

ENVIRONMENTAL INFORMATION FOR PETITIONS

This form is required for all petitions.

Before the State Water Resources Control Board (State Water Board) can approve a petition, the State Water Board must consider the information contained in an environmental document prepared in compliance with the California Environmental Quality Act (CEQA). This form is not a CEQA document. If a CEQA document has not yet been prepared, a determination must be made of who is responsible for its preparation. As the petitioner, you are responsible for all costs associated with the environmental evaluation and preparation of the required CEQA documents. Please answer the following questions to the best of your ability and submit any studies that have been conducted regarding the environmental evaluation of your project. If you need more space to completely answer the questions, please number and attach additional sheets.

DESCRIPTION OF PROPOSED CHANGES OR WORK REMAINING TO BE COMPLETED

For a petition for change, provide a description of the proposed changes to your project including, but not limited to, type of construction activity, structures existing or to be built, area to be graded or excavated, increase in water diversion and use (up to the amount authorized by the permit), changes in land use, and project operational changes, including changes in how the water will be used. For a petition for extension of time, provide a description of what work has been completed and what remains to be done. Include in your description any of the above elements that will occur during the requested extension period.

See Attachment 1.

Insert the attachment number here, if applicable:

1

Coordination with Regional Water Quality Control Board

For change petitions only, you must request consultation with the Regional Water Quality Control Board regarding the potential effects of your proposed change on water quality and other instream beneficial uses. (Cal. Code Regs., tit. 23, § 794.) In order to determine the appropriate office for consultation, see: http://www.waterboards.ca.gov/waterboards_map.shtml. Provide the date you submitted your request for consultation here, then provide the following information.

Date of Request

1/5/2018

Will your project, during construction or operation, (1) generate waste or wastewater containing such things as sewage, industrial chemicals, metals, or agricultural chemicals, or (2) cause erosion, turbidity or sedimentation?

Yes No

Will a waste discharge permit be required for the project?

Yes No

If necessary, provide additional information below:

[Empty text box for additional information]

Insert the attachment number here, if applicable:

Local Permits

For temporary transfers only, you must contact the board of supervisors for the county(ies) both for where you currently store or use water and where you propose to transfer the water. (Wat. Code § 1726.) Provide the date you submitted your request for consultation here.

Date of Contact

[Empty text box for Date of Contact]

For change petitions only, you should contact your local planning or public works department and provide the information below.

Person Contacted: Date of Contact:

Department: Phone Number:

County Zoning Designation:

Are any county permits required for your project? If yes, indicate type below. Yes No

- Grading Permit
- Use Permit
- Watercourse
- Obstruction Permit
- Change of Zoning
- General Plan Change
- Other (explain below)

If applicable, have you obtained any of the permits listed above? If yes, provide copies. Yes No

If necessary, provide additional information below:

Implementation of the project may require Sonoma County building permits.

Insert the attachment number here, if applicable:

Federal and State Permits

Check any additional agencies that may require permits or other approvals for your project:

- Regional Water Quality Control Board Department of Fish and Game
- Dept of Water Resources, Division of Safety of Dams California Coastal Commission
- State Reclamation Board U.S. Army Corps of Engineers U.S. Forest Service
- Bureau of Land Management Federal Energy Regulatory Commission
- Natural Resources Conservation Service

Have you obtained any of the permits listed above? If yes, provide copies. Yes No

For each agency from which a permit is required, provide the following information:

Agency	Permit Type	Person(s) Contacted	Contact Date	Phone Number

If necessary, provide additional information below:

Implementation of the proposed project will require State Water Board approval of this Petition for Change and may require approval from the State Division of Drinking Water.

Once project design is substantially complete, project partner Gold Ridge Resource Conservation District will submit an application to the California Department of Fish and Wildlife's (CDFW) Fisheries Restoration Grants Program (FRGP) for project implementation. If funding is awarded, the project would be included in the CDFW FRGP Mitigated Negative Declaration. However, the project should also be categorically exempt under CEQA pursuant to several exemptions, including Class 1, Class 2, Class 3, Class 4, or Class 33.

Insert the attachment number here, if applicable:

Construction or Grading Activity

Does the project involve any construction or grading-related activity that has significantly altered or would significantly alter the bed, bank or riparian habitat of any stream or lake? Yes No

If necessary, provide additional information below:

Insert the attachment number here, if applicable:

Archeology

Has an archeological report been prepared for this project? If yes, provide a copy. Yes No

Will another public agency be preparing an archeological report? Yes No

Do you know of any archeological or historic sites in the area? If yes, explain below. Yes No

If necessary, provide additional information below:

Insert the attachment number here, if applicable:

Photographs

For all petitions other than time extensions, attach complete sets of color photographs, clearly dated and labeled, showing the vegetation that exists at the following three locations:

- Along the stream channel immediately downstream from each point of diversion
- Along the stream channel immediately upstream from each point of diversion
- At the place where water subject to this water right will be used

Maps

For all petitions other than time extensions, attach maps labeled in accordance with the regulations showing all applicable features, both present and proposed, including but not limited to: point of diversion, point of redirection, distribution of storage reservoirs, point of discharge of treated wastewater, place of use, and location of instream flow dedication reach. (Cal. Code Regs., tit. 23, §§ 715 et seq., 794.)

Pursuant to California Code of Regulations, title 23, section 794, petitions for change submitted without maps may not be accepted.

All Water Right Holders Must Sign This Form:

I (we) hereby certify that the statements I (we) have furnished above and in the attachments are complete to the best of my (our) ability and that the facts, statements, and information presented are true and correct to the best of my (our) knowledge. Dated 2-27-18 at Alliance Redwoods.


Water Right Holder or Authorized Agent Signature

Water Right Holder or Authorized Agent Signature

NOTE:

- Petitions for Change may not be accepted unless you include proof that a copy of the petition was served on the Department of Fish and Game. (Cal. Code Regs., tit. 23, § 794.)
- Petitions for Temporary Transfer may not be accepted unless you include proof that a copy of the petition was served on the Department of Fish and Game and the board of supervisors for the county(ies) where you currently store or use water and the county(ies) where you propose to transfer the water. (Wat. Code § 1726.)

Environmental Information for Petitions
Attachment 1 – Project Description

Petition for Change
Dutch Bill Creek Instream Flow Project
Alliance Redwoods Conference Grounds
Project Description
February 2018

Overview

This Petition for Change is submitted as part of a fisheries enhancement project to improve instream flow in Dutch Bill Creek, a major tributary of the lower Russian River in Sonoma County.

Alliance Redwoods Conference Grounds (ARCG) is petitioning the State Water Resources Control Board (State Water Board) to change the location of the points of diversion (PODs) of its licensed appropriative water rights to a location downstream. ARCG is petitioning to change PODs (A020134 and A022523) from an unnamed stream (Redwood Gulch), tributary to Dutch Bill Creek, to the Camp Meeker Recreation and Park District's (CMRPD) existing groundwater well at the confluence of Dutch Bill Creek and the Russian River in Monte Rio. CMRPD operates an offset well near Monte Rio, and an existing transmission main, treatment facility, pump station, and storage tanks. Once diverted at the Monte Rio well, water will be transported approximately four miles via an existing 6-inch transmission main within the right-of-way for Bohemian Highway to the CMRPD treatment facility located on ARCG property. This will increase flow in Dutch Bill Creek for fish and wildlife benefit in the reach between the existing and proposed PODs.

The project is being designed in partnership with the Gold Ridge Resource Conservation District (GRRCD), Occidental Arts and Ecology Center, Trout Unlimited, and California Sea Grant through the Russian River Coho Water Resources Partnership (Coho Partnership) and with the support of the National Oceanic and Atmospheric Administration (NOAA) and the California Department of Fish and Wildlife (CDFW). The project design is currently funded by NOAA, the National Fish and Wildlife Foundation (NFWF), and CDFW's Fisheries Restoration Grants Program (FRGP).

ARCG requests expedited processing for the Petition for Change since it meets the criteria for prioritized processing of petitions that enhance conditions for fish and wildlife. ARCG also requests that the proposed change in PODs be conditioned upon readiness to utilize the CMRPD well, pipeline, and other infrastructure.

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Existing Setting

ARCG is a non-profit conference and retreat facility located adjacent to Dutch Bill Creek that hosts a variety of programs, including environmental and outdoor education programs for school-aged children. ARCG has been a partner in efforts to restore healthy salmonid populations, and has worked with GRRCD and resource agencies on habitat improvement and sediment reduction projects. ARCG partnered with its upstream neighbor, CMRPD, to release water into Dutch Bill Creek to benefit coho salmon in 2015 and 2016.

ARCG holds two licensed appropriative water rights for surface water in an unnamed stream, tributary to Dutch Bill Creek (A022523 and A020134) which allow for the diversion of a total of 35.3 acre-feet per year, with maximum diversion rates of 0.027 cubic feet per second (cfs) and 0.049 cfs, respectively. The maximum amount that can be diverted under both licenses is 0.049 cfs. The purpose of use of both rights is domestic, fire protection, and dust control. Both water rights specify year-round seasons of diversion. See Table 1 below. (Note that ARCG’s licenses refer to the source as an unnamed stream, tributary to Dutch Bill Creek but it is commonly referred to as Redwood Gulch; hereinafter we will refer to the source as Redwood Gulch.)

Table 1: ARCG Water Rights Summary

Application/License	Current POD	Max rate*	Season	Max Amt.
A020134/ 9450	Unst trib to DBC	0.049 cfs	Jan 1 – Dec 31	25.3 AF/yr.
A022523/ 9541	Unst trib to DBC	0.027 cfs	Jan 1 – Dec 31	10 AF/yr.
* Max amount that can be diverted under both licenses is 0.049 cfs				

Dutch Bill Creek is a critical stream for federally endangered coho salmon (*Oncorhynchus kisutch*) and federally threatened steelhead trout (*Oncorhynchus mykiss*). It was identified as a Core Focus Area for coho protection and restoration in the National Marine Fisheries Service’s (NMFS) Final Recovery Plan for Central California Coast (CCC) Coho Salmon (2012). Dutch Bill Creek has experienced critically low summer baseflows causing loss of rearing habitat for coho salmon and steelhead. It was one of the four tributaries subject to the Emergency Regulation for Enhanced Conservation Measures and Information in Key Russian River Tributaries (Regulation), to Protect Specific Fisheries, adopted by the State Water Board in 2015. It has been a focus for voluntary streamflow improvement efforts through the work of the Coho Partnership and CDFW’s and NMFS’s Voluntary Drought Initiative.

Dutch Bill Creek typically has more than adequate streamflow to support juvenile salmonids during the winter and spring each year, but flow recedes through the summer and fall dry season and can reach levels low enough to cause pool disconnectivity. Coho population monitoring performed by California Sea Grant shows a relationship between pool disconnectivity and juvenile over summer survival. The monitoring also suggests that projects designed to provide even small increases in streamflow can improve the chances of juvenile fish survival by eliminating or reducing the period during which pools become isolated.

The Coho Partnership has focused on improving flow in the reach of Dutch Bill Creek adjacent to and downstream of ARCG, which is considered to be a prime spawning and rearing area for salmonids. This project is being designed in partnership with ARCG to enhance streamflow and improve rearing conditions for juvenile coho salmon and steelhead. The need for the ARCG project is identified in the Coho Partnership’s 2017 *Dutch Bill Creek Streamflow Improvement Plan*. ARCG hired Brelje and Race Consulting Engineers (BRCE) to assist in developing the proposed project (described below).

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Project Elements

The proposed project will eliminate current impacts to streamflow in Redwood Gulch and Dutch Bill Creek resulting from ARCG's existing licensed diversions from Redwood Gulch.

Infrastructure: ARCG is petitioning to change its current PODs under its licensed water rights (A020134 and A022523) from Redwood Gulch, tributary to Dutch Bill Creek, to the CMRPD groundwater well in Monte Rio. CMRPD operates a well near Monte Rio, and existing transmission main, treatment facility, pump station, and storage tanks. Once diverted at the Monte Rio well, water will be transported approximately four miles via an existing 6-inch transmission main within the right-of-way for Bohemian Highway, used by both CMRPD and the Occidental Community Services District, to the CMRPD treatment facility located on ARCG property. This project utilizes existing infrastructure and will add an additional pump at the treatment facility for ARCG's use and an upgrade to CMRPD's Monte Rio pump station to provide redundancy and increase system reliability.

Anticipated Benefits: In coastal streams, even very small flow increments can dramatically improve the chances of juvenile fish survival by eliminating or reducing the period during which pools become isolated. The proposed project will eliminate ARCG's existing licensed diversions from Redwood Gulch, ensuring that the water is instead available for instream flow. The Petition for Change will enable ARCG to change the location of the PODs of its licensed water rights to the CMRPD well downstream. The amount of water that would have been used at the licensed diversions upstream will then flow in Dutch Bill Creek in the reach between the existing and proposed PODs for fish and wildlife benefit. This reach is considered to be a prime spawning and rearing area for salmonids.

The project is part of a much larger effort to improve flow for coho salmon and steelhead, including CDFW's and NMFS's Voluntary Drought Initiative program, CDFW and State Water Board efforts under the California Water Action Plan, State Water Board adoption of the Regulation, cooperative instream flow projects developed by the Coho Partnership with water users, and the actions of the others in the watershed. ARCG's downstream neighbor, Westminster Woods Camp and Conference Center (Westminster Woods), recently implemented a water conservation and tank storage project to improve instream flow, and the State Water Board recently approved Westminster Woods's long-term instream flow dedication under Water Code Section 1707. ARCG's upstream neighbor, CMRPD, has released water into Dutch Bill Creek to benefit coho salmon under two Temporary Urgency Change Petitions, which were approved by the State Water Board in 2015 and 2016; the release point is on ARCG property.

The project will also benefit ARCG's potable water system, which operates as a Community Water System (Water System ID CA4900943) under Water Supply Permit No. 02-03-98P49018 issued by the State Water Resources Control Board Division of Drinking Water, by providing a reliable and permanent source of potable water.

Permitting: Implementation of the project may require Sonoma County building permits, approval from the State Division of Drinking Water, and State Water Board approval of this Petition for Change. Once project design is substantially complete, GRRCD will submit an application to the CDFW's FRGP for project implementation. If funding is awarded, the project would be included in the CDFW FRGP Mitigated Negative Declaration. Given CDFW's support for the project, the project partners are optimistic about future funding. However, the project should also be categorically exempt under the

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California Environmental Quality Act (CEQA) pursuant to several exemptions, including Class 1, Class 2, Class 3, Class 4, or Class 33.

Partners: This project is being implemented with the help of multiple partners. They include ARCG, NOAA, NFWF, and members of the Coho Partnership (GRRCD, Occidental Arts and Ecology Center, Trout Unlimited, and California Sea Grant).

An agreement between ARCG and CMRPD will be required to address the use of existing water system components, operations, and maintenance costs. ARCG, GRRCD, and BRCE presented the project concept to the CMRPD Board in August 2017; the CMRPD Board approved a motion to move forward with investigating the proposal. They also formed a subcommittee for the project. ARCG requests that the proposed change in PODs be conditioned upon readiness and formal CMRPD approval to utilize the CMRPD well, pipeline, and other infrastructure.

Expedited Processing

ARCG requests expedited processing for the Petition for Change since it meets the criteria for prioritized processing of petitions that enhance conditions for fish and wildlife,¹ as summarized in the table below.

State Water Board Criteria	ARCG Project Qualification
The proposed application or petition is for a project of regional or statewide significance.	The project is of regional and statewide significance. It furthers Action 4 of the California Water Action Plan (California Natural Resources Agency et al. 2014); the California Water Boards’ Strategic Plan Update (California Water Boards 2008); the California Wildlife Action Plan (CDFW 2007); the Central California Coast Coho Recovery Plan (NMFS 2012); and CDFW’s Coho Recovery Strategy (CDFW 2004). The State Water Board identified the Russian River as one of its first priority rivers and streams in its prioritized schedule of instream flow studies for the protection of public trust resources (California Water Boards 2010), and Dutch Bill Creek was also one of the four Russian River tributaries selected for CDFW/NMFS’s Voluntary Drought Program and the State Water Board’s emergency conservation regulation.
The proposed application or petition is for an unbuilt project and the applicant or petitioner is trying to abide by the law in developing the project.	The Petitioner seeks to voluntarily change the PODs for its licensed water rights to benefit fish and wildlife. The petition is for a change in PODs, and the petitioner is submitting this petition before the POD change project is developed and implemented.
The proposed application or petition is consistent with the principles of the Policy for Maintaining Instream Flows in Northern California Coastal Streams.	ARCG is requesting a voluntary modification of its authorized diversion for the enhancement of fish and wildlife resources. This project is the very type envisioned by and defined in Section 3.3.2.5 of the North Coast Instream Flow Policy.
The applicant or petitioner has consulted with DFG, NMFS, the Regional Water Quality Control Boards, and	CDFW and NOAA support the project (see Attachment 2). In addition, GRRCD received project design funding

¹ http://www.swrcb.ca.gov/waterrights/water_issues/programs/applications/priority_criteria.shtml

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other agencies with permitting or jurisdictional authority, and the Division has documentation of the agencies' approval or support for the proposed application or petition.	from NOAA and CDFW. Consultation with the North Coast Regional Water Quality Control Board is complete. ARCG will continue to consult with other relevant staff members within those agencies.
The applicant or petitioner has provided documentation showing the application or petition will enhance conditions for fish and wildlife ² . This may include reductions in riparian use and/or diversions under another valid basis of right as a result of application/petition approval, if relevant.	This petition includes documentation that the project will enhance conditions for fish and wildlife. Water management changes voluntarily undertaken by ARCG to improve conditions include relocation of PODs to reduce impacts to aquatic resources and improve fish and wildlife habitat through enhanced streamflow in Redwood Gulch and Dutch Bill Creek.
Review under the California Environmental Quality Act is substantially completed and applicant or petition has agreed to proposed mitigation measures or project modifications.	Once project design is substantially complete, GRRCD will submit an application to the CDFW's FRGP for project implementation. If funding is awarded, the project would be included in the CDFW FRGP Mitigated Negative Declaration. If funding is not awarded, ARCG will work toward completion of CEQA requirements. The project should be categorically exempt under CEQA pursuant to several exemptions, including Class 1, Class 2, Class 3, Class 4, or Class 33.
Protests have been resolved or negotiations are substantially underway.	ARCG is seeking community support for the project, is communicating with likely protestants, and will resolve any issues that may arise.

In addition, the Board may also expedite petitions and any associated applications with an environmental benefit within the geographic area under North Coast Instream Flow Policy Section 3.3.2.5. The proposed change is consistent with and implements the principles of the North Coast Instream Flow Policy. ARCG is voluntarily agreeing to take measures to modify its water management and water rights to protect and benefit fisheries resources, particularly anadromous salmon. Approval of the Petition for Change will enable this component of the project to be implemented and the benefits to salmonids to be realized.

Required Findings of Fact

A. The change will not operate to the injury of any legal user of the water involved (Water Code Sec. 1702)

The project would move the PODs for ARCG's licensed water rights from Redwood Gulch to the location of the CMRPD well downstream. As a result, flow along Dutch Bill Creek between the current POD and proposed POD would be increased, and ARCG would then divert that water at the proposed POD downstream. No legal user of water would be injured along that flow path as a result of this change.

According to the Division's records, water right holders of record between the current PODs and proposed POD include:

- Westminster Woods (Statement of Water Diversion and Use 24280). Westminster Woods recently implemented a water conservation and tank storage project to improve instream flow in Dutch Bill Creek, and the State Water Board approved its 1707 petition to dedicate water

² http://www.swrcb.ca.gov/waterrights/water_issues/programs/applications/priority_criteria.shtml

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formerly diverted at its POD on Dutch Bill Creek. As a result, Westminster Woods is not currently diverting from its POD on Dutch Bill Creek.

- Occidental Community Services District (under Permit 21214). Permit 21214 authorizes year-round direct diversion of 0.16 cfs, up to 65 afa from an offset well approximately 50 feet west of CMRPD's Monte Rio well. This well draws from the same aquifer as the CMRPD well and injury would not occur because the ARCG's current and proposed points of diversion are hydrologically connected. See Section B.2.a for further discussion of connectivity.
- CMRPD (under Permit 21198). Permit 21198 authorizes year-round direct diversion at a rate of 0.23 cfs, not to exceed 90 acre-feet per annum (afa). As stated above, an agreement between ARCG and CMRPD will be required to address the use of CMRPD's well and pipeline.

Because the proposed project is to change the location of the PODs, the quantity of water available to Occidental Community Services District and CMRPD would not be affected by the change.

B. The change will not in effect initiate a new right (CCR Title 23, Art. 15, Sec. 791)

1. The change in the point of diversion does not increase the amount of water diverted under the existing right³

The proposed change does not seek to expand the season, rate or amount of ARCG's licenses. As discussed herein, the proposed change seeks to modify the PODs of ARCG's licensed water rights.

2. The change does not add a new source⁴

a. Hydrologic connectivity:

The existing and proposed PODs are hydraulically connected.

The 2006 memo, "Petitions to Change a Point of Diversion to a New Source," from Erin Mahaney, Senior Staff Counsel, Office of Chief Counsel to Steven Herrera, Chief, Water Rights Permitting Section states that "The points of diversion must be hydrologically connected. Under *Cheda* and other cases that provide geographic descriptions of the contested change in point of diversion, the change involves the same water supply or the same stream."

The term "hydrologic connectivity" is used primarily in hydrologic ecology and various definitions have been developed in recent years. A search of the Division of Water Rights web site, California Statutory Water Rights Law and the California Code of Regulations, found no Division definition of hydrologic connectivity. Based on context and use in other places, it appears that the Division intends hydrologic connectivity to mean the existence of flow pathways between water-bearing zones such as stream channels, surface water and groundwater.

³ See "Petitions to Change a Point of Diversion to a New Source," from Erin Mahaney, Senior Staff Counsel, Office of Chief Counsel to Steven Herrera, Chief, Water Rights Permitting Section.

⁴ See "Petitions to Change a Point of Diversion to a New Source," from Erin Mahaney, Senior Staff Counsel, Office of Chief Counsel to Steven Herrera, Chief, Water Rights Permitting Section.

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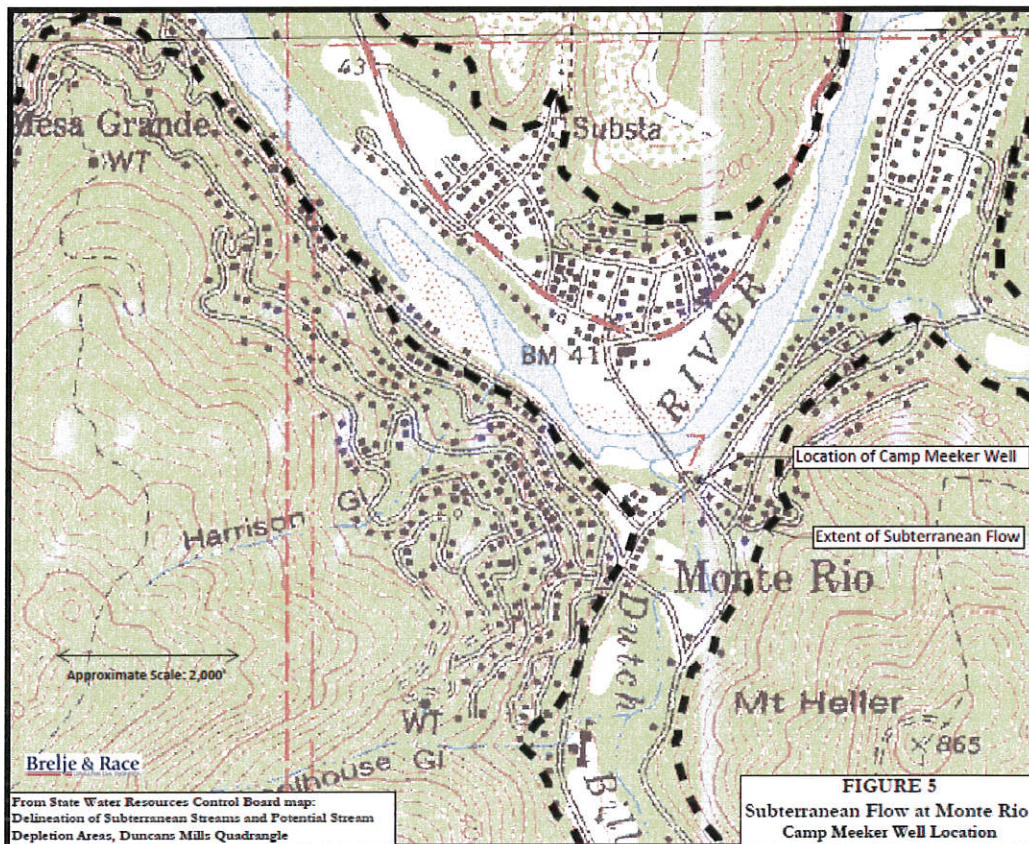
The CMRPD water supply well is located in the floodplain at the confluence of Dutch Bill Creek and the Russian River. Water that is pumped from the well emanates from a gravel water bearing stratum that is approximately 50 to 60 feet below the current flow lines of the Russian River and Dutch Bill Creek at their confluence.

The figure below (labeled Figure 5) shows surface and subterranean streams associated with Dutch Bill Creek and the Russian River at Monte Rio, from the State Water Board map “Delineation of Subterranean Streams and Potential Stream Depletion Areas,” Duncans Mills Quadrangle (2009). (Although the State Water Board has not formally adopted the maps, we understand the maps can be used as guidance.⁵)

Connectivity of the subterranean streams is clear in the map, and connectivity of the surface waters is clear as observed in the field. The well is at the midline of the Dutch Bill Creek subterranean stream and southerly of the midline of the Russian River subterranean stream. Dutch Bill Creek surface flow enters the Russian River a few hundred feet west of the well.

The water available to the well intake is an underground pool that is fed by both the Russian River and Dutch Bill Creek. The well is located in a shared floodplain of both water courses. Therefore, water in Redwood Gulch, which is a tributary to Dutch Bill Creek, is connected through surface and subterranean waters to subterranean water underflow withdrawn in the CMRPD well.

⁵ Division of Water Rights, State Water Resources Control Board, California Environmental Protection Agency, 2013, Revised Sections 6.2, 6.9, and 7 and Supplement to Appendix D of the Substitute Environmental Document Prepared for the Policy for Maintaining Instream Flows in Northern California Coastal Streams.



b. Geographic scale of the proposed change:

The existing and proposed PODs are in close proximity to each other. The distance between the current and proposed PODs is less than four miles as the water flows and the proposed POD location is within the same major tributary system as the existing POD locations.

c. Water availability:

The change in PODs would not result in ARCG taking more water from the proposed POD than was available in Redwood Gulch Creek at the existing PODs. Sufficient water has been available to meet ARCG's water demands at the existing PODs on Redwood Gulch. ARCG's water rights were licensed in 1969 and 1970, and the amounts specified in the rights were put to full, beneficial use.

d. No injury: See above.

e. Subordination of priority:

There will be no injury to water users as a result of the change in PODs.

C. The proposed change will not impair instream beneficial uses due to a decrease in flow (North Coast Instream Flow Policy Section 3.3.2)⁶

The project is designed to increase flow in Dutch Bill Creek and does not have the potential to impair instream beneficial uses due to a decrease in flow. The proposed project moves the PODs for ARCG's licensed water rights from Redwood Gulch to the location of the CMRPD well, which will contribute flow to Dutch Bill Creek for fish and wildlife benefit in the reach between the PODs and proposed POD. Since the place and purpose of use have not changed, there is no change in the timing and location of return flows.

The action would enhance fish habitat and other instream beneficial uses in Dutch Bill Creek by augmenting flows for rearing habitat for salmonids. Increased summer flows can increase dissolved oxygen concentrations and re-connect pool habitat, all to the benefit of juvenile coho salmon and steelhead survival and growth. Previous voluntary streamflow improvement projects in this reach of Dutch Bill Creek have been monitored extensively. For example, University of California Cooperative Extension/CA Sea Grant and SCWA mapped wetted habitat, measured riffle crest depths, and took intermittent measurements of dissolved oxygen and water temperature in Dutch Bill Creek downstream of the CMRPD flow release, and the Coho Partnership operated a streamflow gauge at Westminster Woods, downstream of both the CMRPD release point on ARCG property and the Westminster Woods Project. In 2015, the gauge showed that flow augmentation from the CMRPD substantially improved surface flow. This effort was also a significant contributing factor to maintaining rearing habitat in a wetted condition, despite it being the worst drought condition in recent history. As such, we expect the ARCG project to improve rather than impair instream beneficial uses.

⁶ "Under this policy, a petitioner shall provide adequate information for the State Water Board to determine whether the proposed change will affect instream flows."



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
NOAA Restoration Center
Southwest Region
777 Sonoma Ave., Room 219-A
Santa Rosa, CA 95404-6528

January 10, 2018

Mr. Erik Ekdahl
Deputy Director, Division of Water Rights
State Water Resources Control Board
1001 I Street
Sacramento, CA 95814

Re: National Oceanic and Atmospheric Administration support for Alliance Redwoods Conference Grounds's Petition for Change

Dear Deputy Director Ekdahl:

On behalf of the National Oceanic and Atmospheric Administration's (NOAA) Restoration Center, I am writing to express our support for Alliance Redwoods Conference Grounds' petition for change.

This project will enhance critical instream flow for coho salmon and steelhead in the Dutch Bill Creek watershed. It was designed in consultation with NOAA and in cooperation with the Russian River Coho Water Resources Partnership. NOAA sits on the Coho Partnership's Technical Advisory Committee and is providing funding for the project through the Russian River Habitat Blueprint.

The Central California Coast Coho Recovery Plan (NMFS 2012) identified Dutch Bill Creek as Core Priority Area for CCC coho, and deemed the threat to summer rearing juvenile fish from water diversion and impoundments in the Russian River watershed to be "very high" (i.e., the highest threat level) (NMFS 2012). Moreover, in spring 2015, NOAA and CDFW identified Dutch Bill Creek as one of four Russian River tributaries (and one of nine streams in the state) for the Voluntary Drought Initiative program and asked water users along Dutch Bill Creek to modify their water management to protect native coho salmon and steelhead. This project supports multiple action steps identified in the Final Recovery Plan, including RR-CCC-4.2.2.1 (Work with SWRCB and landowners to improve oversummer survival of juveniles by re-establishing summer baseflows...in rearing reaches that are currently impacted by water use,) and RR-CCC-4.1.1.3 (Avoid and/or minimize the adverse effects of water diversion on coho salmon...).

NOAA supports the project and urges you to grant the Alliance Redwoods Conference Grounds' request for expedited processing so that the benefits of the project to coho salmon and steelhead can be realized ASAP. Please feel free to contact me via e-mail, patrick.rutten@noaa.gov, or my staff, Joe Pecharich, Fisheries Biologist, at 707-575-6095 or via email at joe.pecharich@noaa.gov if you have any questions concerning this letter.

Sincerely,

A handwritten signature in black ink, appearing to read "Patrick J. Rutten".

Patrick J. Rutten
Southwest Region Supervisor
NOAA Restoration Center





Figure 1. A020134-01: Upstream of present POD
Unnamed stream, tributary to Dutch Bill Creek
December 28, 2017



Figure 2. A020134-01: At present POD
Unnamed stream, tributary to Dutch Bill Creek
December 28, 2017



Figure 3. A020134-01: Downstream of present POD
Unnamed stream, tributary to Dutch Bill Creek
December 29, 2017



Figure 4. A020134-02: Upstream of present POD
Unnamed stream, tributary to Dutch Bill Creek
December 29, 2017



Figure 5. A020134-02: At present POD
Unnamed stream, tributary to Dutch Bill Creek
December 29, 2017



Figure 6. A020134-02: Downstream of present POD
Unnamed stream, tributary to Dutch Bill Creek
December 29, 2017



Figure 7. A022523: Upstream of present POD
Unnamed stream, tributary to Dutch Bill Creek
December 28, 2017



Figure 8. A022523: At present POD
Unnamed stream, tributary to Dutch Bill Creek
December 28, 2017



Figure 9. A022523: Downstream of present POD
Unnamed stream, tributary to Dutch Bill Creek
December 28, 2017



Figure 10. Habitat between present PODs and proposed POD
Dutch Bill Creek mainstem
May 12, 2011

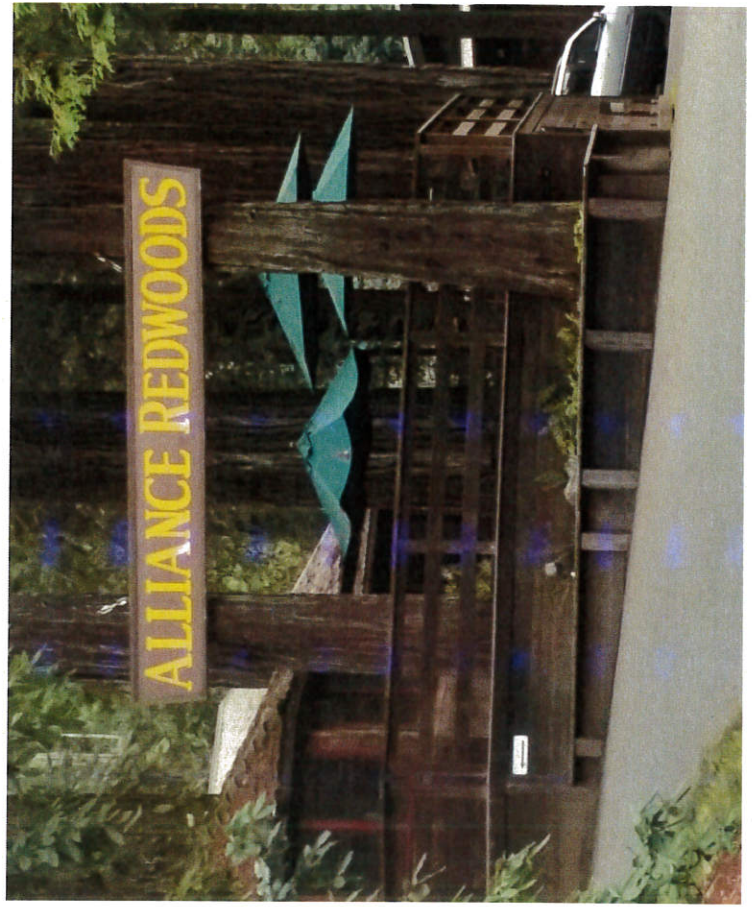


Figure 11. Habitat between present PODs and proposed POD
Dutch Bill Creek mainstem
May 12, 2011



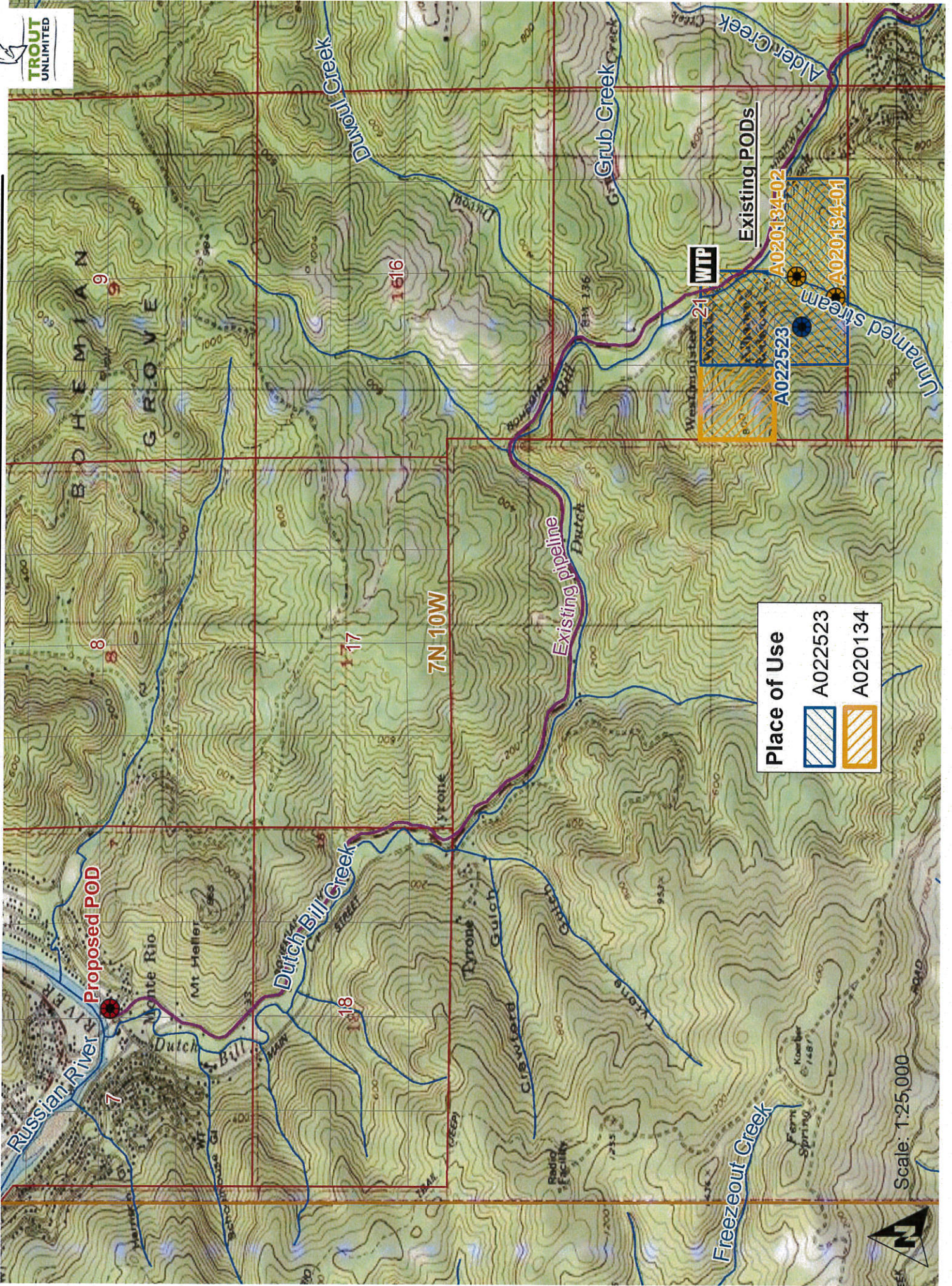
Figure 12. Proposed POD (location of Camp Meeker Recreation and Park District well)

January 5, 2018



Figures 13 and 14. Place of Use: Alliance Redwoods Conference Grounds

Alliance Redwoods Conference Grounds, Petitions for Change in Point of Diversion



Scale: 1:25,000

