

CARPINTERIA VALLEY ASSOCIATION
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established 1964

October 16, 2003

State Water Resources Control Board
Chairman Arthur Baggett
1001 I Street
Sacramento, CA 95812

Carpinteria Valley Association Public Policy Statement
State Water Resources Control Board (SWB)
Consideration of Proposed Modifications to the Terms and Conditions and the U.S.
Bureau of Reclamation' Water Rights Permits (##)
to Protect Public Trust Resources and Steelhead
in the Santa Ynez River

Chairman Baggett and Board:

1. Interest in Cachuma Project Water Rights Proceedings

Carpinteria Valley Association (CVA) is a non-profit public interest group comprised of area residents. CVA monitors local government activities including the activities of the Carpinteria Valley Water District, a member of COMB and CCRB. Carpinteria receives much of its water from the Santa River and from the Cachuma Project. CVA participates in issues that affect the community of Carpinteria, including land use issues and issues affecting water use, habitats, open spaces and the quality of life in Carpinteria. Specifically, CVA is interested in significant steelhead enhancement in this region and is very concerned with water use and conservation in the Carpinteria Valley.

2. Policy Statement:

- Steelhead are an important regional resource that should be protected for the public's use and enjoyment. Steelhead were once very numerous in the region, and in the river, and are now extremely rare in the river and the region primarily due to the damming of the Santa Ynez River, which blocks upstream and downstream steelhead migration and diverts water from the lower river, the lagoon and its riparian habitats and wetlands. Changes to the

Cachuma Project operation to significantly improve conditions for steelhead and the river are necessary in order to protect these public trust resources.

- The NMFS Biological Opinion (BO) which forms the basis for the proposed modifications to the Bureau of Reclamation's permits includes target flows for rearing, passage and spawning as well as enhancements to tributaries below Bradbury Dam. The BO's conditions are designed to prevent any further chances that the species will go extinct. Preventing extinction is an important goal, however the SWB must require recovery and some degree of restoration to ensure steelhead are protected as a public trust resource. To do this, the SWB should set high population-based goals and condition the Bureau's permits to require measures in addition to the BO's.
- More information is needed before the SWB can ascertain the measures required to protect steelhead. These include studies of the feasibility of transporting steelhead to the middle and upper Santa Ynez River watershed where the habitat is far more suitable, the possibility of using WRO 89-18 downstream water rights releases to support steelhead, the effects of Bradbury Dam on the watershed, and the feasibility of utilizing other sources of water and/or water conservation to maximize the beneficial uses of the river water.
- Until such as a time as these studies are complete, the SWB should require significant releases of water to sustain and enhance conditions for the highly endangered steelhead and to fulfill its public trust protection obligation. Through water conservation, alternative supplies and/or more efficient use of downstream water rights releases, and, if necessary surcharging Cachuma Reservoir as described in the BO, steelhead can be protected without affecting water supplies significantly if at all.
- We support additional water conservation to protect public trust resources.
- All measures necessary to protect steelhead and public trust resources, including studies necessary to provide information to determine what protecting these resources entails, must be included as terms and conditions in the SWB permits along with reasonable deadlines and requirements for the Bureau to work with NMFS and California Fish and Game.

Thank you for your consideration.

Sincerely,

Al Clark
President

