



SONOMA COUNTY FARM BUREAU

Affiliated with California Farm Bureau and American Farm Bureau Federation

May 30, 2025

Mr. Greg Guisti, Vice Chair
North Coast Regional Water Quality Control Board
5550 Skylane Blvd., Suite A
Santa Rosa, CA 95403

Submitted via email:

NorthCoast@waterboards.ca.gov

RE: Concerns and Requests Related to Proposed Order No. R1-2024-0056 General Waste Discharge Requirements for Commercial Vineyards in the North Coast Region

Dear Vice Chair Guisti and Board Members,

The Sonoma County Farm Bureau is a non-governmental, nonprofit, voluntary membership advocacy organization that aims to protect and promote agricultural interests throughout the county. Among many endeavors has been our steady participation in the process of the Proposed Vineyard Order No. R1-2024-0056 General Waste Discharge Requirements for Commercial Vineyards in the North Coast Region. Our approach has been consistent in that we are committed to working with Regional Board Staff and all stakeholders to ensure that the regulations and expectations are appropriate, sustainable, reasonable, and financially obtainable. This remains the case today and so we write to encourage you to pause the adoption of this Order.

We are grateful to you and the entire Board for recognizing the complexities of this order and delaying adoption at the hearing on December 4, 2024, until more clarity was provided. We commend the Regional Board Staff for their tireless work as they have been available, attentive, and responsive to incorporating multiple amendments to the draft order based on outcomes from workshops and discussions proving real-time experience and management that exists today verified the draft Order to be overburdensome. These amendments have certainly helped to make the order more reasonable within its mandate. However, the costs to comply with the permit by way of enrollment, administration fees, and ongoing monitoring expenses are prohibitive, especially at this time.

The current market for wine grapes in the North Coast Region is facing significant challenges. Changes in demand by way of consumer preferences, and competition of bulk wine imports, are compounded by the cost of doing business which includes significant fees for regulations, taxes, cost of labor, and the like. Furthermore, the industry is in a holding pattern as we wait to understand the impacts impending tariffs will have. Increasing international competition and fluctuating global economic conditions create an unpredictable environment for long-term planning. This instability directly contributes to a decline in land value for agricultural properties, as the profitability of vineyard operations, a key driver of land value, diminishes. Imposing significant new compliance costs at a time when asset values are depreciating creates an unsustainable financial burden.

The proposed requirements in the Vineyard Order, including the cost of Sediment and Erosion Control Plans, especially the certified version, the corresponding monitoring requirements, and the cost of administration (both State and coalition fees) will necessitate substantial financial investment and increases in ongoing

operational expenses. We understand the values provided in Tables 3, 4a, and 4b (pages 41-43) are estimates, but we are skeptical and fear they are much too conservative. For many family-owned vineyards, these costs will be prohibitive. Without a corresponding (and unlikely) increase in grape prices or alternative revenue streams, compliance could force many vineyards out of business, increasing the cost of compliance for those who remain, leading to unintended negative consequences for the local economy and agricultural landscape.

The adoption of this Order will most certainly be the tipping point for many who will choose to throw in the towel- the result of a death by a thousand cuts. The aggregate of this will result in a devastating economic downturn for Sonoma County. Pending the 2024 Sonoma County Crop Report, data provided by the California Association of Winegrape Growers shows that growers in Sonoma County picked 14.4% fewer tons in 2024 than in 2023 due to fewer contracts. An economic study ordered by the Sonoma County Winegrape Commission in 2023 expressed that winegrape growers utilize only about 6% of the total acreage in Sonoma County but generate more than \$830 million in business activity. For example, part of this business activity is associated with agricultural wages that purchase local goods and services. The activity also includes spending on agricultural inputs such as steel, wire, nursery, etc. The Proposed Vineyard Order will result in increased regulatory costs that would necessitate less spending in other areas and cause economic harm to those businesses that rely on a robust agriculture economy. The loss of planted acres associated with 'throwing in the towel' will further reduce local economic activity.

On behalf of the Sonoma County Farm Bureau, we ask that the Board reconsider the scope and implementation timeline of Order No. R1-2024-0056. Please recognize the current economic realities faced by the winegrape industry. Any regulations designed to protect our natural resources must also be reasonable and economically feasible for the industries they regulate. As written, the Order is negatively impactful on the local economy without demonstrating a corresponding environmental benefit.

Thank you for your time and consideration of these critical issues. We remain committed to contributing to finding practical solutions that achieve environmental goals without jeopardizing the viability of Sonoma County vineyards.

Respectfully,

Pat Burns
President



Dayna Ghirardelli
Executive Director

Cc: Valerie Quinto, Executive Director
Brenna Sullivan, Staff