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DIV OF WATER RIGHTS
SACRAMENTO
STATE WATER RESOURCES
CONTROL BOARD

Ms. Karen Niiya, Senior Engineer
State Water Resources Control Board
Division of Water Rights
1001 I Street, 2nd floor
Sacramento, California 95814

Public comments on the Policy for Maintaining Instream Flows in Northern California Coastal Streams

Dear Ms. Niiya,

Our research group at the University of California, Berkeley, and the Hopland Research and Extension Center has been studying stream ecohydrology and water management primarily in the Russian River watershed since 2000. We have specifically studied streamflow and its links to aquatic organisms, and the interactions of those natural phenomena with management practices, in field applications in the study region; and we have constructed an extensive geographic information system to study the spatial context of natural and human systems, test management scenarios, and develop predictive models that incorporate systemic trends. We believe that our research may provide insights into the new instream flows policies that may be useful to ensure sufficient resources to meet human and ecosystem needs.

We were pleased with two particular developments in the new AB2121 guidelines. The first is that the new equation for calculating Q_{mbr} was derived using empirical data directly related to the ecosystem threshold it is intended to measure; and these data were from pertinent locations in the drainage network, incorporating small headwater streams and lower reaches alike. This marks an important improvement relative to the 1997 draft guidelines (even if some data used to derive the equation are