



835 12<sup>th</sup> Street, Suite 204  
Paso Robles, CA 93446  
tel 805.369.2288  
www.vineyardteam.org

March 23, 2010

Mr. Jeffrey Young, Chair  
Central Coast Regional Water Quality Control Board  
895 Aerovista Place, Suite 101  
San Luis Obispo, CA 93401

Re: Preliminary Draft Agricultural Order

Dear Chairman Young:

The Central Coast Vineyard Team is a non-profit grower group dedicated to sustainable winegrowing. Our membership involves 80% of the Central Coast acreage, spanning five counties. Our innovative programs have received awards from the California Department of Pesticide Regulation, United States Environmental Protection Agency, and the Regional Water Quality Control Board.

Specifically, we conduct water quality research and demonstration projects that reduce erosion, integrated pest management demonstrations that reduce the use of organophosphate and other materials that can potentially negatively affect water quality. We specialize in educational programs that reach 1,000 ag operators each year. Because we are a grower group and have credibility in the agricultural community, we are in a unique position to influence and guide behavior which results in meaningful outcomes that protect water quality.

We have been involved with the implementation of the Ag Waiver through conducting educational meetings on water quality and assisting growers with their Farm Plan. As a result, there are several notable successes and documented positive outcomes since the waiver was introduced.

**Outreach.** CCVT has sponsored over 115 meetings with over 5,500 attendees since the initiation of the original Ag Waiver. We typically reach 50,000 acres through our Tailgate Meeting program alone. And with the Sustainable Ag Expo, we reach row crops and orchards. But most importantly, surveys collected after meetings indicate that over half of those attending are planning to change or modify a practice as a result of the information learned. *Education, done appropriately with the growers needs and interests in mind, results in changed behavior.*

**Organophosphate Use.** From 2005 – 2007, both the acreage treated and total applied pounds of organophosphates in Central Coast vineyards has decreased by 10%. This has been accomplished due to the recent availability of alternative materials for invasive pests, extensive outreach & demonstration, and a true desire to not use organophosphates.

**Certification & Self Assessment.** CCVT has been facilitating whole-farm self-assessment (Positive Points System – PPS) since 1996. There is strong participation in this program and many growers have done multiple year assessments. Since 1996, CCVT has collected 965 self-assessments. On average, these assessments represent 50,000 acres annually. Since 2005, average scores have increased by 50 points – which indicates the adoption of farming practices. *The adoption of farming practices is recognized as a surrogate measure for water quality by the USDA & USEPA and cannot be overstated as a valid measure.*

More recently, the Sustainability in Practice (SIP) Certification program provides an independently audited and verified measure of the adoption of practices. In order to be certified, growers must maintain winter cover to filter stormwater, use nutrient budgets to determine fertilization needs, maintain high irrigation system performance to maximize efficiency, and soil/plant water monitoring to decrease deep

percolation. In addition certified growers are prohibited from using organophosphates or known groundwater contaminants. Currently there are over 11,000 acres certified under this program in three Central Coast counties. *SIP Certified vineyards are not contributing to water quality impairments.*

We have several comments regarding the draft order being circulated, primarily relating to the Low Risk Discharge category (Attachment 3, p 34):

1. We appreciate that SIP Certified vineyards would automatically be in the “low-risk” category. Because of the extensive work and expense that these growers go through to be certified (binders of documentation, implementation of practices according to 100 pg standards, auditing & certification costs), we believe that they should be exempt from the cooperative monitoring fees. In addition, they should be able to submit their letter of Certification to qualify – they should not have to provide additional paperwork.
2. We are concerned about the 1000 ft proximity to an impaired waterbody threshold. If a grower does not have tailwater, is managing their stormwater, utilizing a nutrient budget, and not using high-risk materials, then their proximity to an impaired waterbody should not matter.
3. The current recommendation is to prohibit the use of a long list of pesticides in order to be low risk; based on the suggested list, virtually no grower could fall into the low risk category. In fact, many alternatives to organophosphates and simazine are on this list, so even a grower using alternatives would not qualify for the low risk category.
4. A certified nutrient program is overly burdensome, especially for growers who are applying nominal nutrients, through their drip irrigation system, during the summer, when runoff is not an issue. A grower can attest to the steps they are taking to eliminate the offsite movement of nutrients without this being certified by an outside consultant.

Based on the existing conditions for the low risk category, it will be virtually impossible for any grower to be eligible for this classification, therefore adding an incredible burden to all growers, even though, in actuality, they are not high risk operators.

For those not in the low risk category (which will be virtually every operator based on the extremely restrictive existing requirements), the cost could easily reach \$25K - \$50K per operation regardless of size and actual threat to water quality. This cost will be in the form of record keeping, hiring consultants to certify practices, and individual water quality monitoring and does not necessarily include the cost for actually implementing best management practices.

In addition, there should be significant concern of the recommended order, not only in terms of the paperwork burden to the growers that will not necessarily result in improved water quality, but also in terms of the RWQCB staff capacity to manage, utilize, and effectively act upon the amount of documentation that they are requiring.

We strongly urge you to extend the current Ag Waiver and enforce upon the existing regulations which prohibit discharges that impair water quality and off site movement of pesticides.

Sincerely,



Kris O'Connor, M.S.  
Executive Director  
Central Coast Vineyard Team