

## North Coast Regional Water Quality Control Board

### EX PARTE DISCLOSURE REQUIREMENTS FOR PENDING GENERAL ORDERS

The prohibition against ex parte communications no longer applies to general waste discharge requirements (including NPDES permits), general waivers and general Clean Water Act section 401 water quality certifications. A “general order” does not name specific dischargers, but instead allows eligible dischargers to enroll. The following information will help the public comply with the requirement to meet statutory disclosure requirements. For more information, see Water Code section 13287 and [http://www.waterboards.ca.gov/laws\\_regulations/docs/exparte.pdf](http://www.waterboards.ca.gov/laws_regulations/docs/exparte.pdf).

#### ***Must I disclose ex parte communications with board members regarding pending general orders?***

You must provide written disclosure if you are in one of these categories:

- Potential enrollees (including their representatives or employees)
- Persons with a financial interest (including their representatives or employees). For a definition of “financial interest,” consult the Political Reform Act (Gov. Code, § 87100 et seq.) and implementing regulations (Cal. Code of Regs., tit. 2, § 18700 et seq.), or the Fair Political Practices Commission website (<http://www.fppc.ca.gov/index.php?id=51>)
- Representatives acting on behalf of any formally organized civic, environmental, neighborhood, business, labor, trade, or similar association

#### ***What must I disclose?***

The attached form lists the information that must be disclosed to document a meeting, telephone call or other conversation. For written communications, a complete copy of the letter or email with all attachments is adequate.

#### ***When is the disclosure due?***

Water Board staff must receive the disclosure within seven (7) working days after the board member receives the communication (generally, the date of a phone call or meeting with a board member).

#### ***Who must receive my disclosure documents?***

Unless the board member(s) provided you with a different contact person, please send your materials to: [NorthCoast@waterboards.ca.gov](mailto:NorthCoast@waterboards.ca.gov)

***What will the Water Board do with my disclosure?***

The Water Board is required to post the disclosure on its website and to distribute it via any electronic distribution list for the proposed order. There is no requirement to distribute the disclosure to board members or to prepare responses. If you want to submit written comments or evidence on a proposed general order, you must provide the comments or evidence following the procedure and timelines provided in the notice for the board's proceeding.

***May other interested persons respond to a disclosure notice?***

The Water Code does not require that interested persons be allowed to respond to disclosure notices. Any such responses should be included in formal comments submitted during the order's written comment period, included in oral comments at the hearing, or both.

**NORTH COAST REGIONAL WATER QUALITY CONTROL BOARD  
EX PARTE COMMUNICATIONS REGARDING GENERAL ORDERS  
DISCLOSURE FORM**

*Note: This form is intended to assist the public in providing the disclosure required by law. It is designed to document meetings and phone calls. Written communications may be disclosed by providing a complete copy of the written document, with attachments. Unless the board member(s) provided you with a different contact person, please send your materials to: [NorthCoast@waterboards.ca.gov](mailto:NorthCoast@waterboards.ca.gov). Use of this form is not mandatory.*

1. Pending General Order that the communication concerned:
2. Name, title and contact information of person completing this form:  
Note: Contact information is not mandatory, but will allow the Water Board to assist you if additional information is required. If your contact information includes your personal residence address, personal telephone number or personal email address, please use a separate sheet of paper if you do not want that information posted on our website. However, this information may be provided to members of the public under the Public Records Act.
3. Date of meeting, phone call or other communication:  
Time:  
Location:
4. Type of communication (written, oral or both):
5. Names of all participants in the communication, including all board members who participated:
6. Name of person(s) who initiated the communication:
7. Describe the communication and the content of the communication. Include a brief list or summary of topics discussed at the meeting, any legal or policy positions advocated at the meeting, any factual matters discussed, and any other disclosure you believe relevant. The Office of Chief Counsel recommends that any persons requesting an ex parte meeting prepare an agenda to make it easier to document the discussion properly. Attach additional pages, if necessary.
8. Attach a copy of handouts, PowerPoint presentations and other materials any person used or distributed at the meeting. If you have electronic copies, please email them to facilitate web posting.



**Legal Services**  
2600 River Plaza Drive  
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[www.cfbf.com](http://www.cfbf.com)

Submitted via email

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[NorthCoast@waterboards.ca.gov](mailto:NorthCoast@waterboards.ca.gov)

May 30, 2025

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

**RE: Concerns on Proposed Order No. R1-2024-0056 (General WDRs for Commercial Vineyards in the North Coast Region)**

Dear Mr. Guisti:

The California Farm Bureau (“Farm Bureau”) is a non-governmental, non-profit, voluntary membership California corporation whose purpose is to protect and promote agricultural interests throughout the state of California and to find solutions to the problems of the farm, the farm home, and the rural community. Farm Bureau is California’s largest farm organization, comprised of 54 county Farm Bureaus currently representing approximately 27,000 agricultural, associate, and collegiate members in 57 counties. California Farm Bureau strives to improve the ability of farmers and ranchers engaged in production agriculture to provide a reliable food and fiber supply through responsible stewardship of California’s resources. Farm Bureau engages in legislative, regulatory, and legal advocacy, particularly on issues that impact the ability of agricultural producers to continue farming and ranching sustainably and efficiently. Farm Bureau also works to ensure that regulatory policies are based on sound science and balanced decision-making that considers both environmental conservation and the economic viability of agriculture.

Farm Bureau, on behalf of Mendocino County Farm Bureau and Sonoma County Farm Bureau, appreciates the opportunity to provide additional comments on the latest revised General Order for Waste Discharge Requirements for Commercial Vineyards in the North Coast. Farm Bureau echoes the comments submitted by Sonoma County Farm Bureau, Wine Institute, and California Association of Winegrape Growers on May 30, 2025, and incorporates these comments and concerns herein by reference.

Thank you for the opportunity to provide our comments. We appreciate the opportunity to comment on the development of the Vineyard Order and look forward to further involvement

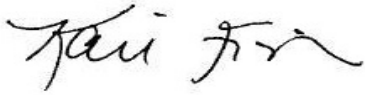
Comments on Proposed Vineyard Order

May 30, 2025

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and discussion with the North Coast Regional Board. Please feel free to contact Kari Fisher at (916) 561-5666 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Kari Fisher", with a stylized, cursive script.

Kari E. Fisher  
Senior Director and Counsel,  
Legal Advocacy  
California Farm Bureau Federation