



August 7, 2014

VIA E-MAIL

Attn: Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814
commentletters@waterboards.ca.gov

Re: Agricultural Expert Panel Draft Report

Dear Dr. Charles Burt, Chair and Members of the Expert Panel:

On behalf of the Westside Water Quality Coalition (WWQC) we applaud the Agricultural Expert Panel ("Expert Panel") for dedicating its time and expertise to address the critical technical and scientific issues posed to the Expert Panel related to nitrogen management and the Long-Term Irrigated Lands Regulatory Program (ILRP).

The WWQC was formed to serve as a Third-Party Representing Members under General Order # R5-2013-0123. Growers within the WWQC invest significant resources in development and implementation of sound and thoughtful irrigation and nitrogen management practices.

The Expert Panel faced a daunting task, under a tight timeline, yet engaged stakeholders in a meaningful public process, which resulted in thoughtful consideration of the issues from a scientific, practical and results-oriented perspective. The WWQC appreciates the opportunity to provide comments on the Agricultural Expert Panel Draft Report ("Draft Report").

The WWQC agrees with the Expert Panel that focusing on implementation of sound nitrogen and irrigation management plans at the grower level, which most growers in the WWQC are already doing, and educating growers to change behavior, where needed, will best achieve the goals of reducing nitrate levels in groundwater over time. The Draft Report's practical and scientifically-based recommendations, when final, should be considered by the SWRCB and the various Regional Boards in development and implementation of the ILRP and other regulations related to agricultural water quality issues. The scientific issues addressed by the Expert Panel are a critical component of the ILRP and the Expert Panel report should be incorporated into the ILRP.



The WWQC provides the following specific comments on the Draft Report:

- The Expert Panel's assertion that implementation of nitrogen and irrigation management plans and developing tools and practices for improved management makes practical sense, but this level of detail would be impractical at the regulatory level.¹ Given the large amount of data which is crop specific or otherwise difficult to compare, the resources needed to assess the data and significant cost of compliance.
- Simplified grower and coalition reporting, based on information used by growers to make farming decisions, is practical.
- The Expert Panel's assertion that there is no reliable or feasible direct method to identify causes of nitrates in groundwater is correct; however, we also agree that regulatory programs are most effective when they focus on areas of highest risk.² We would like to ask the Expert Panel to provide more detail on potential techniques and tools that could be used to categorize and prioritize risk recognizing, as the Expert Panel did in the Draft report, that a "one-size-fits-all approach" will apply to all regulated areas or coalitions.
- The Expert Panel's assertion that extensive groundwater monitoring does not provide scientifically supported indications of impacts or improvements associated with current practices, and that data analysis should focus on representative, multi-year trends and not year-to-year comparisons, which are not helpful in recognizing trends.

Additionally, the WWQC hereby joins in and incorporates the comments submitted by the Kern River Watershed Coalition Authority.

The WWQC appreciates the efforts of the Expert Panel. Its recommendations address critical components of, and should be incorporated into, the ILRP. We are pleased to discuss our comments at any time and look forward to the Expert Panel's final report.

Respectfully,

Greg A. Hammett, PG
Coordinator

¹ "Reduction of Nitrates in Groundwater – Agricultural Expert Panel Draft Report," July 03, 2014. Page 23.

² "Reduction of Nitrates in Groundwater – Agricultural Expert Panel Draft Report," July 03, 2014. Page 4.