



# ABIRC | Asian Business Institute & Resource Center

Serving Asian Businesses in the Central Valley

Ms. Jeanine Townsend  
Clerk to the Board  
State Water Resources Control Board  
1011 I Street, 24<sup>th</sup> Floor  
P.O. Box 100  
Sacramento, CA 95812-0100  
commentletters@waterboards.ca.gov



December 19, 2017

Re: Comments to A-2239(a)-(c)

Dear Ms. Townsend and Members of the State Water Resources Control Board,

I am writing to submit comments on the Waste Discharge Requirements General Order No. R5-2012-0116 for Growers Within the Eastern San Joaquin River Watershed that are Members of the Third-Party Group, Agricultural Order SWRCB/OCC Files A-2239(a)-(c).

Asian Business Institute & Resource Center (ABIRC) has been serving the Asian business community in the Central Valley region for over 9 years, including our small Southeast (SE) Asian farmers. Many of these businesses comprised of individuals who are from immigrant, refugee, and socially disadvantaged backgrounds. They are mainly individuals who speaks limited or no English. SE Asian farmers often do not own their own farming land and are considered small-scale farmers. As part of their narrative, they have grown diverse specialty crops to sell at markets and to have for their family.

Today, our SE Asian farmer are faced with many challenges. Some challenges include representation, cultural, and language barriers. We seek to find ways to best include our SE Asian community as part of the on-going conversations involving changes in policy that reflects their needs. Additional regulations on small farms would only hinder their ability to provide for their family and our economy.

I strongly support the proposal from the University of California Cooperative Extension small farms advisors to implement an alternative certification process for these types of farms. I encourage State Water Resources Control Board to consider the recommendations made.

Thank you for your consideration of these comments. I hope that the State Water Resources Control Board will recognize the unique needs of small-scale immigrant and refugee farmers, and act to address these issues in the General Order.

Sincerely,

ABIRC Chair