



EDMUND G. BROWN JR.
GOVERNOR



MATTHEW RODRIGUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

State Water Resources Control Board

MAY 09 2012

Russian River Property Owners Association
c/o Mr. Alvin Cadd
3845 Highway 128
Geyserville, CA 95441

Dear Mr. Cadd:

WATER DEMAND MANAGEMENT PROGRAMS FOR COMPLIANCE WITH THE RUSSIAN RIVER FROST PROTECTION REGULATION, SONOMA COUNTY

Thank you for submitting your Water Demand Management Program (WDMP) to the State Water Resources Control Board (State Water Board or Board), Division of Water Rights (Division) regarding compliance with the Russian River Frost Protection Regulation (Regulation). Based on your submittal, the Russian River Property Owners Association (Association) proposes to serve as the governing body for the groundwater diverters in the Alexander Valley of the Russian River watershed within Sonoma County. Division staff reviewed the WDMP proposal and finds that it identifies the governing body, the current participants, their frost acreage and sources of water, and it includes a schedule for continuing your existing monitoring program and conducting a risk assessment. Your schedule does not specifically address the determination of a protective stream stage level for your stream stage monitoring program. However, the Association has been monitoring stream flows for each of the last two years, and you have indicated your data, to date, shows there has not been a correlation between stream stage decline and the pumping by your members for frost protection. Should the stream monitoring data collected over the next two years indicate a relationship between stream stage and frost diversions, you agreed that corrective actions will be developed. Division staff assumes that, as part of the corrective actions that are developed, protective stream stage levels will also be determined in consultation with the Department of Fish and Game (DFG) and the National Marine Fisheries Service (NMFS). With this understanding, Division staff concludes that the Association's WDMP is complete and meets the requirements for the initial WDMP submittal as outlined in the State Water Board's Resolution No. 2011-0047. I concur with the Division staff's conclusion and hereby approve the Association's initial WDMP. Please note that my approval is made with the understanding that the Association will cooperate with other State Water Board-approved WDMPs for diversions on the portions of the Russian River stream system affected by the diversions of your members, and will exchange information for the annual risk assessments of the potential for salmonid stranding mortality from those cumulative diversions of water for frost protection. Failure to exchange necessary information with other appropriate WDMPs may lead to a determination in the future that this WDMP is no longer adequate for meeting the goals of the Regulation.

CHARLES R. HOPPIN, CHAIRMAN | THOMAS HOWARD, EXECUTIVE DIRECTOR

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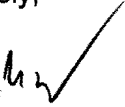
The program inventory the Association submitted is substantially complete and meets most of the requirements of the inventory update due to the State Water Board three months after approval of the initial WDMP. However, an update is still needed to clarify the locations of the points of diversion. The points of diversion should be identified using California Coordinates or Latitude and Longitude for each participant. Please submit this information by June 29, 2012 to complete the initial program inventory of your WDMP.

You noted in your schedule that you intend to complete a final study report by September 1, 2014, and that your study may be complete at that time. Please note that monitoring and annual risk assessments are an ongoing part of WDMPs. Presumably your 2014 completion date is related to the three years of data collection to potentially receive a groundwater exemption from the Regulation. Should your data indicate that the members of your WDMP are not diverting groundwater that is hydraulically connected to the Russian River stream system, then your 2014 report (or an earlier report supported by adequate data) needs to propose criteria that identifies why the groundwater diversions are not hydraulically connected to the Russian River stream system. Your 2014 report should also identify the groundwater diverters within your WDMP that meet the criteria you would be proposing for approval.

Thank you for your cooperation and diligence in working towards the goals of the Russian River Frost Protection Regulation. Should you have any questions, please contact Mr. John O'Hagan of my staff at (916) 341-5368, or by email at johagan@waterboards.ca.gov. Written correspondence should be addressed as follows:

State Water Resources Control Board
Russian River Frost Regulation
Attn.: John O'Hagan
P.O. Box 2000
Sacramento, CA 95812-2000

Sincerely,



Barbara Evoy, Deputy Director
Division of Water Rights