

*Ad Hoc Committee for Clean Water*

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STATE WATER RESOURCES  
 CONTROL BOARD

2015 JUN 30 AM 10: 52

1 of 2  
 6/30/15  
 DIV. OF WATER RIGHTS  
 SACRAMENTO

Re: ***Emergency Actions due to Insufficient Flow for Coho in Tributaries of the Russian River***

I realize the attached comment is being submitted *after* the deadline of June 29 for OAL review. However, I am submitting it anyway for your consideration because of all the gross procedural irregularities, lack of noticing and most recent SWRCB and OAL egregious mistake!

I learned at noon yesterday from a neighbor, that the attached letter, I attempted to Fax to SWRCB several days ago, within the 5 calendar days allowed, did not go through because ***the Fax number I was given by OAL, and that was on the OAL website was WRONG!*** I called staff at OAL to ask why they posted the ***WRONG NUMBER*** on their website and learned that it was the fault of the SWRCB who had put the wrong number on their submission to the OAL, which, he said, was then copied wrong by OAL onto their site!

***We*** are told to submit ***meticulously*** according to the rules of the OAL, the APA, etc. or our testimony will be ignored! We are laypeople with busy lives but serious concerns. Those reviewing us and critiquing our submissions are well paid, some with 6 figure incomes! ***It is therefore totally unacceptable that the WRONG NUMBER was on the website for our extremely important commentary!*** And, the OAL did not catch the error or correct it until noon on June 29th ***after I called***, irate, and told a staff member what my neighbor told me!

***How do you propose to cure and correct this latest roadblock*** to full access by citizens to democratic participation in the decision-making process? We believe the DFW, the SWRCB, and now the OAL have made enough "mistakes" compounding the errors and poor policy rampant in this regulation

***Salmonids aren't the only ones that need "rescuing". "Rescue" the reputation and credibility of DFW and SWRCB by withdrawing the regulation. Begin again at the local level, with your Regional Board, familiar with local conditions. While we have concerns about lack of local regulation and control over groundwater depletion, we are not about to abandon our local government completely, because the state, effectively by-passing locals, with this regulation, has made matters worse.***

*Ann Maurice*

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The sorry state of the coho should be an embarrassment to the State Water Resources Control Board and all other regulatory and responsible agencies including the Department of Fish and Wildlife, County officials, Planning Departments and the Pacific Fisheries Management Commission. ***However, to declare a "State of Emergency" which cut off public notification and input? Emphatically no!***

There is neither a new nor an imminent threat. ***For decades there has been inadequate attention to de-watering and pollution by pesticide runoff into the tributaries by the proliferation of irrigated vineyard and new vineyard wells in our neighborhood threatening rural residents' water supply as well as coho survival. There is no restriction whatsoever of commercial vineyard watering in the regulation nor buffer zones regarding pesticides nor attention to violations of State Agricultural Code 6614!***

The steady decline of the coho existed ***long before the drought***; and, the decline is ***not*** an "emergency" as defined by Code 11346. Therefore, it does ***not*** warrant ***public notification*** to be abridged and denied, (some residents insultingly receiving notice after the meeting was over!)

***Moreover, your regulation gravely misses the mark and will do little to "save" the coho this summer! Agencies have not been listening to public concerns and suggestions.*** We have long clamored for enforcement of ***existing*** state laws (CEQA, Ag Code 6614) and ***recent laws*** regarding water conservation and lawn watering, etc. These existing laws that apply to our watershed make these new regulations redundant and unnecessarily punitive. Enforce existing State Laws! Rampant well-drilling without CEQA review, and illegal drift of pesticides into creeks kill coho and the insects that nourish them in defiance of State law!

Furthermore, this latest "emergency" regulation perpetuates the history of lack of respect for local wisdom. It is poorly conceived and will only further exacerbate the plight of salmonids, the de-watering of tributaries, and create dissension rather than cooperation.

We reject this onerous regulation, its manner of introduction as an alleged "emergency" and the insulting usurpation of our right to participate. We believe firmly that the best interests of beneficial use in the watershed will come from ***a decision to withdraw*** or for OAL ***not to approve***. Then open dialogue with ***all*** interested parties, most especially rural residents in the affected areas. Thank you for your urgent attention to this matter,

*Ann Maurice*