State Water Resources Board

November 10, 2009

Russian River Frost Protection Workshop

Nov 18, 2009 Comments

Last April 7, 2008 NMFS personnel claimed that agriculture was the number one cause of salmonid decline in the Russian River Watershed. The basis for this assumption must not be based on a full and complete study of the causes since no such study has been completed. While agriculture is a large and very visible part of the landscape there are many other potential causes of fish decline in the system. In absence of a study that identifies the causes, and ranks or rate the causes, NMFS cannot effectively protect or attempt to protect salmonids. The letter written by NMFS February 19, 2009 which called for action by the SWRCB and included the Alexander Valley reach of the Russian River is an example of the lack of science being used by the agency. In subsequent meetings of the Frost Protection Task Force NMFS admitted that there was no evidence of fish strandings or negative effects in Alexander Valley, that the agency had not even visited Alexander Valley , but that there was a lot of vineyard land and there could be a problem. The agency seemed willing to essentially destroy a segment an industry based on a concern in absence of science. I ask the SWRCB to ensure that actions taken by the state are based on factual evidence, and not suspected possibilities, and that those actions are directed to specific areas and not to broad areas for ease of enactment.

Following the April 7, 2009 Frost Protection Workshop I began to closely observe water flows and levels in several small streams in Alexander Valley. While at the 4/7 meeting in Sacramento .27 inches of rain fell locally, the next morning there were three dead steelhead trout about 6 inches long in a pool along the highway. The creek had flowed enough for the fish to move downstream into a deep pool which dried up overnight. This creek flows from the mountains onto the alluvial soils of the valley floor. The creek drains into the alluvium at a very fast rate and dries quickly after rains quit. This scenario occurred several times in 2009 and I recovered or found dead approximately 75 to 100 fish in this small stream through the April/May rains in total absence of any agricultural pumping activities. There are vineyards with frost protection nearby. The possibility that naturally killed fish could be found at the same time that frost protection is in operation is a matter of chance and circumstance. There must be and understanding of the function of the stream and the interaction of pumping and the causes and effects to the stream before coming to a conclusion. In this instance the water table is 10 feet below the base of the streambed and changes in the water table caused by pumping cannot affect the creek flow. This stream can only maintain flow when the surface flow exceeds the infiltration rate into the aquifer. The SWRCB should ask for and ensure that NMFS has an effective method of determining the difference between natural kills and those caused by man's actions.

Something for everyone to think about.

There are streams that are not impacted by man and are essentially the same as they were 100 years ago. Why is it that those streams are not teeming with fish, while those that are obviously impacted are devoid of fish.

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