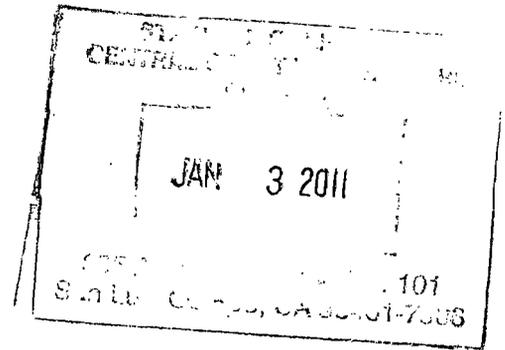


December 30, 2010

CA Regional Water Quality Control Board
Central Coast Region
895 Aerovista Place, Ste 101
San Luis Obispo, CA 93401



Dear Mr. Young,

SUBJECT: Comments regarding draft Ag Order R3-2011-0006

As a small wine grape grower in the Paso Robles AVA, I write to express my concerns regarding the requirements of the subject draft order.

First, I would like to express my thoughts on the process that has brought us to this point: Having watched this draft order evolve over the past several months, it is apparent that your staff is intent on developing an adversarial climate with a program that will treat farmers (tax payers) as "The enemy". The entire tone of this draft order reeks of distrust and threat. If you (who are directly responsible for staff's attitude and behavior) allow this climate to persist, you will likely "Reap that which you sow"—years of push-back or, at best, reluctant cooperation. I urge the board to take charge of this process and redirect the attitude of staff towards a more cooperative tone.

Now some specific comments concerning the draft order:

I am a small (42 acres planted) operator, use drip irrigation and deficit irrigate the vines, monitor soil moisture (electronically) for irrigation decisions, have no irrigation water run-off, do not use listed pesticides and am more than one mile from the nearest water body. Given that, can you logically explain to me why I should be required to (for example):

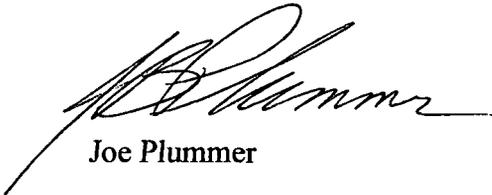
- Initiate receiving water quality monitoring
- Sample groundwater wells
- Monitor/report groundwater depth, etc.

Clearly, my operation fits staff's definition of "Tier 1" and represents minimal risk to impaired water bodies. However, staff's current version of "requirements" penalizes me by "requiring" that I do things that will clearly cost me money and time while doing nothing to reduce contamination of the improved waterways. How can you justify requiring that I analyze my well water (I drink the water) when none leaves the property? How can you justify requiring that I measure depth to groundwater? What does this have to do with your goal of protecting surface water bodies? What qualifications will be

required of the person(s) doing the sampling/measurement? And, finally, what are you going to do with all this data? Who will review it and to what end?

In short, most of the “requirements” for my operation appears to be punitive aimed at “controlling” operations, costing money while adding no value to your stated objective of protecting impaired water bodies. I would ask the Board to instruct staff to justify each of these, and other, “requirements” by developing a “cost” (time and out-of-pocket expenditure) for each requirement as well as a clear statement of the value/benefit of each requirement (specifically what will the data be used for). Once this is completed, I’m sure you will agree the folly of the proposed program and we can begin working, collaboratively, towards a cost-effective program that is solely focused on improving water quality, not controlling farmers.

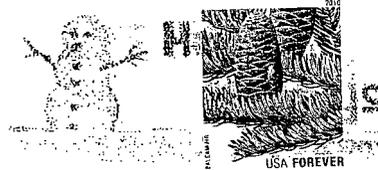
Sincerely,

A handwritten signature in black ink, appearing to read 'Joe Plummer', with a long, sweeping underline that extends to the left and then curves back under the name.

Joe Plummer

Joe Plummer
1990 Wellsona Road
Paso Robles, CA 93446-8533

SANTA CLARITA
CA 913
31 DEC 2010 PM 2 T



Attn: Mr. Young
CA Regional Water Quality Control Board
Central Coast Region
895 Aerovista Place, Ste 101
San Luis Obispo, CA 93401

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