



August 24, 2012

Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
commentletters@waterboards.ca.gov
Sacramento, CA 95814



RE: Comment Letter - Central Coast Agricultural Order Stay Hearing; Support of a short stay in implementation of the Central Coast Agriculture Discharge Waiver to support further dialog and deliberation among stakeholders.

Dear Board Members:

The Central Coast Wetlands Group has worked with land owners, local agencies, the Monterey Bay National Marine Sanctuary, the California Coastal Commission and the Central Coast Regional Water Quality Control Board (Regional Board) to restore hundreds of acres of coastal wetlands and creek habitat in the Salinas Valley, and to construct wetlands designed to treat polluted runoff. We have documented the improvements to water quality and the reductions in nutrient and pollutant loads associated with those projects (Clark et al. 1997, Watson et al. 2007, Dayton 2008).

To achieve our combined objectives of improving water quality and wetland habitat, we rely on the support of the regulatory agencies to develop policies that highlight the importance of creek restoration and treatment wetland installation as management strategies. Similarly we rely on the interest of land owners to provide access to areas on their properties appropriate for restoration. We have been the most successful when grower/landowner and agency goals are aligned and a level of trust has been established.

At the March Central Coast Regional Board meeting I presented water quality findings of Moss Landing Marine Labs and Cal State University Monterey Bay that quantified the load reduction potential of treatment wetlands. These findings have led to significant interest by the growers in the Salinas Valley. Prior to the adoption of the Ag Order farmers had begun to partner with us and others to address impacts to water quality from agriculture like at no other time. The result of that meeting was the adoption of an Ag Order that supported our findings by strengthening opportunities to establish alternate watershed strategies to meeting water quality objectives. The adoption of the Ag Order however has led to confusion as to how these alternative strategies will be implemented and how regulatory credit will be provided to those that adopt these alternate strategies. While we appreciate Regional Board staff efforts to integrate our recommendations, we feel there is more discourse needed before an Ag Order can be implemented effectively.

We request that the State Board stay implantation of the Adopted Ag Order and support an extended dialog between Regional Board staff, the regulated community and regional researchers to develop the guidelines necessary for the agricultural community to

implement a fully defined permit that will effectively achieve the multiple water quality objectives. We believe that a short stay will not lead to substantial harm to other interested persons and to the public interest if granted. This is only if the stay is used in a productive way, to continue stakeholder dialogue so that when the Ag Order is implemented, it is done with greater stakeholder support. With support and guidance from the State Board, we will be able to re-establish a dialog among the regional board staff, the farmers, land owners, resource managers and scientists that will enable us all to establish alternative compliance strategies that support water quality objectives as well as sustainable farming practices. Many of us are looking forward to a final outcome that effectively addresses pollutant loading that is supported by the agriculture community.

We feel that our region is very close to having a robust set of strategies in place that can be verified and will lead to real improvements in water quality and wetland habitat.

Respectfully,

A handwritten signature in black ink, appearing to read 'R. Clark', with a long horizontal flourish extending to the right.

Ross Clark
Director, Central Coast Wetlands Group
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