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STATE WATER RESOURCES CONTROL BOARD

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Ms. Karen Niiya, Senior Engineer  
Division of Water Rights  
State Water Resources Control Board  
1001 I Street, 2<sup>nd</sup> Floor  
P.O. Box 2000  
Sacramento, CA 95814

DIV. OF WATER RIGHTS  
SACRAMENTO

April 20, 2008

Re: Comment Letter –AB 2121 Policy

Dear Ms. Niiya,

I am a landowner in Sonoma County and the proposed policy will directly impact me. I own a 25 acre parcel with 9 acres of vineyards that are presently irrigated using well water. The problem is that the well usually goes dry in the summer.

I therefore filed an application in 2002 to appropriate water for storage in an on-stream reservoir (the "stream" is dry and not spring fed). We have followed the rules of the Water Board and are at the point where we have paid an engineering firm to perform environmental studies at the reservoir site.

The proposed AB 2121 Policy negatively impacts the farming interests of my family business.

Implementation of the Policy will result in further delays in water right processing because the majority of applicants and petitioners will need to seek a variance due to the stringent bypass and diversion rate limitations in the Policy. The variance criteria are not clearly defined in the Policy; therefore, we believe that processing of numerous variance requests will exacerbate the already back-logged workload of the State Water Board staff, and further delay approval of our pending action.

The Policy does not provide a balance to the competing needs for water as it fails to weigh the many benefits derived from the agricultural, domestic and industrial uses of water.

I am concerned that the severe and costly compliance measures imposed on my project will result in drastically reduced water yields and the loss of my productive farmland. There is no indication in the Policy that the fishery resources would actually benefit from my implementation of such measures.

The State Water Board should concentrate on fixing the water right process. Applicants deserve clear and effective guidance as to how to obtain a water right permit. The Draft Policy should be rejected and replaced with one that balances economic interests and environmental protection.

Yours truly,



Steve Pride, owner and manager of Pride Mountain Vineyards

cc: Tam Doduc, Chair, SWRCB  
SWRCB Members: Arthur Baggett, Jr., Charles Hoppin, Frances Spivy-Weber, Gary Wolff  
*at historic Summit Ranch*