



May 30, 2025

Mr. Greg Guisti, Vice Chair
North Coast Regional Water Quality Control Board
5550 Skylane Blvd., Suite A
Santa Rosa, CA 95403
Email: NorthCoast@waterboards.ca.gov

RE: Recommendations to Pause Proposed Order No. R1-2024-0056 General Waste Discharge Requirements for Commercial Vineyards in the North Coast Region

Dear Vice Chair Guisti:

As you know, Sonoma County Vintners represents over 220 wineries in Sonoma County and is one of the main voices and advocates for our multigenerational wine community here in Sonoma County.

While our mission and goal at Sonoma County Vintners is to support, protect and promote our wine community, it is also to support, advocate for and assist in developing sound policy that ensures the wellbeing of our vital wine community, and the continuation of the agricultural heritage that is so important and at the core of the Sonoma County economy.

As we have seen with the Winery Order, the proposed Vineyard Order is also a clear and obvious threat to our multigenerational wine community. Sonoma County Vintners realizes that while the Regional Board is active in development of the proposed Vineyard Order, it is also actively involved in implementing the Statewide Winery Order. As our wine community has communicated, these two orders together would cause irreparable financial harm to the wine community and lead to many multigenerational family wineries and vineyard to go out of business. Simply put, our wine community cannot absorb the drastic financial burdens these two order will impose. In addition, when these two orders are coupled with the many additional regulatory actions from federal, state and county agencies, it is truly the death of the small family farmer through a thousand cuts. Any one of these puts an undue burden on small family farms and wineries. The unintended consequence of these orders is the loss of small wineries, growers and producers.

Although staff have reached out to growers and have tried to incorporate some of their issues in the Final Draft, they have failed to articulate the threat that merits the scope and cost of this order. It fails to recognize or appreciate that one size does not fit all.

With that said, Sonoma County Vintners would like the board to consider our request for pausing adoption of this Order due to the extreme high costs, and staffing bandwidth of compliance in the current economic environment.

The costs calculated in the draft Order are irrelevant if growers and wineries lack adequate revenues to cover the additional cost.

As I am sure you know, the wine community is facing a very challenging time. Increased costs, labor issues, insurance challenges, increased global competition, supply chain issues, federal tariffs and all while seeing a significant decline in revenues.

Sonoma County's vineyard acreage has already dropped by thousands of acres. A very real danger is the abandonment of vineyards by property owners that will go un-maintained and become the source of disease for surrounding vineyards.

Correcting this imbalance and addressing the changes in the marketplace will take years and the wine community needs help. Our wine community is not at a tipping point now, we have already crossed that! The economic engine that is the wine community cannot survive additional regulatory requirements.

Based on the discussion above, we are requesting that the Board pause adoption of the Vineyard Permit. While on pause, the Board should work with the State Water Board and the State legislators to confirm that the unintended consequences associated with implementation of this order are appropriate, meet the intent of state legislation, and produce outcomes that are warranted and economically sustainable and possible.

This request has precedence. Sonoma County Vintners has coordinated meetings with Senate Pro Tem Mike McGuire, Senator Cabaldon, Assembly Member Connolly and Assembly Member Rogers to discuss the real impacts of implementing the Statewide Winery Order. The meeting was attended by staff of the State Water Board. The outcome was an acknowledgement that the legislators have a role to play in review of the impacts of regulatory requirements. There was a decision to develop a working group and direction to conduct three additional meetings with staff and producers to be completed by August to identify the impacts and the ability to meet with the intent without the loss of many small businesses. Also to recommend mitigations.

Thank you for taking the time. Sonoma County Vintners and I would be happy to talk in more detail regarding our thoughts, and to assist in further discussions and order development. We would be honored to work with you and the board.

Please feel free to contact me directly and I would be happy to connect as soon as possible.

Sincerely,

Michael Haney
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