

**From:** [John Zentner](#)  
**To:** [Hartman, Jelena@Waterboards](#)  
**Cc:** [Karkoski, Joe@Waterboards](#); [Laputz, Adam@Waterboards](#); [Bruce Houdesheldt](#)  
**Subject:** ILRP WDR Template Comments  
**Date:** Friday, August 16, 2013 2:37:34 PM

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Dr. Hartman,

I own and operate a 5 acre premium wine grape vineyard in El Dorado county. I have participated in this program since the beginning. I have spent a lot of time in the last few days trying to come up with some specific constructive comments regarding the templates. Here is my summary recommendation: Assemble some real growers who represent the majority of commodities grown in the central valley in a room and start over.

### **General Comments**

The templates as written will add thousands of hours of time for the growers to complete, more thousands of hours by administrators to compile and will not result in the goal of protecting water quality. The decision tree format used by the USDA for the annual agricultural census would be more familiar to growers and could be used to easily identify where management practices need to be increased.

A valuable lesson learned in the successful El Dorado Sub-watershed Management Practices Pilot Program was that if you have check boxes for the practices there should be three choice for answers: USED, NOT APPLICABLE (or APPROPRIATE), NOT USED. It is important to identify practices that could be used and aren't so that if the practices that are in place are inadequate you have a list of additional practices that may be able to help protect the receiving water.

### **Farm Evaluation**

Part A

Question 2 - Acreage (is it parcel size or ag operation size)

Question 3 - Shouldn't you identify irrigation water source before discussing wellhead practices (if you have no wells these will all be left blank and that will skew statistics)

Question 4 - If you check the first item then at least 4 others are redundant. If you don't check the first item you are violating the law.

Question 6 - Define "background level"

Part B

Missing crops: Christmas trees, Blue Berries among many others

Part C

Need to specify scale and accuracy of map.

### **Nitrogen Management Plan Worksheet**

This form is basically impossible for wine grape growers to complete because there are no established "Crop N Needs to meet actual yield (lbs of N per acre)." The amount varies at least by varietal, by clone, by rootstock, by trellis system, by soil type and annual precipitation.

Many growers don't have a need to apply any Nitrogen ever, many only occasionally and some have to apply a little every year. Often times the decision to apply isn't made until well into the crop year.

Thank you,  
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