

**HEARST** corporation

**Via Federal Express**

December 30, 2010

Ms. Angela Schroeter,  
Agricultural Regulatory Program Manager  
Regional Water Quality Control Board  
895 Aerovista Place, Suite 101  
San Luis Obispo, CA 93401

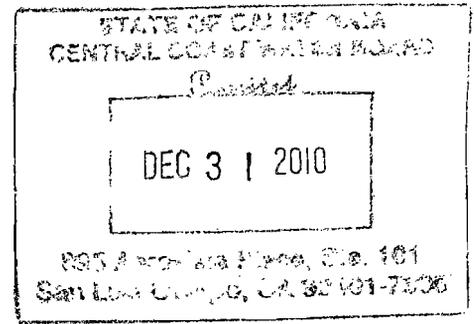
**Re: Draft Order No. R3-2011-0006  
Conditional Waiver of Waste Discharge Requirements for Discharges from  
Irrigated Lands**

Dear Ms. Schroeter,

Hearst Corporation ("Hearst") would like to take this opportunity to provide brief additional comment on the Regional Water Quality Control Board staff's ("RWQCB") latest draft of Order No. R3-2011-006 regarding waivers for irrigated agricultural dischargers (hereinafter "Waiver").

First, we would like to commend the RWQCB for its commitment to preserving and enhancing the quality of water within the central coast region. This is both an important and difficult task and we believe that the RWQCB's success is dependent upon balancing the Waiver's substantive ability to mitigate the targeted agricultural discharges with its functionality and acceptance by the various agricultural operations on the central coast.

In reviewing the numerous correspondences submitted to the RWQCB in this matter, there is still a well-grounded consensus that the proposed Waiver is not a practicable or workable solution for the region's varied water quality problems. Rather than repeat and reiterate what we have already said and what has already been submitted into the record, please allow this letter to serve as acknowledgment of Hearst's support for the positions taken by the various Waiver opponents, most notably the comments set forth by the San Luis Obispo County Farm Bureau, Cattleman's Association and California Avocado Commission. Please note however, that our reference to these agencies in no way excludes our support for the dozens of other small family farms and other agencies that have also expressed meaningful opposition to the Waiver's approach to regulating agricultural discharges, particularly those comments expressing the need for some form of reasonable exemption for "low threat" agriculture operations.



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Again, as a relatively small irrigated agricultural operator (approximately 6 acres of avocados on the San Simeon Ranch and 145 acres of alfalfa on the Jack Ranch, which combined is a very small percentage of the approximately 150,000 acres of both ranches), Hearst is concerned that the proposed extensive management and monitoring requirements of the Waiver, even at the Tier 1 level, will render our avocado and alfalfa operation an unprofitable enterprise and prevent Hearst from expanding its operations in the future. Like many other farmers in the community, we implement all applicable best management practices for our operations and strive to provide the market with excellent quality locally grown commodities with the least possible environmental degradation. Our operations are virtually nitrate free and we believe more consideration is absolutely necessary in order to exempt or at least substantially reduce the proposed costly regulating requirements for such low impact farming operations.

We hope that the RWQCB will consider the concerns of our farming community with all due earnestness, and develop a plan that will achieve its water quality objectives in a practical and feasible manner.

Please call if you have any questions or comments.

Sincerely Yours,  
Hearst Corporation

A handwritten signature in black ink, appearing to read 'Marty Cepkauskas', with a long horizontal line extending to the right.

Marty Cepkauskas,  
Director of Real Estate, Western Properties

cc: Cliff Garrison, Ranch Manager, Hearst Corporation  
Richard Gonzales, San Luis Obispo County Farm Bureau  
Aaron Lazanoff, San Luis Obispo County Cattlemen's Association  
Tom Bellamore, California Avocado Commission  
Timothy J. Carmel, Carmel & Naccasha LLP