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,

Allan F. Nelson