

From: [Fred Allebach](#)
To: [Sullivan, Brenna@Waterboards](mailto:Sullivan,Brenna@Waterboards)
Subject: public comment North Coast Regional Water Quality Control Board, Dec 4th 2024 meeting, Vineyard waste discharge policy
Date: Saturday, November 30, 2024 11:34:32 AM
Attachments: [image.png](#)

Caution: External Email. Use caution when clicking links or opening attachments. When in doubt, contact DIT or use the Phish Alert Button.

Fred Allebach

11/30/24

public comment

North Coast Regional Water Quality Control Board, Dec 4th 2024 meeting, Vineyard waste discharge policy

-as per vineyard water-borne discharge of: sediment, nutrients, pesticides, herbicides, fumigants, pathogens

Short version

Put discharge standards in place that ensure that CA scientific baselines are upheld. If there are economic impacts, it is not the NCWQCB's job to account for them but it is some branch of the CA government's job to do full cost accounting. Whatever the final aggregate bottom line is, it can't be called sustainable, or reasonable, if the collective, common pool environment is progressively degraded in the name of short-term profit.

Long version

The SoCo wine industry claims to be sustainable but this "sustainability" is self-certifying and the industry apparently can't quantify/ certify that their sediment and pesticide discharges are sustainable. **This has been an inherent weak point from the get go, along with that this policy is not triple bottom line and side-steps social equity issues of industry labor.**

This 2023 P-D article provides some context

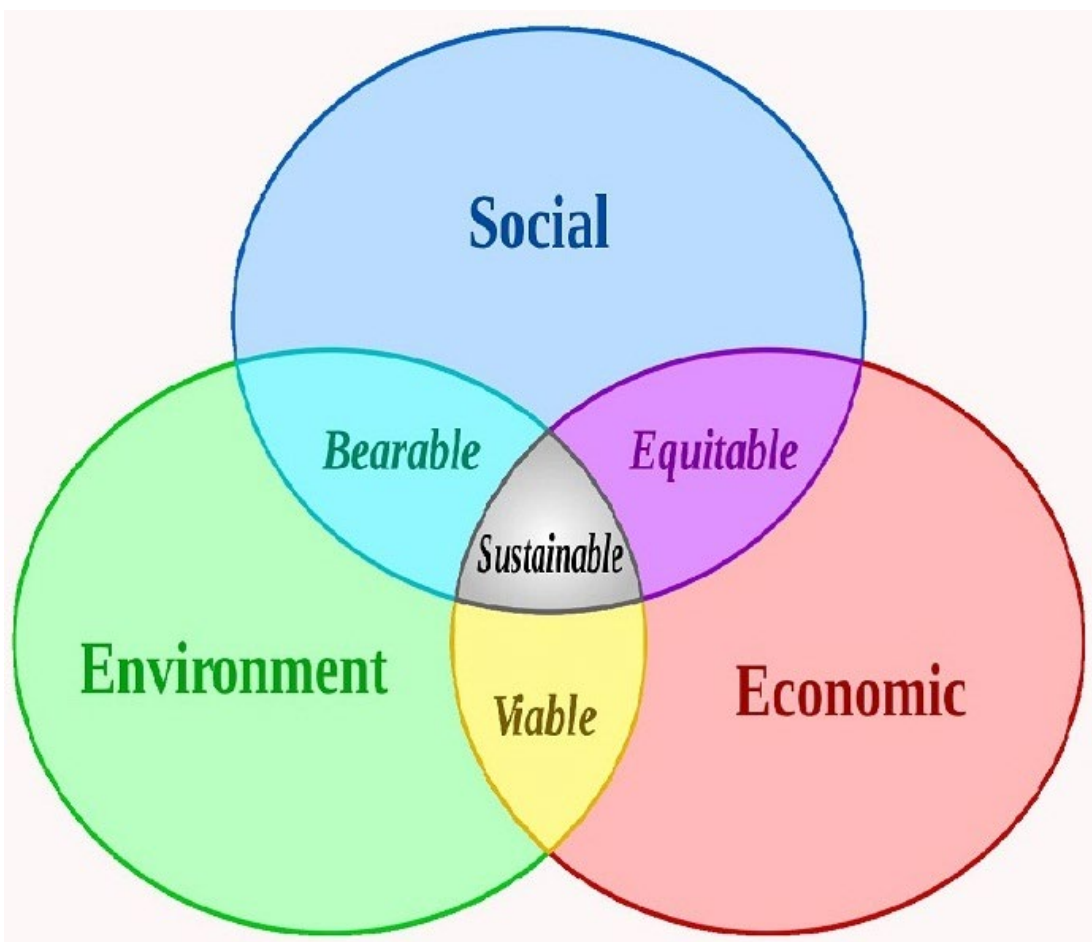
<https://www.pressdemocrat.com/article/news/sonoma-mendocino-county-grape-growers-battling-new-rules-designed-to-reduc/>

"In general, the wine industry in this region really prides itself on sustainable practices, and its widespread enrollment in these (voluntary) programs," said Brenna Sullivan, an engineering geologist with the North Coast Regional Water Quality Control Board, which is developing the rules. "But we also wanted a

program that would be able to effectively track if it's working," Sullivan said. "We wanted an order that assumes that everyone is doing the right thing and doing what they say they're doing."

As NCWQCB technical advisory committee member McEnhill of Russian Riverkeeper said **in the above-linked article**, the term sustainability has turned into a PR weasel word. It has no agreed-upon meaning. The original intent of the Sustainability paradigm *does mean something* however, and this centers on triple bottom line, full cost accounting where the respective bottom lines of environment, economy and society all need to fully reconcile.

Sustainability means cooperating to get to the middle of this Venn diagram, not the component systems fighting among each other as is business as usual.



True sustainability give's business interests, people's interests, the interests of a

healthy environment, all a seat at the table of sustainability policy. Since economy, society, and environment all have different metrics, it takes wide-ranging thinkers and well-educated people to reconcile all the interests at stake, with the goal that overall human systems will endure for 10s of 1000s of more years. It's on us, now, to not run our collective ship into the ground. Some sacrifice is called for because a program of no objective limits is the antithesis of sustainability.

What's reasonable in my opinion, is that with eight billion people on earth, and a limited, finite set of natural resources, is that verifiably sustainable natural resource extraction limits be set. Unregulated natural resource consumption cannot happen. In no reasonable way is the human race in an unlimited frontier context. We are in a natural system with finite limits. To endure, we can't allow tragedy of the commons inertia (every dog for himself) to ruin the core idea of sustainability. We can't take more than can be regenerated by our natural systems or we will run all into the ground, as is happening with human-caused climate change.

The NCWQCB is our regional, CA state, science-based agency in charge of water quality and they need some way to measure sediment and pesticide coming off vineyards. The NCWQCB wants quantifiable measures, which is reasonable.

In an overall multi-billion-dollar North Coast wine-tourism industry, it seems far-fetched to me that smaller vineyards are almost broke, but the question and issue here is not to guarantee businesses of whatever size a profit. It is the government's job, as conservative economist Milton Friedman said, to act as backstop to market excesses. A market can be said to be in excess (unsustainable), if the environment is being ruined because of it, small players, big players, whatever players.

It could be that the overall high-end nature of premium wine tourism pushed by economic boosters does make it harder for smaller economic fish to survive, and that larger corporate LLCs posing as "family" operations are driving up land prices and running smaller, actual family businesses out. In this case, it would be reasonable for the Farm Bureaus and Vintners Alliances to not be advocates of elite, monopolistic corporate investment money but to stand more with smaller farmers **and local labor**. "The industry" needs some way to separate out players so that predatory, **no limits**, unsustainable business practices are not being advocated for.

This view fits the current trend of economic populism, of people being tired of elite, big money entities ruining everything for the little guys of the world.

At the end of the day, human systems need an economy where people have living-wage jobs and so that goods can be generated, transported, and consumed, **value can be generated and we have some currency to exist**. It would be reasonable for local governments to work towards shaping a wine-tourism industry that was actually sustainable from a triple bottom line, full-cost accounting standpoint, an economy that shared the spoils and profits more equitably, and one that did not degrade the natural systems on which we are all dependent.

In this regard, the solution is simple, for vineyard discharges and water quality, let the science do the talking. We all need to work off the same objective water quality ledgers and standards and agree **on** what metrics and measures are sustainable. If the Farm Bureau and Vintners Alliance see NCWQCB regulations as excessive, how will industry measures show us they **themselves** are really sustainable? Where is industry water quality data as per vineyard discharges that a scientific method can look at and independently verify?

If the wine industry position is essentially political, and not scientific, that too many regulations impinge on profits, and therefore environmentally unsustainable practices must go forward, then I submit this is an unreasonable proposition. It is government's job to act as a backstop to market excesses. If government is in bed with business and there are no limits, then foxes are running the henhouse, the epitome of unsustainable.

Government economic policy needs to finesse this situation, but not the NCWQCB which centers on environmental factors and metrics. The NCWQCB needs to **play its part and** call it as they see it based on objective data. Ultimately there will need to be political solutions to vineyard discharge water quality issues, but not ones that ignore the science.

Economic systems need to thrive as well. The North Bay region is one of five Mediterranean climates in the world where premium wine grapes can be grown; wine tourism is the current **big** horse that is pulling the regional economic cart.

There is strong demand, good money to be made; there should be a way to have this work out in a triple bottom line way.

Sustainability as a whole can't happen if each component system, that needs to cooperate, is locked into a zero-sum game competition with other integral bottom lines. I don't have all the answers but I do believe that a science-based approach to vineyard discharge water quality is reasonable, and that it is up to other branches of government to address the economic consequences, and that if we did have a Sustainability paradigm uber-policy, then this can all work out, **but we all have to be playing the same game in good faith.**

"We don't know where we're going but we have to stick together in case somebody gets there." Ken Kesey