

**Condensed Talking Points for State Water Board Workshop
May 17, 2016**

Suggestion to Growers:

If you plan to speak at the State Water Board workshop, we encourage you to use the talking points below but put them in your own words and relay your own experiences as a grower.

Below are the three key issues:

1) Public Availability of Individual Grower Information

- Posting farm practices and nitrogen use information on a public website offers no advantages for protecting or improving groundwater quality.
- Requiring coalitions to post grower's private information on a public website removes an important incentive to participate in a coalition, likely leading to many growers dropping out of their local coalition or refusing to submit data for fear of mischievous use of the information by advocacy groups or other private entities.
- The existing program already enables the Regional Water Board to review and audit the township level data when it deems it necessary and appropriate. Hence releasing data to the public does not improve transparency or accountability.
- Direct submission of data creates the real potential that data quality could be lacking. Current data compilations and analysis by coalitions have a quality control benefit that assures accuracy.
- Direct reporting of data creates an enormous burden on the Regional Water Board staff, with most of the data likely never reviewed because of the vast volume and quantity of individual reports.

2) Requiring Nitrate Sampling of All Domestic Wells on lands covered by the Irrigated Lands Program

- This requirement does not belong in the Irrigated Lands Program, which is focused on protecting water quality as it relates to farming practices.
- Domestic well sampling should be a landowner/tenant issue best handled privately between them.
- Many growers lease land and do not have access to residences located on farm properties.
- Residences with wells on farm properties are a small fraction of rural domestic wells and requiring only farmers to do this is not equitable to solve the problem.
- A requirement to sample rural domestic wells is best administered by county health departments which have access to all property owners who have domestic wells on their property.

3) Requiring Growers to Calculate A/R (A over R) and A-R (A minus R)

- Determining nitrogen removal by crops is an emerging science and is best left to coalitions to calculate for growers upon receipt of A/Y information.
- The existing requirement of reporting A/Y (applied N over yield) is far more straightforward for growers to calculate and will lead to more accurate information submitted to the coalitions.
- There is far more chance for errors with growers reporting the A/R and A-R.