

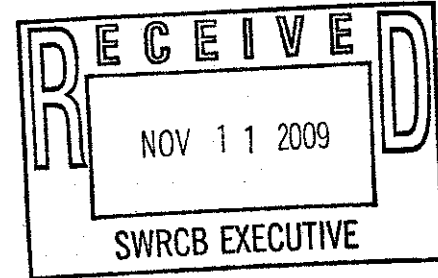
11/18/09 Board Workshop  
Russian River Frost Protection  
Deadline: 11/10/09 by 12 noon

From: Jo <jobobs@comcast.net>  
To: <commentletters@waterboards.ca.gov>  
Date: Wednesday, November 11, 2009 8:28 PM  
Subject: Comments on Frost Protection Impacts on Fish, Russian River, Sonoma County, CA

To-Vicky Whitney  
Date- November 11, 2009  
From- Jo Bentz, 9990 Graton Road, Sebastopol, CA 95472

Dear Ms. Whitney-

I have lived in Sonoma County for almost 30 years. The last 20 years I have lived in a house located within 1/4 to 1/2 mile of Atascadero Creek, Green Valley Creek and Purrington Creeks. These creeks are tributaries to the Russian River and are important salmonid habitat and recovery streams. In the area I live, there are vineyards along most of the length of these creeks. I sometimes walk on roads adjacent to the vineyards and have observed surface water pumps in the creeks where the vineyards are allowed to withdraw surface water. Apparently Fish and Game is OK with this arrangement (?), but I have observed when the flows are very low and the creek is very shallow (a few inches deep), that the vineyards have created berms (from sediment on the creek bottom) across the stream width in order to form deeper pools to draw water with their pumps. These are not dams, but berms that still allow a small amount of water to spill to the downstream side, but the hoses for withdrawal are located on the upstream side.



I am aware that the vineyards adjacent to creeks have riparian rights and apparently, are allowed to pump surface water for frost protection and irrigation as long as they use it right away and do not store it. However, I can tell you that having observed the water levels in these creeks for 20 years, the days when anyone should be able to withdraw surface water for any reason without a permit or any surface water level monitoring should be over. Parts of Atascadero Creek now go completely dry in the summer. Purrington usually has some summer flow, but it gets very low and in some places I have observed, is only several inches deep. There is no one monitoring the flow levels of these important fish habitat creeks that I know of. Also, for the last several summers, some of us who observe these creeks regularly often have noticed that some days the flows stop completely and then the flows reappear a day or two later. This has happened repeatedly on Green Valley Creek and does not seem to be due to natural causes.

**LATE COMMENT**

To make matters worse, there has been a large increase of rural residential development in my area, requiring the installation of many groundwater wells as there is no municipal supply out here in "West County". Domestic wells being installed for housing combined with more and more large capacity and deep agricultural irrigation wells has depleted our groundwater resources. The lack of available groundwater for surface water recharge is likely another cause of low summer flows in these creeks. Add lower groundwater levels to creek withdrawals for frost protection and irrigation and you have a recipe for disaster for the fish.

There is a lot of public and private money being spent on restoration and saving our native coho, salmon and steelhead, yet without water in the creeks these programs are worthless. For this reason, I support a program that would monitor surface water levels and flows in specific creeks or reaches that have been identified as important to fish and wildlife survival. I also support development of an enforcement program to restrict surface water withdrawals on Green Valley, Purrington and Atascadero Creek due to their important fish habitat and recovery values..

Thank you for allowing these comments.

Jo Bentz

P.S. This is sort of off the subject, but it doesn't help that the vineyard operations have completely denuded the riparian corridors up to

top of bank, with construction of dirt roads right along the creek. Because of the vegetation and tree removal, in the summer months the creeks are exposed to more sun and heat and with lower flows this adds up to temperatures that don't support fish or other aquatic life. In addition, rain in the winter washes the dirt and chemicals from the roads right into the creeks as there is no vegetation to filter or buffer the runoff. Combine that with the fact that the vineyards store porta potties, farm equipment, soil amendments and every thing else you can imagine in the "riparian setback" and you can see that there are many factors working against the re-establishment of fish species in these creeks.

Sonoma County has just rewritten its General Plan and the adopted riparian corridor protections are inadequate. The State Board needs to adopt a riparian corridor protection policy, to save the fish, to save the water and to save our creeks, because the Counties and Cities seem unable to do so.