

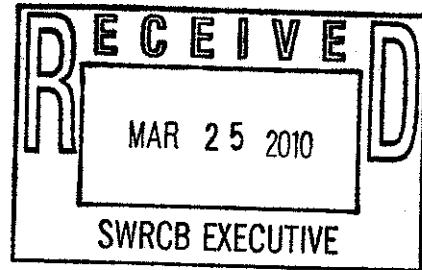


NAPA COUNTY RESOURCE CONSERVATION DISTRICT

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March 25, 2010

State Water Resources Control Board
Charles Hoppin, Chair
c/o Jeanine Townsend, Clerk to the Board
1001 I Street, 24th Floor
Sacramento, CA 95814



RE: Request to Extend the Public Comment Period on Proposed Policy for Maintaining Instream Flows in Northern California Coastal Streams

Dear Chairman Hoppin:

The Napa County Resource Conservation District (RCD) is committed to using cooperative and scientifically sound methods to ensure that the watersheds in our district are sustained, conserved, restored and protected within a landscape of productive agriculture, growing cities, and wild lands. We are committed to working with our conservation partners in the Napa River watershed and with the State Water Board to adopt an Instream Flow Policy that is protective of our salmonid populations and our agricultural industry.

For context, the RCD is a non-regulatory, apolitical local public agency that serves the community through technical assistance, educational outreach, and scientific research. We have spent many years working with agricultural producers and other stakeholders to improve watershed conditions, protect and monitor water quality, remove fish migration barriers, gauge and understand stream flows in our tributary watersheds, and study our local salmonid species and estimate their populations.

The RCD supports the intent of the Policy. We have dedicated significant amounts of time to analyzing and understanding the 2002 Guidelines for Maintaining Instream Flows, the 2007 draft Instream Flow Policy, the 2009 Joint Recommendations on the Instream Flow Policy and the 2010 Draft Instream Flow Policy. Despite our efforts to review and analyze the implications of the revised Policy and its potential to provide benefits to our salmonid species, we find that the time provided for public comment is insufficient to fully understand the policy and how, in a scientifically sound method, it could feasibly be implemented locally.

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We remain concerned that the complexity of the Policy and the onerous and complicated requirements contained therein will lead to unintended consequences that are counterproductive to restoring fish species and fish habitat to the Napa River watershed. We respectfully request a 90-day extension of the public comment period to more fully analyze how the revised regional policy may impact our local stream flows, our fish populations and our agricultural industry. We also request that one or more technical workshops be held in the Policy region so that Board technical staff can provide the public with additional information related to the implications of Policy implementation and provide more specific guidance related to compliance through site-specific studies or the watershed approach.

Thank you for your consideration.

Sincerely,



Leigh Sharp
District Manager

cc: Frances Spivy-Weber, Vice Chair
Arthur Baggett
Tam Doduc
Walter Pettit
Dorothy Rice
Karen Niiya