

rrfrostregulation - Comments on proposed RR Frost Protection Regulation EIR

From: Nick Frey <frey@sonomawinegrape.org>
To: <rrfrostregulation@waterboards.ca.gov>
Date: 11/23/2010 1:54 PM
Subject: Comments on proposed RR Frost Protection Regulation EIR

Attention: Bill Cowan

The Sonoma County Winegrape Commission represents 1800 vineyard owners in Sonoma and Marin Counties, many of whom farm within the Russian River Watershed. Grape growing in Sonoma County generated \$465 million in farm income in 2009, which was 70% of total farm revenues. Grape growing is the only agricultural sector that is not in decline in Sonoma County. There is no economically viable agricultural alternative to wine grapes today. Thus Sonoma County agriculture is dependent on grape growing.

2.0 Project description:

The originally proposed regulation posed significant costs and risks to grape growers. The proposal to include hydraulically connected groundwater greatly expands the economic impact. The extent cannot be determined because there is no definition of the term or method described to prove or disprove connection. The Stetson maps do not provide any clarity, in my opinion, on this issue when preparing the EIR. These deficiencies and the expanded acreage impacted by including groundwater should be considered in the EIR.

4.0 Potential Alternatives

The EIR should consider any local program that is developed, particularly a program that is likely to be developed in Sonoma County under a County Frost Program regulation.

5.0 Probable Environmental Effects

The conclusions that the regulation might require the replacement of frost sensitive crops or that growers would continue to discontinue frost protection altogether are financially unfeasible. There are no cropping alternatives and risking significant crop loss due to frost every year is untenable. Just because a crop is damaged by frost does not mean growers can forego farming expenses. The vines must be protected from mildew and the canopy must be managed to produce suitable buds for next year's crop. Ongoing expense with significant crop loss will result in financial ruin. Fallowing land is not an option. Who can pay taxes on land, maintain the parcel by mowing or disking to control weeds and generate no income? Suggesting frost tolerant crops are an alternative is meaningless; there are not economically viable alternatives in Sonoma County. If grape production is not possible due to the proposed regulation, housing, not agriculture, is the alternative!

Those preparing the EIR must understand the importance of grape growing to agriculture in Sonoma County and the importance to the entire grape and wine industry to our economy. They must also recognize viable options from many of the suggested options proposed in the scoping document.

Thank you for the opportunity to comment on the scope of the EIR.

Sincerely,

Nick Frey

President

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