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January 2, 2011

Chairman Jeffrey Young
Central Coast Regional Water Quality Control Board
895 Aerovista Place, Suite 101
San Luis Obispo, CA 93401-7906

Dear Chairman Young,

I am writing this letter to you to express my deep concerns regarding the "New" Staff proposed Region 3 Agricultural Discharge Waiver and my support for the Agricultural Alternative Proposal that the Regional Water Quality Control Board will be reviewing over the upcoming months.

The Staff proposal is a "tiered" approach that is intended to focus on areas with the highest impact to water quality. In reality the proposed tiering system uses qualifiers to assess and rank the level of risk. Two of the three qualifiers have no bases in science, topography, hydrology, pedology and geography. For example, a qualifier of 1000 acres or more is arbitrary and has no scientific basis. This qualifier does nothing to impede or improve water quality. Furthermore, the Staff proposal is regulatory and administratively burdensome and will waste money on excessive paper work rather than on improving water quality.

The Agricultural Alternative Proposal is a "coalition" approach with farmers, landowners, and scientists, from public and private industries working collectively to solve water quality problems that are unique to every watershed. Audits and penalties ensure compliance and participation. Dollars will be spent on improving water quality not paper work. The Agricultural Proposal also includes elements for pilot water improvement projects to better understand, implement, and treat water impairment.

Agriculture in California is an extremely unique, diverse, and competitive industry. We have a successful history of overcoming challenges creatively. The Agricultural Alternative Proposal is our industry's answer to improving water quality, and remaining a viable industry for generations to come. It is for these reasons and many more that I strongly urge the Regional Water Quality Control Board to adopt the Agricultural Alternative Proposal.

Thank you for your time and consideration.

Respectfully,

Michael R. Scattini
Partner
LUIS A. SCATTINI & SONS, LP