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Dear California Water Resources Control Board members,

I am writing to encourage you to **improve the draft Phase I update** to the Bay-Delta-Water Quality Control Plan (draft Plan) **by providing flow levels** your own science suggests are necessary **to support our public resources**: clean water, usable rivers, healthy ecosystems, sustainable populations of fish, birds, etc. And I have recommendations for improving communication to reduce conflict & misunderstandings.

As a high school environmental science teacher in San Francisco, I teach my students the critical importance of healthy ecosystems and conserving biodiversity, including our local fish, which are critically endangered by unsustainable water withdrawals. I also lead birding excursions around the Bay & in the Delta, so I am very concerned about maintaining wintertime flow of freshwater into the Delta to support the 100s of millions of birds wintering in / migrating through this incredibly important biodiversity hotspot and linchpin of the Pacific Coast Flyway.

On Dec. 20, I took the entire day to travel to Modesto to make a public comment about the draft Plan. We drove 4 hours round trip and sat through 8 hours of your hearing, until we finally had to leave after 5pm without even getting the chance to speak. I did this because I care deeply about the health of our Delta, our Bay and the rivers in our part of California.

I am struck that you chose to have ZERO hearings in the Bay Area, forcing any of the 7 million residents here who are concerned about this to drive at least 1.5 hours each way to attend the several hearings you held in the Central Valley. This limited and skewed the voices you have heard from, towards those in the communities where you made the effort to hold hearings. Please know that many MANY thousands of us here in the immediate Bay Area would gladly show up and speak out if you provided a more accessible opportunity.

At the start of the Dec. 20 presentation, your staff incorrectly cited the Board's 2010 report conclusion as saying 60% of natural flow was "ideal" for maintaining salmon populations. Your 2010 report stated 60% was the ABSOLUTE MINIMUM to maintain salmon populations at levels satisfying your public trust obligations. I understand further studies suggested "non-flow management strategies" (improving habitat, controlling reservoir release timing) could reduce that threshold down to 50% of natural flow, but no one on or the board nor your staff mentioned that. Non-flow strategies were referred to ad nauseum by politicians, water district panelists and others, as if those would allow salmon to survive below 30% of natural flow -- a false premise unchallenged by the board. No one on the board EVER clarified that the 30-50% of natural flow proposal ALREADY PRESUMES non-flow strategies are implemented, or that the science strongly suggests salmon extinction is inevitable even with these strategies at flows below 50%.

Speaking of non-flow management strategies, I have compiled a list of non-water-related actions that if implemented could reduce poverty, improve education & increase economic opportunities with less water withdrawn. You have no less capacity to implement these than the non-water management strategies for salmon:

- Offer tax and other incentives to attract tech startups and other businesses
- Fund job retraining and career enhancement programs
- Provide grants and other funds for schools to secure additional funding (including support to help regional school districts win “first-come-first-served” funding through this past November’s Prop 51 which allocates major funding for school infrastructure).

Similarly you can recommend the state do more to support farming practices most efficient at providing local jobs and other local economic input per unit water withdrawal.

- How much water various crops take
- Impact of water demand by non-fallowable vineyards and orchards in dry years
- Percent of harvests exported with no local processing or secondary markets
- Jobs per acre of different crops
- Off-farm employment of different crops

I have enormous respect and empathy for the residents of the watersheds in your Phase 1 update. But they are incorrect in attributing their woes to water, fish, you, or your draft Plan. Poverty, inequality, lack of opportunity and education, have all persisted in these communities for decades, even as they withdraw up to 90% of the natural flow from the rivers.

Please do more to communicate the multiple benefits of restoring more flow to the San Joaquin’s three main tributaries. Focusing on salmon restoration (while I support that), plays into a “fish vs. people” or “jobs vs. environment” framing. Topics that desperately need more emphasis from the Board, regarding the need for natural flow to remain in the rivers, include:

- Increase groundwater recharge by more frequent/extensive natural floodplain flooding
- Improve recreational use by local communities, especially low-income communities
- Expand economic opportunities in recreation/tourism e.g. rafting, birding & fishing guides
- Enhance water quality protection in the Delta and lower San Joaquin River.

I also want to encourage you to do more education, disseminate clearer information to people, and be quicker in correcting false statements (e.g. the repeated yet incorrect assertion that your proposal will only save 1,200 salmon). Just because people on all sides criticize you or seem angry about your decision, doesn’t mean you’ve struck the right balance.

Thank you for your time and consideration.

Sincerely,



Fred Werner