

PRESERVE RURAL SONOMA COUNTY



July 20, 2024

North Coast Regional Water Quality Control Board
5550 Skylane Blvd., Suite A

Santa Rosa, CA 95403

Submitted via email to: Brenna.Sullivan@Waterboards.ca.gov;
Chris.Watt@Waterboards.ca.gov; David.Kuszmar@waterboards.ca.gov

RE: Comments on Public Transparency and Community Engagement During Vineyard Order Drafting Process

Chair Bedolla and Members of the Board:

Preserve Rural Sonoma County is submitting these comments in regards to our concern over lack of public transparency and community engagement during the Vineyard Order Drafting Process. *Preserve Rural Sonoma County works to protect the rural character of Sonoma County from the urbanization and commercialization of agricultural and rural lands. We represent over 3,000 concerned residents from throughout the County.*

Historically, the State of California has been less than responsive when it comes to reconciling the different positions of regulated industries and taking into consideration our underserved communities. This failure has led to a variety of environmental harms that impact our community's ability to fully enjoy our public resources, while further perpetuating the idea that industry's opinions, perceived harms, and economic considerations are more important than the public's.

The State Water Resources Control Board (SWB) adopted a Racial Equity Resolution and subsequently a Racial Equity Action Plan in 2021. The North Coast Regional Water Quality Control Board (RWB) followed suit by adopting their resolution in 2023 and are currently in the drafting phase of a related action plan. These are steps in the right direction and crucial acknowledgments are made; however, the recent Draft Vineyard Order process is a prime example of

continuing deficiencies that must be rectified for the RWB to fulfill its commitments.

We have noted deficiencies around meaningful engagement of BIPOC and other communities that will be impacted by any permitting language. From TAG involvement and community based outreach, to public education and noticing of speaking opportunities, more could have been done to ensure that members of the public and underserved communities were aware of and given opportunity to engage throughout this process. Though some efforts were made, groups within the North Coast Region like the NAACP, local BIPOC community groups, and the public were largely left unaware. It is really unreasonable to expect individual community groups to actively seek out and sign up for specific RWB meeting notices and engagement opportunities.

This means that underserved communities missed out on opportunities to provide meaningful comment and input on the draft vineyard order. It is important that these and other impacted communities have more opportunities to learn about these important issues before October's proposed draft release so informed input can still be provided via oral comment. The more the community is involved in this and other processes, the broader the impact analysis and support for associated protections there will be.

Decisions regarding public resources impacting health, and well being must be more representative of all communities impacted by the decisions. It is critical to ensure that all communities be part of the solution. Our waterways are an important public resource and all deserve to have their voices heard when it comes to ensuring their protection. Industry cannot continue to be allowed to negatively impact our shared resources while community voices are omitted from the decision making process.

Thank you for the opportunity to provide comments.

Sincerely,

Padi Selwyn

Co-chair