

From: AlMeg
To: [commentletters](mailto:commentletters@waterboards.ca.gov)
Subject: Comment letter – 2016 Bay Delta Plan Amendment & SED
Date: Friday, March 17, 2017 11:43:39 AM



March 17, 2017

Via email: commentletters@waterboards.ca.gov

The Honorable Felicia Marcus
Chair, California State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814-0100

RE: Comment letter – 2016 Bay Delta Plan Amendment & SED

Dear Ms. Marcus:

We appreciate the opportunity to comment on the Bay Delta Plan Amendment and SED, and thank the Board for extending the comment period to March 17. Having over recent years studied risk factors to the Bay ecosystem, we are convinced of the importance of increasing freshwater flows to and through the Delta. Sufficient flows can help ameliorate problems such as pollution (including pollution from wastewater discharge), salinity, nonnative species, failing populations of native species. *We support increasing flows that are critical to aquatic ecosystems like the San Francisco Bay and Delta.*

State and federal wildlife agencies have made it clear that increased flows are needed for the survival of native fishes. A healthy Bay and economy depend on such flows. Reduced river flows contribute to fish mortality; reduced flows increase and concentrate pollutants and salinity, increase water temperatures (sometimes lethally for young native fish), decrease dissolved oxygen and contribute to overgrowth of cyanobacteria, causing harmful algal blooms.

The effects of freshwater starvation can be felt far beyond the immediate Bay and Delta. Lack of sufficient freshwater affects the 500+ species of wildlife that migrate through the region, such as salmon and birds using the Pacific Flyway.

Reliable water for California, as called for in the Delta Reform Act of 2009, can be supplied through such programs as recycling, wastewater reuse, stormwater reuse and storage in groundwater aquifers—which programs can supplement ecologically-safe amounts conveyed through the Delta.

If jurisdictions—both urban and rural/agricultural—were to work collaboratively to reuse available supplies wisely, imported Delta water would not be needed in such quantities, leaving sufficient for the environment. Higher flow standards (as proposed by the California Department of Fish and Wildlife in 2013) could increase flows and restore the failing ecosystem.

From a South Bay perspective, our Santa Clara County could provide better reuse of its wastewater and stormwaters, lessening the burden on imported water from the Delta.

For instance, our POTWs discharged $\pm 218,680$ af of wastewater to the Bay in 2015—which is more than the $\leq 173,000$ af of water that Santa Clara County/SCVWD's imported in 2015. Although the Silicon Valley Advanced wastewater treatment plant is operating, it recycles only a fraction ($\sim 8,960$ afy) of what Orange County's Groundwater Replenishment System accomplishes ($\sim 103,000$ afy). More wastewater reuse would mean less need for imported water.

And, currently the wealth of water brought to us by our wet winter is being discharged to the Bay, rather than being used to recharge our underground aquifers via our percolation ponds (as reported by the San Jose Mercury at <http://www.mercurynews.com/2017/03/02/water-district-perc-ponds-pass-on-turbid-water-full-of-sediment/>.) This is despite the fact that our aquifers provide a significant percentage of our water each year. (The SCVWD reportedly is waiting for the storm season to end to begin filling the perc ponds.)

Water left instream can perform the necessary functions of sediment transport, pollution dilution, and helping to meet salinity standards—not to mention providing significant ecological benefits for native species such as endangered salmon.

More, and creative, water reuse means more water can be left in streams and rivers to benefit all of California. With an average of only one-third of all waters from the rivers of the San Joaquin basin reaching the SF Bay-Delta, its populations of salmon and other native species have plummeted.

We support higher flows—beyond the 40% UF recommended in Lower San Joaquin River Alternative 3. Please continue working to restore the ecosystems of the San Joaquin River and the whole Bay-Delta.

Sincerely,

Alan and Meg Giberson
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