



May 28, 2016

Ms. Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
1001 I Street 24th Floor
P.O. Box 100
Sacramento, CA 95812-0100

Via: Email to commentletters@waterboards.ca.gov

Re: Waste Discharge Requirements within the Eastern San Joaquin Watershed SWRCB/OCC Files A-2239(a)-(c)

Dear State Water Board Members,

Thank you for the opportunity to provide comments on the Eastern San Joaquin Water Coalition Irrigated Lands Regulatory Program Draft Order.

I'm a third-generation member of a farming family in the Salinas Valley. Our farm supports the five families of the owners and over 700 employees. Our farm consists of a total of 44 individual ranches which vary in size; some are contiguous and some are not. The smallest of these ranches is 5 acres in size and several are 18 acres. The total number of blocks or fields on our farm is 436 with an average size of 13.3 acres each. Some of these blocks get broken down even further for multiple staggered plantings, and as we plant through the year the average size of each individual planting is about 8 acres. We average about 2.2 crops per acre per year and all of these crops have differing maturities (or days from planting to harvest). The fastest maturing crops that we grow are harvested approximately 29 days after planting; many others are harvested 50 to 65 days after planting, leading to the multiple crops planted on a given acre of ground in a year. We currently raise 27 different crops and the total number of individual plantings for us in one year's time is 1,500. Also, this isn't a "plant in the spring/harvest in the fall" scenario; our single biggest planting week of the year is the last week of July.

The main area I would like to comment on in this letter has to do with the A/R ratios and their calculations. The 27 crops that we grow and multiple plantings per year on a given acre of ground only begin to touch on the complexity. Nitrogen uptake data on many of these crops we grow doesn't exist. On a particular crop like romaine lettuce for example, from one individual field it would be common for us to harvest that romaine 40

different ways from the same field. These different ways could be for romaine as processing for salads, as romaine hearts, as commodity romaine, as individual whole leaf romaine, and other packs, and within these particular uses there would be multiple pack sizes or differing size cartons and counts involving that product. Most of these products are packed in a carton by count, not by weight. The particular weights of any carton pack differ not only by the field but within the field, for example six count, 12 count, 24 count, or mini-bin cartons. These boxes or cartons are not weighed when they are delivered to the shipper because the product is sold by count. The weight in a 24 count carton could vary by field, variety, season of the year, or buyer preference by anywhere from 5 to 7 pounds per box. Trying to calculate crop removal for nitrate removal purposes would be so inaccurate that I think the information would be useless. At the very least I don't understand how it could be accurate enough to serve a regulatory purpose. In addition, I don't believe the A/R ratio as recommended by the expert panel was ever intended to be used as a regulatory tool.

For this reason in our operation we have undertaken a substantial pre-application soil sampling program prior to every potential nitrogen application. We are sampling prior to the planting of every field and then before every potential application, in addition to a post harvest sample to measure residual N. We use the results from the sampling and laboratory analysis to determine whether to continue with our normal fertility program or whether to reduce rates or skip an application. We spend over \$335,000 per year on this sampling and analysis program and believe it to be very accurate in its results and recommendations for our fertility program.

Again, thank you for the opportunity to provide comments. The precedential nature of this proposal is of great concern to us because we believe that the yield reporting requirements of the East San Joaquin Irrigated Lands Program as proposed are entirely unworkable for coastal vegetable producers in Region 3 and others. I encourage you to take these comments into consideration allow for additional review before finalizing the final regulation. The rules you set will have ramifications for generations to come; they deserve more time for thoughtful analysis and consideration.

Sincerely,



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