

Pulver, Barry@Waterboards

From: R.Mina <rami.mina@gmail.com>
Sent: Monday, June 27, 2016 4:24 PM
To: Pulver, Barry@Waterboards
Subject: Proposed WDR's

Barry:

Thanks for taking the time and effort to rewrite the proposed waste discharge regulations. As mentioned in our last phone conversation, I have major concerns related to the viability of small avocado groves in the southern California area if we are bound by the proposed WDRs. This email documents the reasons.

In terms of the specifics of the latest proposed WDRs, small growers would have been glad to comply with the "individual" regulations if the fees were waived. Coalition member annual charges are lower than the annual fees for individuals, hence based on cost and extra responsibility, why would anyone choose the individual option?

It seems to me your goal is to improve the quality of our watersheds rather than collect fees. In fact, the federal government is assisting us financially by allowing generous write-offs and subsidising expenses such as crop insurance and others. Thus one government agency is attempting to reduce our financial burden while another is increasing it, without water quality improvement.

As you know from our grove data I previously shared with you, my situation is fairly typical of many small growers in the area. Highlights follow:

- In the 10 years our 5 acre grove has been in operation, we had one year of profits and 9 years of losses. Even if tax write-offs are considered, we annually experience net losses of ~\$3600.*
- We must use good agricultural practices. i.e apply the optimum amount of fertilisers and water to reduce cost and minimise waste which also results in decreased contamination of surrounding watersheds*
- water and labor costs are increasing, while avocado prices are decreasing due to south American imports.*

I and many of my fellow small avocado growers are seriously considering turning our water off and exiting the business. Many of our northern SD region have already done so because their water cost is significantly higher than ours. Grove managers and growers are worried that this may be the proverbial straw that broke the camels back.

If the proposed WDRs are approved as proposed, I personally cannot comply and my only alternative will be to exit the business. I'm sure many of my fellow growers will be doing the same if they have not already done so. It would be a shame if our beautiful green Southern California region is converted into brown brush.

Respectfully,

*Rami Mina
951-699 1799*