

# Commentary

## Draft A.B. 2121 Instream Flow Policy: Framework Proposal for Defining Stream Management Objectives

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### Introduction

With this paper I do not seek to define better formulas. Instead, I seek to define better management objectives.

If the management objectives are adopted, the analog to the draft policy regional criteria would be standard estimates of important flow thresholds incorporated into the management objectives. Those standard estimates could be validated or improved upon with site specific studies. Alternatively, the management objectives could become the foundation for a coordinated diversion management plan under a "watershed approach."

What follows is a framework proposal, not a final recommendation. With Trout Unlimited, I will further refine the ideas described here and discuss it with SWRCB, the fish agencies, and other parties.

### Summary

We endorse the draft's general objective to focus diversions away from dry months and toward rainy season months, and to manage diversions in a way that protects spawning and winter rearing habitat and retains the variability of the hydrograph.

The framework proposal starts by defining two important flow thresholds for fish.

The first is the flow that fills the active channel, where most spawning takes place. (See MTTU 2000.) The second flow, which I call the winter baseline flow, is the flow that keeps riffles flowing, sustains juvenile rearing habitat, and prevents redds from de-watering.

The sweet spot for fish is between these two flow thresholds. Flows above the active channel get too fast. Flows below the winter baseline impair basic