

commentletters - "Comment Letter-Proposed Russian River Frost Regulation"

From: Barb Petersen <petersenweldingultd@juno.com>
To: <commentletters@waterboards.ca.gov>
Date: Friday, July 01, 2011 1:31 PM
Subject: "Comment Letter-Proposed Russian River Frost Regulation"

From everything I have read, it seems that you have no scientific facts to base such a radical proposal on. It seems that 3 incidents of fish stranded in how many years? The year those 3 incidents were noted was the coldest spring in over 30 years. Most years, frost protection is not used more than a handful of times depending on location. Another point -- Stranded fish are common in streams and creeks for the last 100 years. As the weather warms up, and the rains stop, the water naturally drains down until there are little pools or no water at all in most of the creeks and streams until the next winter when they fill up again. It's mother nature. Ask the old timers. When Farmers use the water to Frost, the water drains back into the creeks and watersheds naturally or evaporates and ends up back in rivers and streams as rain.

Another point - to target the vineyards only is rather discriminatory, don't you think? What about everyone else. It is getting rather tiresome that city people are instigating a lot of the water controls on the vineyards when they don't have a clue as to how things work. All they think about is the fact that when they turn on their faucet in their house they have water. And because grapes are a big industry, they think they can pick on the vineyards. There are a lot of individuals and businesses that use the water besides vineyards.

And the proposed cost to the vineyards is totally ridiculous!!! It is proposing that vineyards not only register their sprinkler systems but their wind machines. Vineyards are not the only ones that use wind machines - pear orchards, oranges, peaches, etc. We know the state is broke, but this, again, is unfair to the farmers. This will push more farms out of business. There are a lot of small farms / vineyards that rules like these could push over the edge into bankruptcy.

If you are going to propose some rules and regulations, I would suggest someone get some facts together and I would request a phased-in development of the regulations in order to allow data from the Sonoma County local Frost Ordinance to inform the final state regulations. Please refrain from including ground water in the regulation. Groundwater may be an effective solution if stream reaches are identified where direct diversions are impacting stream flows. The state at this time has not met the regulatory threshold to justify such a far reaching and precedent setting statute.

Please take a good hard look at the details and think about the far-reaching effects rules like these could set into motion. Thank you for your consideration.

Barbara A. Petersen

