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July 5, 2011

Re: Comment Letter for Proposed Russian River Frost Regulation

Dear State Water Resources Control Board,

Thank you for the opportunity to comment on the State Water Resources Control Board's proposed frost regulations for the Russian River basin.

Russian Riverkeeper urges the Board to adopt the Frost Regulation without further delay. In addition, we suggest the following:

- The draft's framework of stating that diversions for frost protection are unreasonable unless they are undertaken in compliance with a Board-approved local water management plan makes sense.
- The draft's inclusion of connected groundwater and all water rights is appropriate and necessary.
- The rule must ensure 100% participation by people who use water for frost protection.
- The rule must ensure comprehensive stream gaging. It should be uploaded automatically to the internet in real time.
- The rule must ensure comprehensive monitoring and reporting of diversion data.
- Both gage data and diversion data must be reported to the SWRCB and be publicly available.
- The program must be transparent.
- The rule must ensure accountability (i.e., if something goes wrong, it must be clear who is responsible for fixing it).
- If aspects of the program are implemented in phases, there must be clear deadlines for each phase.
- Above all, the program must ensure that fish kills from frost protection never happen again.

Thank you for your hard work and we hope to see these regulations in place by next spring.

Sincerely,  
Kate Wilson  
Russian Riverkeeper