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September 13, 2011

STATE WATER RESOURCES CONTROL BOARD

**"COMMENT LETTER -RUSSIAN RIVER FROST PROTECTION  
REGULATION"**

I am responding to proposed second draft EIR and Resolution to be adopted on September 20, 2011.

A broad-brush approach to regulation and using the word "unreasonable" regarding water use to frost protect is **WRONG**.

Diverter should be looked at individually for problems. One single study showing approximately 100' of river bank with a fish kill, and then claiming all of the footage being the same as the 100' is regulation at its **WORST**.

As for being financially responsible this regulation doesn't make sense to change from a good clean system (for instance one pump and motor on 40 acres with water) to one wind machine for 12 acres. One wind machine being good for 2 - 3 degrees temperature increase when used without smudge pots and heaters (which are dirty on the air).

Sincerely,

A handwritten signature in black ink, appearing to read "Allan F. Nelson", with a long horizontal line extending to the right.

Allan F. Nelson