

commentletters - Comment Letter - Proposed Russian River Frost Regulations

From: Chris Bowen <cwbowen3@sbcglobal.net>
To: <commentletters@waterboards.ca.gov>
Date: Saturday, July 02, 2011 10:15 AM
Subject: Comment Letter - Proposed Russian River Frost Regulations

Dear Board Members:

I would like to request that you modify the proposed Russian River Frost Regulation. The economic impact analysis in your rulemaking notice cites significant economic impacts and because the need for this new regulation is based on only three incidents of reported fish strandings which occurred during the third year of a drought and during the coldest spring in a great many years, your board should be hesitant to impose regulations which may not be necessary. I question whether the need for such a major and potentially precedent setting regulation has been adequately demonstrated.

I believe that a more gradual implementation of any new regulation is more reasonable. This would allow data collected from the local Frost Ordinance adopted in Sonoma County to establish a more solid factual basis for any regulation you might adopt.

Ground water should be excluded from the regulation at this time. If data support stream reaches where direct diversions are impacting stream flows and potentially impacting endangered salmonids, ground water may be an effective alternative source of water for frost protection, without the negative impact.

While I do not grow grapes in the Russian River watershed, I am a grower in Sonoma County. I am concerned the proposed regulation will become basis for future regulations which will impact my business and the businesses of growers throughout the state who rely on water for frost protection and irrigation.

Thank you for your attention.

Sincerely,
Chris Bowen
Manager, Hunter Farms

