

# Trentadue

WINERY

November 2, 2010

State Water Resources Control Board  
PO Box 2000  
Sacramento, CA 95812-2000

Attn: Mr. Bill Cowan:

We are against the proposal set forth by the California State Water Resources Control board to restrict vineyards use of water for frost protection.

According to the recent report in the Wine Business Insider dated October 26, 2010 the proposal by California's State Water Resources Control Board to restrict vineyards from using the Russian River, its tributaries, and connected groundwater as a source of frost protection could result in losses of business income, state and local taxes and land values costing the California economy more than \$2 billion annually including \$143 million in lost tax revenue to local governments, according to an economic impact study by Robert Eyler, chair of the economics department at Sonoma State University.

The study was conducted by Eyler for Williams Selyem Winery.

We understand the state regulation was proposed in reaction to two alleged events in which salmon, which are protected under the Endangered Species Act, were stranded. Until now we have never heard of such an incident in the entire fifty years that we have lived here. Everyday we hear about climate change and global warming. Given this background perhaps it would be more appropriate to investigate how this could impact future demands for frost protection.

We feel the proposed state regulation is going overbroad and ill-defined because it issues a complete prohibition on water usage for frost protection unless and until a water management program is approved by the Water Resources Control Board.

We do agree with the efforts to manage this situation vis-à-vis the formation of a Frost Working Group among growers that seeks to ensure something like that never happens again. We support the development of more water storage ponds that would lessen the growers' dependence on the river for frost protection -- and a better system of communication so growers aren't all taking water at the same time. We also believe the new alert system at Coyote Dam represents a positive step that should be fully evaluated before drastic measures are imposed by the state.

Sincerely,

*Victor Trentadue*  
Victor Trentadue

APT / BC  
STATE WATER RESOURCES CONTROL BOARD  
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