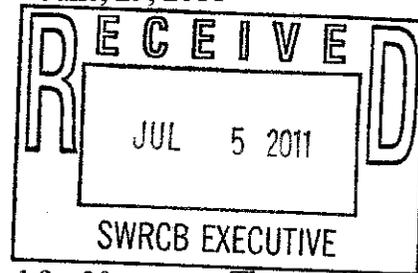


Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-2000

June, 29, 2011



To Whom It May Concern,

I have farmed at 4849 Hwy 128, Geyserville, CA in the Russian River Watershed for 30+ years. The ranch has Senior Water/riparian rights to the Russian River and also borders Gird Creek. We have been monitoring the Russian River, Gird Creek, and test wells, with several gauges for the past 3 years.

Our wells for frost protection are in the Alexander Valley Aquifer, which has been reported to contain over 500,000 acre feet of water. By pumping out of the aquifer/ground water, we already are pumping "stored water" that has no effect on the Russian River or Gird Creek. Over the past 3 years, the gauges have proved this to be true.

It is important that we all work together, with the goal of gaining accurate information and the use of sound science, to protect and save the fish, while preserving our agricultural heritage. However, I feel that to place the whole watershed under the same regulations is not reasonable. It would be better to phase in regulations on the most critical tributaries first.

I support the Sonoma County Frost Ordinance. I am willing and looking forward to working with them in obtaining accurate information and providing further education on the entire Russian River Watershed.

If we were to suffer a frost episode and we did not have the ability to frost protect, we would not be able to continue our farming operation and would not be sustainable.

To say frost protection is a "waste or unreasonable use, or unreasonable method of use, or the unreasonable method of diversion of all waters of the state" must be removed from the regulations. It is my opinion that if this language is included in the "Proposed Russian River Frost Protection Regulation" it would be grounds for legal action as it could violate our "Senior Water Rights".

Some have suggested that farmers switch to another crop. However, it has been reported, repeatedly, that other viable crops could use up to 5 to 10 times more water than what we currently use.

In the end, if this proposed regulation's only goal is to save the fish, and not to ultimately control the water, than it seems reasonable to me, to concentrate on the tributaries that dry up naturally, every spring, or in years of late rains or high water. The natural drying up of tributaries has eventually left many fish stranded to die.

The tributaries in the Russian River Watershed have dried up naturally for 100's of years and we should not be penalized for these naturally occurring springtime events.

Thank you,

A handwritten signature in cursive script that reads "Harry Black".

Harry Black