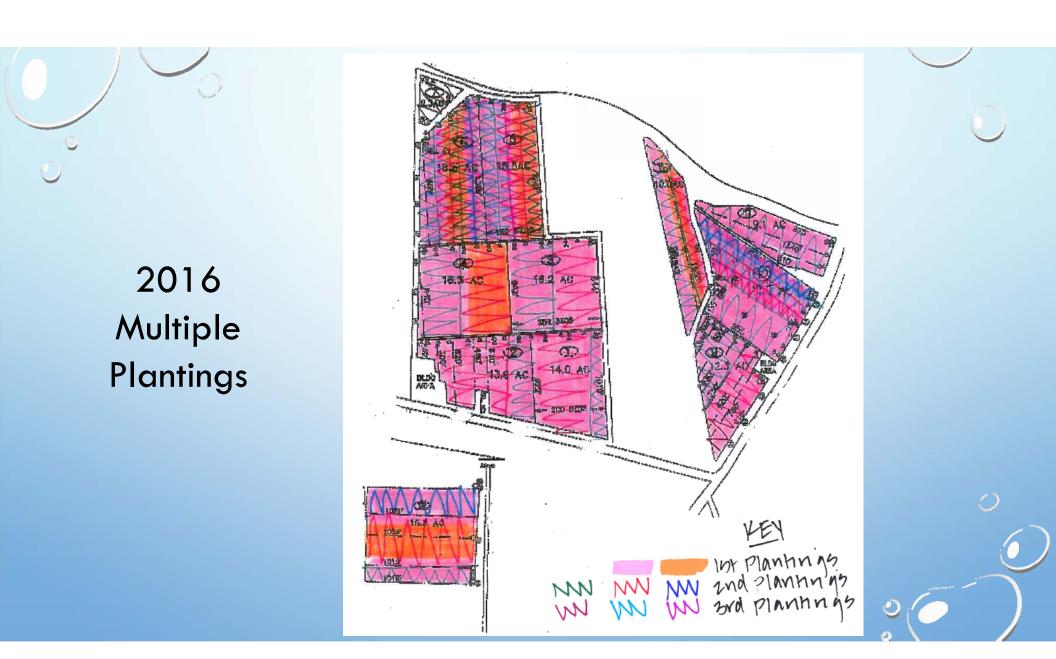
- WHAT IS A FIELD?
- IRRIGATION METHODS AND ANTICIPATED APPLICATIONS
- CROP EVAPOTRANSPIRATION
- PROJECTED YIELDS
- WEATHER VARIABILITIES BY SEASON
- MOST FARMS WILL NEED TO HIRE EXPERTS TO HELP DEVELOP AND VALIDATE CROP CULTURAL PRACTICES AND ASSUMPTIONS



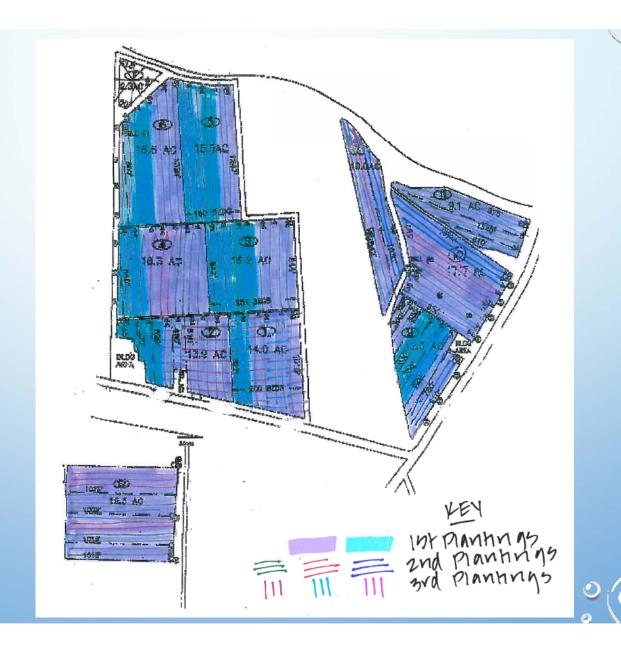
CONCERN: A/R METRICS

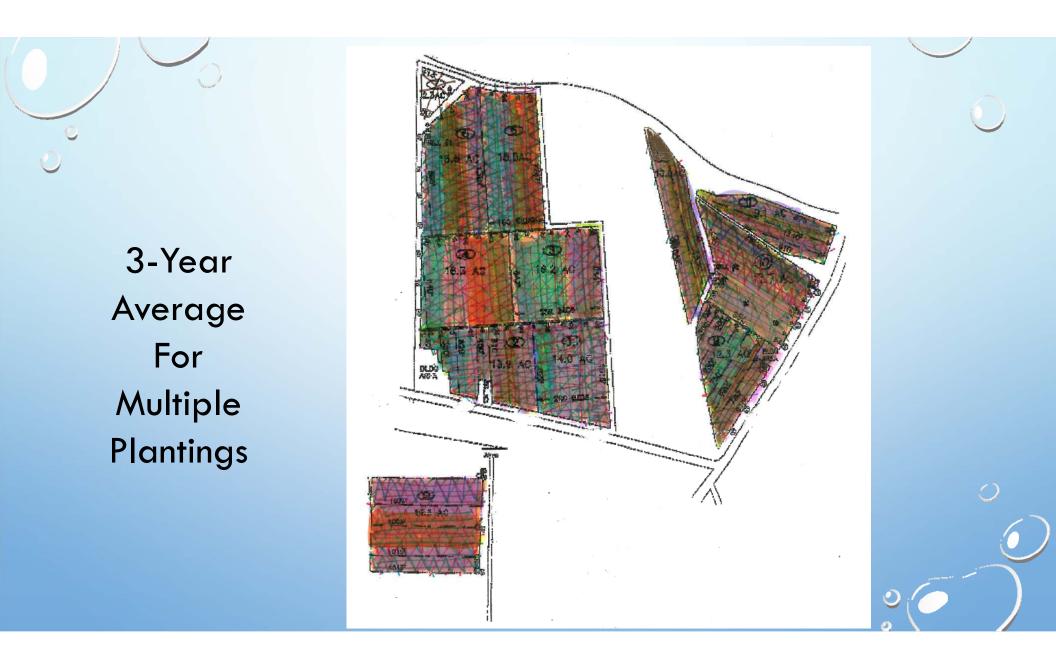
- NITROGEN APPLICATIONS VARY BY CROP, SEASON, SOIL TYPE, AND DELIVERABLES
- A/R RATIOS WILL BE DIFFERENT FOR THE SAME CROP IN DIFFERENT SUB-AREAS
- DATA CAPTURE IS A SIGNIFICANT BURDEN TO FARM OPERATORS
- DETERMINATION OF 'OUTLIERS' IS PROBLEMATIC FOR ROW CROPS & BERRIES
- THREE-AVERAGE FOR ANY ONE CROP ON THE SAME FIELD WILL BE IMPOSSIBLE TO CAPTURE DUE TO CROP ROTATIONS





2017 Multiple Plantings







- STRONG HISTORY OF COALITION-BUILDING ON CENTRAL COAST AROUND WATER ISSUES
 - CHALLENGE COMES WITH USING COALITION TO MEET IRRIGATED LANDS REQUIREMENT IN REGION 3
- SURFACE WATER & GROUNDWATER MONITORING COALITIONS ALREADY EXIST BUT DO NOT FULFILL ALL PROPOSED REQUIREMENTS
- COSTS OF COALITIONS EXCEED PROJECTIONS; INDIVIDUAL REPORTING MAY BE MORE COST EFFECTIVE FOR SOME GROWERS
- NO DESIRE TO PROVIDE MORE DATA TO COALITIONS AFTER ADMINISTRATIVE AND LEGAL DETERMINATIONS ERODING PRIVACY OF INDIVIDUAL INFORMATION
- COMMODITIES ARE DEVELOPING 'SUSTAINABILITY IN PRACTICE' CERTIFICATIONS
- LEGALITY OF REQUIRING EXISTING COALITIONS (AS TAX-EXEMPT ORGANIZATIONS) TO MEET REGULATORY REQUIREMENTS



Central Coast Farming presents a complex set of challenges for collecting compliance data in the way proposed.

Central Coast growers need to be able to work with the State Water Board to evaluate whether transitioning from Total Nitrogen Applied Reporting to a new format that meets the State Water Board's New Draft is even feasible given our unique characteristics, substantial variables of our growing culture and multiple rotations of crops.

Due to the complexity of what we grow and the variety of crops there needs to be an interim bridge to implement the precedential aspects of the state order and give the region necessary time to collect the research needed to provide accurate and informative data.

