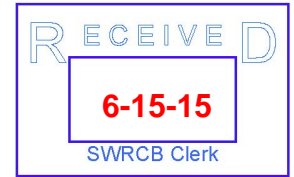




June 15, 2015

Ms. Felicia Marcus and Members of the Board  
State Water Resources Control Board  
1001 I Street  
Sacramento, CA 95814  
Via email to [commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)



**RE: 6/16-17/15 BOARD MEETING (Consideration of a proposed Resolution to adopt a drought-related emergency regulation requiring enhanced water conservation and additional water user information for the protection of specific fisheries in tributaries to the Russian River)**

Trout Unlimited, California Trout, and the Nature Conservancy, submit the following comments on the Board agenda item concerning adoption of a drought-related regulation in select Russian River tributaries. Our three organizations work cooperatively with water users to implement projects that benefit instream flow throughout California. In the Russian River watershed, Trout Unlimited works as part of the Russian River Coho Water Resources Partnership.

Given consecutive years of drought, the fact that many Russian River tributaries are already approaching low flow conditions commonly seen in late summer or fall, the dire status of Central California Coast coho salmon, and the need to protect existing flow for domestic uses (especially drinking water), we believe that both voluntary and mandatory actions are warranted and necessary.

Our three organizations support the proposed regulation. In addition, we offer the following recommendations:

**I. Outreach and technical assistance to accompany the informational order**

Many of the water users likely to receive the informational order are rural residential users with riparian rights, and not all will have the resources or monitoring equipment necessary to answer technical questions. To maximize the likelihood of success of the informational order, compliance with the order, and the quality of the information generated by it, we urge the State Board to consider providing technical resources to water users working in good faith to comply with it. This could include a public workshop to answer questions and provide assistance completing necessary paperwork or, at a minimum, provision of contact information for State Board staff and other entities that can provide assistance in determining what information is required and how to collect it.

**II. Expansion of Geographic Scope**

We urge the State Board to extend the conservation measures and information order in Sections (d) and (e) to other coastal watersheds with imperiled salmon and steelhead populations. The regulation is comparable to the drought emergency conservation regulation that already applies to urban water users; extending it beyond urban users and beyond the Russian River makes sense, is necessary to conserve

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salmon and steelhead, is necessary to protect drinking water supplies, is consistent with the Governor's order, and would have the effect of not singling out Russian River water users from others who rely on diversions from steelhead and salmon-bearing streams.

For example, the Eel River mainstem notoriously went dry last year near Fortuna. Many rural residential landowners were forced to truck in water for domestic purposes in the Eel and other coastal areas. This year, flows are already receding faster than in 2014 despite early season storms. Meanwhile, coho salmon and steelhead are at historically low population levels. Absent more aggressive conservation measures, many local populations will be extirpated.

Federal and state recovery plans identify other core and priority areas for salmon and steelhead along the coast, and many of these watersheds face streamflow conditions similar to the Russian River tributaries. Our recommendation is that the State Water Board consider an order similar to the Russian River order for other "core" recovery areas, in coastal areas from the Southern Oregon Northern California Coast coho (SONCC) through the South Central California Coast steelhead, which have similar issues. Where large watersheds are identified as a core population, we would suggest limiting the conservation order to the subbasins identified for priority actions, and excluding mainstem rivers with regulated flows and areas above the reach of anadromy. All of this information can be easily identified in the Recovery Plans.

Although this may seem like a large request, a conservation order that limits irrigation of outdoor landscaping and helps the state understand who owns and uses water is eminently reasonable under the circumstances.

We recognize that this cannot be done at the June 17 meeting. We suggest that the Board chair direct staff to evaluate the expansion in consultation with the Department of Fish and Wildlife and the North Coast, San Francisco Bay, and Central Coast Regional Boards.

### III. Additional Support for Voluntary Actions

Many water users in the Russian River have already made changes to their diversions to benefit flow and fish populations, and many of these projects go beyond the measures provided in the regulation. The Russian River Coho Partnership has a number of projects in development that build on this momentum and, through the generosity of other water users, developed a [rebate program](#) to compensate water users for winter storage tanks and other measures. We urge the State Board to treat the voluntary efforts of landowners as urgent as well, to expedite permitting, to and focus funding to encourage such efforts.

We appreciate the opportunity to comment and the State Board's consideration of our recommendations.

Sincerely,



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