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Sent on: Wednesday, September 8, 2021 5:38:38 PM
To: WB-DWR-MillDeerDrought <DWR-MillDeerDrought@Waterboards.ca.gov>
Subject: Deer Creek land owner comments

EXTERNAL:

Deer Creek water management

Dear Directors,

The fish population of Deer Creek were able to maintain viable numbers for over 100 years of local irrigation along the creek. Local water users are concerned with fish numbers and have helped in any way they can to sustain them. The declining numbers occurred from other changes in water use downstream. I am aware this watershed plays a critical role in the lifecycle, but our water right should not be the solution for other management practices downstream that we have no control over. If our right is diminished, we should be compensated.

Arbitrary flow volumes are a concern when they have no proven basis. I have seen biologist' recommended minimum flows for fish sustainability that are higher than historic flows 8 out of 10 years. I know that it is not "natural" to modify the riffles to allow easier fish movement, but neither is modifying the delta to transfer water through it. A policy to modify obstructing riffles in low water years would allow fish to safely move with considerably less than 50 CFS flow.

An important part of having normal stream flows is forest management that removes the highwater using undergrowth in the watershed. This allows the water to infiltrate the soil and maintain natural springs. It also makes available more moisture for the mature trees to stay healthy and resist disease.

Deer Creek water user,



Keith Bentz

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