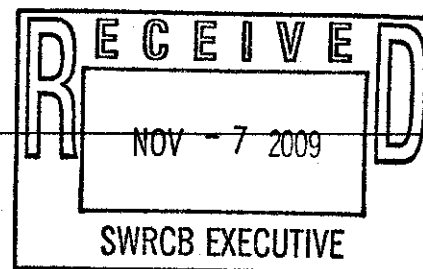


commentletters - Frost Protection-Russian River (11/18 hearing)

From: Kimberly Burr <kimlarry2@comcast.net>
To: <commentletters@waterboards.ca.gov>
Date: Saturday, November 07, 2009 4:35 PM
Subject: Frost Protection-Russian River (11/18 hearing)



November 7, 2009

Dear Ms. Whitney and Board Members:

Last spring, NMFS recommended no diversions for frost protection involving surface or hydrologically connected ground water in the Russian River Basin. (NMFS power point 2009). No prohibition on diversions, however was issued, and many rare specimens of steelhead and coho salmon perished as predicted.

PROHIBITION

I have been a restoration volunteer for several years on Green Valley Creek in Sonoma County. I concur with a prohibition on the use of such waters for frost protection, but think it responsible to go further and prohibit the use of all water insofar as the sprinkling activities cannot be adequately monitored especially in critical spawning and rearing tributaries, and the risk of TAKE is high. If any sprinkling is allowed, ponds will go dry only to be refilled, large amounts of water will be drawn at the same time, and the imperfections in modeling, forecasting, and irrigation systems, to name just a few of the many problems with allowing any sprinkling of vines, cannot be dismissed. The tolerance for risk at this stage in the game must be zero. When protected species are killed, especially when it could have been avoided if due regard for the species had been exercised, the laws protecting those species are triggered.

ALTERNATIVES

The growers have alternatives including crop insurance. The cost of business should be placed where it belongs and not on a beleaguered fishery. The issues surrounding the dire impacts of water use, as frost protection, have been known for over 10 years. SWRCB staff identified water consuming frost protection activities in the Russian River as unreasonable and wasteful in 1997. Yet in Sonoma and Mendocino Counties, growers have largely ignored those impacts and in fact vineyards are expanding. Your actions are past due and are very important to jump start a change that is critically necessary.

The time to indulge in experiments, theories, good intentions, modeling, pilot projects, and promises can come after the future of the fishery is secure. The "collapse" of the fishery has already happened according to graphs produced by NMFS, and there is no other course but to refrain from all use of water for frost protection.

Thank you,

Kimberly Burr

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