



May 27, 2014

State Water Resources Control Board
Att: Jeanine Townsend, Clerk of the Board
1001 I Street, 24th Floor
Sacramento, CA 95814

VIA: E-mail

RE: Comments on Proposed General Order for Recycled Water Use

Dear Board Members:

Monterey County Farm Bureau represents family farmers and ranchers in the interest of protecting and promoting agriculture throughout our County. We strive to improve the ability of those engaged in production agriculture to provide a reliable supply of food and fiber through responsible stewardship of our local resources.

The groundwater basin of the Salinas Valley is utilized for municipal, irrigation, and environmental purposes; throughout the past seven decades, local agricultural producers have recognized the need to develop local water resources to manage groundwater recharge. This has led to the construction of two large reservoirs, a river diversion facility, and the use of recycled water, all intended to manage the groundwater basin ensuring continued use for irrigation purposes; indeed, through this resource management we support over 210,000 acres of irrigated crop production. Our county has a salt water intrusion problem that is slowing due to these facility and project investments, and while our problem is not completely solved yet, we are working diligently to equalize our groundwater basin.

Recycled (reclaimed) water is an important element of agricultural irrigation in Monterey County; through a system of pipelines covering an area of 12,000 acres, reclaimed water is delivered for crop production in the coastal zone of the Salinas Valley. This water comes directly from the regional water reclamation facility and is blended with fresh water from the Salinas River to manage salts to acceptable levels for vegetable and berry crops.

It should be noted that this system of reclaimed water is financed by the farms utilizing the reclaimed water; the user is paying for the benefit of the processing and delivery of this water. There are multiple benefits associated with the use of this reclaimed water:

- Farm wells impacted by salt water intrusion into the Salinas River Groundwater Basin are curtailed from use, relieving groundwater imbalance in the coastal zone
- Waste water from Monterey Peninsula cities is processed at one central point, rather than multiple, duplicative facilities, enabling cost efficiencies of scale
- Water normally discharged to the ocean is utilized for food production



Currently, all water reclaimed through the processing facility is utilized by agriculture for irrigation purposes. Future plans include utilizing additional sources of tertiary water to expand the acreage utilizing reclaimed water, as well as a possible groundwater recharge project. Our challenge is finding enough source water to sustain all the various components of this project at the same time. Continued conservation by Monterey Peninsula residents and businesses has yielded the lowest per-capita use of water in California; this, in turn, presents a challenge when allocating reclaimed water that depends on a certain flow of tertiary water.

Monterey County is proud of this project and the ability to maximize the use of water over many different beneficial uses. Indeed, utilizing reclaimed water for production of crops enhances our ability to manage the imbalance in our groundwater basin while maintaining valuable farmland in nearly year-round production.

Monterey County Farm Bureau favors a general order that encourages recycled water for the beneficial use of agricultural productions; this use should not be limited by additional regulatory requirements beyond the current practices already in place.

We have specific comments about the Antidegradation Analysis related to item 24 in the proposed general order:

- Under section 24.a.ii., application of recycled water is proposed to be limited to 'agronomic rates' presumably to limit the amount of percolation to the groundwater basin. Using our reclaimed water project as the example here on farms that are producing a variety of crops annually, our concern is that an agronomic rate of water application would require an expert opinion based on review of crop planted, soil components, climate and time of year, and other variables. This could lead to an expensive process if growers are placed in a position of justifying their specific water use on each crop, keeping in mind that we often have three cycles of leafy greens grown during a year, this could become an expensive requirement. We would suggest that this requirement be modified to reflect a best management practice of adequate water use sufficient to maintain proper crop growth, rather than a specific standard requirement.
- Under section 24.a.iii., waste water is to be controlled to prevent significant runoff from application areas ... something that is already a requirement of our Regional Water Board Agricultural Order. This appears to be a duplicative effort to control waste water runoff and impose additional areas of regulatory oversight that could be abused through nuisance lawsuits and unnecessary regulatory oversight. We would suggest language that provides guidance from regional Agricultural Order requirements rather than a one-size-fits-all requirement.
- Under Section 24.b.ii., airborne spray of recycled water is proposed to be controlled, but not specifically stated as to how this will be accomplished. Agriculture takes place in the environment and is subject to local weather conditions, including breezes. Using our reclaimed water project as the example, water is distributed over 12,000 acres utilizing many different methods of irrigation. Our primary use is micro irrigation, but some crops still require the use of sprinkler irrigation for field preparation; in these instances, a breeze could carry water a short distance. As a rule, reclaimed water quality is generally better than the other types of irrigation water utilized in this area and would not pose any additional risk if drift were to occur. There is no science to



support any risk associated with recycled water drift on either agricultural fields or urban settings. We find this proposed requirement to be unnecessary.

- Under Section 24.b.iii, saturated soil is not conducive to growing high-quality crops and would not be a likely situation where additional irrigation would occur. Farmers are smart enough to know that saturated lands do not need additional water applied; we have demonstrated this repeatedly during periods of rainfall here where reclaimed water is utilized. Simply stated, irrigation stops when rainfall happens. We find this requirement only states the obvious, and while we have no objection to the requirement, the likelihood of this occurring is nil and only serves to insult the farmers who must manage their crops for the best market quality at harvest.
- Under Section 24.c., in general, existing reclaimed water projects should not be subject to any new engineering reports or qualification factors. These projects have already been certified and are currently operating within the regulatory boundaries established for these types of system. We urge that existing projects be specifically exempted from further engineering, permitting, or regulatory reporting requirements.

To summarize, we support the use of recycled water for irrigation purposes and the beneficial use of agricultural production. Monterey County has been successfully doing so for several years and additional burdens for regulatory compliance would prove to be expensive and unnecessary.

We urge that recognition be provided to regions where recycled water is already in use for this beneficial use.

Thank you for the opportunity to comment on the proposed general order.

Sincerely,



Norman C. Groot
Executive Director