

April 30, 2008

Ms. Karen Niiya, Senior Engineer
Division of Water Rights
State Water Resources Control Board
1001 I Street, 2nd Floor
Sacramento, CA 95814

STATE WATER RESOURCES CONTROL BOARD
DIVISION OF WATER RIGHTS
1001 I STREET, 2ND FLOOR
SACRAMENTO, CA 95814
2008 MAY -1 AM 9:02

Dear Ms. Niiya:

I am the owner of a small winery in Sonoma and the co-owner of a vineyard partnership that farms 58 acres of premium wine grapes in the Sonoma Valley, most of which are purchased by the winery. While the vineyard is currently supplied with water from a well drilled in 1998 when the vineyard was developed, I am very concerned that the proposed Water Rights Policy for the North Coast would all but prohibit future expansion the vineyard.

I am aware that salmon and steelhead runs in coastal rivers have declined dramatically and that instream flow availability is a possible cause. I do support the idea that industry and government should find a way to solve this problem, but at the same time I believe that the proposed Policy goes too far in decreasing our ability to access surface water for vineyard development.

Please consider the following points:

1. Fundamental problems in the water right system must be fixed in order to have an effective instream flows policy.
2. The Draft Policy does not acknowledge that the water right administrative system has caused the massive application and petition backlog in the North Coast.
3. An alternative watershed approach for investigating impacts, processing water right applications, and managing water diversions is needed.
4. An alternative is needed that will provide on-the-ground scientific and technical evaluations of actual streams rather than blanket application of generic one-size-fits-all

screening criteria. A watershed approach can encourage a broad set of actions such as fish passage improvements, stream shading, and shifting of existing spring, summer and fall diversions to the winter rainy season. Working together in a watershed, property owners, public agencies and conservation groups can contribute to local efforts actually beneficial to fish while also providing for regional economic viability and regulatory certainty.

In summary, we need a new water rights process that breaks the permitting backlog, fixes stream flow problems and increases habitat.

Most sincerely,

Steven MacRostie
PRESIDENT
MacRostie Winery and Vineyards
Managing Partner, Wildcat Mountain Vineyard