

AB2121Policy - Comment Letter - AB2121 Policy

From: Chris Bowen <cwbowen3@sbcglobal.net>
To: <AB2121policy@waterboards.ca.gov>
Date: 4/30/2008 11:40 AM
Subject: Comment Letter - AB2121 Policy

I am a landowner in Sonoma County and currently farm 42 acres of grapes. I have License Number 12305 from the Division of Water Rights to divert and use water for irrigation, frost protection, recreation and wildlife enhancement uses under permit 16620. My reservoir is an onstream reservoir on an unnamed winter stream which drains to Sonoma Creek. Sonoma Creek also borders my property and my permit also allows diversion from Sonoma Creek.

While the Instream Flows Policy - Frequently Asked Questions web page of the SWRCB states "Those who have existing legal water right permits are not affected by the draft policy unless they seek to change the conditions of their water right permits or licenses." I am not at all confident that there will be no impact upon the farming interests of my family. The policies relating to maintaining minimum bypass flow, for example, would be very costly for us to implement. If the need arose to repair our existing reservoir dam, or we had to move or alter the reservoir to conform with the proposed policy, the disruption, cost and loss of productive farmland would be extremely onerous.

The cost to other farmers of compliance and the sever loss in water and possibly farmland are unacceptable, especially for a policy which has no proven benefit for the fish it seeks to benefit. Here in Sonoma Valley, for example, the increased demand on scarce groundwater supplies which could occur if surface runoff storage is curtailed would be a serious problem both for farmers and for rural residents not hooked up to municipal water. There needs to be better balance between improving fish habitat and the needs of farmers and other users.

While the decline in salmon and steelhead is a significant problem, the SWRCB needs to reject the draft policy and replace it with one which strikes a more even-handed balance between environmental and economic concerns.

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