

Proposed Model to Improve WQ Associated with Agricultural Lands

Regional Water Quality Control Board
Agricultural Discharge Waiver Hearing

Marc Los Huertos
Watershed Institute
Science and Environmental Policy
California State University, Monterey Bay

March 14, 2012

Goals of Water Quality Protection Plan and Agricultural Alternative

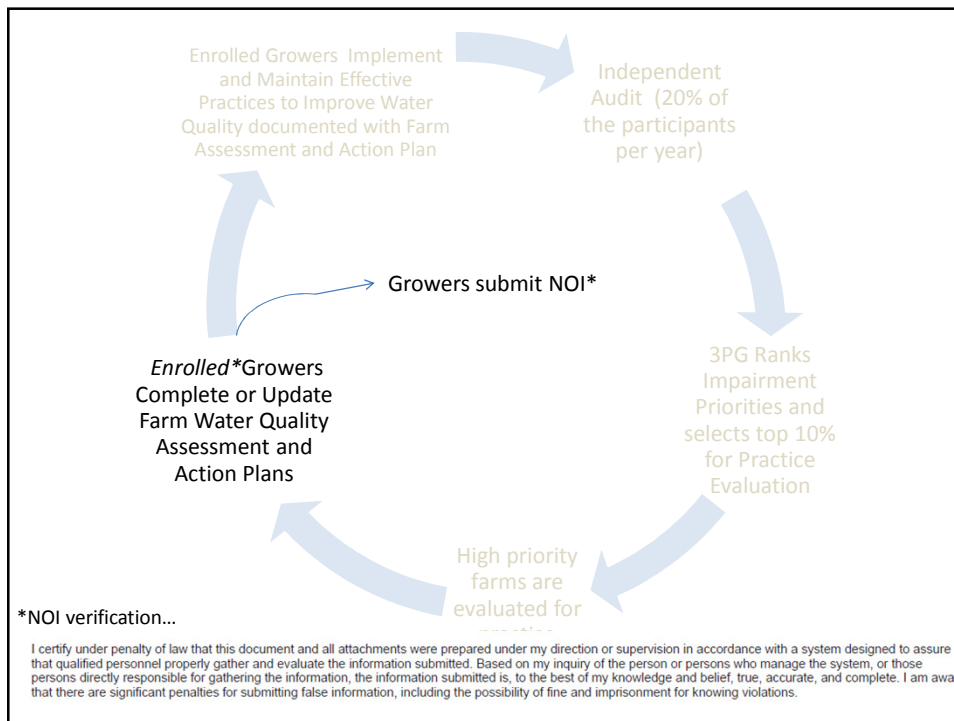
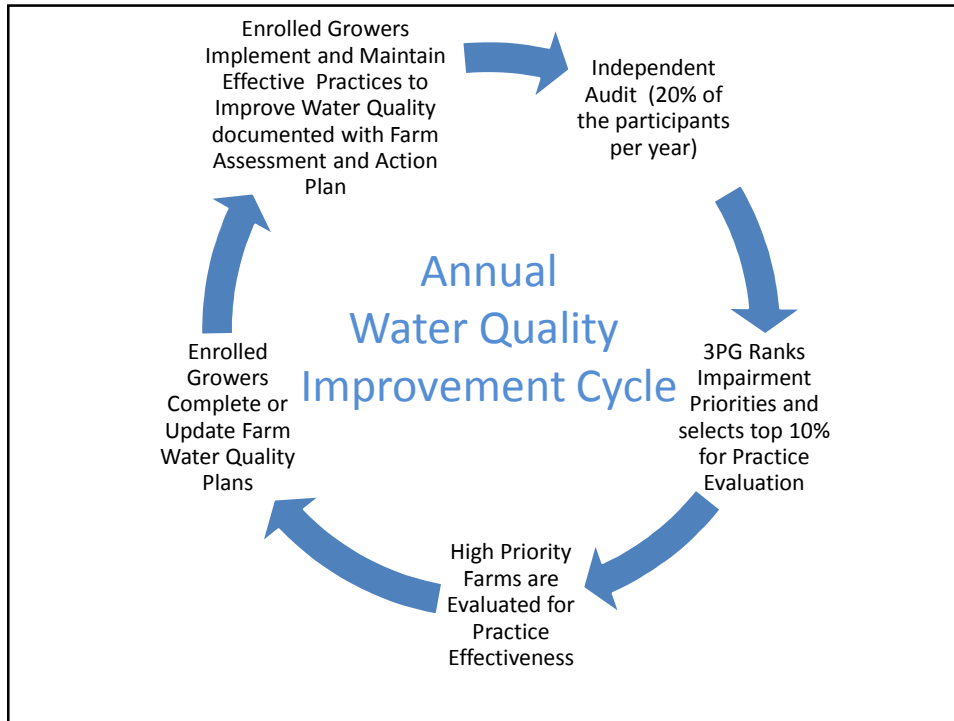
- 1) Create a collaborative context for growers and technical advisory resources to improve water quality, based on *reliable risk assessments*.
- 2) Provide the Public and Regional Board with evidence that growers are effectively implementing management practices that reduce nonpoint source pollution.
- 3) Meet the requirements of the California Water Code.

A question of law and water quality

- Proposed 3PG Model is a robust mechanism to promote water quality improvement.
- Draft Order will not result in tangible water quality improvements.
- Draft Order and associated reports are confusing, ambiguous and contradictory and leaves the Board extremely vulnerable while taking enforcement actions.
- Draft Order does not reflect stakeholder engagement for “high risk” farms in a problem-solving manner and may conflict the State’s NPS policy.

Responding to Questions (time allowing)

- Addressing specific questions from Board members
 - Chairman Young
 - [How do we know that farms are complying?](#)
 - [What is the value of fear?](#)
 - [How can we re-dress the process problems?](#)
 - Dr. Hunter
 - [How can a cooperative program address ground water quality?](#)
 - Mr. Jeffries
 - [Is the Draft Order hard to understand?](#)
 - Mr. Johnston
 - [Which approach will have the maximum impact?](#)
 - [Is this a good place to negotiate with agriculture?](#)
 - Mr. Delgado
 - [Are these tweaks or fundamentally different approaches?](#)
 - [Is the Agricultural Alternative a moving target?](#)
 - [How do we negotiate between sideboards or restrictive requirements?](#)



Potential WQ Practice Effectiveness Evaluation Reports and A Question that can be answered with Practice Evaluations

Regarding the proposed model...

"The type of aggregate reporting proposed would not allow the Water Board to determine the source and amount of waste being discharged and whether management practices are being effective."

Staff Report, Feb. 22, 2012

