

## Schultz, Daniel@Waterboards

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**From:** Harris, Bradley <BGH2@pge.com>  
**Sent:** Monday, June 29, 2015 11:39 AM  
**To:** Schultz, Daniel@Waterboards; 'staff@AOL.ca.gov'  
**Cc:** efren.carrillo@sonoma-county.org; james.gore@sonoma-county.org  
**Subject:** RE: Emergency Actions due to Insufficient Flow for Coho in Tributaries of Russian River

I hereby submit these comments for your consideration in connection with the Emergency Actions due to Insufficient Flow for Specific Fisheries in Tributaries to the Russian River. I live in the Green Valley Watershed, near the headwaters of Dutch Bill Creek.

We recommend that the Board reconsider and revisit this regulation and the Office of Administrative Law not approve it into law. The drought regulation mentioned in the California Water Board letter dated June 9, 2015, stated “the enhanced conservation measures apply to *non-economic* use of water”. The Green Valley Watershed area where I live has dozens of parcels of land, which have been planted with vineyards. In a study by Aaron King and Harold Leverenz, Civil and Environmental Engineering, U.C. Davis, state in one of their periodicals, “if there is agriculture around, and they are in the same aquifer, your little bit ( of water use) is pretty insignificant in comparison to agricultural use”. The perilous situation of the Coho Salmon and Steelhead, which is the result of a deteriorating habitat caused by the lack of sufficient water, why would you not include the majors users of water, in your emergency actions conservation plan? It minimizes your conservation efforts and makes it seem as though you do not have a real commitment to saving the Coho and Steelhead, except to saving more water for vineyard use.

Furthermore, in an effort to save more water from being drawn from the aquifer, why are the existing water re-use systems, not being implemented as a method of water conservation? There are residential systems that produce hundreds of gallons of tertiary treated water daily which can be used for the irrigation of residential landscape. These units are scaled down versions of municipal sewage treatment facilities. Many units have passed the NSF/ANSI 350 testing procedures, which is a grueling 6 month test with health and safety concerns as the main criteria. The California Water Board is not using all existing technology to address the Coho Salmon and Steelhead extinction issues.

Please reconsider and revisit this regulation and not approve it into law.

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