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Renewal of Conditional Ag Waiver
California Regional Water Quality Control Board

Attention: Jeffrey Young, Chairman of the Board
Angela Schroeter, Agricultural Regulatory Program Manager

Pacific Vineyard Co operates as a Vineyard Management company providing a service to landowners including vineyard and land management along with Farm Labor. We provide this service to several landowners, or more than 2000 total acres. Individually, each client's ranch ranges from 2 acres to 900 acres. All of the acres are farmed Sustainable within the SIP certification from the Central Coast Vineyard Team.

I have been following the progress of the Water Board's renewal of the Conditional Waiver of Waste Discharge Requirements for Discharges from Irrigated Lands ("Ag Order") and am concerned with staff's draft Ag Order. The draft Ag Order will negatively impact my ability to continue producing a marketable crop. The draft Ag Order contains many undefined and potentially highly impractical requirements for agricultural operations.

The threshold of 1,000 acres for inclusion in the Tier 3 level is too generic and does not provide enough flexibility for situations unique to agricultural tenant or professional land management practices.

The draft Ag Order that your staff is proposing for Agriculture is not a workable plan for our Sustainable business model. The original Irrigated Agricultural Waiver was a workable plan that encouraged and provided education, suggested management practices, in-house evaluations, and workable time periods to complete the new practices. The draft Ag Order will be cost prohibitive to implement, has time limits that are not achievable, and adds additional large burdens to the landowner and grower.

Pacific Vineyard farms using the Sustainable Farming model that the Central Coast Vineyard Team has developed for Central Coast property owners. Working with the Vineyard Team, we have developed many positive improvements to the land we farm and have developed and implemented many Best Management Practices to improve water quality. The draft Ag Order does not include any incentives for growers to participate in water quality best management practices, and the language seems punitive towards growers and does not provide incentives to participate in additional BMP, monitoring, or load reduction activities.

I urge the Board to listen to all growers along with grower organizations for feedback and suggestions and incorporate these ideas into a workable draft Ag Order. Any future Ag Order must be designed with achievable objectives and must be a collaborative process that utilizes Agricultural stakeholders. Loss of grower cooperation would be counter productive to water quality.

Thank you,

George Donati
General Manager
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