

Shandon-San Juan Water District

Shandon-San Juan Groundwater Sustainability Agency

June 15, 2020

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

Re: Comments on Draft Ag Order 4.0

Dear Chairman Wolff and Members of the Board:

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

1. Wine grape vineyards are currently farmed well within the Board's desired Nitrogen and chemical limits that protect the groundwater resource.
 - a. Wine grapes use only 1 to 1.9 acre-fee per year of water.
 - 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 for considering the input of the Shandon-San Juan GSA.

Sincerely,



Willy Cunha, President of the Board
Shandon-San Juan Water District / Shandon-San Juan Groundwater Sustainability Agency