

Kathy D'Andrea
PO Box 370
San Miguel, CA 93451

January 3, 2011

Jeffrey S. Young, Chairman of the Board
Roger Briggs, Executive Officer
California Regional Water Quality Control Board
Central Coast Region
895 Aerovista Place, Suite 101
San Luis Obispo, CA 93401

RE: CENTRAL COAST REGIONAL WATER QUALITY CONTROL BOARD'S
DRAFT AGRICULTURAL ORDER 2011

Dear California Regional Board:

I am a small farmer of approximately 60 acres of wine grapes. I cannot address the details of this Draft Agricultural Order 2011 for lack of time. This draft was released with a much too short of a time for comment and all during one of the busiest times of putting the vineyard to bed and getting the soil prepared and planted with ground cover before the rains make it impossible... etc.

However, I have read the letters sent by Precision AG Consulting and Central Coast Vineyard Team and I would like to go on record standing behind their excellent and well-crafted comments and suggestions. Yet, I will take time to present to you a personal and the more emotionally frustrating picture facing me.

There are only two of us that work this vineyard due to the fact that I can not afford another helper. As any farmer knows the rule of thumb for vineyard managing is one worker per 20 acres. Being understaffed, I work from 5:30 am to 8 pm seven days a week. And I am sure there are many small vineyard owners that do the same thing.

The draft proposes such expensive and time consuming requirements... that when I understood what it was about, I just threw up my hands in hopelessness and collapsed into a chair. This is a straw that can break the camel's back!

Does the staff that came up with this draft have any experience in farming at all? I highly doubt it. They seem carelessly to dump needless (as by their own admission they will have no opportunity to review the information they request!) requirements, expense and paper work on to already overloaded family farmers who are trying to just barely make ends meet in order to save the family farm and are hoping that at some point the price of wine grapes might rise enough to save something for retirement.

When we started working with Central Coast Vineyard Team years ago, we year by year were able to pay for one more environmental improvement to the vineyard. Our progress was steady, and our resolve determined, and we emptied our bank accounts in the effort to attain certification proof of our loving care for our farm.

We are now proudly SIP Certified Sustainably Farmed and we are independently audited to confirm that we carry out these standards. In addition, this last year we have maintained Organic and Biodynamic standards in order to acquire that certification in two more years. We are doing everything we possibly can to farm responsibly as have many of my friends. But our budgets are VERY TIGHT.

By reducing incentives for creating food and drink (history has shown a number of national governments to have done this purposely as a grasp for power) and I take for one example Chairman Mao, was able to kill off a lot of people due to a shortage of food and hold an iron grip on the rest of the people by controlling food merely by reducing incentives for farmers.

I would hope that this draft is merely incompetently attempted and not a veiled attempt to overload the system, in order to promote a regime change.

However, history often repeats itself and I am hoping that the spirit of cooperation between the farmer and the California Water Quality Control Board can prevail and that all can take step back and take into account the larger picture of, 1) world hunger, 2) the incredible opportunity of an international marketplace, 3) California's need to pay bills and the 4) **farmers ability to produce product** (does any one appreciate that fact?)

Hopefully the CWQCB can find a way to be friendly and not adversarial. To have farmers in a state is a great advantage. Take away their incentives and empty dusty land remains.

Farmers produce a very valuable product one that keeps people alive! With more to sell, there will be more state bills paid, not by tightening the noose of more and more fees around the farmers' neck, but by putting in place increased incentives to produce high quality product. Possibly the perspective of a larger common goal and the taking of a long historic look and noting continued improvements that have been made, may enable all together to plot the course of **realistic continuous** improvement.

Sincerely,

Kathy D'Andrea