



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 fourth-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.

There are several areas of concern for our operation regarding the East San Joaquin Irrigated Lands program. The first area of concern is the precedential mandate of the proposed order and its supposed fit for all other regions of the state. Regional differences must be accounted for in the development of any irrigated lands program. It is our hope that the details included in the opening paragraph of this letter can begin to explain that

to you. The word "complex" is an understatement at best when trying to describe coastal vegetable production. Multiple crops from the same field in a year's time is one thing, but different crops in the same field at the SAME time are common and complicate (or doom) any reporting requirement or effort. Coastal vegetable production does not fit neatly into a uniform set of monitoring, reporting and compliance requirements, yet that seems like the assumption at the state level. There has to be flexibility for local differences in an irrigated lands program or else the Central Coast growers will be set up for failure.

Another area of concern is data confidentiality. Despite claims by more than 79 operators including myself that we had included trade secrets on our total nitrogen applied forms in Region 3, all but a number of operator's total nitrogen applied forms were disseminated to the public after a public records act request. This confidential information was specifically promised not to be released by Region 3 staff and counsel. As a result, all trust has been broken between growers and regional board staff. I don't believe that trust can ever be repaired.

As a member of a coalition here on the Central Coast we have watched the bar continually be raised with regards to compliance requirements after the coalition was established. The continued changes to the program after the waiver was written have significantly affected the viability of the coalition, and it has significantly impacted the ability of the coalition to manage its required functions for the benefit of those who fund its operation. The end result has been zero cost certainty for both the coalition and its members.

We are all interested in clean water supplies and improved water quality. We go about our job of growing fresh vegetables and caring for our land with significant care and investment. It is our family farm's hope that the final regulation developed for the East San Joaquin doesn't become a deterrent for future generations to continue the work of current and prior generations of our families and others like us here on the Central Coast and in Region 3.

Thank you for the opportunity to provide comments on the proposed order. I hope you take these comments into consideration as this proposed order has precedential implications for many regions.

Sincerely,

A handwritten signature in cursive script that reads "Melissa Costa".

Melissa Costa
Costa Family Farms
36817 Foothill Road
Soledad, CA 93960