

From: Mark
To: AgNOI_WB@Waterboards
Subject: Proposed Conditional Waiver of Waste Discharge Requirements
Date: Wednesday, January 04, 2017 10:55:27 AM
Attachments: [image002.jpg](#)

January 3, 2017

California Regional Water Quality Control Board, Central Coast Region

The agricultural community of Monterey and Santa Cruz Counties operate under the most restrictive regulatory oversight that exists anywhere within the United States. Agricultural operations are being carried out adjacent to the Monterey Bay Marine Sanctuary with its extensive component of regulatory agencies. The agencies both state and federal responsible for the supervision and protection of the Monterey Bay Marine Sanctuary include the United States Environmental Protection Agency, California Environmental Protection Agency, California Department of Pesticide Regulation, United States Department of Agriculture, California Department of Agriculture, California Coastal Commission, National Oceanic and Atmospheric Agency, U.S. Army Corps of Engineers, United States Coast Guard, Central Coast Regional Water Quality Control Board, United States Fish and Wildlife Service, California Department of Fish and Wildlife, Santa Cruz County Agricultural Commissioner, the Monterey County Agricultural Commissioner. The Central Coast Agricultural community must economically produce agricultural commodities while conforming to the regulations generated by these agencies. To create new restrictions on Central Coast agriculture, such as those proposed in Ag Order 3.0, will place the most ecologically compliant farmers in the country at an economic disadvantage while competing in national and global markets. To further restrict the use of pyrethroid and neonicotinoid insecticides by Central Coast growers will further hinder integrated pest management practices, create a reliance on older chemistries and limit the ability to respond to new pest and disease pressures. Please consider existing regulations and regulatory agencies related to the Monterey Bay Marine Sanctuary that provide environmental oversight to the Central Coast agricultural region before adding regulatory requirements with the new Ag Order 3.0.

Respectfully submitted



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