



EARTHJUSTICE Public Comment 2016 Bay-Delta Plan Amendment & SED Deadline: 3/17/17 12:00 noon

CLEAN WATER ACTION























































Felicia Marcus, Chair and Board Members State Water Resources Control Board 1001 I Street, 24th Floor Sacramento, CA 95812-2000

RE: STRENGTHEN PROPOSED SAN JOAQUIN RIVER INFLOW REQUIREMENTS TO RESTORE FISHERIES AND WATER QUALITY IN THE SAN FRANCISCO BAY-DELTA ESTUARY

Dear Chairwoman Marcus:

As environmental and fishing advocacy organizations with members throughout California, we are deeply interested in and supportive of the State Water Resources Control Board's efforts to adopt new water quality standards for the great San Francisco Bay-Delta estuary. The health and productivity of our rivers and the Bay-Delta estuary is vitally important to California residents, who depend on them for jobs, sustenance, recreation and an unrivalled quality of life.

We commend the Board's efforts, in preparing to adopt the first of these new standards (which would set minimum requirements for the amount of inflow from the rivers of the San Joaquin basin), to seek a better balance between the many competing uses of the public's water resources. Only a third or less of the natural runoff from these rivers now reaches the estuary, with catastrophic results for fisheries and water quality. The once great salmon runs of the San Joaquin River system have been destroyed or severely impacted, contributing to historic closures of the Pacific Coast salmon fishery. This has had devastating impacts to thousands of men and women whose livelihood directly depends on that fishery and has harmed many more in the seafood industry and those who consume its products. The drastic reduction in inflow also means that downstream water quality in the estuary continues to deteriorate, resulting in more frequent toxic algal blooms and higher pollutant concentrations, increasing the risk of exposure to contaminants for those who rely on the estuary for subsistence fishing and recreation.

The Board's final decision should be based on the best available science, ensure that enough water reaches the estuary to reverse these trends, protect the beneficial uses of water as required by state and federal law, and provide adequate protection for our Bay Area and coastal fishing communities, recreation, water quality, and the wildlife of our state's aquatic ecosystems.

We are very concerned, however, that the best available information provided by scientists from fish and wildlife agencies, academia, conservation groups, and the Board itself, strongly indicates that the Board's current proposal will not adequately protect fish and wildlife, water quality, and recreational benefits in the estuary, lower San Joaquin River, and San Joaquin tributaries. The best available science shows clearly that more water from the San Joaquin River system is needed to reach the estuary throughout the year, and especially in the winter and spring. We are concerned that failing to listen to this science will lead to all of the work done to develop this plan to be for naught, as species will not fully recover to sustainable levels. We are united in urging you to revise your proposed water quality standards for San Joaquin flows to the estuary in order to fully protect our fisheries and water quality, and look forward to

the Board's timely adoption of additional standards that ensure sufficient flow to San Francisco Bay over the next two years.

Sincerely,

Kyle Jones Heinrich Albert Jennifer Clary

Policy Advocate Co-Chair Water Programs Manager

Sierra Club California Sierra Club Bay Chapter Clean Water Action

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Pacific Coast Federation of Fisherman's Association Earthjustice

Amber Shelton Conservation Advocate Environmental Protection Information Center

Cc: State Water Resources Control Board Members

c/o Jeanine Townsend, Clerk to the Board