

# \* SAN JERARDO COOPERATIVE, INC. \*



January 26, 2015

Dr. Jean-Pierre Wolff, Chair  
Regional Water Quality Control Board  
Central Coast Region  
895 Aerovista Place, Suite 101  
San Luis Obispo, California 93401

**RE: January 30 Board meeting, Agenda item 15; Timing and Planning for the next Agricultural Order**

Dear Chair Wolff and Board Members:

On behalf of the above listed organizations we are writing to express our support for beginning the Agricultural Order Renewal Process later, Option 1 in the staff report for Agenda Item 15, as reflected in Supplement 1 to the staff report. We think that beginning the process later is necessary in order to ensure that the new Agricultural Order is fully informed by pending policy and regulatory action at the State Board, and by continued data collection and reporting at the local level.

Our organizations have been engaged in the development and implementation of the waivers for several years. It is in the interest of the communities we represent that these orders be implemented in a timely and effective manner. However, the adoption of this order, as well as the agricultural waste discharge requirements in Region 5, have generated a flurry of activity in research, data and policy arenas. These activities include the State Water Board's Expert Panel Report; ongoing legal actions regarding the orders and their implementation; and the State Board's stated intent to update their anti-degradation policy (Order 68-16) to specifically address the unique characteristics of groundwater. In addition, information collection required by the

current Order was delayed, then amended by the State Water Board, resulting in delays in the collection of data that will inform development of the new Order.

We are very interested in participating in the development of the new Order, but want to ensure that the renewal process is not premature. Discussing the next Agricultural Order renewal process now is untimely—there are many issues that are currently being discussed and resolved both at the State Water Board and also pending in the courts. The Regional Board would undoubtedly benefit from resolutions to these issues prior to crafting a new iteration of the Agricultural Order. The most practical response for this Board is to ensure that deliberations take place with best available information and policy to direct your decisions. This requires beginning the Agricultural Order Renewal Process at a later date.

Thank you for your continued leadership on this issue.

Sincerely,

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