

North Coast Regional Water Quality Control Board

Errata Sheet

Order No. R1-2024-0056
General Waste Discharge Requirements
for Commercial Vineyards
in the North Coast Region

December 4, 2024

Staff Initiated Changes to the Proposed Vineyard Order

North Coast Water Quality Control Board staff identified late revisions to the Proposed Vineyard Order that are not currently reflected in the document released to the public on October 31, 2024. These revisions are **non-substantive** and meant to clarify certain elements of the Proposed Vineyard Order in response to late public input following document release on October 31, 2024.

Underlined text in this document denotes text added to the Proposed Vineyard Order.

Staff recommend that the following changes be made to Order No. R1-2024-0056 concurrent with its adoption:

1. Add the following terms to Appendix I: Acronyms, Definitions, and Endnotes (beginning on p. 71 of the Order):

Management Practices. Practices or combination of practices including, but not limited to, structural and non-structural (operational) controls that may be applied before, during and after waste producing activities to eliminate or reduce the generation of nonpoint source discharges and the introduction of pollutants into receiving waters.

Planted or Rooted Ground Cover. A matrix of Ground Cover that is primarily composed of plants (e.g., grasses, forbs, legumes, vines, or other herbaceous plants) that are rooted in the ground. This term is distinguished from other types of acceptable Ground Cover under this Order such as straw and mulch, that are not rooted in the ground. See the term Ground Cover.

Initial Replanting. The work undertaken as part of the initial phase of vineyard replanting, including removal of existing grapevines, soil preparation, agricultural grading, construction or modification of vineyard infrastructure, and other similar work.

2. Strike the definition of Agricultural Drainage Structure in Appendix I: Acronyms, Definitions, and Endnotes (beginning on p. 71 of Order) and replace with the following language:

Agricultural Drainage Structures. Constructed features that work to collect, convey and discharge stormwater to surface waters including pipes, ditches, and channels.

3. Add the word “Initial” and remove hyphenation from the term “re-planting” in Provision 7) on p.46 of the Order. Provision 7) should now read:

“Initial Replanting of enrolled commercial vineyards between November 15 and April 1 of each year is prohibited. Replanting commercial vineyards on Unstable Areas is prohibited unless repaired under the direction of a Qualified Professional. New Agricultural Drainage Structures that discharge onto unstable slopes, earthen fills, or directly to a waterbody are prohibited.”

4. The Proposed Vineyard Order had used the two terms “Sediment Management Area” and “Sediment Management Unit” interchangeably. Any instance of the term “Sediment Management Unit” in the Order is a typographical error. All uses of the term “Sediment Management Unit” in the Proposed Vineyard Order and its attachments should be updated to “Sediment Management Area.” (pp. 48,50 of Order; p. 6 of Attachment A: MRP for Individual Enrollees; p. 6 of Attachment B: MRP for Enrollees in a Coalition; and p.1 of Attachment D: Methodologies and Procedures).

5. The Draft Vineyard Order had included a provision that addressed Enrollee requirements if the Enrollee is unable to collect Agricultural Drainage Structure samples in a given year due to unsafe conditions or lack of discharge. This provision was not intended to be removed and has been restored in the Proposed Vineyard Order. The original language has been modified slightly to be consistent with revisions in the Proposed Vineyard Order (e.g., modifying the term “Discharger” to “Enrollee.”) The following language should be added to Provision 4) on p. 4 of Attachment A: Monitoring and Reporting Program for Individual Enrollees and added to Provision 5) on p. 4 on Attachment B: Monitoring and Reporting Program for Enrollees in a Coalition:

If an Enrollee is unable to collect samples in any given year due to lack of discharge or unsafe conditions, the Enrollee shall include in the submittal of their annual Agricultural Drainage Structure Turbidity Monitoring results documentation explaining why the sampling did not occur. Documentation may include, but may not be limited to weather reports, photographs of unsafe conditions, or other written explanation.

- The Sonoma, Gold Ridge, and Mendocino Resource Conservation Districts (RCDs) submitted written comments during the public comment period estimating the cost of road storm-proofing and stream crossing management practices. A request was made by the Mendocino County Farm Bureau in written comment to adjust the cost estimates to reflect the estimates in the RCD letter. However, RCD staff noted that these cost estimates were not intended to be attributed to the RCD and requested that specific attribution to the RCDs in the cost estimate section of the Proposed Vineyard Order be removed. Staff appreciate cost estimates provided by the RCDs and recommend the following revisions:

The following language should be removed from Finding 20) on p.35 of the Order:

“Table 2 and Table 2.a also includes cost estimates provided by the Mendocino, Gold Ridge, and Sonoma Resource Conservation Districts (RCDs). “

Table 2 and Table 2a (and associated table titles) should be removed and replaced with the following table and table title on p. 36 of the Order:

Table 2: Estimated Costs of Management Practices/Scenarios for Road Storm-proofing and Stream Crossing Improvements

<u>Management Practice</u>	<u>Scenario Size</u>	<u>Unit Cost</u>	<u>Total Cost (low)</u>	<u>Total Cost (High)</u>
<u>Rolling Dip</u>	<u>1,000 feet</u>	<u>\$10-20/ft</u>	<u>\$10,000</u>	<u>\$20,000</u>
<u>Critical Dip</u>	<u>1,000 feet</u>	<u>\$10-20/ft</u>	<u>\$10,000</u>	<u>\$20,000</u>
<u>Road Out-sloping</u>	<u>5,000 feet</u>	<u>\$3-\$30/ft</u>	<u>\$15,000</u>	<u>\$150,000</u>
<u>Ditch Relief Culvert</u>	<u>20 feet</u>	<u>\$75-200/ft</u>	<u>\$1,500</u>	<u>\$4,000</u>
<u>Debris Deflector</u>	<u>Each</u>	<u>\$300-\$1,200</u>	<u>\$300</u>	<u>\$1,200</u>
<u>Stream Crossing Rock Armor</u>	<u>100 tons</u>	<u>\$200-400/ton</u>	<u>\$20,000</u>	<u>\$40,000</u>