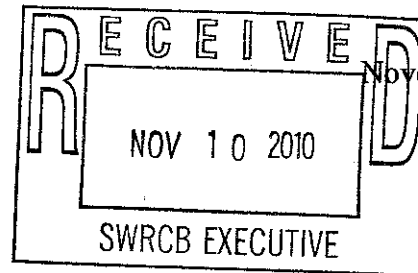


Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
1001 I Street, 24<sup>th</sup> Floor  
Sacramento, CA 95814



November 10, 2010

Subject: Comment Letter – Instream Flow Studies Report

Dear Chairman Hoppin and Members of the State Water Resources Control Board,

Thank you for the opportunity to provide comments to the draft report “Instream Flow Studies for the Protection of Public Trust Resources: A Prioritized Schedule and Estimate of Costs.” We applaud the SWRCB’s efforts to identify high priority rivers and streams in the Sacramento River watershed and other watersheds. The 127 rivers and streams identified as priorities provide an important first step for conserving the state’s aquatic resources.

The Nature Conservancy recently initiated a California salmon program that focuses on actions that will improve salmon and trout habitat and increase the viability of populations while also providing benefits to a wide variety of freshwater, marine and terrestrial species. As part of our salmon program we have developed a prioritization of the state’s salmon watersheds using population viability, habitat quality indicators, and future security indicators (including climate change). The prioritization ranks watersheds based on three strategies: protection, restoring populations and restoring habitats. Developing and securing environmental flows (quantity, magnitude and timing) for these priority streams is a focal point of our salmon program.

Many of the priority rivers and streams selected by the SWRCB were also identified through our prioritization analyses. However, there are some additional rivers and streams that we request the State Board consider as suggested additions to your priority lists (See Tables 1 and 2 included here at the end of the document). The rivers listed in Tables 1 and 2 are important salmonid habitats that we have identified during our analyses. They are also included in NOAA recovery plans.

We also extend our support to the SWRCB in developing flow criteria for priority rivers. The Nature Conservancy is committed to finding sustainable solutions to our global water and energy challenges by using science, engineering and public policy, and bringing together public agencies, academic institutions and private organizations. Through our work we have become recognized world leaders in the determination and implementation of environmental flows. By developing and refining new approaches and best practices, the Conservancy believes that freshwater habitats can be protected and restored while meeting the needs of people now and for future generations.

Working with partners and stakeholders, Conservancy staff in our 50 state and 30 country programs have defined, protected, and restored environmental flows at hundreds of project sites. Applying the lessons learned from our demonstration projects, collectively we have accumulated extensive experience in developing and implementing environmental flow prescriptions in a vast range of ecological, hydrological, social, and political settings. These applications, in turn, inform and refine the methodologies we develop, demonstrate, and disseminate.

To help others implement environmental flows, Conservancy staff work in partnership with government agencies, multilateral institutions, water management agencies, the hydropower industry, the scientific community, and other non-governmental organizations around the world. Recently, scientists, water managers and others signed the Brisbane Declaration, calling for the global protection and restoration of environmental flows. We have developed tools and methodologies for application at individual projects as well as approaches that work at a river basin or regional scale. Conservancy scientists provide training in these methods, while continuing to develop and refine new approaches for protecting freshwater habitats.

Thank you for the opportunity to provide written comments. Please contact Jeanette Howard (415) 281-0476 or Leo Winternitz at (916) 449-2850, ex. 4105 if you wish to follow up on, or have any questions regarding these comments.

Sincerely,

Jeanette Howard  
Leo Winternitz

**Table 1. TNC Recommended Additions to Schedule 1 – Priority Rivers in the Delta Watershed.**

Watersheds	Proposed Priority
Clear Creek	1
Fall River	2
Hat Creek	2
Inter-dam Sacramento	1
Little Sacramento	1
Lower Feather River	2
McCloud River	2
Pit River	2
Upper Sacramento - -Keswick to Red Bluff	1
Yuba River	1

**Table 2. TNC Recommended Additions to Schedule 2 – Priority Rivers Outside the Sacramento Watershed.**

Watersheds	Proposed Priority
Alder Creek	1
Arroyo Leon	2
Austin Creek	2
Big Salmon Creek	1
Canada de la Gaviota	1
Carpinteria Creek	2
Caspar Creek	1
Chorro Creek	2
Corte Madera Creek	2
Cottaneva Creek	1
DeHaven Creek	1
Dry Creek	2
Elk Creek	1
Greenwood Creek	1
Guthrie Creek	2
Hardy Creek	2
Hare Creek	2
Howard Creek	2
Humboldt Bay Creeks	1
Little Sur River	1

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Maacama Creek	2
Mad River	1
Maple Creek	2
Mark West Creek	2
Mission Creek	1
Morro Creek	2
New River	2
Novato Creek	2
Pescadero Creek	1
Petaluma River	2
Pine Gulch	1
Pismo Creek	2
Pudding Creek	1
Redwood Creek – Humboldt County	1
Rincon Creek	1
Salmon Creek Sonoma	2
San Gregorio Creek	1
San Jose Creek	2
San Pedro Creek( S.Jose, Atasca.,MI)	2
San Simeon Creek	1
Stevens Creek	2
Ten Mile River	1
Thomes Creek	1
Toro Creek	2
Upper Klamath River	1
Usal Creek	1
Uvas Creek - Pajaro River	1
Villa Creek	2
Wages Creek	1
Walker Creek	1
Wilson Creek	2
Zuma Creek	2

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