



Alison Weber-Stover
1739 Blake Street
Berkeley, Ca 94703
aweberstover@gmail.com

January 4, 2016

State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814-0100

Dear Chairman and Members of the State Water Resources Control Board:

The purpose of this letter is to comment on your draft proposed update to the Bay-Delta Water Quality Control Plan, specifically the parts that set freshwater flow standards for the San Joaquin River and its main tributaries. I deeply respect your efforts and sympathize with the conundrum Chair Felicia Marcus described in the San Francisco Chronicle recently trying to balance the needs of all California's and multiple beneficial uses of water within the state (<http://www.sfchronicle.com/opinion/article/SF-should-help-state-devise-plan-to-share-10787026.php>). However, proposed river flow standards for the San Joaquin River and its tributaries are inadequate to support restoration of Chinook salmon populations and water quality in the watershed. I urge you to consider inadequate water balancing of the past that has led to the near loss of several California fish species. Although the choices are difficult, our native species depend on your efforts to protect them. Requiring more freshwater to flow from the San Joaquin River to the Bay is essential to enhance the River and Bay ecosystems, improve water quality and protect our fisheries for future Californians to enjoy.

I am a life-long recreational explorer of riverine and terrestrial environments throughout California, having lived here most of my life. In addition, I have spent my career investigating science and policy related to California fisheries for a variety of governmental, non-governmental, academic and private organizations. My passion for science stems from a deep desire to protect and enhance our natural landscapes and the fisheries they support for future generations. I am particularly interested in this issue as I have rafted and kayaked on the Stanislaus and San Joaquin Rivers (yes, the portions of the San Joaquin that actually flow!) and my family enjoys fishing in these rivers and other tributaries to the San Joaquin.

Inadequate flow standards of the past severely weakened population resilience and diminished abundance of several native fish species, including Chinook salmon. Improving flow remains a crucial element of any plan aimed at restoring and protecting fish populations. The Board's proposed standards are incongruous with the heavy lift needed to enhance and restore our fisheries. Protecting only forty percent of the flow in these rivers, and only during the February-June period is not adequate. This proposal is far below the recommended unimpaired flow in the Board's 2010 report, as well as far below scientific standards established for riverine and ecosystem health.¹

Increased flows will improve habitat conditions for several imperiled native fish species and enhance population viability for salmonids (including attributes such as diversity, abundance, spatial distribution, productivity) and have additional implications for imperiled Delta fish species such as Delta and Longfin Smelt that depend on water in the estuary. Please consider the needs of all Californian's and the native species that live here as you set water quality standards that fully protect our natural heritage.

Sincerely,

Alison Weber-Stover

¹ Richter, B.D., M. M. Davis, C. Apse, and C. Konrad. 2011. A presumptive Standard for environmental flow protection. River Research and Applications.