



Dear Ms. Bashaw,

Our farming operations are subject to the Conditional Waiver Order (R3-2012-0011) adopted in March by the Central Coast Regional Water Quality Control Board. The terms of that Order are under review.

There are substantial and costly requirements that will be due in October of this year. These include groundwater sampling, photo monitoring of riparian habitat, determining the nitrate loading risk of each farm, the installation of back-flow prevention devices on all irrigation wells, preventing erosion by minimizing bare dirt, and the implementation of management practices to meet water quality standards.

My company will have to hire consultants to comply with the new and extensive Monitoring and Reporting requirements. These include updating the Notice of Enrollment several times per year as individual farms are acquired, and the filing of a Notice of Termination each time a farm is turned over to a new 'operator'. Each farm will have to file an extensive Annual Compliance Form beginning on October 1, 2012. A separate and extensive Groundwater Monitoring Report will also be required on October 1, 2013 with the first round of sampling to begin in two months time.

There are substantial economic costs that I will incur in meeting these new and unprecedented requirements. I am therefore asking the Board to grant the Stay Request while the adoption of the new Ag Order is being reviewed. Thank you.

Sincerely,

Tom Goldberg
VP
Skyline Flowers
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Oxnard, CA 93033