



SHANDON-SAN JUAN WATER DISTRICT SHANDON-SAN JUAN GSA

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February 24, 2021

Chairman Jean-Pierre Wolff
Central Coast Regional Water Quality Board
895 Aerovista Place, Ste. 101
San Luis, Obispo, CA 93401-7906

Subject: Comments on the Draft Ag Order 4.0 Suggestions for the Final Draft

Dear Chairman Wolff and Members of the Board,

The SSJ GSA are participants and supporters of the Ag Partners and agree strongly with their comments. Of especial importance is the idea of a third-party pathway that allows farmers, researchers and their staff to grow adaptively over time to expand their understanding, capabilities and capacities to manage their farm ecosystems in a truly sustainable fashion. This is the vision of the State Board. I have seen good results coming from the groups working in the Central Valley.

The EIR is integral to the Order. It is unconscionable to not allow written comments and a hearing from your Board that includes a response to our written comments.

The effectiveness of the Final Order will be greatly enhanced if your Board were to address organization and understandability. The final regulations should be comprehensible. It was clear in each day of your lengthy hearings that Board Members had difficulty following along with the Staff. And the Staff did not take you through the whole set of documents in a fashion to emulate what farmers will be facing under this Order. The proliferation of acronyms is not useful. It is a symptom of the overly complex opaque approach taken by Staff. Plain language in a simple straight forward Regulation will produce far more positive results than the likely outcome of the current effort. At the end of the day this Order is aimed at helping farmers produce healthy crops in a fashion that sustainably protects the environment.

Thank you for considering the input of the Shandon-San Juan GSA.

Sincerely,

Willy Cunha
President of the Board of Directors
Shandon-San Juan GSA