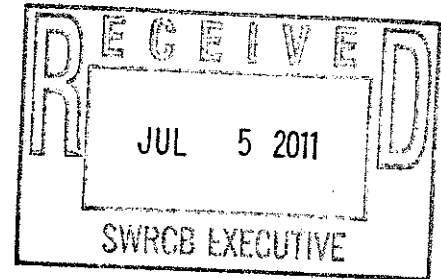


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July 2, 2011

Jeanine Townsend, clerk to the board
State Water Resources Control Board
P.O. Box 100
Sacramento, Ca. 95812-2000
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**RE: COMMENT LETTER-PROPOSED RUSSIAN RIVER FROST
REGULATION, (2 pages)**

We would like to take the opportunity to respond to the draft EIR produced and made publicly available by SWRCB.

We all want to do our part and do not wish to endanger any fish. However, we feel that assumptions have been made without accurate information or data. We feel that to properly address the issues would require specific and accurate data which is lacking at this time.

We feel that in both Sonoma County and Mendocino County that landowners have already responded to any concerns. There is the need for cooperation with water released from both Warm Springs and Coyote dams.

Frost protection varies drastically from year to year. You may frost protect 1 night or 5 nights or zero nights. To just say that the "use of water in frost protection is effecting the water flow in the Russian River watershed" is not correct. Where is the data on this accusation?

Many growers use surface water, ground water, and wind machines. To not be able to use over head frost protection in our operation would be devastating. When you have the system and then you are not able to use it doesn't make economic sense. No one has talked about how much we already have invested. With over head frost protection, one might have a cost of \$ 5,000.00 to \$ 10,000.00 per acre. On a 40 acre vineyard that would be \$200,000.00 to \$ 400,000.00. On a 160 acre vineyard that would be \$800,000.00 to \$ 1,600,000.00. Why would you want to abandon a system that you have invested in, isn't causing any damage and works!

The use of just wind machines is not the answer. While potentially helpful, they are not as effective or cost efficient. Just turning on a wind machine doesn't mean you can control the temperature. Has anyone addressed the need for heat in combination with a wind machine? Some Return Stack Heaters hold 10 gallons, lasting about 8 hours, and heat a very small area which would require many heaters. A 10 acre vineyard may cost \$ 1,000.00 to \$ 10,000.00 a night, plus the particulate matter. The fossil fuel use would be a huge impact (with current fuel cost of \$ 3.50 to \$ 4.50 per gallon) along with the noise complaints.

Our operation has used some form of frost protection measures since the 1950's. Our experience is that each vineyard has different conditions and needs that you just can't use one method of frost protecting.

We feel the estimations for the changes are not realistic. The formula of 1 wind machine covering 10 to 17 acres is not always accurate. There are so many different shapes, sizes, and elevations in a single vineyard operation, that you could need several on less than 10 acres.

As far as the State Water Board determining that there will be an increase in economic activity may not happen when the crop is lost to frost and you have no income.

The extra amount of reporting is just another clerical and vineyard expense that we all do not need in the state of this economy.

At this time, this proposed rule making would be a huge financial burden for our family farming operation. We currently farm approximately 300 acres and use both wind machines in places where they work and over head frost protection where it works. We feel our current frost protection ordinance is adequate.

My family has farmed in Sonoma County since 1917, with my two sons making the 4th generation. We respect the land, the environment, the fish, and feel that we are good stewards of the land. Asking us to make changes that aren't necessary to our farming practices would be a harsh blow, and may make our continuation of farming impossible.

Sincerely,

John Saini

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