

California Sportfishing Protection Alliance

"An Advocate for Fisheries, Habitat and Water Quality"

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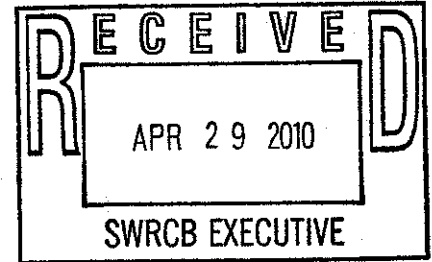
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April 29, 2010

State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

(via e-mail)



RE: April 27 revisions to Final Draft Policy for Maintaining Instream Flows in Northern California Coastal Streams

Members of the Board:

The California Sportfishing Protection Alliance (CSPA) supports the revisions to the Final Draft Policy for Maintaining Instream Flows in Northern California Coastal Streams, as released on April 27, 2010.

The monitoring and reporting included in the revisions is basic. Hourly gauging of Policy-affected diversions, and recording of gauge data on data loggers, is fundamental, and incorporates an appropriate timestep. Gauging of affected stream reaches downstream of these diversions on the same timestep is equally necessary. It is also important that the Policy state that real-time monitoring and reporting is a longer-term goal.

Policy Effectiveness Monitoring is also something that simply must happen. We are pleased to see it incorporated into the revisions.


The inclusion of an objective standard, against which cumulative effects of watershed development must be measured, corrects a critical shortcoming of the previous draft. The Board needs to evaluate the overall condition of each affected watershed as well the incremental effect of each new diversion.

CSPA's support includes recommending that the yellow-highlighted proposed addition to Appendix C, section C.1.3, "Alternative Site Specific Approaches," be included in the final policy. This approach proposed by Trout Unlimited and Dr. Trush has considerable merit. The concept incorporated by Dr. Trush of allowing small diversions between an

absolute minimum flow and a flow designed to support a specific salmonid lifestage (spawning or migration) has been adopted elsewhere, for example in the NMFS Biological Opinion for construction and operation of a fish screen at California Water Service's Bear Creek Station 3 pumping plant in the San Francisquito Creek watershed (2007, San Mateo County, submitted to the Division of Water Rights on April 17, 2009 by California Water conjunction with a petition for extension of time for application 14313, permit 8816). Such an approach allows protection and longer duration of the critical higher flows that are sufficient for spawning and migration of salmon and steelhead.

Thank you for the opportunity to comment on the April 27, 2010 revisions to the Final Draft Policy for Maintaining Instream Flows in Northern California Coastal Streams. We urge the Board to adopt the Policy as revised on April 27.

Respectfully submitted,



Chris Shutes
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California Sportfishing Protection Alliance