

Zellmer, Ashley@Waterboards

From: Bob Martin <chilibob@RIOFARMS.COM>
Sent: Saturday, June 14, 2014 7:40 PM
To: Zellmer, Ashley@Waterboards
Cc: Gretz, Jocelyn@CDFA; David Gill
Subject: Further clarification for questions 3, 4 & 11

Please consider the following comments regarding further clarification for the ag panel discussions, questions 3, 4 & 11;

Question 3/4 –

From a scientific standpoint, threat to surface water impairment should be based on physical, watershed aspects such as:

- Slope of ranch
- Soils - Heavy, non-permeable soils (if we are using soil type for leaching to groundwater, why not use for surface water?)
- Areas with high annual rainfall (if they are worried about storm water runoff this could be a way to Tier)
- Farm discharge
 - o Farms that have surface water discharge from irrigation water directly to water bodies with current impairments (i.e. adjacent farms)
 - o Farms that have surface water discharge from irrigation water that leads to (via tile drain, creek etc.) to water bodies with current impairments
- “negative” farmer practices such as furrow irrigation, use of Diazinon/Chlorpyrifos
- Presence of “positive” farmer practices such as width of riparian area, buffer strips, conservation tillage, row alignment etc. would reduce tiering

Crop type – makes some sense, but raises some questions as well -

- Simplistic math equation to generate threat level wasn't meant for regulatory purposes... is a carrot (2 ranking) really twice as less of a threat than lettuce (4)?
- If farmers implement good nutrient balance ratios (N in > N out), should crop type matter?
- What about recent work on potential N scavengers, like broccoli (should they be a -1 rather than a +4?)

Farm size –

Tiering by size may be ideal for regulatory purposes (easier to cover a few large farms as Tier 3 vs. Tier 2) however I do not understand the scientific basis -

*“As another example, with regard to farms growing crops with high potential to discharge nitrogen, the Central Coast Water Board analyzed the impact of size of the farm on such potential and explained that the numbers less than 50 acres and more than 500 acres were chosen as the thresholds for placing a discharger in Tiers 1 or 3 **respectively because 50-500 acres represented an average loading appropriate for Tier 2 categorization.**”*

- What is the data source for this? What does this mean, average loading of ___ nitrogen?

*“But the Agricultural Petitioners do not appear to be advancing a proposed, well- defined, alternative, **and they are not advocating for uniform requirements for all dischargers.**”*

- Advocating against farm size as a standard is advocating for uniform requirements

Sediment and Erosion Control Plans - To my knowledge only required by Central Valley Board. Central Coast Board has a Farm Water Quality plan that must address it, and a Water Quality Buffer Plan for Tier 3 ranches, not sure how they differ.

Question 11

I agree with this statement from the State Water Board (pg 10-11)

The better approach may be to rely on receiving water monitoring data and to require the third party monitoring groups administering receiving water monitoring to pursue exceedances with increasingly focused monitoring in upstream channels

designed to narrow down and identify the sources of the exceedances. ... The surface receiving water monitoring approach recently approved by the Central Valley Regional Water Quality Control Board (Central Valley Water Board) for growers in the Eastern San Joaquin Watershed, where a detected exceedance may trigger source identification, management practice implementation, and follow up reporting, perhaps more closely matches the type of monitoring that would assure pollutant discharges are actually addressed."

Bob Martin



General Manager

P.O. Box 605

King City, CA 93930

Off: 831-385-6225 ext 112

Direct Line: 831-676-2168

Fax: 831-385-0133

Mobile: 831-595-1554

E-Mail: chilibob@riofarms.com