



May 30, 2025

North Coast Regional Water Quality Control Board
5550 Skylane Blvd, Suite A
Santa Rosa, CA 95403

RE: June 12th, 2025 Hearing for Adoption of Proposed Vineyard Order

Dear Board Members and Staff:

The Sonoma County Chapter of Community Alliance with Family Farmers (CAFF) appreciated the invitation to participate in the development of the General Waste Discharge Requirements for Commercial Vineyards in the North Coast Region (or "Order") these past few years, since summer 2022. CAFF is a non-profit organization whose mission is to build sustainable food and farming systems through policy advocacy and on-the-ground programs that create more resilient family farms, communities, and ecosystems. Our guiding values include ecological stewardship, justice & equity, practical solutions, economic fairness, centering farmers, and strong local communities.

Regarding adoption of the proposed Order on June 12th, 2025, our Chapter offers our support, with the reservations delineated below. We believe the Order, as drafted, is in alignment with our organizational mission and many of its values. We have also received support to endorse adoption from some of our constituents.

The primary concerns we currently have with the Order are regarding outreach and streamlining the bureaucratic aspects of the Order. While those of us involved in the process believe that Staff have done an excellent job of incorporating first-hand feedback from growers from many site visits and have held outreach events in conjunction with other agricultural organizations, many small growers may not be a part of such agricultural organizations or be as attuned to their communications. We hope that should the Order be adopted on June 12th, significant outreach efforts be directed at small vineyards, in particular.

We also believe that Staff's efforts over the past few years, in conjunction with the Board's direction, to streamline and simplify the Order for growers has resulted in much-improved regulatory framework. We believe the Order's impact to the intended agricultural landscape will result in significant improvements in water quality, environmental protection and enhancement, public health and safety, and more.

Of outstanding concern is modification of the Sediment and Erosion Control Compliance "Option D" since the December 2024 hearing. The overview wording in the table (p. 48) for this option was changed from requiring 90% planted or rooted ground cover during the below-stated dates, to:

No-Till Ground Cover: Implement No-Till Ground Cover in Planted Areas and Seasonal Roads between December 15-April 1 of each year.

While this option is further defined outside of the table, this wording could be perceived as confusing if interpreted as simply not tilling during the stated time period. Items 20 and 21 on p. 52 of the Order, which further define Option D, also potentially exclude practices that would be equally protective of water quality during the stated wet season period. For example, growers may till alternate rows or implement strip tillage outside of this period but still meet the minimum planted or rooted coverage requirement between December 15 and April 1.

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CAFF respects many of our constituents' deep pre-existing commitment to ecologically beneficial and socially just practices. We hope that Board members and Staff continue to uphold these same values with this Order, as well as the farmers and communities affected. Our Chapter supports adoption of the Order with these principles in mind.

Sincerely,

Wendy Krupnick, Rue Furch & Christina David
President and Members
Sonoma County Chapter of CAFF

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