



April 1, 2015

Submitted via email to tom.kukol@waterboards.ca.gov

Re: Proposed WDR Order No. R3-2015-0007 for Windset Farms, Inc., Santa Maria Greenhouses

Dear Mr. Kukol,

Thank you for the opportunity to review and comment on the Draft Staff Report (SR), Draft Waste Discharge Requirements (WDR), and Draft Monitoring and Reporting Program (MRP) for Windset Farms in Santa Maria, Santa Barbara County. We share a strong interest in the basin's long-term ability to support diverse beneficial uses and have been actively engaged in many local planning and implementation projects, including the referenced Salt and Nutrient Management Plan workgroup. We represent numerous members who farm down-gradient of the site and have a keen interest in any precedent that could impact the future regulation of agricultural discharges.

We commend all agricultural operations who strive to advance Best Management Practices (BMPs), including Windset Farms; we also commend staff for prioritizing mutually beneficial outcomes and focusing on BMP implementation. At the same time, we perceive and question the multiple comparisons being made throughout the Staff Report presumably between this operation, whose unique characteristics make it more similar to a point source of discharge traditionally regulated through an individual WDR, and operations with non-point sources of agricultural discharge currently regulated through the Ag Order.

We believe an individual WDR should focus on a particular site's unique opportunities and challenges in protecting beneficial uses, rather than making peculiar comparisons between disparate types of discharges and situations.

We absolutely recognize the need for flexibility in outlining monitoring and reporting requirements. However, we are unclear on how the stream gauges proposed as the groundwater monitoring alternative (SR page 12, MRP page 5) and/or alternatives to the Salt and Nutrient Management Program (WDR page 11) would fit into existing efforts of stakeholders like the USGS and County Public Works Water Agency. Would another option for a groundwater monitoring alternative perhaps be to contribute to the Central Coast Groundwater Coalition or similar successor program, which would be a closer match to the intent of the original requirement than a stream gauge in Oso Flaco? We are also unclear on how the alternatives would conflict with other requirements outlined in the WDR and MRP.

We would also like to take this opportunity to point out some statements that could be further clarified:

- The *vast majority* of farmers on the Central Coast implement BMPs to a high degree. State-of-the-art practices repeatedly referenced that are widely adopted include:
 - Widespread use of Integrated Pest Management and use of pesticides only when necessary
 - Efficient use of water and nutrients using the best available technology and industry standards
 - Remarkable crop yields of nutritionally diverse, safe, and healthy fruits and vegetables

- Monitoring soil moisture levels, including the use of soil moisture probes
- Many Central Coast strawberry, raspberry, blackberry, and blueberry farms utilize hoop houses
- Some have experimented with coconut coir substrates but large-scale feasibility is limited
- What is the basis for crop yield comparisons (SR pages 1, 4, 6, 8)? This particular operation facilitates the vertical orientation of indeterminate growth crops. Many of the crops grown on the Central Coast do not share this characteristic and similar yield increases could not reasonably be expected. **We are concerned if this production model is a desired outcome of the irrigated lands regulatory program** (SR pages 6, 14).
- The narrative at the end of Staff Report page 5 and the discussion on TDS on SR page 9 is an inaccurate oversimplification of how Central Coast farmers manage salts in both irrigation water and the soil. What is the basis of the statement that “Irrigated agriculture poses the greatest salt and nutrient threat to the Santa Maria Valley’s water quality” (SR page 1)? Have these statements been vetted through a public review process? The IRWMP Groundwater Assessment showed that naturally-occurring salts in surface and subsequently groundwater flows, particularly from the Cuyama River, play a dominant role in existing salts in the basin. We are unfamiliar with the statements and source allocation presented in Staff Report page 6; we are not able to recall or find documentation of its public review.
- Figure 4’s (SR page 8) assertion that “Conventional farms’ soil wet zone not limited; applied water wicks away from root zone, evapotranspires, and percolates to groundwater” is an inaccurate description of the irrigation management on the majority of Central Coast farms.
- Maintaining constant flow through the bioreactors is indeed *mutually beneficial* in terms of nitrate remediation, but is also necessary given the system capacity design and, as stated, in fact *benefits* the discharger in terms of TDS dilution (SR page 9).
- Is the off-site location for coco peat composting within the basin (SR page 11)? Is the fodder crop used on-site? Are the salts truly being removed from the basin?
- We find the Staff Report Recommendations (SR page 14) particularly subjective.

Finally, we object to the following requirement: “If the Discharger monitors any pollutant designated more frequently than is required by this Monitoring and Reporting Program, the results of such monitoring shall be included in the monitoring reports” (MRP page 7). We see value in encouraging the voluntary collection and review of information to improve management.

We sincerely appreciate the diversity of agriculture in the Central Coast Region and wish shared success and a continued future for our communities. We are proud that many farmers on the Central Coast are implementing Best Management Practices on diverse crops throughout the Region and are constantly evolving in response to increased understanding of the best available information and technology.

We look forward to reviewing revised drafts in response to these comments.

Sincerely,



Claire Wineman
President