



May 30, 2025

RE: Comments on Adoption of Proposed Order No. R1-2024-0056, General Waste Discharge Requirements for Commercial Vineyards in the North Coast Region and Proposed Resolution No. R1-2024-0057

Dear Chair Bedolla, Board Members and Staff,

The Mendocino County Farm Bureau (MCFB) is a non-governmental, non-profit, voluntary membership, advocacy group whose purpose is to protect and promote agricultural interests throughout the county and to find solutions to the problems facing agricultural businesses and the rural community. MCFB would like to submit the following comments for the Public Hearing to Consider Adoption of Proposed Order No. R1-2024-0056, General Waste Discharge Requirements for Commercial Vineyards in the North Coast Region and Proposed Resolution No. R1-2024-0057, Certification of Environmental Impact Report, California Environmental Quality Act Findings of Fact, and Statement of Overriding Considerations (*Brenna Sullivan, Chris Watt, David Kuszmar*).

First off, we want to thank Region 1 water quality control board staff for the time they have taken to engage with us and our members through in person visits to commercial vineyards and virtually through meetings with potential coalition stakeholders. The time spent being able to voice our concerns, showing real-life scenarios on how the proposed order would affect producers, and working through possible scenarios to limit unintended consequences was invaluable. We hope this leads to an efficient and streamlined roll out and implementation of the Vineyard Order.

With that being said, we still have concerns. It is still our position that the contribution of sediment to our waterways from commercial vineyards is exaggerated. We also don't believe commercial vineyards are the culprit in nutrient loading or pesticide contamination

of surface and groundwater. As an industry, most businesses are operating conscientiously as good stewards of our lands and waters. While we believe the oversight and protection of water quality is necessary, we have doubts that this order will lead to the desired outcome.

The vineyard industry is suffering globally, especially here in California. With an increase in input costs, labor, costs to meet compliance standards, we fear this order will be the “last straw” for some producers that will lead to the loss of more farmers and farmland.

With this in mind, we hope that the work and effort put in by all stakeholders, including water board staff, will lead to minimal unintended consequences and that the process to meet regulatory compliance be as painless to the extent possible.

With respect,

A handwritten signature in black ink, appearing to read "Adam Gaska". The signature is fluid and cursive, with the first name "Adam" and last name "Gaska" clearly distinguishable.

Adam Gaska, Executive Director

Mendocino County Farm Bureau