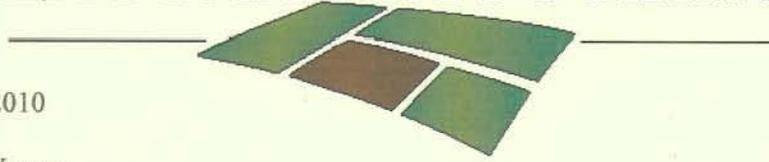


LAGUNA MIST FARMS



December 29, 2010

Mr. Jeffrey S. Young
Board Chair
California Regional Water Quality Control Board
Central Coast Region
895 Aerovista Place, Suite 101
San Luis Obispo, California 93401

Dear Chairman Young,

I am writing to make comments on the new Region 3 discharge waiver that The Regional Water Quality Control Board will be discussing over the next several months. I am General Manager of Laguna Mist Farms, we farms approximately 1300 acres of vegetable crops on several ranches between Salinas and Gonzales in the Salinas Valley.

After reading the Regional Board Staff's "Recommendations for Water Code Waiver for Agricultural Discharges, and all the supporting materials" we were completely overwhelmed with the regulation that the Regional Board is preparing to burden us with. The tiered structure of the staff's proposal is most concerning. The acreage number of 1,000 acres and 1,000 feet, growing certain crops and using certain pesticides, to be thrust into tier 3 is purely arbitrary and has no scientific foundation. We farm properties that are not adjacent to impacted waterways yet are still apart of the acreage equation. For example, we farm properties that have high levees bordering between ourselves and an impacted waterway, and there is no way that waters from our ranches reach the water way.

Laguna Mist Farms supports Agriculture's Alternative Discharge Proposal. We believe that the Agriculture's alternative waiver will achieve the goals on water quality faster for the following reasons: 1. It takes all dischargers – no matter how large or small the acreage component and holds them accountable; 2. Growers will be audited for compliance; 3. Growers can elect to participate in the CMP or do individual monitoring, but every grower will have to participate; 4. With a grower group coalition as the auditing entity, all growers will have to participate, or face penalties by the Regional Board; and 5. Given the complexity of soils, crop diversity in the Region, and the Regional Board's lack of ability to do follow up visits and audits, the Grower based coalition will make more progress towards reducing discharge issues than the Regional Board's staff's proposal.

Laguna Mist Farms grows fresh vegetables for Ocean Mist Farms. We support the comments on the Staff draft waiver submitted on behalf of Ocean Mist Farms and RC Farms by attorney William Thomas of Best, Best, and Krieger LLP. Thank you for allowing us to comment on this very important issue.

Sincerely,

A handwritten signature in black ink, appearing to read "Paul Scheid". The signature is fluid and cursive, with a large initial "P" and a long horizontal stroke at the end.

Paul Scheid
General Manager
Laguna Mist Farms