

From: [Garcia, Danielle J.@Waterboards](mailto:Garcia.Danielle.J@Waterboards)
To: [Sullivan, Brenna@Waterboards](mailto:Sullivan,Brenna@Waterboards); [Kuszmar, David@Waterboards](mailto:Kuszmar,David@Waterboards)
Subject: FW: Region 1 Vineyard Permit Grape Grower Response
Date: Monday, December 9, 2024 9:02:00 AM

Good Morning,

Please see the email received below.

Thank you,

Danielle J Garcia
Associate Governmental Program Analyst
North Coast Regional Water Quality Control Board
5550 Skylane Blvd., Suite A
Santa Rosa, CA 95403

From: sbt@pacific.net <sbt@pacific.net>
Sent: Sunday, December 8, 2024 2:28 PM
To: Giusti, Gregory@Waterboards <Gregory.Giusti@Waterboards.ca.gov>
Cc: NorthCoast <NorthCoast@Waterboards.ca.gov>
Subject: Region 1 Vineyard Permit Grape Grower Response

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Re: Dec 4, 2024

Regional Water Quality Control Board North Coast Region Meeting
Ruling Postponement of Region 1 Vineyard Permit

Dear Vice-Chair Gregory Giusti and Board Members of the Regional Water Quality Control Board, Thank you for the time and commitment you have given to the discussion and continuing development of the Region 1 Vineyard permit. Once again, we were present for the most recent hearing on December 4, 2024 and appreciate your attention to the continued modifications before adopting this multi-sectioned proposed permit.

We remain concerned on how the permit will transpire and be implemented. Our family are generational farmers in both Sonoma and Mendocino counties and take very seriously how our land and its water sources are being sustained for the environment and future. Our stewardship is demonstrated through management practices and farm plans with the Fish Friendly Farming program on all of our ranches, some for over twenty years.

We are in agreement with your recent requests that necessary adjustments to the intended permit

be clarified. We would like to bullet point some of our thoughts in hope that you will consider them in the refinement of the intended permit.

1. **Document Size.** This **very long document** needs to be streamlined for ease and understanding of what is required of vineyard owners. There were many explanatory graphs presented during the hearing and appreciated for gaining knowledge on the revisions and requirements.

Something such as a simple flow sheet and minimal pages (10) of direction for us to follow may be more feasible for explanation and direction. This would allow for ease of comprehending what will be required and how to collect data for reporting.

Having a basic outline addressing the varying topography of vineyards, slope percentage, cover crop or not, etc. for the requirements would be welcoming.

Another consideration would be the submission process. We hope for it to not be lengthy or difficult to decipher whether it is individually or through a coalition. Our time is best spent in the vineyard as farmers.

2. **Cost.** Always to be determined, but with lagging revenues in the industry as Mr. David Kolbolt presented at the hearing, vineyards are struggling as a commodity. This has been ongoing for several years now and predicted for a minimum of two more years. Hiring manpower of any kind to meet permit requirements such as third-party engineers or paying to be part of a coalition puts a strain on budgets. Honestly, the manpower availability is slim in general. Region 1 has many acres of ground to cover for review and inspection for compliance.

In Mendocino County it has recently been regulated that we will be paying approx. \$40 an acre for groundwater management.

Mr. Glen McGourty addressed this in his public comment. We hope that an additional groundwater fee will not be duplicated in the Region 1 permit for those of us already paying.

We will continue with our farming practices of natural and seeded cover crop, but this expense comes with rising costs. Let us also keep in mind that labor in general will see a cost of living raise with the mandated minimum wage increase effective January 1, 2025.

3. **Coalition.** It is being assumed that a coalition will step up and assist us in the process. To think that the local Farm Bureau Agencies or California Land Stewardship Institute would take this on is just that: "an assumption". It is understood that no one will step up until the permit has been adopted, but we will need assistance for this permit. What will transpire if agencies do not form a coalition?

We do realize that the Sonoma County Farm Bureau already participates in Region 2, yet now a different permit is being defined for the northern part of their county and asking them to take that on is once again an assumption.

The implementation schedule has factored in several years of time which includes the approval of a coalition and this is appreciated. We hope that our rotation with the Fish Friendly Farming program coincides with the permit requirements.

4. **Sample Location.** Who is deciding where we take our sample of water from? Will multiple

samples come from one vineyard location? Will someone be doing a site visit and guiding on how to manage our own personal vineyard location to meet the permit requirements? These answers may have been presented, but it feels uncertain as to how this will all come about.

Defining parameters are part of the education we will need.

5. **Testing Facility.** We do have concerns on who will be able to provide water testing in a sufficient time frame. We do have one provider in Mendocino County, but has anyone verified they could meet the needs? Water tests can take time and are not inexpensive. From experience when there is a large group of people requiring valuable test results in a short amount of time it can be inaccessible. It was not that long ago that we all scrambled for smoke taint testing and it was a fiasco.

6. **Training and Education.** We are confident that plenty of time will be allowed and **many courses** offered for those to be trained. There are not many experts to assist us as mentioned in the hearing and if a certification of the vineyard owner can be offered that would be ideal. Gaining knowledge about the requirements and reporting will be a learning experience from both sides.
May we suggest something similar for our flow meter monitoring and maintenance?. We took a course for Flow Meter Water Certification in order to report for our Water Rights. This has served us well.

7. **Offsite Restoration Alternative.** Pertaining to the EIR. We were not clear on what this actually means if the vineyard footprint remains the same. If a definition or example of what is considered an offsite restoration alternative could be provided to us here individually, that would be most helpful.

We do understand that the Region 1 Vineyard permit will be adopted and necessary for us to obtain for continuing our farming practices in the future. Continuing to work together as a team for smooth transition of acceptance and compliance is our hope.

We appreciate you taking some of your time to read our comments.

Sincerely,

Tim and Shawna Todd

Canebroke Vineyards

Todd Brother Vineyards