

Trout Unlimited Public Workshop
March 17, 2005
hard cc: Board, Debbie Irvin

electronic cc:
Exec, OCC, EM
VAW, SRH, LLE, RAS, JT



Friends of the Navarro Watershed

PO Box 178 Philo CA 95466 707 895-3887

13 March 2005

State Water Resources Control Board
Division of Water Rights
PO Box 100
Sacramento, CA 95812-0100

Attn: Ms. Debbie Irvin, Clerk of the Board

Subject: Trout Unlimited Petition

Members of the Board:

EXISTING PERMITTED WATER RIGHTS

I offer data attached, showing a 48-year history of the Navarro River comparing Minimum Daily Average Flows versus Summer Appropriations. As the number of approved appropriations increased the average minimum flows continually decreased. During this period:

| <u>Decade</u> | <u>Average Minimum Flows</u> | <u>Appropriations</u> |
|---------------|------------------------------|-----------------------|
| 1950s | 9.3 cfm | 1.8 cfm |
| 1960s | 6.7 | 3.3 |
| 1970s | 5.1 | 5.3 |
| 1980s | 4.6 | 6.0 |
| 1990s | 2.7 | 6.3 |

Many of the older existing approved permits for summer diversion do not have ANY by-pass restrictions. In the early 90's there were six years when average minimum flows were reduced to one cfs or less. The river has been reduced to complete surface dryness on several occasions. It is imperative that the board in their response to this petition not simply respond to pending applications but review *existing* water rights permits on the Navarro and other rivers for modification with appropriate bypass restrictions

consistent with present conditions. As stated in the petition you have "the exclusive jurisdiction to issue, condition, or rescind water rights."

MAINTAIN THE GAUGES

In 2003 the Department of Fish and Game and NOAA issued a report to the State Water Resources Control Board with suggestions for addressing the issue cumulative impacts on water availability. Part of their recommendation would establish bypass restrictions based upon daily flow measurements at the "Navarro River Gauge". Many pages of data taken from gauge readings support their report. The 50-year attached on average minimum flow rates is derived from gauge readings. Existing water rights have bypass conditions based upon specific reference to those same gauge readings. Any response to this petition by your board will undoubtedly rely upon these gauges. Yet every gauge within the boundary of this petition has been imperiled by the state's withdrawal of funds for their operation this year. This was an unfortunate "penny wise" decision that must be reversed by your agency. The opportunity to address the loss of adequate instream flows cannot be addressed if we are no longer able to assess what those flow are now and what they are in the future. Good science can only happen with good data.

We urge support of this petition which speaks very clearly to the problems facing our watersheds and the need for your action to meet those needs.

Very truly yours,

Daniel Myers
Friends of the Navarro Watershed

Attachment: 48-year History Navarro River Average Minimum Flow Rates

CC: Audubon
Natural Heritage Foundation
Trout Unlimited

Navarro River Minimum Flow (Daily Average) vs. Summer Appropriations cfs

