From: David Costa
To: commentletters
Subject: Comments on East San Joaquin Agricultural General WDR Requirements
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SWRCB Clerk

State Water Resources Control Board members

c/o Ms. Jeanine Townsend, Clerk to the Board

Thank you for the opportunity to provide comments from the perspective of a Central Coast landowner and grower on the precedential nature of the East San Joaquin Order Requirements and their impacts to agricultural production in our region (Region 3).

Many provisions of the Eastern San Joaquin Agricultural General WDR Requirements ('ESJR') raise a number of issues and questions on how to implement the precedential mandates of this order for the Central Coast region and the Salinas valley in particular. Following are my comments on several specific subject areas.

I represent a family farm that currently grows 22 different crops in several areas of the Salinas Valley. In addition, there are 7 crops that we currently are not growing that we have grown previously. This total of 29 different crops that we've grown starts to give you an idea of the complexity of what we do to produce cool season vegetables in this valley. This complexity at the very least will challenge any ability to calculate meaningful yield data and A/R ratios.

We have 442 individual lots averaging 13.25 acres per lot in our operation on 44 different ranches. We average 2.1 crops per acre per year. Some of these crops are in the field as little as 28 to 40 days from planting to harvest, and many are in the 55-60 day range. The average size of an individual planting of any given crop for us is 6.5 acres, so we have a total of over 1800 individual separate plantings during the year, which is further complicated by 32 different soil types. In particular, a 163 acre ranch which we farm has 12 soil types; two others have 8 soil types, and even a 5 acre ranch we have has 2 soil types.

50% of what we harvest is packed and sold by count (such as 24 heads per box), not by weight, so not all loads are weighed upon delivery to the cooler or shipping point. Each acre of crops that we grow generates @1 to 1.5 truckloads per acre. If we were to attempt to weigh every truckload of product that left our fields we would end up with between 12,322 and 18,484 scale tags (5868 acres times 2.1 crops per acre times 1 to 1.5 truckloads per acre of each crop). There are variations in weight of as much as 10% for a 24 head count box of green leaf or romaine depending on the time of day that it gets harvested, as well as variations in yield depending on the crops particular seed variety, irrigation method, growing location in the valley, and time of year that it's grown (day length).

10 % of what we harvest goes through some form of pre-wash in the field, so any retained water on the leaves or heads would skew any weight numbers as it relates to crop removal, as would any dirt remaining on root crops when they would get weighed.

Trying to calculate a meaningful 3 year average will be futile. There's too much variation, especially concerning seasonality of yields and weights, not to mention the fact that we may go 3 years <u>without having the same crop planted on the same field twice</u>! On one of our fields, in the last 3.5 years and 7 crops planted we have not planted the same crop twice.

Due to the complexity of crops grown in the Central Coast region and the variety of crops, I would suggest that the Total Nitrogen Applied reporting process of Region 3 be maintained to give the

Central Coast region necessary time to collect the research which is drastically needed to provide accurate and informative data for the formation of any potential future regulatory program.

Central Coast growers need to be able to work with the State Water Board to evaluate whether transitioning from Total Nitrogen Applied Reporting to a new format that meets the State Water Board's New Draft is even feasible given our unique characteristics, substantial variables of our growing culture, and multiple rotations of crops. In addition, could the sheer number of data points that would be generated even be managed constructively?

I believe that as currently mandated, if precedential, the ESJR will set a course of failure for all landowners and growers in the Central Coast region where compliance will be impossible to achieve. I don't believe the science exists to mandate an irrigated lands program for our region that places unreasonable burdens that are not supportive in achieving improved water quality by adding additional reporting requirements. Time must be allowed to develop reliable scientific data that empowers an irrigated lands program that the Central Coast region can manage and comply with without unnecessary burdens. I urge the Board to suspend the precedential aspects of this Order to better adapt to the diversity of crops and dynamic land use patterns on Central Coast, many of which I mentioned above.

Thank you for your consideration of the points which I have raised in this comment letter.

Sincerely,

David Costa

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