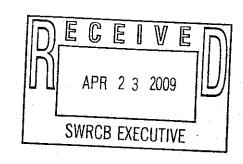
Public Comment TUC Sonoma Co. Water Agency Deadline: 4/24/09 by 5:00 p.m.

April 21, 2009

Mr. Charles R. Hoppin Board Chair State Water Resources Control Board 1001 I Street Sacramento, California 95814

Re: Division of Water Rights Order WR 2009-0027-DWR



Dear Mr. Hoppin:

The Sonoma County Winegrape Commission represents 1800 vineyard owners in Sonoma and Marin Counties. Those vineyards produce winegrapes that contribute \$400 million in revenues to the agricultural economy and support \$8 billion in business revenues from the wines produced and from tourism. The nearly 61,000 vineyard acres in the county include nearly 40,000 acres in the Russian River basin. A vast majority of those vineyards rely on drip irrigation to produce quality winegrapes that are the foundation for premium wine production. While drip irrigation is the most efficient irrigation system for grape production, local growers are committed to water conservation so that agriculture also contributes to the conservation goals your Board is seeking.

The Commission has been actively involved in grower education on water conservation strategies for grape production for 3 years. Survey results by Mark Greenspan, Advanced Viticulture, under a contract with the Sonoma County Water Agency, found growers were able to reduce irrigation 10% from 2006 to 2007. The average application was 3.7 inches/acre which is 47% below published USGS drip irrigation rates for grape production on the North Coast. (Drip irrigation replaced sprinkler irrigation which used 12 to 14 inches/acre/yr.)

Further reductions will be more difficult, but there are still opportunities to improve irrigation efficiencies. Dr. Greenspan has worked with local growers to develop irrigation Best Management Practices (BMPs) which have been presented growers at a number of meetings over the past 3 years. Those BMPs have been updated to include frost protection in 2009 and we will have late season conservation BMPs for vineyards later this summer.

The largest savings in water in 2009 compared to 2008 will be in frost protection. The 2008 spring was very cold, requiring more frost protection than normal. Sprinkler irrigation is the best available frost protection, but it requires significant amounts of water. Some growers have supplemented irrigation systems with wind machines in 2009, thus reducing water demand on all but the coldest nights. The more normal spring in 2009 means most growers have greatly reduced water use for frost protection. Frost events are not predictable from year to year, but 2008 was the worst frost season since 1974. Four to five frost events are normal in the Alexander Valley. This year we have had that number of events but most were later in the

morning, requiring shorter run times for sprinklers. Those savings along with ongoing conservations efforts for drip irrigation will contribute substantial water savings for other beneficial uses, including protecting threatened and endangered salmonids.

In addition to ongoing grower education at grower meetings this winter and spring, a number of growers have been working together on the Salmon Coalition to improve salmonid habitat through adoption of BMPs and to take a watershed approach to water management and stream restoration. For those efforts to be successful, it will require your Board's support to allow off stream storage of water during peak flows and when necessary timed diversions to mitigate peak diversion periods that affect stream flows. This will reduce demand during the summer when stream flows are low. All of these efforts are evidence that local growers are informed and engaged in water conservation as part of their grape production practices and they are contributing to the water conservation efforts the entire county is pursuing as we enter a third year of drought conditions.

We have appreciated the support of the Sonoma County Water Agency in providing Dr. Greenspan as a resource to our Commission and its growers. This includes a water conservation demonstration at Hoot Owl Creek Vineyards in Alexander Valley this summer. It will demonstrate different irrigation regimes and evaluate alternatives to cooling during high temperature events with overhead sprinklers. The demonstration will include field days for growers with speakers from NRCS and the local RCD. These collaborations have been productive in meeting the water demands of growers and the agencies.

Sincerely,

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President