



11/15/06 Bd Mtg
 Shasta River
 Deadline: 11/1/06 12 pm

North Coast Consumers Alliance

P.O. Box 351
 Redwood Valley, Ca 95470

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Comment letter - Shasta River Watershed DO and Temperature TMDLs

to: Song Her, Clerk of the Board by Fax 11/1/06 916 341-5620

Dear State Water Resources Control Board:

We appreciate all the hard work the Water Board has done to develop the action plan for the Shasta River Watershed. We support any attempt to increase cold water flow in the Shasta.

If the unimpaired flow of the Shasta is 353 cfs, and the baseline flow is 22 cfs, your requirement for 45 cfs more cold water flow is a step in the right direction. However, we believe that larger increases in flow may be needed to save salmon runs.

The warm water currently flowing from the Shasta to the Klamath exacerbates the parasite problem in the Klamath.

The water that can be drawn down from Lake Shastina may not be cold enough or plentiful enough to make up for the diversions in the lower reaches. Tailwater returns from irrigation are certainly too hot and dirty to be useful. This water adds considerably to the eutrication process that takes place with low flows.

We strongly support the Water Board's plan to buy excess water from the diverters. Any diverter who creates tailwater returns has irrigated too heavily but diverters may only be trying to protect their water rights by using up their allocations, as, analogously, the farmers of Potter Valley must do to retain their water rights. This approach is not only a detriment to the salmon in the Eel River, but also to the people of Potter Valley. The town is drowning in excess water. The water table is so high that toilets sometimes cannot be flushed. If the Potter Valley "use it or lose it" scenario is a parallel case for the beef industry in the Shasta River Watershed, a smart beef rancher would grow some water intensive feed crop like alfalfa to use up his allocation. But with the money he gets from selling water to the Water Board, he may be able to buy his feed from outside the watershed. This would save us all the agony of re-ajudication of water rights (which will take even longer than dam removal!) Buying the water from diverters is an instant winner for both the fish and the beef. If selling excess water to the Board becomes economically advantageous to the rancher, there will be a strong incentive to irrigate more efficiently. Tailwater return flows will become a thing of the past.

Regarding quality and quantity of water in Lake Shastina, Yreka Creek and other water bodies in the watershed where towns draw water, we look for an extensive public education process to help people understand the necessity of water conservation. Nobody in the whole watershed should be watering lawns. Waterless toilets should be zoned into any new development. Why not now in this critical watershed? Waterless toilets are not just an idea, they are a practical reality. They are sold by Real Goods, a Fortune 500 company in Hopland, just south of Ukiah in Mendocino County.

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Is all water taken from the Shasta River watershed metered -- both for the beef industry and for individual homes?

There is one issue in the Action Plan that needs more work. A 35 foot setback between beef cattle and the river is pitifully narrow. The Board's own data will probably show that you need a 300 foot fenced setback. I know this is going to be a hard sell, but consumers will pay more for Sustainably Farmed Beef.

The North Coast Consumer's Alliance understands the importance of salmonids to the American diet. We have a nutritional need for fatty acids. We get too much of the Omega 6 fatty acids from beef, and not nearly enough of the Omega 3 fatty acids found primarily in ocean-caught salmon. This imbalance results in many common diseases, ie: heart disease and arthritis (also foggy thinking). The average American diet is as unbalanced between Omega 6 and Omega 3 as the Shasta River Watershed is between beef and salmon. The correlation is impossible to miss -- it's laid out on the ground and in the water, as readable as a map and its laid out in our arthritic joints and failing cardiovascular systems. Ocean-caught salmon (and steelhead) are doubly valuable as nutrients because they are not only high in Omega 3s, but also low in mercury, a profile matched by no other ocean-caught or fresh water fish.

In Mendocino County, the Fort Bragg Salmon Trollers are our only source of locally produced ocean-caught salmon. Currently, the salmon fishing season regulations are tied to the very salmon run under discussion in the Action Plan. These regulations are pushing salmon trollers out of business. In our desire to protect the quality of our food supply, we are supporting the Water Board to restore the salmon run in the Shasta and the whole Klamath watershed. We urgently request that you chose the fastest way forward towards that goal.

Yours truly,

Ellen Faulkner