



RRWPC

Russian River Watershed Protection Committee

P.O. Box 501

Guerneville, CA 95446

Email: rrwpc@comcast.net

Website: <http://www.rrwpc.org>

Handout: Fish Flow EIR Panel

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Summary of key issues regarding low flow

Brenda Adelman: Russian River Watershed Protection Committee (RRWPC)

Note: To stay up on issue, sign up for email list (we do not share list) by email to: rrwpc@comcast.net

Fact Sheet: Issues

- **BIOLOGICAL OPINION (BO):** National Marine Fisheries Service published Biological Opinion (BO) on Sept. 24, 2008. That document contained numerous requirements to be fulfilled by Sonoma County Water Agency (SCWA) by 2023, with probable extension to 2040 in order to protect three threatened salmonid fish species. Projects most affecting lower Russian River:
 - According to the BO, implementation of the Estuary Project is the only reason provided for lowering minimum summer flows as measured at the Hacienda Bridge.
 - Flow decreases addressed in Environmental Impact Report (EIR) include minimum flow reductions of up to 50% in lower river between May 15th and October 15th each year.
 - In normal rainfall year, Hacienda minimum flows will go from 125 cfs to 70 cfs.
 - In dry rainfall year summer flows can go down to 50 cfs according to EIR but Biological Opinion calls for only 70 cfs minimum.
- **ESTUARY PROJECT:** Goal of project: when mouth closes naturally, SCWA is to create channel that allows fresh water to seep out, but doesn't let salty ocean water in. Objective is to maintain fresh water lagoon for juvenile steelhead and assumes that lower flows would help sustain the closure. There are indications however, that ocean tidal and wave actions control mouth openings and closures much more than river levels. SCWA uncertainty about channel placement, including length and width and angle, etc., have also been a factor in its failure.

Estuary Project was attempted annually for the last six years and succeeded only once. Flows in May and June are generally higher than 125 cfs minimum because of natural tributary runoff. In July and August flows naturally decline and, contrary to the BO's view that SCWA breaches occur too frequently, in the last 20 years there have been only 3 in July and 1 in August. Yet the

Biological Opinion states (P. xii): “*The proposed project will sustain high, artificial inflows to the estuary during the low flow season and it will entail detrimental sandbar breaching activities at the mouth that will significantly affect water quality in the lowermost segment of the river.*” Furthermore, the river is usually open most of July and August even when flows are low. This leads us to believe that permanent lowering of minimum flows would be no help to the fish.

- In fact, the EIR concludes that the following shall not only cause significant impacts, but will be un-mitigatable. Impact 4.2-4: “*Changes to minimum instream flows could result in a violation of water quality standards or waste discharge requirements or otherwise degrade water quality relating to biostimulatory substances in the Russian River*”. EIR alternatives should include, if any reductions are to occur at all, an alternative that looks at impacts of much smaller flow reductions. Right now, the No Project Alternative #1 looks to be the best for the lower river and **low flows should not be approved or implemented until all water quality issues are resolved.**
- **FISH FLOW PROJECT (LOW FLOW) WATER QUALITY IMPACTS:** The river is impaired for sediment and temperature and bacteria. There are also excessive amounts of phosphorus documented in the lower river and large amounts of algae. Toxic algae (cyanobacteria) has been found in the river in the last few years and proliferates in conditions of high temperatures, high nutrients (phosphorus), and low flows. We have an abundance of the first two, and if summer flows are lowered permanently, that will provide the third element to sustain a very difficult water quality problem as described in preceding paragraph. Toxic algae has become a serious national problem and in California, Clear Lake, and the Eel and Klamath Rivers have had serious toxic algae problems. Low flows can also cause a cascade of other environmental problems, not to mention possible serious health issues for children, elderly, those with compromised immune systems and especially pets. Detailed information can be found at the following website: www.MyWaterQuality.ca.gov
- **CITY GROWTH IN SONOMA & MARIN WILL BENEFIT FROM LOW FLOW:** SCWA has informed contractors that adequate water supplies exist behind both dams to assure adequate water to fully serve their general plan growth projections. Their analysis also assumes that low flow will be adopted to fulfill BO requirements and to assure they will not be held accountable for takings of threatened fish species. The water saved from low flow will remain in the reservoirs and can be used by cities to fulfill their General Plan growth projections until 2040.
- Very few toxins are monitored in the river, but no doubt they exist. Lower flows will concentrate toxins and make them more available to affect humans, pets, and wildlife (including fish) who live and recreate in the river. They may also become more toxic in concentrated form. Furthermore, little is known about how these toxins interact with one another to form even more dangerous compounds. In any case, the less flow there is for dilution, the more risky exposure can become. **CONTACT RRWPC TO STAY INFORMED:** rrwpc@comcast.net
- Finally, we have learned that the Board of Directors of the Sonoma County Water Agency (Supervisors) will extend the comment period for the EIR and will hold a hearing in the lower river community. They will decide details at their October 4th meeting, which are unknown at this time. We will notify everyone on our email list when we know details. So sign up soon!

Save the river and the fish: NO LOW FLOW