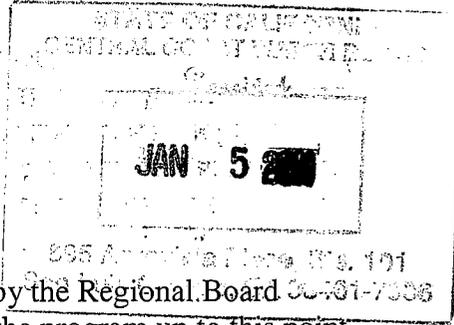


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December 30, 2019

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Central Coast Regional Water Quality Control Board
Jeffery Young, Board Chair
895 Aerovista Place, Suite 101
San Luis Obispo, Ca. 93401-7906



Sir:

I have been following the new proposals for the Ag Waiver by the Regional Board (CCRWQCB), attending meetings, and have participated in the program up to this point in time. While I do not claim to know every detail of every part of this proposal the parts that I do see are interesting to say the least. Let's not discuss the cost for the moment but focus on the expectations and execution.

The plan that was set in place five years ago seems like it is doing what it was intended to do. The monitoring system is in place, education has helped the growers to identify areas of improvement and some results have been achieved. Now we find ourselves in a position where, without regard for current improvements and efforts, we will have to add a considerable amount of time and effort to more regulatory issues, but we are not sure these "improvements" will work. It reminds me of the new diesel regulations: The new order will take many acres of productive ground out of agriculture, monitor activities on a micromanagement level, and were produced with the idea that there is a belief that agricultural activities are responsible for all that ails the Central Coast. Instead we should be continuing our current activities, with an eye for improvement.

In the Board's zeal to adopt their mission exactly to letter of a flawed policy, they have not introduced any common sense into the equation. Discharging water into your neighbor's property, letting it run down the gutter or just using too much is costly to the growers. The growers have no incentive to maintain practices such as these but the regulations are aimed at eliminating these practices. Not only is a tier system cumbersome, it was written so that everyone will qualify for the next level, so it will require more monitoring but results (?).

Please consider the plan proposed by the Six County Coalition. Extensive Industry experience, stewardship of the land and water, and the people who will have to implement the processes have put together a program that can succeed in accomplishing what the Board' mission says, without, now the drum roll for the cost, adding multiple layers of regulators who are regulating the same issues, onerous reporting on an individual basis, and spending unnecessary funds on projects that will not produce results but create more regulation. That is the plan that I support and will achieve the objectives.

Regards,

Michael Manfre
R. Michael Manfre
Partner

