**From:**      <graysaan@gmail.com>
**To:**        commentletters@waterboards.ca.gov
**Date:**      Wed, Apr 22, 2009  9:56 PM
**Subject:**   Order WR 2009-0027-DWR

April 23, 2009

Jeannie Townsend
Clerk to the Board
State Water Resources Control Board
1001 I Street
Sacramento, CA 95814

Randy Poole
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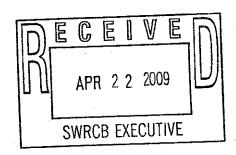RE: Comments for May 6th Workshop on Order WR 2009-0027-DWR

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 will cause severe impacts to
water quality, recreation, community water systems, over-summering
juvenile salmon and Steelhead as well as the lower River economy that
depends on a healthy Russian River.

I am a homeowner in Guerneville on the river. I fell in love with this
particular river corridor as a child and teen going to camp nearby. As
an adult I finally stumbled back into the area, reestablishing the
adoration of the natural and riparian world that is so unique and
special. Besides the obvious incredible recreation opportunities a
healthy Russian River affords and the beauty of it, I find incredible
connection to the wildlife that call it home. I cannot imagine the
damage to the animals, otters, birds, fish, etc that the super low
flows would bring. To myself and many, many others in the area, the
severely reduced water flows would seriously affect us economically,
and hurt all the local businesses that are already struggling in the
current economic crisis. I can imagine the summer season and angry
vacationers (and property owners) being disgruntled and therefore not
taking care of the river areas; this would further hurt the community,
the riparian habitat, and the wildlife. Please, there must be a better
way to deal with the water situation!

In order to reduce the impacts from reduced flows under Order
2009-0027-DWR we urge you on May 6 to take action to protect water
quality and beneficial uses in the Russian River.
Specifically we urge you to:

- Increase frequency of chemical water quality monitoring to every two

weeks with results posted promptly on a public website to proactively prevent water quality problems such as algae blooms from 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 released water to protect grapes from frost on April 14 to 16th so we expect increases to protect water quality as well

- Installation of additional gauges as needed to ensure instantaneous flow compliance levels are maintained, in 2004 and 2007 compliance levels were violated under previous orders

- A minimum of 25% mandatory conservation for SCWA customers and all users downstream of Dry Creek to to help maintain flows and conserve water in case of multi-year drought.

- Mandatory conservation by all permitted water diversions upstream of Dry Creek including agricultural and rural residential diversions and streamside wells pumping underflow

- Additional prohibitions in the Order on diversions that are not permitted in critically dry conditions or if needed a separate order restraining those unpermitted diversions to protect water storage in Lake Mendocino and maintain higher flows

- Keep order prohibition on commercial turf irrigation in SCWA service area and expand to include all commercial turf using water from the Russian River

We believe that modifying the order to include these provisions will improve protection of water quality, juvenile endangered fish and likely result in somewhat higher flows due to reduced diversions. We greatly appreciate your consideration of our comments.

Sincerely,


Gray Douglas
17304 Neeley Road
Guerneville