



Lodi District Grape Growers Association, Inc.

January 17, 2014

Pamela Creedon
Executive Officer
Central Valley Regional Water Quality Control Board
11020 Sun Center Dr., St. 200
Rancho Cordova, CA 95670

Submitted via email

RE: San Joaquin County and Delta Area Tentative Waste Discharge Requirements General Order

Dear Ms. Creedon,

On behalf of the Lodi District Grape Growers Association Board of Directors and members, I thank you for the opportunity to comment on the Tentative Waste Discharge Requirements General Order for the San Joaquin County and Delta Area.

Our Association feels that the frequency of reporting outlined in the Tentative WDR General Order is excessive and costly to both growers and the Coalition. The Tentative WDR General Order requires, "By 15 June 2015, all Members within a high vulnerability area must prepare their Farm Evaluation and submit it to the third-party. An updated Farm Evaluation must be prepared and submitted to the third-party by 15 June and annually thereafter." (Page 26)

As proposed, the annual reporting requirement is excessive, especially for permanent crops (such as winegrapes). There are over 100,000 acres of winegrapes in San Joaquin County, in addition to numerous other permanent crops. These crops account for half of the irrigated acreage in the area. Farming practices for permanent crops vary little from year to year, therefore Farm Evaluation reports will show virtually the same information each year. We feel that the submission of this report every five years would be less of a burden on growers, as well as the Coalition.

If Coalition members were divided into groups, with 1/5 of the members scheduled to report each year, the Coalition's annual workload would be reduced and could be managed by a smaller staff, therefore reducing costs which are passed on to the grower. There would also be a reduction in the time and costs associated with preparation of the report by the grower.

Our Association will continue to be engaged in this process and will work with the Coalition to keep our members up to speed on the necessary steps to comply with the General Order.

The Lodi District Grape Growers Association was formed in 1952 and represents the interests of wine grape growers in California Crush District 11. Today, over 100,000 acres of wine grapes are grown in the district.

Sincerely,

Amy Blagg
Executive Director, LDGGA