

## FishNet 4C Fishery Network of Central California Coastal Counties

A Regional Approach to Salmonid Protection and Restoration

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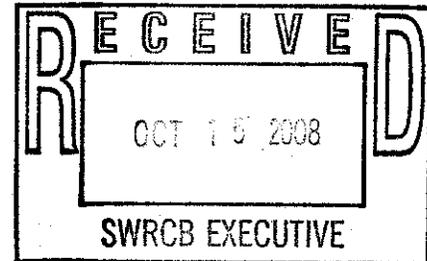
California Department of  
Fish & Game

NOAA Fisheries

California Resources  
Agency

October 14, 2008

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



RE: Development of Urban Water Conservation Regulatory Program

Dear State Water Resources Control Board Members:

I'm writing on behalf of FishNet 4C to comment on your proposal to develop an Urban Water Conservation Regulatory Program. FishNet 4C comprises the counties of Sonoma, Marin, San Mateo, Santa Cruz and Monterey, working together to implement fisheries restoration projects. Our efforts focus on recovering the endangered and threatened coho salmon and steelhead trout populations.

Our intent is not to comment on the key issues and questions identified by State Water Board staff; there are many water conservation professionals in California who are highly qualified to address those issues. We would like to insure that any regulation developed by the Board utilizes water conservation requirements to provide and protect instream flow for fisheries.

Historically, California water purveyors and water users have been very successful in reducing water demand through water conservation programs. This conserved water is considered as "new" supply to fuel continued growth. California's water resources are already over-subscribed from a biological standpoint. Therefore, any new regulation to require water conservation should include safeguards that will insure that some of this reduced demand results in increased instream flows.

Local agencies and organizations throughout the state are implementing projects to remove salmonid migration barriers, improve habitat and water quality, and protect these resources through protective land use policies. To complement these efforts, we need strong leadership from the state to protect instream flows through statewide policy and regulation.

The State Water Resources Control Board is already in the process of developing the North Coast Instream Flow Policy as a means to maintain instream flows for the protection of fishery resources. An urban water conservation regulatory program could contain similar principles and guidelines to insure that reduced water demand results in increased instream flows. Once the instream flow requirements are met for the water bodies affected by a water supplier's diversions, then additional conserved supplies could be used to supply new demand.

In addition, agricultural water use efficiency should also be addressed. Outdated "use it or lose it" water allocation policies should be revised, subsidies for high water using crops should be abolished, and agricultural water users should develop a similar menu of best management practices and a framework to insure implementation.

Salmonid fisheries throughout the state are in serious decline, threatening the economic and ecological health of California. We urge you to use this opportunity to create a new paradigm for water supply management, allowing biological "users" to have a place at the table along with urban and agricultural water users.

Sincerely,

A handwritten signature in cursive script that reads "Darcy Aston".

Darcy Aston  
Program Director, FishNet 4C