

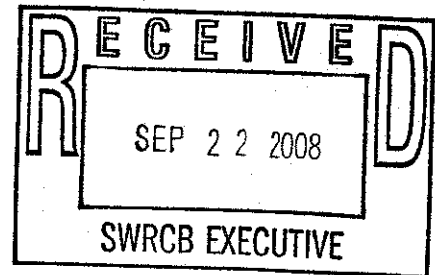


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Mission Resource Conservation District
990 East Mission Road, Fallbrook, California 92028
P.O. Box 1777, Fallbrook, California 92088-1777

September 22, 2008

Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
1001 I Street
Sacramento, CA 95814



RE: Comments on Conditional Waiver No. 4

Dear Ms. Townsend,

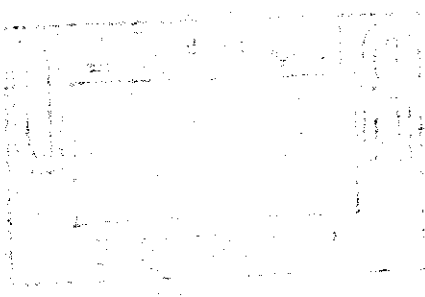
Mission Resource Conservation District did comment on the Conditional Waiver No. 4 in September of 2007 and we have attached our original comments. Mission RCD performs the agricultural irrigation water management program for the San Diego County Water Authority. Although we had noted on the original Waiver that San Diego was incorrectly attributed with having a regional Resource Conservation District this change was never made. There are three separate Resource Conservation Districts in San Diego and this change should be made on the final language.

Mission RCD is very concerned about the financial impact of the monitoring requirements of the Conditional Waiver No. 4 on the great number of small growers we assist in San Diego. We do not think this waiver has gone far enough to address this unique farming situation in San Diego and would like to recommend that the **waiver not be approved** until this issue is more fairly addressed as it has been for the small confined animal operations. The District is always active in promoting clean water BMPS but we also are committed to sustaining Agriculture in San Diego County.

Thank you for your consideration.

Sincerely,

Judith Mitchell
District Manager



Comments on Ag Waiver:

- Appendix A, page 8 – There is a good understanding in the document that plant crop residue is helpful however; there is a contradiction that remains in the last paragraph that needs to be fixed if the final intent is to be understood.
- Page 26 – the beginning wording “nurseries are encouraged” is confusing because subsequent wording uses the words must; does this mean shall? This conflict of what you actually intend should be resolved.
- Appendix A, page 13 – existing Conditional Waiver No. 15 requires submittal of an enrollment form. Do you really mean that there should be enrollment if applying manure compost to soil? There are so many residences and agricultural operations in the county where this occurs; for example, Home Depot sells manure/compost therefore, are the individual residential parcel owners required to enroll? Often ag operations purchase composted manure and incorporate it into the soil, this is true especially in organic operations and this proposed requirement seems counterproductive to encouraging that kind of agriculture.
- Because covering compost piles seriously disturbs the proper oxygenation of the compost pile, it would be preferable to say that compost piles should be “covered if rain is forecast to occur within the next 24 hours”.
- Item D – The 100 foot distance between compost piles and water bodies of concern would simply not work on small sites. Why not add the use of berms, perhaps with plastic lining, to allow piles to be closer to the protected water bodies. That way the individual property would have a viable option to comply with the goal of protecting the beneficial uses.
- Page 22 – Waiver 18 – Ag operators must receive annual training. This is probably too prescriptive – operators could show training within the past 2 years. This would be the same as the current licensure requirements for pesticide operators; pesticide use is a far more regulated area, and this change would probably result in better compliance and acceptance. Mission Resource Conservation District would also like to remind the Board that there is no “regional Resource Conservation District (RCD) in San Diego”. There are three independent RCDs.