Garys' Vineyard, LLC
32070 River Road
Soledad, CA 93960
831-675-1681

Dr. Jean-Pierre Wolff
Chair Central Coast Regional Water Quality Control Board
895 Aerovista Place, Suite 101
San Luis Obispo, CA 93401

Dear My Wolff,

My name is Gary Franscioni and I farm 90 acres of wine grapes in Soledad, California. I planted Garys' Vineyard in 1997 and Soberanes Vineyard in 2007. My partners and I employ 40 workers year-round on our vineyards. I am a third-generation family farmer and have farmed for over 40 years in Monterey County.

Having farmed these properties for over two decades, I know the importance of tracking and maintaining records of fertilizers and pesticides we input into our ranches. We currently report monthly all pesticides and the rate used to the Monterey Agriculture Commissions office and Department of Pesticide Regulations. We use an experienced PCA for pest control recommendations and use as little pesticides as the crop requires. We rely on our beneficial insects to do most of the work in controlling pests. In addition, we perform routine training and re-training for all person(s) who handle pesticides, as well as, applying all products in accordance with Monterey Ag Commissioner and Department of Pesticide regulations. This is all done to minimize any run-off into ground and surface water. We would also like to add that we irrigate our vineyards as little as possible to minimize movement of water beyond the rootzone. We farm with the best practices and are certified members of Sustainable In Practice. Ag Order 4.0 would be extremely expensive and burdensome to an operation of our size.

We are concerned that the proposed reporting regulations in Ag Order 4.0 does not differentiate between ranch size, daily operations, crops produced, location, and other important factors. In addition, we feel we are already heavily regulated and the requirements in Ag Order 4.0 are duplicative and overly onerous.

We hope that you will take our letter into consideration as you develop your final recommendation. We appreciate your reading this letter and please feel free to contact us should you have further questions or need explanations.

Regards,

Gary Franscioni
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