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October 23, 2006

State Water Resources Control Board

Song Her, Clerk of the Board
1001 I Street
Sacramento, CA 95814

RE: Comment Letter – Shasta River Watershed DO and Temperature TMDLs



Gentlemen,

It is unfortunate and inappropriate for this Resolution and Action Plan for the Shasta River to have come this far and not include among its listing of "the designated beneficial uses" that of "Agricultural Supply" (AGR). Without its inclusion, the public perception is that legally adjudicated water rights holders are engaging in illegal acts of some kind. One simply needs to look at the June 12 Action Plan or the October 12 notice, which requested this comment to see the omission. By this egregious oversight, it will taint the spirit of cooperation and set a precedent for adversarial relationships among ALL the stakeholders, which is unwarranted and shortsighted. This would appear to be derived from a misguided notion that water quality and water quantity are inseparable. This is not true. The lack of water quality is affected far more by the under funded antiquated infrastructure systems that manages the current water supplies than it is by water volume alone. The water quality would improve in direct proportion to the public funding and implementation of infrastructure improvements throughout the watershed.

The Staff Report for the Action Plan for the Shasta River Watershed Chapter 13 Economic Analysis did not address the various economic impacts to agriculture and the County if loss of production were directly attributable to a reduction in the irrigation water supplies. There was no discussion or quantification of any kind as to how this might impact the County long term or the affected landowners. It also, did not address the economic benefits currently being provided to the County by the environmental habitat, which is maintained through seasonal irrigation and other appropriate water uses.

Everyone would agree that the process of managing not only the TMDLs and DO but also the entire Klamath watershed, including the Shasta River component, should be driven by sound science. It takes more than one scientist for any meaningful peer review. This could be achieved by a plan similar in nature to one used on the Columbia River put forth by NOAA. This would entail having seven rotating qualified scientists out of a pool of qualified scientists, put forth by the stakeholders, which would review findings and make recommendations, thus holding the water, fish studies, harvest management and environmental reviews to a higher degree of scientific rigor. The recommendations may not be liked by everyone, but there would be at least a sense that they are unbiased in anyway.

Sincerely

Tom Connick