



SHANDON-SAN JUAN WATER DISTRICT

SHANDON-SAN JUAN GSA

2021 BOARD OF DIRECTORS

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February 22, 2021

Chairman Jean-Pierre Wolff
Central Coast Regional Water Quality Board
895 Aerovista Place, Ste. 101
San Luis, Obispo, CA 93401-7906

**Subject: Comments on the Draft Ag Order 4.0
Wine Grape Designation**

Dear Chairman Wolff and Members of the Board,

The Shandon-San Juan Groundwater Sustainability Agency (SSJ GSA) and Water District was created specifically to protect the groundwater and surface water resources of our area. All of us who live and work over the Paso Robles Groundwater Basin are highly reliant upon the annual precipitation that falls upon the Paso Basin and surrounding watersheds. Water that each year refills the Basin. SSJ GSA strongly supports the mission of the Central Coast Regional Water Quality Board and hope to see an effective, practical and achievable Ag Order 4.0 Final Draft that protects this water resource and that also recognizes and protects the many benefits that arise from the multiple uses of that water.

Wine Grapes should have a separate designation and management requirements under Ag Order 4.0. Wine grape vineyards are currently farmed well within the Boards desired Nitrogen and chemical limits that protect the groundwater resource. **Wine Grapes should have a separate designation in Ag Order 4.0:**

- a. Wine grapes use only 1 to 1.9 acft/yr of water in the Central Coast.
- b. Wine grapes use much lower rates of Nitrogen. UC recommends 10 to 25 lbs of N per year. Many vineyards competing for higher value markets use less. These application rates are far below the rates Board Staff have set as hard targets for allowable Nitrogen remaining in the soil post-harvest by 2050.
- c. The local Vineyard industry has a history of being good stewards. Locally viticulturists in the Paso Basin developed and supported the Vineyard Team and later the Vineyard Team's SIP certification. Statewide and locally winegrowers have created and broadly participated in the California Sustainable Winegrowing Program and Certification.
- d. **In recognition of the low input requirements of Wine Grapes and the good stewardship of Wine Grape Growers, Wine grapes deserve a separate management category Under AG Order 4.0.**

Thank you very much,

Willy Cunha, President of the Board of Directors
Shandon-San Juan GSA