



PARAMOUNT

FARMING



August 6, 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 Paramount Farming Company LLC and its related entities ("Paramount") we would like to thank 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).

Paramount is a grower and processor of almonds, pistachios, pomegranates, and citrus with land throughout the Central Valley and California. Paramount invests significant resources in development and implementation of sound and thoughtful irrigation and nitrogen management practices.

The Expert Panel faced a significant 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. Paramount appreciates the opportunity to provide comments on the Agricultural Expert Panel Draft Report ("Draft Report").

Paramount agrees with the Expert Panel that focusing on implementation of sound nitrogen and irrigation management plans at the grower level, which many growers 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 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.

Paramount 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 at the grower level, but, as recognized by the Expert Panel, this level of detail would be impractical at the regulatory level¹ given the large amount of data which is crop specific or otherwise difficult to compare, the resources needed to assess the data, and the 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 not 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 is an important scientific consideration which can save significant costs in ILRP compliance.

Paramount 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 anytime and look forward to the Expert Panel's final report.

Sincerely,



Kimberly M. Brown
Director, Water Resources

cc: Mr. Darrin Polhemus, Darrin.Polhemus@waterboards.ca.gov
Ms. Dee Dee D'Adamo, Board Member, Dorene.Dadamo@waterboards.ca.gov
Dr. Stewart W. Styles, sstyles@calpoly.edu
Mr. William D. Phillimore, wdp@paramountfarming.com
Mr. Hung Le, hungl@paramountfarming.com

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.