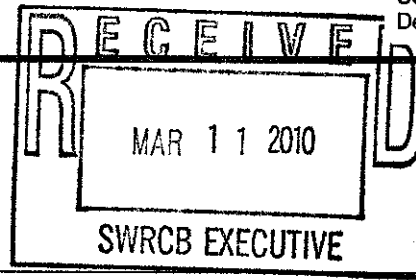


commentletters - Sonoma Creek TMDL



From: "Nick Frey" <frey@sonomawinegrape.org>
To: <commentletters@waterboards.ca.gov>
Date: Thursday, March 11, 2010 11:57 AM
Subject: Sonoma Creek TMDL

I am writing on behalf of grape growers in the Sonoma Creek watershed who will be impacted by the proposed amendments to the basin plan. I must question item 14 in the draft Resolution No. 2010-. I find no way to judge the economic impacts on individual growers, but I fear the projected costs of \$1.3 to 2.3 million/year for 20 years will make many farming operations uneconomic and unsustainable. I also feel the assumption of 75% government grant support is optimistic given current economic conditions. It is important to keep vineyards, in particular, economically viable because a managed landscape will contribute less sediment to Sonoma Creek than unmanaged land or commercial development. Did your staff check their economic assumptions with any growers? In order for a grower to know the economic impacts, we must know the agricultural acres impacted by the proposed amendment. Specifically how many agriculture acres are assumed to be contributing the 8600 tons of sediment per year? Can you give any examples of management practices which have resulted in a 7000 ton/yr decrease or an 82% reduction in sedimentation? More importantly, growers need to know how much sediment loss per acre will meet the TMDL target. Has any watershed achieved total sediment loading of 125% of background? How can the public assess whether this threshold is reasonable or achievable at any cost?

If I use your assumptions that 75% of costs will be for correcting channel incision and enhancing habitat conditions, including stream bank stabilization, and that 75% of those costs might be paid through government grants, that leaves nearly 50% of the costs for landowners as a best case. That does not result in \$300,000 to \$600,000 for growers, which is only 25% of the total projected costs to reduce sedimentation from agricultural lands. Are your economic analyses sufficient to meet your requirements for assessing economic impacts of proposed modification to the basin plan?

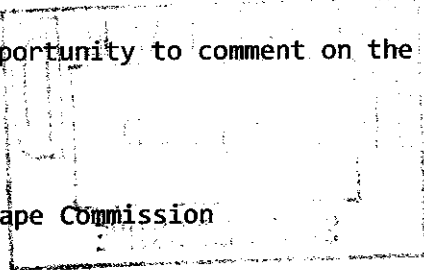
The amendment refers to the Vineyard Erosion and Sediment Control Ordinance. That ordinance has been expanded to include grading and drainage reviews. There is also a newly released Best Management Practices for Agricultural Erosion and Sediment Control. This manual is available online at <http://www.sonoma-county.org/agcomm/vesco.htm#erosion>. All newly planted or replanted vineyards in the county fall under this ordinance. You will note vegetative buffer strips (setbacks) have been increased and now ephemeral streams also have vegetative buffers. These requirements along with extensive planting and maintenance of cover crops in vineyards are decreasing sediment movement from vineyards today.

Is it possible to include Certification under the CA Sustainable Winegrowing Program as an approved program under the WDR waiver policy? Third Party Certification begins in 2010. The process includes annual self-assessments by growers, requirement for an annual action plan to improve elements that the grower feels need to be improved (in this case, elements affecting water quality would need to be addressed unless already performing at a very high level). Growers are audited every three years to insure assessments are accurate and action plans are implemented. There is a cost for certification in addition to the costs for implementing practices to reduce sediment movement off the property. The advantage of this program over all others I am aware of is all self-assessment data are recorded online and reports can be generated to document improvement in practices over time.

I ask the board to provide growers with maximum sediment discharge per acre per year to meet the TMDL targets. If you have data on current sediment loss from vineyards, those too should be provided. If you have no such data, how valid is your projected 8600 Tons/Year? I also ask that you do more rigorous economic analyses, including scenarios that assume less than 75% grant support for in-stream restoration work. Those costs need to be compared to typical returns for grape and livestock production. Compliance with the Basin Plan amendment will further stress agricultural producers who already suffer from a weak agricultural economy.

Thank you for the opportunity to comment on the draft Basin Plan amendment.

Sincerely,


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