



Ms. Courtney Tyler
Clerk of the Board
State Water Resources Control Board
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August 7, 2023

<Submitted electronically to commentletters@waterboards.ca.gov>

RE: 9/19/23 BOARD MEETING: COMMENTS ON A-2751(A-B) PROPOSED ORDER

Dear Chair Esquivel and Members of the State Water Resources Control Board (“State Water Board”):

Californians for Pesticide Reform and Safe Ag Safe Schools appreciate this opportunity to comment on A-2751(a-b) Proposed Order (“Proposed Order”) on the Central Coast Regional Water Quality Control Board (“Central Coast Water Board”)’s 2021 Central Coast Agricultural Order (“Ag 4.0”). Safe Ag Safe Schools is the Monterey Bay regional branch of the 200-plus organization network of Californians for Pesticide Reform. Our mission is to protect public health, improve environmental quality and support a sustainable and just agricultural system by building a diverse movement across California to change statewide and local pesticide policies and practices. **We write to urge the State Water Board to maintain Ag 4.0’s discount factors that incentivize the use of compost & organic fertilizers and are therefore critical to support organic agriculture in the Central Coast region.**

The Proposed Order directs the Central Coast Water Board to remove discount factors available for the application of compost and organic fertilizers. Unfortunately, the elimination of discount factors would provide the perverse incentive for growers to continue using or revert to using synthetic fertilizers and pesticides, which could result in an increase in nitrate and pesticides in the Central Coast region’s waters—in violation of Ag 4.0’s objectives.

Ag 4.0’s primary objectives include minimizing nitrate and pesticide contamination in the Central Coast’s waters.¹ Since organic agricultural practices generally use far fewer highly hazardous chemical pesticides,² the Central Coast Water Board’s inclusion of discount factors

¹ Ag 4.0 at 2, para. 5a.

² “The [California Pesticide Use Report] data ... confirm the existence of stark differences between organic and conventional growers in their approach to pest management. Overall, organic growers use low-toxicity pesticides and fewer pesticides per hectare of crop planted and, for the crops evaluated, they are far less dependent on

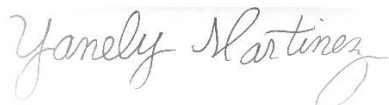
for compost and organic fertilizers would incentivize organic agricultural practices and therefore the reduction of pesticide use and discharge. Conversely, eliminating these discount factors would increase nitrate and pesticide use and discharge, and thus undermine the objectives of Ag 4.0.

The Proposed Order argues that these discount factors will “artificially reduce” A values and result in lower A/R ratio and A-R difference values than are required to be calculated under the ESJ Order.³ However, Ag 4.0’s discount factors are well-supported in the Order. The use of compost increases soil water and nutrient retention and improves soil bacteria, crop, and overall ecosystem health.⁴ The use of select organic fertilizers also supports crop production and soil improvement.⁵

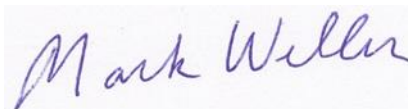
The Board must also consider the impacts of its decision on the costs of organic growing. Since organic fertilizers are generally more expensive than synthetic fertilizers, the discount factors provide an important incentive for growers to switch from using synthetic to organic fertilizers.⁶ The elimination of these incentives could result in growers’ continuing or switching back to conventional growing using synthetic fertilizers, which could increase the price of organic fertilizers and further increase the cost of organic growing. Ultimately, if the Board’s proposal were adopted, it could have far-reaching market impacts and ultimately push organic growing out of existence in the Central Coast region.

We request that the State Water Board maintain Ag 4.0’s nitrogen application discount factors for organic fertilizers and compost to support organic growing and sustainable farming practices that are essential for water quality protection, soil health, and the well-being of all Californians. Thank you for your consideration of our comments.

Sincerely,



Yanely Martinez
Organizer, Safe Ag Safe Schools



Mark Weller
Campaign Director, Californians for Pesticide Reform

herbicides, insecticides, and fumigants than conventional growers.” Organic Farming Lessens Reliance on Pesticides and Promotes Public Health by Lowering Dietary Risks, *Agronomy* 2021, 11(7), 1266; <https://doi.org/10.3390/agronomy11071266>.

³ Draft Order at 11. *See also* Draft Order at 13.

⁴ Ag 4.0 Attachment A at 151-152.

⁵ Ag 4.0 Attachment A at 152-153.

⁶ “Even if they are raised on the farm, organic fertilizers usually are more expensive than chemical fertilizers,” Allen V. Barker, *Science and Technology of Organic Farming*, CRC Press, 2021.