

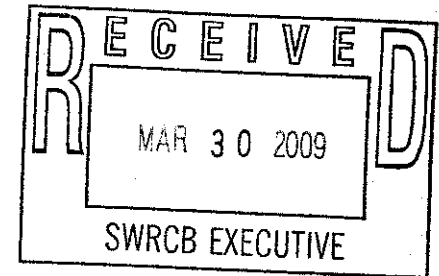
## California Sportfishing Protection Alliance

*"An Advocate for Fisheries, Habitat and Water Quality"*

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State Water Resources Control Board  
1001 I Street, 2<sup>nd</sup> Floor  
Sacramento, CA 95814

Members of the Board:



The California Sportfishing Protection Alliance (CSPA) appreciates the fact that the Board has called a workshop on frost control in the Russian River watershed. Indeed, CSPA, in our comments on the North Coast Instream Flow Policy, recommended that frost control in the AB 2121 counties be addressed en bloc.

Frost control presents a distinct set of problems on the North Coast that are unique because of their cumulative effects over a relatively short period of time. These effects are highly variable, as is the amount of water used for frost control on an annual basis.

However, the problems presented on some occasions by use of water for frost control are also intertwined with some of the other regulatory problems in the North Coast region in general and in the Russian River watershed in particular. Most notably, the Board has no reliable accounting of water use on the North Coast, the Board has very incomplete coordination among different water users, and the Board does not have a handle on how much water is actually in the system at any given moment. There are hundreds of unauthorized diversions and storage reservoirs that shouldn't be in operation, and there are many cases where relatively small storage reservoirs could avoid problems caused by direct diversion for frost protection and simply for irrigation. Finally, there is a huge number of acres planted to grapes.

The Board in short has the systemic and chronic problem that it does not have the pre-conditions needed to make a program similar to that on the Napa River successful on the Russian and its tributaries.

The Board is also faced with the immediate problem that there is very little water in storage in Lake Mendocino, and very little water in storage in Lake Pillsbury that will be transferred to the Russian River system under the terms of the FERC license for the Potter Valley Project. The Board must therefore determine whether in 2009 *any* use of water for frost protection is unreasonable, considering that grapes protected from frost today may die on the vine for the consequent lack of water in summer.

The National Marine Fisheries Service has done a very good thing by raising this issue in immediate terms. The Russian River system was home, not that long ago, to one of the great anadromous fisheries in the world. Today, its salmon and steelhead are teetering on brink of extirpation.

The tail is wagging the dog, because the Board has not done its job. The Board cannot systematically protect salmon and steelhead in the Russian River system, or elsewhere in the AB 2121 counties, from the type of stranding cited by NMFS, and still allow direct diversion for frost protection. At the very least, the Board should therefore immediately disallow direct diversion for frost control purposes in the Russian River system, until such time as D-1610 is re-opened and adjudicated, and the North Coast Instream Flow Policy is completed and implemented. Those processes should be pursued immediately, and should both explicitly address frost control on a broad basis. We note here, as we have in the past, that extensive and coordinated resources, including modern and publicly available water balance models, and real-time monitoring and reporting, are essential to the completion of these processes.

Respectfully submitted,

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FERC Projects Director  
California Sportfishing Protection Alliance