

6/7/06 Bd Mtg: Scott River-
Item ___ Deadline 5/10/06

23443 Hays Rd.
Manteca, CA 95337-8882
May 8, 2006



Ms. Song Her
Clerk to the Board
1001 I Street
Sacramento, CA 95812-0100

RE: Comment Letter - Sediment and Temperature TMDL in the Scott River
Watershed

Dear Ms. Her:

The Staff Report for the Action Plan for the Scott River Watershed includes various proposals. One of these is that streamflow temperature should be enforce ably regulated by Water Use Implementation Actions. These actions are to include raising the water table to increase subsurface accretion of cool water to the streams, and reducing use of surface water to increase streamflow.

If the rights to diversion of surface water are reduced it will presumably decrease the accretion of subsurface water to streams unless the use of groundwater is also curtailed. The stream temperature may be dominated by the ambient temperature, and the ambient temperature may be rising due to climate changes. The desired stream temperature may often, therefore, not be attainable even though surface and groundwater rights are reduced and water management methods are regulated.

This proposal would set precedents that could affect water rights throughout the state. For example, river temperature cannot be controlled along the floor of the San Joaquin Valley. This should not be done without a full and public examination of the principles, the feasibility, and the water supply implications throughout the state.

Sincerely,


Alex Hildebrand