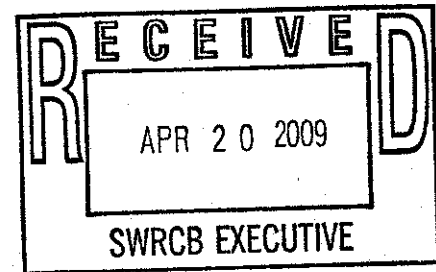


commentletters - Order 2009-0027-DWR

From: "NORMA JELLISON" <normalj@monitor.net>
To: <commentletters@waterboards.ca.gov>
Date: Monday, April 20, 2009 2:26 PM
Subject: Order 2009-0027-DWR
CC: <randy.poole@scwa.ca.gov>

Jeannie Townsend
Clerk to the Board
State Water Resources Control Board
1001 I Street
SacramentoCA 95814

Randy Poole
General Manager/ Chief Engineer
Sonoma County Water Agency
PO Box 11628
Santa RosaCA 95406



Dear Chairman Hoppin and Members of the Board:

I am writing to express my concern regarding impacts related to Order 2009-0027- DWR and modifications in permit terms that would reduce those impacts. The reduction in flows in the Russian River will cause severe impacts to water quality, recreation, community water systems, over-summering juvenile salmon and Steelhead, as well as the lower Russian River economy that depends on a healthy Russian River.

I have lived on the Sonoma Coast for 15 years and spend substantial time volunteering with interpretive programs for State Parks on Goat Rock Beach at the mouth of the Russian River. I have seen the lower river in past low water years of 2004 and 2007 and how those conditions caused the river to become filled with algae and warmer than a bathtub. This was not a good thing for recreation at Goat Rock State Beach, a heavily used recreation spot for Sonoma County residents and out of town visitors that make up the millions of annual visitors to Sonoma Coast State Park and the Russian River. Talking to friends with businesses that depend on the river, they indicate that their businesses suffered from less visitors in those earlier incidents because people were staying away due to the low flows. The lower Russian River economy depends on summer visitors to make it through each year. This new proposal that will result in flow reduction will harm local businesses at a time when the economy is already reeling from the national downturn.

To reduce the impacts from the reduced flows proposed under Order 2009-0027-DWR, I urge you to take action on May 6th to protect water quality and beneficial uses in the Russian River.

Specifically, I urge you to:

- Increase the frequency of chemical water quality monitoring to every two weeks; to post results promptly on a public website to proactively prevent water quality problems such as algae blooms associated with increased nutrient concentrations;
- Include new provisions in the order to require flow changes in response to violations in water quality

standards or as needed to protect juvenile ESA listed fish over the summer. The water agency (SCWA) released water to protect grapes from frost on April 14-16th, thus we expect increases to protect water quality as well;

- Installation of additional gauges as needed to ensure instantaneous flow compliance levels are maintained. These need to be located to get better information immediately. In 2004 and 2007, compliance levels were violated under the previous orders;
- Require a minimum of 25% **mandatory** conservation for all SCWA customers and all users downstream of Dry Creek to help maintain flows and conserve water in case of multi-year drought;
- Require mandatory conservation by all permitted water diversions upstream of Dry Creek, including agricultural and rural residential diversions and stream side wells pumping underflow;
- Add additional prohibitions in the Order on diversions that are not permitted in critically dry conditions. Alternatively, if needed, issue a separate order restraining those unpermitted (an illegal) diversions to protect water storage in Lake Mendocino and maintain higher flows;
- Keep the ordered prohibition on commercial turf irrigation in SCWA service area and expand the prohibition to include all commercial turf using water from the Russian River - I believe it is time for replacing lawns in all commercial developments and large public properties in the SCWA service area and all users of the Russian River water supply with drought tolerant plantings watered by recycled water;

I believe that modifying the order to include these provisions will improve protection of water quality, of juvenile endangered fish and will likely result in somewhat higher flows due to reduced diversions.

I appreciate your consideration of my comments.

Sincerely,

Norma Jellison

Norma Jellison
P O Box 1636
Bodega Bay CA 94923