

1/19/10 Bd Mtg/Wrkshp Item 7  
Russian River  
Deadline: 1/13/10 by 12 noon

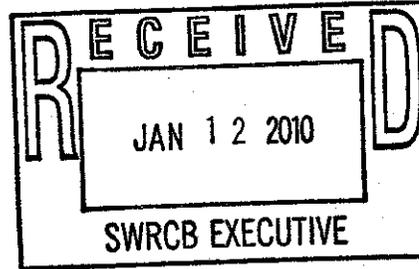
**From:** "Bob Leonard" <bobl@ferrari-carano.com>  
**To:** <commentletters@waterboards.ca.gov>  
**Date:** 1/12/2010 2:03 PM  
**Subject:** 1/19/2010 Board Meeting-Russian River Waterhedfrost protection swrcb

Clerk of theBoard

January 12, 2010

Chairman Charles Hoppin

State Water Resources Control Board  
P.O. Box 100  
Sacramento, CA 95812-0100



Re: Russian River Frost Protection Draft Regulation for the January 19th SWRCB Workshop

Dear Chairman Hoppin and Board Members,

This is in response to the State Water Resources Control Board (SWRCB) draft regulation relating to use of water for frost protection of crops in the Russian River watershed in Mendocino and Sonoma Counties.

Ferrari-Carano Vineyards and Winery farms approximately 1,500 acres in the Russian River and Navarro River Watersheds, we have always been stewards in protecting our very valuable natural resources especially our water. Of the 1,500 acres of vineyards farmed, 35% doesn't have any frost protection available, 29% uses wells for overhead sprinklers or micro-mist sprinklers (micro climate specific), 24% uses reservoirs, and 12% wind generation. We have spent several hundred thousand dollars the last several years, on reservoirs and wind generation where we can, because we understand the importance of protecting our water supply and endangered fish. We also need to protect our business interests. If we are not allowed to use the little water we need for frost protection the potential impact on our crops could be economically devastating, even with the little protection (monetarily) that crop insurance can provide (if they would even cover us at all).

This draft regulation does not give any consideration to the Frost Protection Program that was presented to the SWRCB at the November 18, 2009 Russian River frost protection workshop. The Program represents a collaborative effort by local growers and other stakeholders in Mendocino and Sonoma Counties over the last year and offers real solutions to identifying problem areas within the watershed and how instantaneous demand issues can be lessened. We believe your draft regulation is an impractical starting point from which to continue the collaborative efforts to resolve the water use needs for both the agricultural community and the fishery resources.

This draft regulation appears to be an attempt by the SWRCB to secure new jurisdiction over groundwater sources. This goes beyond the initial scope of developing a program to reduce instantaneous demand during frost events. We are concerned about the statewide implications to groundwater resources that could result from such a regulation.

We ask that you re-consider the Russian River Frost Program and the proposed policy that was submitted to you. Agriculture has demonstrated that it is able and willing to work with the SWRCB and other regulatory agencies to address problems in the watershed. Please do not adopt a regulation that

would thwart that effort.

Sincerely,

Robert Leonard  
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