

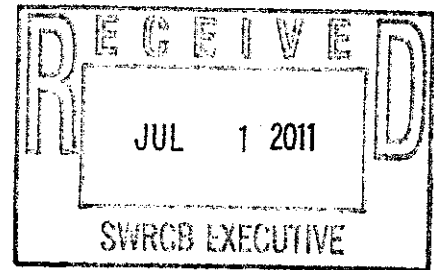
July 1, 2011

Jeanine Townsend, Clerk of the Board

State Water Resources Control Board

P.O. Box 100

Sacramento, CA 95812-0100



RE: Comment Letter on the Proposed Russian River Frost Regulation

Dear Board Members,

We are grape growers in Mendocino County and are doing something people have been doing ever since they learned to grow things, we grow wine grapes. In the 60's, 70's and 80's we frost protected with wind machines and smudge pots and were told we needed to come up with something cleaner. We slowly converted to sprinklers and they have proved to be a good choice. This is a reasonable and beneficial use. This is our life, not a hobby, so how in the world can this be construed as unreasonable use. Some years it is necessary to protect the shoots multiple times and some years as little as once or twice

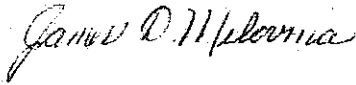
An issue is being made of two strandings in April 2008. It was unfortunate that some fish were killed when the flow of the Russian River and a small stream dropped. Because of these incidences certain agencies feel there is a need to implement regulations related to the use of Russian River water for frost protection. There is no real evidence to support this need. In a matter of 6 months we believe the problem was addressed with the building of multiple ponds so they can frost protect out of the ponds at night and recharge out of the Russian River during the day after the frost pumps have been turned off.

We have been to several meetings and the agencies responsible for this charade refuse to listen and accept the fact that the problem has been solved. We all have a responsibility to protect the fish and we don't have to be constantly reminded of that fact. We have yet to ever hear one of these people that work for us that they are also looking out for the well-being of us humans. The fish don't pay their salaries. We believe the quick and aggressive approach taken by the farming community demonstrates we can resolve the problem without the need for more unnecessary government regulation.

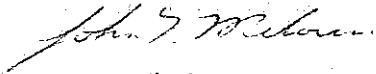
There is no way that us family farmers would ever be able to absorb the ridiculous costs that could be incurred to comply if this regulation is adopted. As a member of that agricultural community that will be impacted by the proposed regulation, we encourage the Board to reject the proposed regulation and

instead support the collaborative, cost effective and productive solution to allow for Russian River water to be used both for farming and the fishery without layers of needless regulation.

Sincerely,



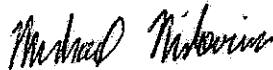
James D. Milovina



John L. Milovina



David Milovina



Michael Milovina