

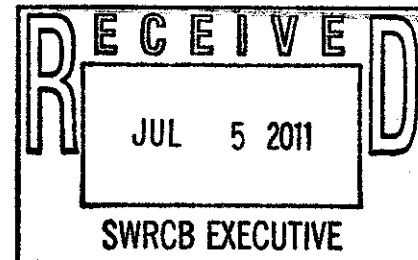
PEDRONCELLI

Sonoma County Wines

Public Comment
RUSSIAN RVER FRST PRCT REG
Deadline: 7/5/11 by 12 noon

July 1, 2011

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



RE: Proposed Russian River Frost Regulation

These comments are in response to the proposed Restriction on Water Use in the Russian River Water Shed. This regulation was developed due to two incidents of fish stranding in April 2008.

Our family has farmed in the Dry Creek Valley for more than 80 years. We have held a permit for Water Diversion & Use since 1951. There is a drainage stream that flows through our property that has water flow to Dry Creek only during rain season. We do not take or use water for frost protection, however, any fish in the stream are naturally stranded.

The SWRCB states that the regulation would apply to ground water hydraulically connected to the Russian River. This description of water rights to be regulated should be riparian and appropriative.

Even though we do not currently draw water for frost protection, our use of water for irrigation would be impacted.

We are all concerned about the environment, however, there is a need to develop regulations that are appropriate. I would request that the board consider further studies prior to implementing any regulations.

Thank you,

A handwritten signature in cursive script that reads "James Pedroncelli".

James Pedroncelli
Proprietor
Pedroncelli Vineyards