

Central Coast Water Quality Preservation, Inc.

P.O. Box 1049
Watsonville, CA 95077

(831) 761-8644
Fax (831) 761-8695
e-mail kschmidt@ccwqp.org

May 27, 2014



State Water Resources Control Board
c/o Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

Re: draft Recycled Water General Order

Central Coast Water Quality Preservation, Inc. (CCWQP) manages the Cooperative Surface Water Monitoring Program (CMP) for Central Coast farmers in compliance with the CCRWQCB Ag Order. Part of CCWQP's initial obligation under the Ag Waiver was to conduct education and outreach with growers and to review management practices used by farmers in watersheds above CMP sites.

Agriculture throughout the Central Coast is very diverse, as are climatic variation and soil types. Farms in the Pajaro Valley may receive ten times as much rain annually compared with farms in King City, just 60 miles south. Temperature may also vary by as much as 25° within 10 miles during August. Only a few of the over 150 crops grown on the Central Coast have been well researched, and none of the UCCE researchers believe that irrigation and fertilization results from a test plot can be directly applied to the same crop with different soil and weather characteristics, even if relatively nearby.

The proposed Recycled Water General Order makes the assumption that there is standardization between crops and soil types with the term: "Agronomic Rates."

"Application of recycled water to the use area shall be at **agronomic rates** and shall consider soil, climate, and nutrient demand, consistent with applicable provisions of the Recycled Water Policy." (page 15)

Which is further defined as:

"Agronomic Rates: The irrigation and nitrogen requirements of a plant needed for optimal growth and production. Nitrogen requirements may be as cited in professional publications for California or recommended by the County Agricultural Commissioner, a Certified Agronomist or Certified Soil Scientist. Irrigation rates may be established through the California Irrigation Management Information System (CIMIS), available at <http://www.cimis.water.ca.gov/cimis/welcome.jsp>." (page 33)

Agronomic Rates is a phrase which is not possible to apply to individual farming operations. While an interesting research concept, its application in a regulatory environment will be arbitrary, and possibly capricious, as it necessitates second guessing farm practices through regulatory review long after application of the recycled water. Phrases similar to this were rejected by the State Water Board during the appeal of the Central Coast Regional Water Quality Control Board's Ag Order in 2012 when the Board found certain elements of the Irrigation and Nutrient Management Plan is unreasonable in light of the fact that the underlying data and the calculations for these elements are inexact and speculative. Agronomic Rates are also inexact and speculative. As there is only a short Fact Sheet, 2 pages, and no staff report or EIR accompanying the draft Order, it is impossible to determine the intention or application of the limitation on farm practices by the imposition of Agronomic Rates.

The State Board recently established an Agricultural Expert Panel to assess existing agricultural nitrate control programs and develop recommendations. The Expert Panel met four times in May, and optimistically will complete their work and issue a report by the end of June. The Expert Panel was established to review the relationship of irrigation and fertilization on surface and groundwater, with particular emphasis on nitrate impairment. This is same object as the use of Agronomic Rates in the draft Order. Indeed, during the first two days of hearings by the Expert Panel, panel members repeatedly stated that there were no accepted Agronomic Rates of irrigation for crops grown in California, which could be applied beyond the research trial plots.

Therefore, it is recommended that limitation on irrigation practices by reference to inexact and speculative Agronomic Rates be deleted from the draft Recycled Water General Order prior to its adoption. The relevance of Agronomic Rates as a viable agricultural standard should be referred to the Expert Panel prior to inclusion in future regulations.

Should you have any questions regarding the above, please do not hesitate to contact me. Thank you for your consideration in this matter.

Sincerely
Central Coast Water Quality Preservation, Inc.



Kirk F. Schmidt
Executive Director

CCWQP Recycled Water draft order 5-27-14.docx