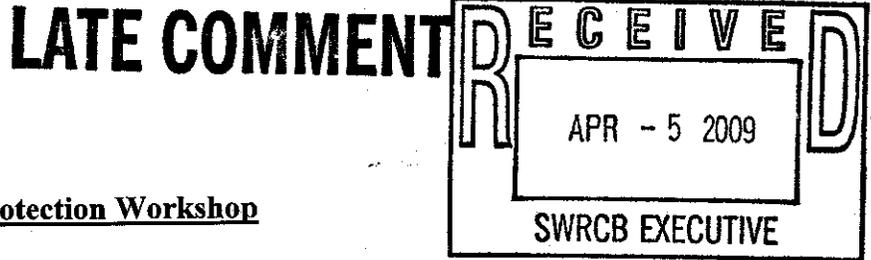


## California Advisory Committee on Salmon and Steelhead

April 1, 2009  
Donald Koch, Director CDFG  
1416 Ninth Street  
Sacramento, CA 95814  
[Director@ca.dfg.gov](mailto:Director@ca.dfg.gov) emailed 4/4/09



**RE: 4/7/2009 Russian River Frost Protection Workshop**

Dear Director Koch

The California Advisory Committee on Salmon and Steelhead (CAC) urges the Director to support salmonids in the Russian River by submitting comments such as these to the State Water Resources Control Board for their April 7, 2009 workshop on frost protection. The CAC is a citizen committee that advises the Director of the Department of Fish and Game and the Legislative Joint Fisheries and Aquaculture Committee concerning the Fisheries Restoration Grants Program and issues relating to salmon and steelhead in the State.

We are pleased that the SWRCB is taking up the matter of frost protection. For years, we have been urging the State to take more seriously the harmful consequences of unregulated or under-regulated water diversions, and specifically their contribution to the statewide decline of salmon and steelhead. The SWRCB should move immediately to ensure that no frost protection or summertime irrigation is conducted without measures to protect salmonids.

As a first step, the Board should mandate real-time reporting and public display of diversion and streamflow data. This requirement should be considered an essential part of "reasonable use" for any diverter, whatever the nature of their water right. In addition, the Board should direct staff to take strong action to identify and remedy illegal diversions, including not only surface storage reservoirs but also direct diversions and diversions through wells in subterranean streams for frost protection or agriculture. Without these two actions, the State will continue to lack the most basic information needed to run a water right system: the availability and demand for water, and the State will continue to signal its disregard for whether water users comply with the law.

We urge you to take immediate action to address these concerns. Thank you for taking the time to consider our comments.

Sincerely,

—  
Vivian Helliwell  
Chair, CAC  
850 Greenwood Heights Drive  
Kneeland, CA 95549