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4 Attorney for Complainants
and Petitioners

5
6
7 BEFORE THE STATE WATER RESOURCES CONTROL BOARD

8)
9 FRIENDS OF THE NAVARRO WATERSHED,)
SIERRA CLUB, CALIFORNIA) COMPLAINT AND PETITION TO
10 SPORTFISHING PROTECTION ALLIANCE,) RESTRAIN ILLEGAL
FRIENDS OF THE RIVER, PACIFIC) DIVERSIONS OF WATER FROM,
11 COAST FEDERATION OF FISHERMEN'S) AMEND WATER APPROPRIATION
ASSOCIATIONS, UNITED ANGLERS,) LICENSES AND PERMITS TO
12 CALIFORNIA TROUT, TROUT UNLIMITED) ASSURE BYPASS FLOWS
and MENDOCINO ENVIRONMENTAL CENTER,) SUFFICIENT TO PROTECT
13 Complainants and Petitioners,) INSTREAM FISH AND WILDLIFE
14 v.) BENEFICIAL USES WITHIN,
RESTRAIN UNREASONABLE
15) RIPARIAN USES AND
UNNAMED ILLEGAL DIVERTERS OF WATER) APPROPRIATIONS OF, AND
16 FROM NAVARRO RIVER AND ITS) DECLARE FULLY
TRIBUTARIES AND NAVARRO BASIN) APPROPRIATED, THE NAVARRO
17 WATER RIGHTS OWNERS WHOSE LICENSES) RIVER AND ITS TRIBUTARIES
AND PERMITS DO NOT REQUIRE BYPASS)
18 FLOWS SUFFICIENT TO PROTECT INSTREAM)
BENEFICIAL USES,)
19 Respondents.)
20)

21 I. PRELIMINARY STATEMENT

22 Friends of the Navarro Watershed, Sierra Club, California
23 Sportfishing Protection Alliance, Pacific Coast Federation of
24 Fishermen's Associations, Friends of the River, United Anglers,
25 California Trout, Trout Unlimited and Mendocino Environmental
26 Center (hereinafter, collectively "Friends of the Navarro")
27 hereby complain and petition this Board to take immediate action
28 to restrain illegal diversions of water from, amend water

1 appropriation licenses and permits to assure bypass flows
2 sufficient to protect instream fish and wildlife beneficial uses
3 within, restrain unreasonable riparian uses and appropriations
4 of, and declare fully appropriated, the Navarro River and its
5 tributaries. Complainants petition this Board to take these
6 actions in order to protect the Navarro River system's instream
7 beneficial uses as designated in the California Regional Water
8 Quality Control Board Basin Plan for the North Coast Region, and
9 to protect instream public trust resources, all as required by
10 California Constitution Article X, sections 2, 4 and 5 and
11 California Water Code sections 100, 101, 102, 105, 1052, 1205,
12 1206, 1243, 1243.5, 1253, 1257, 1258, 1381, 1394, 1410, 1611 and
13 1831.

14 Friends of the Navarro request the foregoing enforcement
15 action by this Board because illegal and unreasonable water
16 diversions from the Navarro River and its tributaries, primarily
17 for agricultural purposes, have significantly impaired instream
18 fish and wildlife beneficial uses, to the point where the river
19 was literally pumped dry during August and September of 1992.
20 Such illegal and unreasonable diversions threaten again this fall
21 to eliminate the natural flow of the river and its tributaries
22 necessary to sustain constitutionally and statutorily protected
23 instream fish and wildlife beneficial uses.

24 Historically, the Navarro River and its tributaries have
25 provided essential habitat for Coho salmon, steelhead trout,
26 Navarro Roach and other important fish stocks. The California
27 Regional Water Quality Control Board for the North Coast Region
28 has identified in its Basin Plan the following beneficial uses

1 for the Navarro River and its tributaries: contact recreation,
2 non-contact water recreation, cold fresh water habitat, wildlife
3 habitat, fish migration and fish spawning.

4 The recent severe reductions and complete losses of flow in
5 the Navarro River due to illegal and unreasonable diversions of
6 water destroy these designated uses. This Board is required by
7 the foregoing constitutional and statutory provisions to regulate
8 riparian and appropriative water diversions from the Navarro
9 River and its tributaries as necessary to protect and maintain
10 designated instream fish and wildlife beneficial uses of these
11 waters.

12 According to this Board's staff files, there are fifty-two
13 existing water rights licenses or permits, and fifteen pending
14 applications, within the Navarro River watershed. Most of the
15 existing licenses and permits allow direct diversion during the
16 summer months. Because this river system is undammed and
17 precipitation occurs primarily in the winter months, late summer
18 (August and September) flows averaged only about 1% (10 cfs) of
19 winter (January and February) flows (1000 cfs) during the forty
20 years of record for this watershed. Consequently, summer
21 diversions pose an extreme threat to instream beneficial uses.
22 Yet it is undisputed, as the Department of Fish and Game (DFG)
23 has noted in its protests against all the pending water rights
24 applications, that the Navarro River provides essential habitat
25 for important fishery resources.

26 For this reason on February 3, 1992 DFG filed a Complaint
27 with your Division of Water Rights requesting that it "review
28 water usage from the Navarro River and its tributaries to

1 determine if there are illegal diversions and take the necessary
2 actions to insure they comply with the laws related to water
3 appropriation." Friends of the Navarro joins in this request,
4 but petitions this Board additionally either to conduct a
5 statutory adjudication of Navarro Basin water rights pursuant to
6 Water Code section 2501 et seq., or to exercise its continuing
7 authority under Article X of the Constitution to modify existing
8 water rights, as necessary to protect instream beneficial uses
9 and assure that all riparian and appropriative rights are
10 exercised in a "reasonable" manner.

11 II. STATEMENT OF THE FACTS

12 From its headwaters in Rancheria Creek northwest of
13 Cloverdale, the Navarro River flows northwesterly through
14 southern Mendocino County for a distance of about sixty miles
15 into the Pacific Ocean about ten miles south of the City of
16 Mendocino. It drains a watershed of approximately 300 square
17 miles and includes among its principal tributaries, in addition
18 to Rancheria Creek, Anderson Creek, Indian Creek, Mill Creek, and
19 the south and north branches of the North Fork Navarro River.
20 According to DFG, the Navarro River supports significant
21 populations of Coho salmon and steelhead trout. The population
22 of these salmonids has declined precipitously during the last
23 three decades, due to water diversions, timber harvest and road
24 construction. These developments impair their spawning and
25 rearing habitat by decreasing summer flows, increasing water
26 temperatures and sediment, and disrupting natural transport of
27 sediment downstream to the ocean. During years of low flows,
28 sediment transport of sands and gravels has become so impaired

1 that rearing pools that provide protection from summer heat have
2 become filled with sediment, exposing these salmonids to lethal
3 water temperatures. Even below the confluence with the
4 relatively clear and cold North Fork, the Navarro River's average
5 daily maximum temperature during the months of June, July and
6 August exceeds the lethal temperature threshold for salmonids of
7 70 degrees Fahrenheit.¹

8 Excessive summer diversions for agricultural irrigation have
9 reduced stream flows so significantly as to strand salmon and
10 steelhead in small pools where they are vulnerable to predators,
11 elevated water temperatures and low dissolved oxygen. In drought
12 years, these diversions have actually dried up portions of the
13 Navarro River, most notably in 1992, resulting in substantial
14 fish mortality as well as loss of recreational uses. Impairment
15 of these beneficial uses contravenes the North Coast Basin Plan,
16 which designates fish and wildlife habitat and contact recreation
17 as beneficial uses of this river.

18 At present, thirty-three landowners have water appropriation
19 licenses, and nineteen own water appropriation permits, allowing
20 diversions from the Navarro River and its tributaries.² Twenty-
21 nine of these diverters secured their water rights since 1972,
22 after salmonid population declines had begun and this Board
23 clearly had a duty to prevent further habitat loss. All but four

24
25 ¹ See Exhibit 1 hereto, a July 28, 1994 report by the Mendocino
26 County Water Agency enclosing graphs of temperature studies conducted
by the U.S. Fish and Wildlife Service and the Corps of Engineers.

27 ² See Exhibit 2 hereto, a table prepared by State Water Board
28 staff that summarizes these appropriative rights and the pending water
rights applications.

1 of these diverters apply the water to agricultural uses,
2 primarily orchard and vineyard irrigation and frost protection.
3 The balance are for recreational or domestic use. There are
4 fifteen pending water rights applications, primarily for winter
5 irrigation storage and spring frost protection. Existing
6 diversions range in size from 0.01 to 9.00 cfs; existing storage
7 capacities range in volume from 0.01 to 122.00 acre feet. The
8 proposed diversions are all less than 3.00 cfs and, with one
9 notable exception, proposed storage volumes are all less than 200
10 acre feet. The exception is a proposal to construct a reservoir
11 for storing 1500 acre feet for irrigation purposes on Robinson
12 Creek two miles south of Boonville.

13 Widespread public concern that the Navarro River is already
14 overappropriated has delayed this Board's approval of the pending
15 water appropriation applications. Recently Water Rights Division
16 staff have recommended informally that the pending water rights
17 applications for winter diversions be subject to a 200 cfs bypass
18 requirement. This requirement would do nothing, however, to
19 alleviate the severe overappropriation which exists during the
20 summer. This Complaint and Petition is thus directed primarily
21 at the absence of adequate regulation by this Board to prevent
22 excessive summer diversions, resulting in significant fish
23 mortality and loss of recreational uses during that season.
24 Despite repeated requests by agencies and concerned citizens
25 for more than three years that the Board take action to protect
26 the Navarro River, the Board has failed to do so. On May 22,
27 1991, the Mendocino County Water Agency informed the State Board
28 that the Navarro River had experienced a statistically

1 significant decline in annual minimum flows and asked the Board
2 to find that the river was fully appropriated during the summer
3 months.³ This Board took no action to declare the river fully
4 appropriated or to curtail the excessive agricultural diversions.

5 Friends of the Navarro Watershed wrote this Board on April 2
6 and August 12, 1992, likewise requesting that the Board
7 investigate and take action to correct harmful diversion levels
8 on the river, and offering assistance in bringing illegal
9 diverters into compliance with state law. Again this Board made
10 no response. After the river completely dried up in the summer
11 of 1992, an aggrieved citizen and member of Friends of the
12 Navarro Watershed informed this Board's Division of Water Rights
13 by letter dated September 1, 1992 of the situation and again
14 requested corrective action. Because it had received no Board
15 response to any of these letters, nor to numerous phone calls
16 from members of Friends of the Navarro Watershed reiterating the
17 letter requests, on October 14, 1992 Friends of the Navarro
18 Watershed requested in writing that the State Board send a staff
19 person to inspect the river with them and a Department of Fish
20 and Game biologist.

21 The Division Chief responded on October 15, 1992 to the
22 September 1 letter which had documented zero flows, stating that
23 "[i]t is not legal for farmers ... to dry up the River," and
24 "it is not reasonable to divert water in a manner that dries up a
25 stream and impacts fish and wildlife." However, despite its

26
27 ³ May 22, 1991 letter from Dennis Jackson of the Mendocino
28 County Water Agency to Ross Swenerton of the State Water Resources
Control Board.

1 recognition of applicable law, this Board again failed to take
2 action to enforce these laws. Friends of the Navarro Watershed
3 therefore wrote yet again on August 12, 1993, to again document
4 the fact that existing diversions, both permitted and illegal,
5 had literally sucked the Navarro River dry the previous summer
6 and threatened to do so in the future.⁴ Again this Board failed
7 to take action.

8 Therefore on August 24, 1993 the undersigned counsel for the
9 Friends of the Navarro Watershed transmitted to this Board's
10 Division of Water Rights a formal request for Board action to
11 evaluate the reasonableness of appropriations and riparian uses
12 of Navarro River water and to schedule an evidentiary hearing on
13 the matter.⁵ On August 30, 1993, Friends of the Navarro
14 Watershed reiterated its 1992 inquiry concerning when and how the
15 State Board would take action, and noted in particular that
16 several illegal dams had been constructed recently by people who
17 "are aware that complaints about illegal diversion are being
18 ignored by the State Water Resources Control Board."⁶

19 The Board responded to the August 12 letter on September 24,
20 1993, stating that it would "initiate an investigation relating
21
22

23 ⁴ August 12, 1993 letter from Tom Wodetzki, Friends of the
24 Navarro Watershed, to Edward Anton, Chief, Division of Water Rights,
State Water Resources Control Board.

25 ⁵ August 24, 1993 letter from Stephan C. Volker of the Sierra
26 Club Legal Defense Fund to Edward Anton, Chief, Division of Water
Rights, State Water Resources Control Board.

27 ⁶ August 30, 1993 letter from Diane Paget, Friends of the
28 Navarro Watershed to Ed Dito, State Water Resources Control Board.

1 to water right issues on the Navarro River."⁷ Also on September
2 24, 1993, the Board responded to the undersigned's August 24
3 letter by indicating that further action to protect the Navarro
4 River would be delayed due to this "investigation," on the
5 grounds "we do not intend to schedule a water right hearing on
6 this matter until we complete our complaint investigation."⁸ To
7 date the Board's "investigation" has produced no water rights
8 hearing, much less any corrective Board action.

9 Yet another year later, on April 25, 1994, Friends of the
10 Navarro Watershed again wrote to the Division of Water Rights to
11 warn that the river may be pumped dry again this year and
12 requesting again that the State Board take action.⁹ With little
13 sign that the Board plans timely action, Friends of the Navarro
14 Watershed is now impelled to file this formal Complaint and
15 Petition.

16 III. APPLICABLE LEGAL REQUIREMENTS

17 "The State has an affirmative duty to take the public trust
18 into account in the planning and allocation of water resources,
19 and to protect public trust uses whenever feasible." National
20 Audubon Society v. Superior Court (1983) 33 Cal.3d 419 , 446 [189
21 Cal.Rptr. 346, 364]. "The use of all water now appropriated, or
22

23 ⁷ September 24, 1993 Letter from Ed Dito, State Water Resources
24 Control Board, to Tom Wodetzki, Friends of the Navarro Watershed.

25 ⁸ September 24, 1993 letter from Ed Dito, State Water Resources
26 Control Board, to Stephan C. Volker, Sierra Club Legal Defense Fund.

27 ⁹ April 25, 1994 letter from Tom Wodetzki, Friends of the Navarro
28 Watershed, to Edward Anton, Chief, Division of Water Rights, State
Water Resources Control Board.

1 that may hereafter be appropriated ... is ... subject to the
2 regulation and control of the state, in the manner to be
3 prescribed by law." California Constitution, Article X, Section
4 5.

5 "The agency entrusted with the 'orderly and efficient
6 administration of the waters of the state' is [the state Water
7 Resources Control] Board." Imperial Irrigation District v. State
8 Water Resources Control Board (1990) 225 Cal.App.3d 548, 569 [275
9 Cal.Rptr. 250, 265], emphasis retained. "Once [this Board] has
10 approved an appropriation, the public trust imposes a duty of
11 continuing supervision over the taking and use of the
12 appropriated water." National Audubon Society, supra, 33 Cal.3d
13 at 447 [189 Cal.Rptr. at 365].

14 These duties emanate from a 1928 constitutional amendment
15 which abolished the right of a riparian to devote water to
16 unreasonable uses, and "established the doctrine of reasonable
17 use as an overriding feature of California water law." Id., 33
18 Cal.3d at 442 [189 Cal.Rptr. at 362]. Subsequently renumbered
19 Article X, section 2, this constitutional amendment requires that
20 "[a]ll uses of water, including public trust uses, must now
21 conform to the standard of reasonable use." Id., 33 Cal.3d at
22 443 [189 Cal.Rptr. at 362]. This duty is also codified in Water
23 Code sections 100 and 101, which command that the "unreasonable
24 use or unreasonable method of use of water" by appropriations and
25 riparians alike "be prevented,"¹⁰ and in Water Code section 1253,

26 _____
27 ¹⁰ To underscore this Board's ultimate responsibility for
and control over private water usage, the Legislature provided in
Water Code section 102 that "[a]ll water within the State is the

(continued...)

1 which directs this Board to allow appropriation of water "under
2 such terms and conditions as in its judgment will best develop,
3 conserve, and utilize in the public interest the water sought to
4 be appropriated."

5 Since 1936 it has been clear that instream uses to maintain
6 recreational values are considered reasonable and beneficial uses
7 protected by the public trust doctrine. County of Los Angeles v.
8 Aitken (1936) 10 Cal.App.2d 460. 468-469 [52 P.2d 585]. The
9 California Legislature codified this point by directing that
10 "[t]he use of water for recreation and preservation and
11 enhancement of fish and wildlife resources is a beneficial use of
12 water." Water Code S 1243; see also. California Trout, Inc. v.
13 State Water Resources Control Board (1979) 90 Cal.App.3d 816, 821
14 [153 Cal.Rptr. 672].

15 The Legislature also directed that this Board, in acting on
16 applications for appropriative water rights, "shall consider the
17 relative benefits to be derived from . . . all beneficial uses of
18 the water concerned including, but not limited to ...
19 preservation and enhancement of fish and wildlife [and]
20 recreational . . . purposes." Water Code § 1257. This statute
21 vests this Board with broad discretion to "subject such
22 appropriations to such terms and conditions as in its judgment
23 will best develop, conserve, and utilize in the public interest,
24

25 ¹⁰ (...continued)
26 property of the people of the State," and in section 105 that
27 "protection of the public interest in the development of the water
28 resources of the State is of vital concern to the people of
the State and . . . the State shall determine in what way the water
of the State, both surface and underground, should be
developed for the greatest public benefit."

1 the water sought to be appropriated." Id. In 1969 the
2 Legislature specifically directed that "[i]n determining the
3 amount of water available for appropriation, [this Board] shall
4 take into account, whenever it is in the public interest, the
5 amounts of water needed to remain in the source for protection of
6 beneficial uses." Water Code § 1243.5.

7 To assure that the foregoing state policies are implemented,
8 the Legislature empowered and directed this Board to institute
9 court proceedings to enjoin any diversion or use of water "other
10 than as authorized" under the Water Code. Water Code section
11 1052. The Legislature also empowered and directed this Board to
12 adopt declarations that a stream system is fully appropriated
13 "where the [B]oard finds that previous water rights decisions
14 have determined that no water remains available for
15 appropriation," or where this Board finds, based on evidence
16 presented at a noticed hearing, "that a stream system is fully
17 appropriated." Water Code sections 1205(b) and (a),
18 respectively. "From and after the date of adoption of a
19 declaration that a stream system is fully appropriated [except
20 upon specified conditions] the [B]oard shall not accept for
21 filing any application for a permit to appropriate water from a
22 stream system described in that declaration, and the [B]oard may
23 cancel any application pending on that date." Water Code section
24 1206(a). Consistent with Water Code sections 1205 and 1206, this
25 Board "must not accept for filing" any further applications to
26 appropriate water from the Navarro Basin.

27 The Legislature provided further that in acting upon
28 applications to appropriate water, this Board "shall" consider

1 water quality control plans applicable to the waters in question,
2 and empowers this Board to "subject such appropriations to such
3 terms and conditions as it finds are necessary to carry out such
4 plans." Water Code section 1258. Accordingly, in considering
5 the pending water rights applications, this Board must consider
6 the beneficial uses of the Navarro River that are designated in
7 the North Coast Regional Water Quality Control Board Basin Plan.
8 As noted previously, those designated beneficial uses include
9 "fish and wildlife habitat" and "contact recreation." Water
10 Quality Control Plan for the North Coast Basin at II-5. This
11 Board may not, consistent with its duty to "consider" the Basin
12 Plan, approve further appropriations from the Navarro Basin that
13 would exacerbate the declining habitat conditions and further
14 jeopardize the survival of fish populations within this stream
15 system.

16 Finally, the Legislature has invested this Board with broad
17 authority to enforce permit terms, such as minimum bypass flows,
18 under Water Code section 1381, and to reserve jurisdiction under
19 Water Code section 1394 to amend water appropriation permits
20 where the Board finds that additional study is necessary to
21 prevent unreasonable water use, contrary to the public interest.
22 Where this Board has failed to reserve jurisdiction in approving
23 an appropriation, nonetheless "the public trust imposes a duty of
24 continuing supervision over the taking and use of the
25 appropriated water." National Audubon Society v. Superior Court,
26 supra, 33 Cal.3d at 447 [189 Cal.Rptr. at 365]. In particular,
27 this Board "is not confined by past allocation decisions which
28 may be incorrect in light of current knowledge or inconsistent

1 with current needs." Id. This Board "accordingly has the power
2 to reconsider allocation decisions even though those decisions
3 were made after due consideration of their affect on the public
4 trust. The case for reconsidering a particular decision ... is
5 even stronger when that decision failed to weigh and consider
6 public trust uses." Id.

7 This Board also has broad authority under Water Code section
8 1410 to revoke water rights permits where the permittee fails to
9 apply water to the beneficial use as contemplated, and under
10 Water Code section 1611 where the permittee's use of water is
11 "not in conformity with the law, the rules and regulations of the
12 board, or the terms of the permit." This Board may, following
13 notice and an opportunity for hearing, issue an administrative
14 order directing any person holding a water appropriation permit
15 or license to cease and desist any water use in violation of any
16 term or condition of the permit or license. Water Code section
17 1831.

18 IV. CONCLUSION

19 In summary, it is the law of the State that "no one has a
20 vested right to use water in a manner harmful to the state's
21 waters." United States v. State Water Resources Control Board
22 (1986) 182 Cal.App.3d 82, 106 [227 Cal.Rptr. 161, 171). This
23 Board, "as trustee, has a duty to preserve [public] trust
24 property from harmful diversions by water rights holders." Id.
25 This Board must exercise its continuing supervisory jurisdiction
26 over Navarro Basin water rights consistently with the North Coast
27 Basin Plan's designation of fish and wildlife and contact
28 recreation beneficial uses for this river system, and consistent

1 with its duty to protect instream public trust uses protected
2 under Article X, sections 2, 4 and 5 of the California
3 Constitution.

4 It is undisputed that the fish and wildlife resources, and
5 recreational uses, of the Navarro River have been severely
6 compromised by low summer flows due to excessive diversions,
7 primarily for agriculture. Unless this Board takes prompt action
8 to protect those resources and uses by restraining illegal
9 diversions and modifying existing water rights permits that fail
10 to provide for adequate bypass flows, the instream public trust
11 uses of the Navarro River will be destroyed, contrary to
12 applicable law.

13 Therefore this Board must take immediate action, in
14 accordance with the constitutional and statutory authorities and
15 requirements outlined above, to (1) restrain illegal diversions
16 of water from, (2) amend water appropriation licenses and permits
17 to assure bypass flows sufficient to protect instream fish and
18 wildlife beneficial uses within, (3) restrain unreasonable
19 riparian uses and appropriations of, and (4) declare fully
20 appropriated, the Navarro River and its tributaries.

21 Dated: August 25, 1994

Respectfully submitted,

22
23 
24 **STEPHAN C. VOLKER**

25 Attorney for Friends of the Navarro
26 Watershed, Sierra Club, California
27 Sportfishing Protection Alliance,
28 Pacific Coast Federation of
Fishermen's Associations, Friends of
the River, United Anglers,
California Trout, Trout Unlimited
and Mendocino Environmental Center

EXHIBIT 1



MENDOCINO COUNTY WATER AGENCY
COURTHOUSE
UKIAH, CALIFORNIA 95482
(707)463-4589

'RECEIVED
AUG 1 2 1994
SIERRA CLUB LEGAL DEFENSE
FUND, INC.

July 28, 1994

Robert: Klamt
North Coast
Regional Water Quality Control Board
5550 Skylane Blvd. Suite A
Santa Rosa, CA 95403

Dear Bob:

Enclosed is the graph of the Navarro River water temperature data I collecting using your HOBO temperature logger. The HOBO was deployed about 120 feet upstream of the USGS staff gage at the bottom of a pool on the left (south) bank. The pool is shaded by overhanging vegetation and was about 3 feet deep on June 1.

The water temperature data was collected in degrees C and converted to degrees F in a spreadsheet. The lethal and preferred temperature ranges shown on the graph are those quoted by Roger A. Barnhart's 1986 report on steelhead and from Thomas J. Hassler's 1987 report on Coho. Both reports were prepared as a part of a series of joint studies by US Fish and Wildlife Service and the Corps of Engineers.

I have also enclosed a copy of a graph summarizing the daily maximum water temperature record collected by the USGS at their Navarro gaging station between 1966 and 1979. The summary graph shows the greatest maximum daily temperature for each day of the year the period of record, the average maximum daily temperature for each day of the year, and the lowest maximum temperature for each day of the year.

The graph of the 1994 data shows that water temperature is still a serious problem on/the mainstem of the Navarro River. If you have additional units available, I would like to deploy them on Indian Creek, Anderson Creek, Rancheria Creek and the North Fork which are the major tributaries of the Navarro River.


Robert Klamt

PAGE 2 .

July 28, 1994

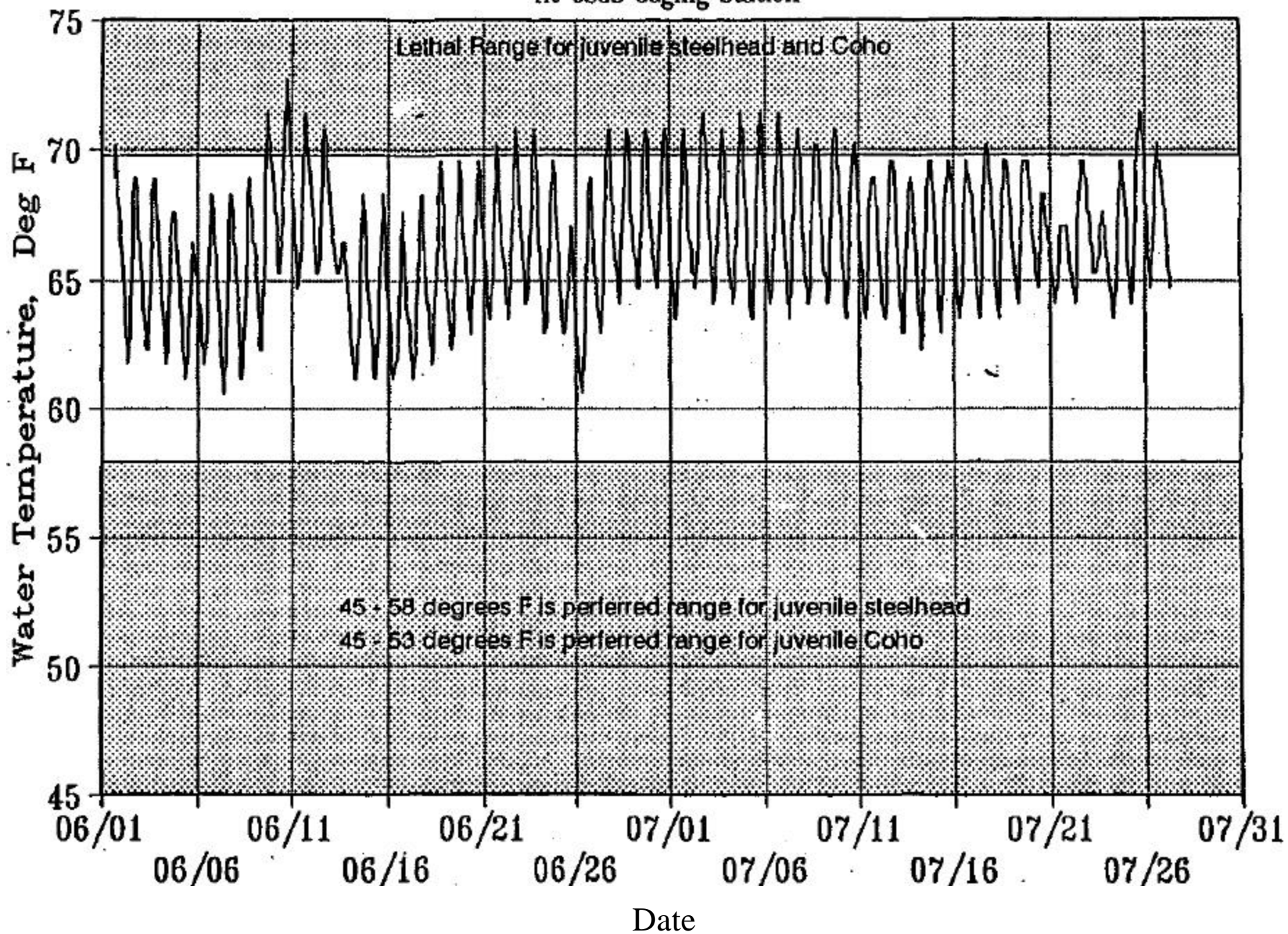
Thanks for your assistance on this issue. If you wish to discuss this please call me at 463-4589 or CALNET 553-4589.

Sincerely,

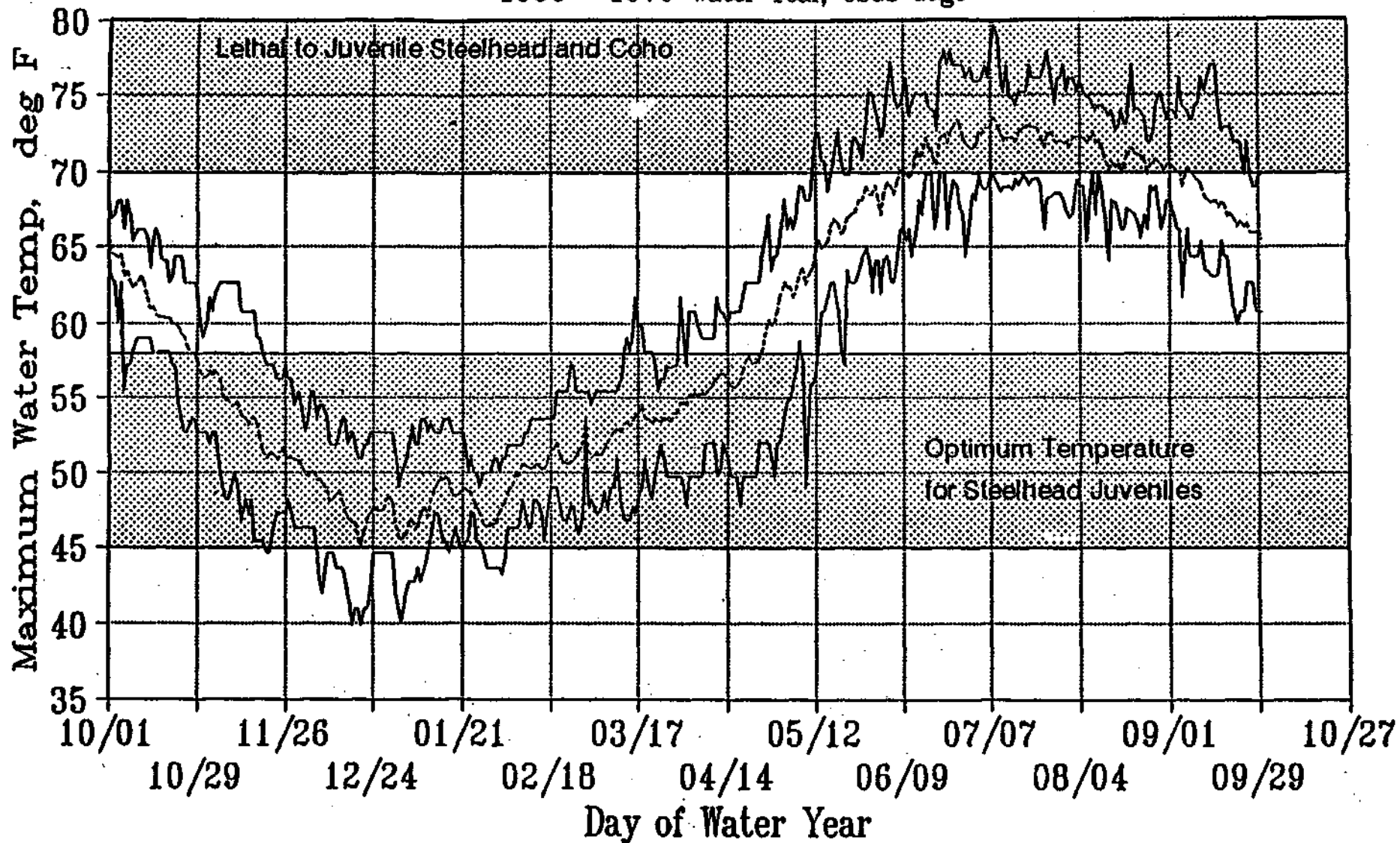


Dennis Jackson
Hydrologist

1994 Navarro River Water Temperature At USGS Gaging Station



Navarro River Maximum Water Temperature 1966 - 1979 Water Year, USGS Gage



Greatest Max Temp

 Average Max Temp

 Lowest Max Temp