



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL OCEAN SERVICE
Monterey Bay National Marine Sanctuary
99 Pacific Street, Bldg 455a
Monterey, CA 93940

January 4, 2017

Central Coast Regional Water Quality Control Board
895 Aerovista Place, Suite 101
San Luis Obispo, CA 93401
ATTN : Mr. John Robertson, Executive Officer

SUBJ: Monterey Bay National Marine Sanctuary (MBNMS) support for and comments on proposed Order R3-2017-0002 Conditional Waiver of Waste Discharge Requirements for Discharges from Irrigated Lands

Dear Mr. Robertson:

On behalf of Monterey Bay National Marine Sanctuary (MBNMS), I support the proposed changes and commend your staff for the professional work and coordination regarding Order R3-2017-0002 (Order). Protecting public health and ensuring safe drinking water is among the highest priorities of this Order which prioritizes conditions to control nitrate loading to groundwater and impacts to public water systems. This Order also prioritizes conditions to address pesticides that are known sources of toxicity and sources of a number of impairments on the 2010 List of Impaired Waterbodies, specifically chlorpyrifos and diazinon. Twenty-two sites in the region, 13 of which are located in the lower Salinas/Tembladero watershed area, and the remainder in the lower Santa Maria area, have been toxic in 95% (215) of the 227 samples evaluated. We are supportive of the changes proposed to replace Order No. R3-2012-0011 which is due to expire on March 15, 2017.

Since 1999, MBNMS has been responsible for the coordination of the Agriculture Water Quality Alliance (AWQA) where partners have worked together to reduce the runoff of sediments, nutrients, and pesticides from agricultural and rural lands through education and outreach, technical and financial assistance, research and monitoring, permit streamlining, and watershed coordination. AWQA is a unique regional partnership that brings together farmers, ranchers, technical service providers, researchers and resource conservation agencies to protect water quality in MBNMS while maintaining the productivity of Central Coast farmlands through a voluntary stewardship approach. The AWQA collaborative approach is outlined in the "Agriculture and Rural Lands Action Plan" which was developed with broad stakeholder involvement and released in 1999.

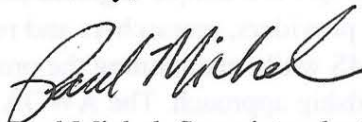
MBNMS is currently conducting a review and update of its Management Plan which includes the Agriculture and Rural Lands Action Plan. We are re-focusing the source-based water quality action plans to align better with sanctuary priorities and resources. One issue we plan to tackle is plastics in the ocean. We hope to better understand the primary sources of plastics in the ocean and their fate and transport as they relate to sanctuary resources.

At the Central Coast Water Board meeting on Thursday, December 9th, MBNMS staff commented that we have been working with partners to improve the Annual Compliance Form that growers are required to submit. The purpose of the electronic Annual Compliance Form (ACF) is to provide up-to-date information to the Central Coast Water Board to assist in the evaluation of the effect on water quality from agricultural waste discharges and evaluate progress towards compliance, including implementation of management practices, treatment or control measures, or changes in farming practices. We believe this section of the Ag Order is important because it requires growers or their representatives to consider and report on best management practices (BMPs) that can be beneficial in regard to reducing or eliminating pollution in runoff and to groundwater. With analysis, it could also allow technical service providers to see what practices growers are using regionally and how effective these practices are for improving water quality. Furthermore, it allows growers to report on the efforts they are making toward good stewardship of the land and water.

We requested the information from the ACF and conducted a preliminary analysis of the data, by BMP, for nutrients, pesticides and sediment. This analysis was presented to AWQA and the Grower Shipper Association Water Committee. It triggered a robust conversation among the partners as to the relevance, utility and representativeness of the results. We believe the findings have the potential to be very informative and useful for technical service providers and resource managers to more effectively promote best practices and quantitatively report on the level of effort in the watersheds to address water quality improvement. That said, we identified multiple instances where the content and the online form can and should be improved to ensure it is providing the most useful and accurate information possible. We believe the form should describe the practices growers are using and the most effective practices in the region for achieving WQ improvement, assessing their effectiveness and measuring the outcomes. We recommend the information (checkboxes on the form) be reviewed and upgraded; engaging researchers, technical service providers, agronomists and grower representatives in the process. In addition, the web-based interface should allow for intermittent saving of the form.

Thank you for the opportunity to comment on the proposed Order. We appreciate all that the Water Board is doing to improve water quality on the Central Coast. If you have any questions regarding our comments, please contact Pam Krone-Davis of my staff at (831) 647-4238.

Sincerely,



Paul Michel, Superintendent
Monterey Bay National Marine Sanctuary