



December 21, 2010

**California Regional Water Quality Control Board
Central Coast Region
895 Aerovista Place, Suite #101
San Luis Obispo, CA 93401**

Dear, Central Coast Regional Water Quality Control Board (CCRWQCB) Members & Staff:

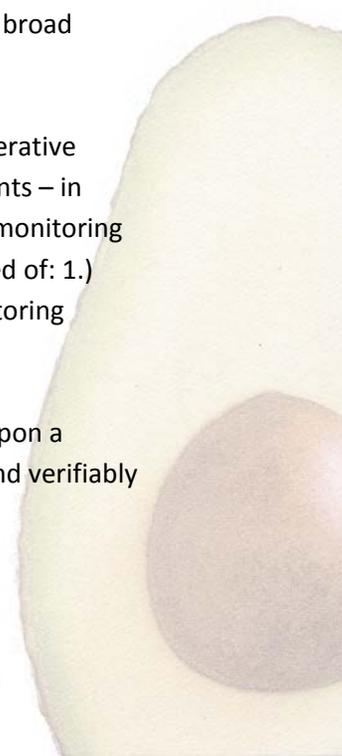
The California Avocado Commission (CAC) wants to commend CCRWQCB Staff on the tiering approach utilized in the updated Draft Conditional Waiver of Waste Discharge Requirements for Discharges from Irrigated Lands (released November 19, 2010). The concept indicates marked progress in establishing regulations that collaboratively improve Central Coast water quality; an objective shared by the Water Board and avocado growers, alike.

In the interest of advancing Central Coast water quality and a mutually beneficial relationship, as staff further revises regulations within the existing Draft Conditional Waiver, the CAC respectfully, and strongly, requests the Water Board and Staff consider the minimal surfacewater impairment generated by Central Coast avocado growers. The avocado crop's inherent nature and efficient irrigation and fertilization practices combine to essentially produce no tailwater discharge. In addition, avocado groves contribute a low degree of stormwater runoff – if any – to Central Coast watershed pollution.

The Central Coast avocado growers wish to continue strengthening surface and sub-surface water quality, as well as enhancing regulatory efficiencies required to accomplish such. Furthermore, avocado growers are committed to verifiably demonstrating – and subsequently improving – their role in Central Coast watershed impairment. Therefore, the CAC respectfully proposes the Draft Conditional Waiver's monitoring requirements reflect avocados' low-discharge risk and quantity, as opposed to a broad threshold attached to operational size and location.

More specifically, the CAC is respectfully requesting avocado growers be exempt from cooperative surfacewater monitoring, only undergoing cooperative monitoring – during stormwater events – in monitoring sites receiving avocado runoff. Additionally, avocado growers should only incur monitoring expenses for discharges, in which they bear responsibility (i.e. – a pricing structure comprised of: 1.) solely watershed monitoring sites that collect avocado drainage 2.) solely stormwater-monitoring charges).

In moving forward, the CAC wants to underscore the aforementioned proposal is founded upon a sincere and long-term commitment, from Central Coast avocado growers, to productively and verifiably improve water quality, through an efficient regulatory system.





Thank you very much for your time and consideration in this important matter. To further discuss the Draft Conditional Waiver and points raised in this letter, the California Avocado Commission also is formally requesting a meeting, with Water Board Staff, following January 3, 2011. Angie Hanson, CAC communications manager, will contact you then, regarding a possible meeting date. The CAC deeply appreciates the existing collaboration between itself and the Water Board, as both entities assume greater accountability in improving water quality for the benefits of the State. Please do not hesitate to contact myself with questions and comments.

Sincerely,

A handwritten signature in black ink that reads "Thomas A Bellamore".

Tom Bellamore
President
California Avocado Commission

