



10 January 2017

To: State Water Resources Control Board
P. O. Box 100
Sacramento, CA 95812-0100

Email: commentletters@waterboards.ca.gov

From: Mark Foxx
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Re: Comment Letter – 2016 Bay-Delta Plan Amendment & SED
Unimpaired Flow Regulation & CA Water Board Proposal

Dear Chair Felicia Manus
Vice Chair Ms. Frances Spivy-Weber
Member Dorene D'Adamo
Member Steven Moore
Member Ms. Tam Doduc

In the 2016 Bay-Delta Plan Amendment the State Water Resources Control Board has proposed regulations that will send huge amounts of fresh river water out to sea –enough water a to irrigate over 100,000 acres of farmland or meet the domestic needs of 2 million people for a year.

Problems:

This Amendment depletes water in our reservoirs and some aren't even 20% full. It threatens drinking water plus water needed for agriculture and recreation. This Amendment will result in loss of jobs, will cause economic hardship and will cause environmental impact.

For example, California flushed over 1 million acre-feet of water out to sea in 2016 in a mis-guided effort to improve fish habitat. The Amendment proposes more actions like this. As a result of myopic and narrow vision water management policies on the Stanislaus River in 2015, involving large pulse flows of water out of New Melones reservoir in the winter and spring, New Melones nearly went dry. As a result:

- A. The 'green' non-fossil fuel electrical power generating facilities at the New Melones dam had to be shut down in the summer during peak electrical demands, resulting in environmental impacts associated with replacement fossil fuel power; and resultant greenhouse gas emissions; thereby contributing to climate change.
- B. Water temperatures soared, resulting in fish kills.
- C. Fish and wildlife in reservoir ecosystems, particularly shoreline ecosystems were heavily impacted.

The Bay-Delta Plan Amendment purports to save 1104 fish at a cost to the economy of over \$250 million..... about \$245,000 a fish.

If implemented, the State Water Board's rule alone will have a devastating impact on drinking water, sanitation needs, food production, the economy and JOBS for people stretching from the upper Central Valley throughout the Bay Area. The JOBS, economic and social impacts cannot be underestimated.

All Californians need a healthy environment in order to thrive and farmers' very survival depends on it. We also need to share our available water and that means working together, using sound science and common sense and balance to make smart choices about allocation.

Solutions:

- Stop winter and spring 'pulse flows'. Capture water in the reservoirs (New Melones, Don Pedro, etc.) during the winter and spring. Large volumes of water results in cold water for summer use.
- Realize the environmental impacts on the fish and wildlife at the reservoirs and the environmental and economic impacts on the human population (both in the communities that are near the reservoirs and those at a distance) associated with poor water management. Don't wear blinders; focus on all impacts in crafting solutions.
- If fish survival is the problem, then solve predation problems first. More than 90 percent of juvenile salmon are eaten by predatory fish before they even reach the San Joaquin River.
- Implement river and habitat improvements. Projects could include gravel improvements, water hyacinth removal and riparian vegetation expansion.

Closing:

Do not approve the current 2016 Bay-Delta Plan Amendment & SED. Fundamental aspects of the plan need to be re-considered prior to it being adopted. A 'feasible' plan must be developed. "Feasible" means capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors.

A handwritten signature in blue ink, appearing to read "Mark ...".