



Re: Draft Russian River Frost Protection Regulation

The water in the Russian River watershed was known to be overdrafted in the 1990's. Since that time vineyard growth has skyrocketed and is continuing today. The new proposal to deal with this should be fully transparent and reflect real time conditions in our river and streams. To allow the wine and grape industry to exert any control of the info and not release it until it has been studied (and doctored for public consumption) by "science review committee" will only serve the industry and not the fish. In Sonoma County, vineyards are not to release any sediment into streams by using BMPs. Some growers follow this, some do not. The ones that don't are not subject to any enforcement. In the same way the wine and grape industry does not want to have regulation of water use, but would like to let it be a long process that will eventually "solve" this problem.

Sonoma County has no policy in place that may consider cumulative impacts in regards to vineyard development. This is a fast trip to the devastation of our salmonids. It is a common practice now to have real time monitoring gauges that can upload to the web and provide the public with real time info of what is happening to our water. Our water is a public trust. Real time monitoring is critical to having knowledge of what is happening in our streams.

All policy decisions should adhere to AB2121.

Voluntary Self regulation by the industry should be a non-starter. It certainly is not working with sediment control.

Frost protection waters should only be available to fully licensed diverters, and that should be under regulatory control.

Changing the term of "harm" to "stranding mortality" (due to Farm Bureau lobbying) waters down the full scope of protection for endangered species.

Using water for frost protection should be a last option, not the first. Many vineyards are using alternatives. More should be.

This is a tough problem. I appreciate that you are addressing it.

Sincerely, John Roberts Board Member of the Atascadero Green Valley Watershed Council