

CALIFORNIA TROUT



KEEPER OF THE STREAMS

September 21, 2006

(via electronic circulation)

Mr. Dave Woelfel
Staff Environmental Scientist
Santa Ana Regional Water Quality Control Board
3737 Main Street, Suite 500
Riverside CA 92501

Re: Comments on Initial Draft 2006 Basin Plan (revised 9/7/06 version).

Dear Mr. Woelfel,

California Trout, on behalf of the State's 2,000,000 anglers – the majority of whom live in Southern California and fish for coldwater species such as trout – submit comments on Initial Draft 2006 Basin Plan Triennial Review Priority List Revised September 7, 2006 for the Water Quality Control Plan for the Santa Ana River Basin (Basin Plan).

Our primary concern with the Basin Plan is the document's recognition of the importance of aquatic, riparian and floodplain systems as habitat for coldwater species, such as trout.

Specifically California Trout supports retaining the COLD designation for the Mill Creek reaches. On Issue No. 11 as it pertains to Mill Creek, we strongly support the addition of new reaches and the designation of appropriate beneficial uses. We support the designation of (c) Mill Creek from SAR to Highway 38 as Reach 1 and keeping it I-COLD. Currently the intermittent flow is essential to maintain alluvial floodplain habitat. The COLD designation is essential to provide continued intermittent uses to salmonids and the adjacent riparian habitats that could be enhanced through decreased diversions.

We support the designation of (d) Mill Creek from Highway 38 to Mountain Home Creek confluence as Reach 2 and keep COLD. This reach and the COLD designation is essential to providing habitat for salmonids with maintaining the upstream hydrology is essential to maintaining the downstream habitats.

We support the designation of (e) Mill Creek from Mountain Home Creek confluence to upper diversion in Forest Falls as Reach 3 and I-COLD. The COLD designation is essential for this reach in its ability to support wildlife habitat. While we recognize that the artificial hydrology due to water diversion upstream of Forest Falls currently imposes an I (intermittent) designation, we would also support a non-intermittent designation for this reach, which reflects the original and potential future hydrology of this important reach for salmonids.

We support the designation of (f) Mill Creek from upper diversion to headwaters as Reach 4 and keep COLD. This reach currently supports salmonids. Additionally it is designated as Critical Habitat for the Southwestern Willow Flycatcher (see below comments on additional beneficial uses in Section IV).

Thank you in advance for your consideration and attention to California Trout's comments. If you should have any questions, please do not hesitate contacting us at your first opportunity.

Respectfully,

CALIFORNIA TROUT, INC.

A handwritten signature in black ink that reads "Jim Edmondson". The signature is written in a cursive style with a long horizontal line extending to the right.

Jim Edmondson
Southern California Manager