



SAN JERARDO COOPERATIVE, INC.



August 27, 2012

Charles Hoppin
Chair, State Water Resources Control Board
State Water Resources Control Board
1001 I Street, 22nd Floor
Sacramento, CA 95812-0100
Via E-mail: commentletters@waterboards.ca.gov.

Comment Letter – Central Coast Agricultural Order Stay Hearing

Dear Chair Hoppin and Board members,

The undersigned organizations and individuals urge the State Water Board to deny the request for a stay in implementation of the Central Coast irrigated agriculture regulatory program. The request fails to meet a key requirement for approval, namely that the stay “not cause substantial harm to other interested persons or the public interest.”

Significant evidence exists showing that nitrate contamination of groundwater is increasing in the Central Coast region and, that *current* agriculture practices are the overwhelming cause of new contamination. Continued delay in the implementation of this order *will* result in additional





groundwater contamination and cause both public supply and domestic wells to exceed the drinking water standard, risking the public health and economic well-being of impacted residents.

The order under review contains measures to monitor and protect groundwater, beginning October 1 of this year, which will not take effect in the event of a stay. Instead, the prior agricultural waiver would continue in effect - an order which contains *no provisions* to monitor or protect groundwater.

This order has been years in development and convened at least three different stakeholder processes that involved agricultural representatives, including a mediated process that did not involve the Central Coast Water Board. Placing a stay on this order for yet another process would seem to reinforce the law of diminishing returns.

We urge you to reject the proposed stay request.

Sincerely,

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