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September 16, 2011

Mr. Charlie Hoppin, Chair
and Members of the Board
State Water Resources Control Board
1001 I Street
Sacramento, CA 95814
Via email to commentletters@waterboards.ca.gov



Re: Proposed Russian River Frost Protection Regulation - Support

Dear Chairman Hoppin and Members of the Board:

On behalf of Russian Riverkeeper I submit the following comments on the Proposed Russian River Frost Reasonable Use Regulation ("Frost Rule"). Russian Riverkeeper is a local member of the international Waterkeeper Alliance and represent our over 1500 members.

We support the most recent changes to the draft Frost Rule, and we urge the State Water Board to adopt the Frost Rule without further delay.

It is likely that the Frost Rule will make everyone unhappy including grape growers, stakeholders including Russian Riverkeeper. In particular, many of us still have questions about how the local water demand management programs will function and where the lines of responsibility and accountability will be lie between water users, Demand Management Program governing bodies, and the State Board in specific cases. Nevertheless, we believe the Rule provides a solid foundation on which to build and leaves sufficient room for leaders within the grape growing industry and interested stakeholders like Trout Unlimited to work out the details together with your staff.

Since the first fish kills in 2008, the State Water Board and many stakeholders have labored to put in place a reasonable use rule and local frost management programs to protect salmon and steelhead. Although the public debate has been dominated by some of the loudest voices urging the Board to do nothing or to move more decisively, many people are working behind the scenes to improve our scientific understanding and to improve conditions on the ground. We remain optimistic that this is a problem that can be solved and we look forward to the Board adopting the revised

Thank you for your consideration of our comments.

Sincerely,

Don McEnhill
Executive Director