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THOMAS S. VIRSIK

Via email: mjholman@calpoly.edu

June 6, 2014

Charles M. Burt, Ph.D.
Irrigation Training & Research Center
1 Grand Avenue
California Polytechnic State University
San Luis Obispo, CA 93407-0730

Re: Agricultural Nitrate Control – Expert Panel
Public comment for June 9, 2014

Dear Dr. Burt:

This letter is being submitted in connection with the "Reporting" heading of the charge to the Panel, primarily Question 13. That Question as presently phrased asks the Panel to opine about a narrow duality, *i.e.*, one "versus" the other. As some other comments have noted, the complete charge to the Panel, however, asks the panel to apply its expertise not only to the specific Questions, but also to many other issues implicated in WQ 2013-0101, including monitoring. See Comments submitted by KMI (first page), May 14 2014.

During the hearings and consideration by the Central Coast Regional Water Quality Control Board, this office vigorously emphasized as a goal the consistency of data collected and especially reported, offering practical suggestions on accomplishing that goal. See enclosed letters of August 31, 2011 and March 13, 2012. We are also bringing to the Panel's attention a more recent comment by Dr. Peter Reinelt, the Chair of the Department of Economics at the State University of New York in Fredonia, dated February 26, 2014. As that comment reflects, Dr. Reinelt has devoted a substantial amount of his professional efforts to economic analysis of agricultural and most especially water driven dynamics in California. Dr. Reinelt's comment challenges the economic rationality of wholesale data protection, especially in the current Drought Era.

This public comment will not attempt to summarize all content of the three enclosures, which stand on their own. The purpose of this comment is to warn against creating unique, complicated, non-public, and potentially contradictory reporting systems that stifle real progress on the underlying issues for the practical and policy reasons articulated in the three enclosures.

Very truly yours,



Thomas S. Virsik

Encl.

August 31, 2011 Letter to Jeffrey S. Young

March 13, 2012 letter to Jeffrey S. Young

February 26, 2014 comment by Dr. Peter Reinelt