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February 25, 2016

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

RE: 3/1/2016 BOARD MEETING (Consideration of a proposed Resolution to Update and Readopt a Drought-Related Emergency Regulation Requiring Additional Water User Information for the Protection of Specific Fisheries in Tributaries to the Russian River)

On behalf of Trout Unlimited (TU), I am submitting comments on the Board Meeting agenda item concerning re-adoption of the informational order in select Russian River tributaries. TU works cooperatively with water users to implement projects that benefit instream flow throughout California. In the Russian River watershed, we work closely with and as part of the Russian River Coho Water Resources Partnership.

Given consecutive years of drought, the likelihood that Russian River tributaries will continue to experience low flow conditions this year, and the dire status of Central California Coast coho salmon, TU believes that re-adoption of the Informational Order is warranted.

The lack of accurate and complete information about dry season water diversion is one of the major obstacles to managing water to protect salmon in coastal streams. Already, the maps produced as a direct result of the Information Order have provided valuable detail about how and where water is being used in these key tributaries – much more detail than what had been available previously (and much more than is available in e-WRIMS). That information can be incredibly useful for prioritizing cooperative restoration efforts with landowners and directing the use of public funds.

TU supports the re-adoption of the Informational Order. In addition, we offer the following recommendations:

I. Revisions to the Informational Order

We received feedback from a number of landowners that portions of the Information Order were difficult to answer. If there were parts of the forms that State Water Board staff observed people struggling with or that were commonly not completed, those might be area for improvement. The “Resources and Guidance Table” that the Water Board provided was a good resource, and we suggest that the State Water Board take another look at the Information Order with an eye toward the constraints that individual rural residential riparian users face in completing the application, especially those without the resources or monitoring equipment necessary to answer technical questions.

II. Use of the Data Gathered through the Informational Order

The first Information Order produced a great deal of useful information. We urge the State Water Board to consider how it will ensure that data is used to guide better water management. The Board should think about how it will incorporate the data into eWRIMS and other databases, how it will provide the data to communities in these watersheds in a format that best enables residents to make informed decisions about their collective water future, and how it will communicate its plans to water users. We are aware that the administration and enforcement of the current order have represented a substantial investment of Board resources. It is important to make sure that the value of that investment is not lost.

III. Re-Adoption of the Enhanced Water Conservation Measures

We urge the State Board to keep a close eye on whether enhanced water conservation measures will be necessary this year, and to re-adopt that portion of the emergency regulation well before the dry season so that landowners have appropriate notice.

IV. Additional Support for Voluntary Actions

Finally, we ask the State Board to continue to support the many water users in the Russian River that are making changes to their diversions to benefit flow and fish populations. We urge the State Board to expedite permitting for the voluntary efforts of landowners – especially those that came out of the outreach efforts of the State Water Board, Department of Fish and Wildlife, and National Oceanic and Atmospheric Administration this past year.

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

Sincerely,



Mary Ann King