

## Farmer Coalition Releases Alternate Water Quality Proposal

The Ag Waiver Working Group\* has been actively working on an alternative water quality plan to submit to the Regional Water Quality Control Board for more than eight months. We made a strategic decision to submit our proposal after we'd seen the staff proposal (released 11/19/10). Based upon the RWQCB staff final recommendations, consensus emerged that the agricultural coalition needed to strengthen our alternative by inserting a Coalition approach for high nitrate loading potential row crops and acreage with irrigated water runoff. In order to meet CEQA and public comment legal requirements, we are submitting this document today.

This is an attempt to submit a document that will do more to improve water quality than the staff proposal, while being practical for farmers.

We believe our approach is more effective and more practical than the staff proposal (see a list of major concerns with the staff proposal here). The basis of the proposal is to use a survey to determine what general practices farmers are using to improve surface water and ground water quality. That survey will be submitted to the regional board staff and the staff or an approved third-party auditor (grower's choice) will audit 20% of growers in the region within four years. All farmers, unless already in a state-approved sustainability program, will implement a nutrient management plan.

The Coalition will be formed to address crops with high nitrate loading potential and irrigated water runoff (with or without sediment). Growers with an acre of row crops with high nitrate loading potential are automatically in the Coalition, unless they decide to opt for on-farm reported monitoring or are a member of a state-approved sustainability program. Row Crops with High Nitrate Loading Potential include, but are not limited to: Crops in the Brassica family\*\* with high nitrate loading potential, Lettuce Cultivars\*\*\* with high nitrate loading potential, Artichokes, Beans, Beets, Celery, Corn, Cucumber, Daikon, Endive, Leek, Onion, Parsley, Peas, Pepper, Pumpkin, Potato, Radishes, Spinach, Squash (including Summer), Strawberries and Tomatoes.

Benchmarks in this alternate proposal were created to reduce organophosphate toxic units at current CMP sites (by 50% in 4 years); meet water quality objectives for diazinon and chlorpyrifos (within 8 years); Decrease sediment loads from current CMP sites by 20% (within 5 years); Decrease nitrate loads from current CMP sites by 10% (within 10 years).

This submission of a document on behalf of so many agricultural trade associations is the result of thousands of hours of hard work by many. Our next priority will be a technical and legal response to the staff proposal.

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\* The Ag Working Group presently is led by the California Farm Bureau Federation and includes the California Association of Nurseries and Garden Centers; California Artichoke Commission; California Avocado Commission; California Strawberry Commission; Central Coast Ag Water Quality Coalition; Central Coast Agricultural Task Force; Central Coast Vineyard Team; Central Coast Water Quality Preservation, Inc.; the Grower-Shipper Association of Central California; the Santa Barbara and San Luis Obispo Grower-Shipper Associations and Western Growers.

\*\*The Brassica family includes Kale, Cabbage, Broccoli, Cauliflower, Kai-lan (broccolini, a cross between broccoli & kai-lan), Brussels sprouts, Collard, Kohlrabi, Tender Green, Mustard Spinach, Chinese cabbage, Rapini (broccoli rabe), Turnip, Rutabag, Komatsuna, Abyssinian Mustard/Cabbage, Elongated Mustard, Mediterranean Cabbage, Indian Mustard, Brown and leaf mustards, Sarepta Mustard, Rapeseed, Canola, Nabicol, Broadbeaked Mustard, Black Mustard, Brown Mustard, Seventop Turnip, Asian Mustard.

\*\*\*Lettuce cultivars include butterhead, Chinese lettuce, crisphead (iceberg), looseleaf (leaf), romaine, and summer crisp. Spring mix is included in endive, brassica, lettuce cultivars and spinach.