

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

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**From:** DERMOT BOURKE <rrpinot@sbcglobal.net>  
**To:** <commentletters@waterboards.ca.gov>  
**Date:** Wednesday, July 06, 2011 9:28 AM  
**Subject:** "Comment Letter - Proposed Russian River Frost Regulation."  
**CC:** <rrpinot@sbcglobal.net>

**LATE COMMENT**

1. This proposal is a taking from us and has devalued our property significantly without demonstrating any defensible scientific research or data.
2. We 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.
3. We request a refrain from including ground water from the regulation. Groundwater may be an effective solution only if stream reaches are identified where direct diversions are impacting stream flows.
4. The state at this time has not met the regulatory threshold to justify such a far reaching and precedent setting statute. There have been three incidents of reported fish strandings, and those occurred during the 3rd year of a drought and during the coldest spring in over 30 years.

Sincerely,

Dermot & Darice Bourke  
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