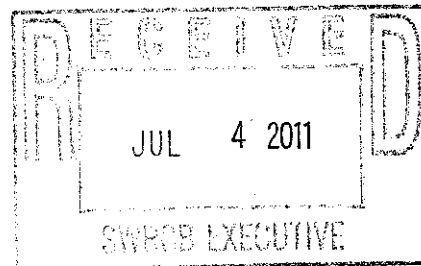


Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-2000



RE: Comment Letter – Proposed Russian River Frost Regulation

Dear Ms. Townsend:

We understand that the reasoning behind this regulation stems from the two episodes of stranding mortality that are noted in the draft Environmental Impact Report. However, it seems that there is a significant lack of documentation and data which deduced that these two episodes are linked to a series of other incidents throughout Sonoma and Mendocino Counties. Until a sufficient amount of accurate data is provided showing the exact number of strandings, location and timing of such strandings, it is impossible to conclude that this in fact was the cause of the problem. In order to adequately protect the Coho, Chinook and Steelhead we must properly address the issues and that requires specific and accurate data which is lacking from the draft EIR.

Should the Board implement this proposed regulation there are two things that need to happen:

1. The unreasonable use of water regulation needs to be eliminated.
2. The proposal needs to be phased in over a period of no less than 7 years as the cost and time to make the switch from water for frost protection to other methods (most of which will likely be regulated to the point of extinction by the California Air Resources Board) will be immense and difficult; especially with our downed economy.

It is our belief that the proposed Russian River Frost Regulation should be completely rejected. If implemented, this Proposed Regulation will lead to the extinction of our local family farms.

Thank you for your time and attention to this matter and our concerns.

Sincerely,

Don Guadagni
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Healdsburg, CA 95448
(707) 433-1081

Joe Guadagni
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