

AgOrder - Draft Order No. R3-2011-0006 ("Draft Ag Order")

From: Greg Barr <barrcreeksidevineyard@tcsn.net>
To: <AgOrder@waterboards.ca.gov>
Date: 1/2/2011 9:07 PM
Subject: Draft Order No. R3-2011-0006 ("Draft Ag Order")
CC: Lisa Bodrogi <lbodrogi@pasowine.com>

January 2, 2011

Barr Creekside Vineyard, LLC
6944 Union Road
Paso Robles, CA 93446

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

Re: California Regional Water Quality Control Board, Central Coast Region Draft Order No. R3-2011-0006 ("Draft Ag Order"), dated November 2010 Conditional Waiver of Waste Discharge Requirements for Discharges from Irrigated Lands

Dear Honorable Chairman Young:

Our family has owned Barr Creekside Vineyard since 2007. It is a relatively small 85 acre parcel with less than 50 acres planted in a mixture of varieties. The bulk of our grape production is sold to a large winery but we keep a portion of the production for our use at Barr Estate Winery.

To say it has been a steep learning curve to understand the basics of vineyard management and operations would be an understatement. We have been fortunate to have good advice from neighbors and agricultural organizations to help us along the learning path. We also employ the services of an experienced Farm Advisor. Most of the routine hands on work, we do ourselves to control costs. Agricultural activities that require large amounts of labor over a short period of time, such as pruning and leaf thinning, are performed by qualified labor contractors that we select. Both my son and I maintain QAL licenses that allow us to purchase and properly apply the chemicals we use on the vineyard. We also operate and maintain the drip irrigation system at the vineyard. We utilize a weather station and soil moisture monitoring probes at the vineyard to help us match the irrigation water to the plant requirements.

In 2006, like most non-farmers, I didn't have an appreciation for how challenging the business is for small producers. In the last three years, I have seen a number of small vineyards and wineries seek bankruptcy protection or change hands. Undoubtedly, the economy was a significant factor but it also highlights the fragile economic structure of this business. To survive, a small farmer must be a good steward of the land and resources, follow sound agricultural practices, and watch their costs like a hawk.

We are members of CAWG, IGGPRA, and the Paso Robles Wine Country Alliance. As I am sure you are aware, these organizations are strong sponsors of sustainable wine grape growing. The industry, both farmers and wine makers, fully understand the critical importance of applying best practices to our industry. There are few industries that possess a greater understanding of the criticality of managing our limited water resources to ensure our business longevity. Without a reliable source of good water, there will be no wine industry. Our customers, wine enthusiasts, are also demanding high standards of sustainability for the industry.

I am providing this background information so you have a better understanding of my perspective on wine grape farming, wine production, and the need to conserve and maintain the quality of our water resources. From this perspective, I would like to respectfully provide input on the proposed updates to the Ag Order.

- Vineyards utilize deficit irrigation practices, drip tubing, water to root technology, drip irrigation and soil moisture calibrations. These practices should be encouraged and incentives given to maximize practices that serve to minimize water quality degradation.
- An exemption from additional monitoring and requirements should be available for farming practices and operations that are not contributing to water quality degradation.
- Basing the tiers on location and size has no practical bearing on potential contribution to poor water quality. The tiers should be based upon whether there is probable cause for pollution to be transported. Farming operations that do not result in tailwater (i.e. drip irrigated vineyard operations) and are closely monitored for input requirements to the specific plant needs, should be exempt from a tiered approach.
- The Ag Order should be based upon practices that have the potential to degrade water quality and provide incentives and performance-measures to improve water quality, not based upon arbitrary characteristics such as size or location.
- Dischargers who do not cause tailwater, as is the case for vineyards, should not be subject to receiving water monitoring.
- The requirements for well water monitoring go beyond what is necessary to carry out the order to address pesticides, sediment, and nutrients associated with agricultural discharges.
- Depth to groundwater monitoring should be eliminated from the order. It is unclear how this would address the issues of pesticides, sediment, and nutrients associated with agricultural discharges. This could add substantial cost for compliance without any justification for this requirement.

I believe the Agricultural Alternative is a better approach to addressing water quality issues since it is more performance-based and focused on research, education, and extension.

In closing, I'd like to make two points.

San Luis Obispo County is blessed with an abundance of small vineyards and wineries that are family owned and operated. They are positive contributors to the local economy, the quality of life, and create a unique and attractive image for the area. They are businesses that face extreme financial pressures even in the best of economic times. As we move forward, we must be sensitive to adding nonproductive costs and unnecessary reporting requirements that don't produce clearly identifiable benefits to the

maintenance of resources and the environment.

The wine industry and the Water Resource Board have aligned objectives in the area of water conservation and quality control. I believe more can be achieved through collaboration than confrontation. Every effort should be made to maintain a constructive dialogue that addresses our mutual objectives. Working together will always produce the most workable plan with the best outcomes.

Respectively,

Greg Barr