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STATE WATER RESOURCES
CONTROL BOARD

2008 MAY -1 AM 11:55

Karen Niiya, Senior Engineer
Division of Water Rights
State Water Resources Control Board
1001, I St. Second Floor
Sacramento, CA 95814

DIVISION OF WATER RIGHTS
SACRAMENTO

May 1, 2008

Dear Ms. Niiya,

Sanctuary Forest is pleased to submit these comments on the State Water Resources Control Board's (SWRCB) December, 2007 Draft Policy for Maintaining Instream Flows in Northern California Coastal Streams ("NCIFP"). Sanctuary Forest is a non-profit land trust dedicated to the conservation and restoration of the Mattole River watershed and surrounding areas. The Mattole River is a stronghold for federal and state listed coho, Chinook and steelhead salmonids. For over twenty years Sanctuary Forest and its many non-profit, federal, state and private partners have made considerable investment and effort towards the recovery and enhancement of Mattole River fisheries, including land purchases, conservation easements, sediment reduction and habitat improvement programs.

As stated in the Introduction of the NCIFP, the focus of the policy is "on measures that protect native fish populations, with a particular focus on anadromous salmonids and their habitat." NCIFP, p. 1. The NCIFP states that water diversions have "resulted in a significant loss of fish habitat in California," and "change the natural hydrologic patterns of streams and can directly result in a loss or reduction in the physical habitat that fish occupy". NCIFP, p. 1. While Sanctuary Forest strongly agrees with these assessments, in general, the draft NCIFP does very little to address these problems in the Mattole River watershed, and actually will make it more difficult for local streamflow conservation programs to address these issues. The NCIFP does not specifically address existing summertime diversions, which have the greatest potential to affect fish habitat in the Mattole River, while at the same time, creates significant obstacles to permitting safe implementation of winter and spring-time diversions, which as explained below, will have very little impact on fish habitat in the Mattole River and are needed to allow for adequate water storage.