



Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
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To Members of the Agricultural Expert Panel:

I'm writing as a concerned constituent of California, community activist, business owner and proud member of the Agricultural Community in Monterey County.

Along with sales of all essential plant nutrients, my company also sells Nitrogen; Nitrogen is a vital and essential nutritional element to ensure a healthy, marketable plant, specifically the leafy green products, strawberries and many other specialty crop products that Monterey County is known around the world for producing. With overly strict and costly regulations, what is being asked for by the State Water Control Board and its sub Regional Boards is likely to destroy the one true native industry the great state of California possesses, Agriculture.

Our company works hard everyday as one of many agricultural stewards of the land; I and our staff incorporate best practices into the daily work flow to fulfill our desire and commitment to a clean, healthy, sustainable environment for the community in which we live.

We have diligently worked with our customers and the committees we participate with (Monterey County Farm Bureau, Central Coast Grower Shipper Association and Western Growers Association) to define, implement and refine best management practices, documenting and sharing the most efficient irrigation practices known to maximize plant uptake of essential nutrients while also minimizing the leeching of nutrients below the root zone of a multitude of crops, grown on the various soil types in the Salinas Valley.

Over the past five years with California's Region 3 Water Quality Control Board Ag Waiver process, I've worked very hard to participate and share in many meetings; bringing rational, grounded, scientific and economic facts about the challenges the state has in regards to water quality, specifically high nitrate levels.

It is well understood there is a strong desire to document nitrate loading throughout California and Agriculture is willing to work within a reasonable framework to meet those ends. However, what has been proposed by the State Water Quality Control Board has no clear focus on how to gather data or how the gathered data will be used. This raises the specter that the gathered

data will be used to penalize, fine and/or shut down Agricultural Businesses in order to meet the defined objectives and goals of the State Water Quality Control Board's staff.

I've been kept abreast of the Panel's deliberations and believe all of you have a very solid understanding of our community. Many growers are doing great things in the way of making their operations efficient, safe and sustainable; ensuring the water that does run off or percolates into the water tables is cleaner than what they received prior to its beneficial use.

Rather than penalizing growers or putting them out of business, I support what many of you on the Panel had to say; the desire and recommendations to educate and thoughtfully document aspects of nitrate loading in order to improve water quality is a balanced approach that strikes the right chord and meets the objective of improved water quality.

There are a lot of families (businesses and employees) on the firing line of this important topic and resulting regulations. Based on my analysis, your panel is made up of people that are of sound mind and body, bringing rational, grounded, scientific and economic balance to the forefront of this discussion.

Kindest regards



William O. Lipe

CFO/Partner

NH₃ Service Company