

From: Colin Bailey
To: AgNOI_WB@Waterboards
Cc: [Randy Reck; Schroeter, Angela@Waterboards](mailto:Randy_Reck; Schroeter_Angela@Waterboards)
Subject: Re: Comment to Order No. R3-2017-0002 (Draft Agricultural Order, Conditional Waiver of Waste Discharge Requirements for Discharges from Irrigated Lands)
Date: Monday, January 09, 2017 12:00:44 PM

To Whom It May Concern:

In addition to the comments submitted by my colleague, Randy Reck, at 10:54am, today, please accept the following comments on the record.

The Environmental Justice Coalition for Water (EJCW) has argued in the past and asserts, here, again, that the frequency of testing of drinking water wells should be done at least annually and, preferably, twice: once at the end of the dry season and once at the end of the wet season to account for seasonal variability.

Right now, the Draft Ag Order requires one-time sampling of drinking water well in the 1st year of 3-year order. In keeping with the theme that the frequency of the well sampling and testing need to increase for the growers to adopt the best management practices required of them and to protect public health and the environment, EJCW would urge the Board to consider including in the Ag Order additional triggers for sampling and testing like a change in the tenancy of a ranch. This will help each new tenant grower with budgeting what fertilizer to apply, relative to what is then in the groundwater. Then everyone will have the bare minimum information they need to budget nitrogen applications accordingly. The problem with order now is that it only applies to the tenant then resident in 2017. Someone who comes onto the property in 2018 would, theoretically, have no legal requirement to test to manage to the standard.

Finally, some additional attention should be given to the effectiveness of notifications that are provided to the users of the wells that are found to be above the standard. EJCW experience shows that they have not been as effective at conveying the message to all who should have it, including mothers of young children, as they should be.

Thank you.

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Host a screening of the documentary film, *Thirsty for Justice: the struggle for the human right to water*, in your community! Watch the 2-minute [trailer](#) or view the 38-minute [film](#).

Reduce e-mail! Schedule a 15-minute meeting with me [here](#) or MeetMe [here](#).



On Mon, Jan 9, 2017 at 10:54 AM, Randy Reck <randy@ejcw.org> wrote:

Please see the attached letter for our submission of comments on the Draft Agricultural Order, proposed for adoption March 7-9, 2017 by the Central Coast Regional Water Quality

Control Board.

Best,

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