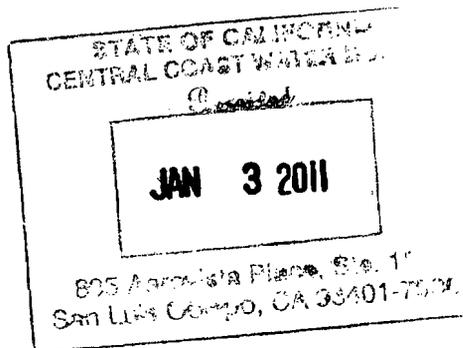


Huntington Farms

December 27, 2010

Re: Proposed Ag Order

Central Coast Regional Water Quality Control Board
Att: Jeffrey Young, Chairman of the Board
895 Aeovista Place, Suite 101
San Luis Obispo, CA 93401



Dear Chairman Young,

I am writing to you on behalf of Huntington Farms, a family run farming operation in the Salinas Valley. I would like to voice my concern with the Central Coast Regional Water Quality Control Board's proposed Ag Order. It is disappointing to have witnessed a process that has been so hostile towards Agriculture when California's income and success rests on the success of Agriculture in this State. It is clear that these proposed rules are completely unrealistic, unworkable, and burdensome for the agricultural industry. I believe that these new rules would add major costs to all agricultural operations without benefiting water quality.

Huntington Farms has been farming vegetables for three generations. We have a vested interest in maintaining a sustainable operation in this valley that we can continue to pass to subsequent generations. The health of the land we farm, the water we use, and the environment that we live and work in has always been a priority in our company and family, as well as the farming community as a whole. We employ over 1,000 people in the Salinas Valley. It is important for us as a company, as well as the community, that farming continues to be viable. If the proposed Ag Order is adopted as it is currently written many productive farm acres will be lost along the central coast and growers will be forced to change practices and spend money on monitoring and reporting that will have no impact on improving water quality. This will equate to a loss of yield, revenue, and eventually a loss of jobs in our Central Coast communities.

To protect water quality Huntington Farms currently utilizes cover crops, drip irrigation, and laser leveling to reduce irrigation and storm water runoff. We have 7.5 miles of farm land around the river that would require buffers if the proposed Ag Order was adopted. This would interfere with our food safety practices and our ability to grow leafy green vegetables and take valuable farm acres out of production.

We feel that the Tier system proposed in the Ag Order is a farce. Almost all growers who farm on the Central Coast would fall into Tier 3. To portray the tier system otherwise is a sham since the majority of farms on the Central Coast grow vegetables and/or strawberries. Many of the Tier 3 requirements are out of touch with reality. Retention ponds have historically been engineered so that water can percolate out of them. How does the staff expect a grower to hold water indefinitely in a pond? In Monterey County we already have strict requirements regarding practices along the Salinas River. It is over kill to require a grower to do more than they are already doing to comply with Fish and Game regulations already in place.

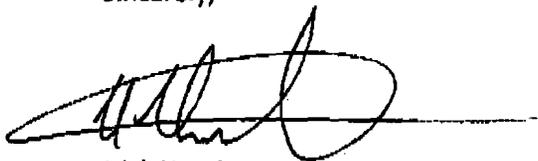
P.O. Box 398
Soledad, CA 93960

Huntington Farms is in strong support of the Ag Alternative Draft Waiver submitted on December 3, 2010. We believe that to truly improve water quality we must work with researchers and the UC Davis Agricultural Cooperative Extension to utilize the newest technologies. It is with science and research that we will best be able to find practices that work to improve water quality without harming the viability of Agriculture.

I urge the Board to listen to growers' feedback and suggestions, including mine, and incorporate that feedback into the draft Ag Order. Any future Ag Order must be designed with achievable objectives and must be a transparent and collaborative process that utilizes agricultural stakeholders. Loss of grower cooperation will be counterproductive to improving water quality.

Thank you for considering my views.

Sincerely,

A handwritten signature in black ink, appearing to read "Nick Huntington", written over a horizontal line.

Nick Huntington
President

Cc: Vice Chairman Russell Jeffries
John Hayashi
David Hodgkin
Monica Hunter
Tom O'Malley
Gary Shallcross
Roger Briggs, Executive Officer
Angela Schroeter, Senior EG
Lisa Horowitz McCann, Environmental Program Manager
Howard Kolb, Agriculture Order Project Lead Staff