		Table 4-1. Response	is to Comments
Ltr#	Cmt#	Comment	Response
300	1	Since we live along Lake Tulloch, we know that requiring more water to flow down the Stanislaus River and lowering this lake will have devastating effects on the local economy. Our area booms with activity in the summer months and many people here rely on this economic activity for their annual income: restaurants, boating services, contractors, dentists, hardware stores, retail, groceries and many more businesses. If we do not entice our summer population to come here, the area will become depressed and rely even more on social services. Considering how much money is invested in each fish saved along the Stanislaus (over \$200K per fish), it seems that investing it in human capital would be more humane.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
301	1	New Melones needs to be allowed to recover to full capacity. Major water users need to change their usage practices in order to conserve. And we definitely don't need more water released in the spring down the Stanislaus River.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
302	1	The State Water Board is currently proposing to double water releases from the Stanislaus River. Not only am I in total opposition to the new proposal, but I believe water releases should be discontinued IMMEDIATELY IN DROUGHT YEARS, no questions asked.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
302	2	It's concerning that the State Water Board cannot even answer the question about how many fish they are attempting to save with these releases. By the state's own calculations, the cost of each fish ranges from \$108,000 to \$394,000. REALLY???	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
302	3	This practice seriously impacts agriculture in the valley, our economy, and our entire way of life and ecology of the Sierra Foothills and Mountains. Our foothill economy depends upon recreation heavily. The drawdown of New Melones, Don Pedro, Folsom, Hogan and more reservoirs is a disaster for our communities! Lake Tulloch generates power and is our community's drinking water. PLEASE PUT A STOP TO THIS NONSENSE IMMEDIATELY!	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
303	1	The states water boards plan to take 40% of the water from our local dams sickens me. My father Alfred Sorrenti, started to work on the plans for the New Malones Dam in the 1950s. His plan was to supplement the water supply during droughts and to help protect our water table. (It takes 7 years for surface water to reach the water table.) Clearly, The current water board wants our area to fall on the sword, and they want us to help pay for the sword.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
304	1	Your proposal to increase unimpaired flows on the Stanislaus, Tuolumne, and Merced rivers will not help the fish! It is not remotely a solution to the problems of predation to young fish. Rather, It will harm our the economy and devastate agriculture in the State of California.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
305	1	I am opposed to your plan to raise flows on the Stanislaus River because there is no scientific evidence from the state that more water means more fish. This grab of irrigators' water will impact the state economy millions of dollars. The state's ideal that 300,000 AF of water won't impact the state is unfounded. Where will this water be made up from? The ground. And that supposedly is not an impact. This does not make sense!!! This needs to be stopped. It is common sense that to make more fish, we need to build fish hatcheries not take farmers' water that produces food for people.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.

		Table 4-1. Response	es to Comments
Ltr#	Cmt#	Comment	Response
306	1	Clearly, our state's water board is more than willing to sacrifice the Central Valley for the benefit of the L.A. area. Our areas dams were built to protect against drought and to help preserve our falling water table. Our area has been working hard to conserve water. When I go to the L.A. area I do not see the kind of water conservation that I see here. Are you on the states water board or L.A.s water board?	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
307	1	I have lived in California all my life and was raised on a farm where water is the number one most precious resource for the survival of my family. All our jobs, including mine, depend on Agriculture. I call on physicians who take care of migrant farm workers all throughout the Bay area and Central Valley. Many farmers and their families go to these physicians also. If there is NO water for these farmers to conduct their business, than all of California is affected. This would include: Farmers, Canneries, farm laborers, cannery workers, truck drivers, Health systems, Medi-Cal, Welfare, Medicare, Pharmaceuticals, Pharmacies, Hospitals, Clinics, tech companies, wineries, and Restaurants just to name a few. We are all tide to Agriculture and when it is threaten all of our jobs and resources are threaten and could financially ruin California.	
307	2	Katie Van Konynenburg (Tax payer) is very concerned with your Draft Revised Substitute Environmental Document (SED) supporting Phase 1 of the Board's Bay-Delta Water Quality Control Plan. If approved, your proposal requiring the Merced, Tuolumne, and Stanislaus rivers to dedicate 40 percent of unimpaired flow to fish and wildlife would cause irreversible harm to our region.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
307	3	The Revised SED will not only financially harm our region's farmers, manufacturers and businesses, but it will directly harm organizations like ours who rely on the generosity of our community. We are an agriculturally based community; when actions are taken that directly harm the largest economic sector in the region, organizations that provide overlooked and underfunded services to our community are directly impacted.	-
307	4	Beyond devastating our community by demanding 40 percent unimpaired flows from February 1st-June 30th annually, your staff is proposing taking over control of our locally paid for, built and operated Don Pedro Reservoir. Don Pedro was built specifically to allow our community to survive a prolonged drought, similar to the one we are currently in, but the Revised SED now limits the amount of water available to our community.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
307	5	I work for Novo Nordisk pharmaceuticals where we specialize in Diabetes and Obesity. Many farm laborers are Hispanic and suffer from Diabetes and obesity. If they no longer can work, do to farming being eliminated by lack of water resources, than the company I work for would no longer need me and this state would lose another tax payer in which it cannot afford to do. Please consider the devastating impact your Revised SED will have on nonprofit organizations as well as profit organizations within our community.	regarding the economic analysis.
308	1	Not one fish has been saved in well over 20 years off increased flows. When will you look at other solutions to dwindling fish populations besides destroying communities economically? When our children look back at history and wonder what happened to our once rich state, they are going to look at you and your poor decisions. Stop taking water from humans. Start looking at building major water storage projects to increase water security, reducing predator fish populations, and cleaning up the contaminated water discharges into the	

		Table 4-1. Response	
Ltr#	Cmt#	Comment	Response
		Delta. And one more thing: How about venturing out into the real world once in awhile to view the impacts of continued water mismanagement on real life people?	
309	1	<ul> <li>I am absolutely for increasing water flows in rivers. We have paved-over, diverted, killed-off, and otherwise taken from our environment, any chance we get. I am for anything that will help the natural balance of the environment, even at humans expense.</li> <li>We are so over-populating this earth we think that it is fine to deplete underground water reservoirs, put in more roads, highways, build on any empty spot that we can.</li> <li>I am and always will be for the environment over my destructive species.</li> </ul>	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
310	1	I do not think your plan to increase flows is a good idea at all. It will reduce the flow required for farming and they will revert to more pumping, which will deplete the aquifers. Also, more water flow will not help the fish because they are eaten by predator fish.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
311	1	The Sierra watershed is a California resource that belongs to every Californian not simply to those living upstream. California told miners, loggers, dredgers, and others we will protect our rivers, a warning you see on the following page. California has a responsibility to protect the environment while providing a stable resource for residential, industrial, and agricultural use. I am pleased to support additional flows in the San Joaquin and Sacramento River watersheds, especially now that federal legislation will provide more pumping from the delta.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
311	2	Modern science proves the west is far drier than we thought, and it is imperative we live within our means. Farming has always been gamble, and farmers must be responsible stewards of the land with our limited water resources. California finally developed regulations to protect our aquifer that is under assault from farmers who believe they can pump unlimited water resources or greedy groundwater miners like those in northern Merced County who pumped 22,000 acre feet for sale to other water districts, a sale that harmed their neighbors. The increased water flows may help sustain and stabilize our aquifers.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
311	3	I attended the October 18th Water Board update to Merced County Supervisors and was alarmed some supervisors joked we do not need to protect our environment since Alaska has all the salmon and bald eagles California needs. The presenter outlined mitigation activities we could perform in our region, and I hope the Waterboard will work with responsible, local stakeholders to develop appropriate mitigation activities. Recent federal legislation may provide funding to line primary irrigation canals with concrete and alleviate the environmental destruction gold dredgers caused when they turned millions of river bottom acres into piles of stone for millennium. I am pleased the Water Board believes California water resources shall be managed to protect the environment while providing stable and sustainable water deliveries to	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
		residential, industrial, and agricultural users. We must live within our means in the arid west, and I am pleased to offer my support for increased river flows in the San Joaquin and Sacramento watersheds.	
311	4	[ATT1:] San Francisco Illustrated Wasp 12/4/1880 cartoon: "The Sacramento River is Our Future"	This attachment was included with the comment letter. The attachment does not make a general comment regarding the plan amendments or raise a significant environmental issue.

		Table 4-1. Response	is to Comments
Ltr#	Cmt#	Comment	Response
311	5	[ATT2:] Photograph of cabin with snow up to the roofline.	This attachment was included with the comment letter. The attachment does not make a general comment regarding the plan amendments or raise a significant environmental issue.
312	1	Taking this water away not only means taking my dream of fanning away but also means taking this dream away from so many of my fellow farmers. What your asking is outrageous. Not only is there insufficient data to prove that more water flowing through rivers will provide more fish but more importantly you are putting fish before human lives.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
312	2	I can prove to you that if given a full allotment of water how much I can produce through the various crops I grow. Taking this water away won't just hurt the farmers in this valley, it will have devastating effects on this state. Agriculture is the life blood of this state and we need water to continue to grow our crops. These past few years have been extremely hard for all of us farmers, it's taking its toll not having our full allotment of water and every year gets harder and harder for us to survive. Now we are being punished for conserving our water through these years with insufficient rainfall? That is not fair. The water was conserved so that we could continue to farm each year, not to have you wake up one day and decide that we don't have the right to it anymore. Taking this water away is basically signing a death warrant for farmers like me that depend on it too make a living. I truly hope that you think of the drastic effects that would come from taking this water away.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
313	1	<ul> <li>What the Water Board has put a small fish that isn't even native to California before the needs of our farmers that produce food for us and raise livestock. You're putting a fish before the physical needs of Americans.</li> <li>It is my opinion that you are making a huge moral choice. That you would even consider putting a small fish before the needs of our farmers and ultimately all of America to eat is absurd.</li> <li>This goes beyond a wrong choice! This foolishness has got to stop!</li> </ul>	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
314	1	My Wife and I are writing to support your recent letter to the State Water Board, dated September 19, 2016 on the minimum flow standards on the lower San Joaquin River to the Delta and to take action to protect our region of nearly 1.8 million people from the dangerous water policy proposed recently by the State Water Board. The State Water Board will damage all of the population in the seven county region. The very idea of nearly doubling the amount of water used for fish flows from our rivers and lakes is disastrous for the economy, ecology and our local communities. We are pleased that you have recognized the concerns of communities throughout our region about the negative impact these policies have that put fish first, people second. In 2015, fish flows continued even though we were in the middle of a serious drought and had serious ramifications.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
314	2	For example, the Lake Tulloch Basin in Tuolumne and Calaveras Counties is home to about 10,000 people, which my wife and I are one of the 10,000. We have lived in Calaveras County for 5 years and enjoy our community for the serene environment it provides us. If we do not have heavy snows in the Sierra this winter, we are threatened again as we were last year with the draining of Lake Tulloch Reservoir, which is our sole source of water.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
		New Melones Reservoir above us was drawn down to just 10% of its capacity in the middle of the drought last year. Ironically, independent research found that 80% or more of the fish	

		Table 4-1. Response	s to Comments
Ltr#	Cmt#	Comment	Response
		died because the water was too warm coming out of the bottom of New Melones due to the lack of cold water. The fish flows have proven that they don't work and in May of last year 30,000 acre feet of water valued at \$21 million was released to move a total of nine fish downstream. This just doesn't make sense when California should be storing more water to offset additional drought years.	
314	3	We urge you to take action to ensure that you and your agencies have a complete understanding of the impact of these policies on the seven counties with a population of nearly 1.8 million people with major agricultural production. These counties include Stanislaus, San Joaquin, Merced, Calaveras, Tuolumne, Amador and Mariposa Counties.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
314	4	According to weather experts this may be another limited precipitation year continuing the current drought. If draining of our reservoirs continues and we have inadequate precipitation to fill them, the policies of the State Water Board will make a bad position even worse. The mantra should be People First, Fish Second.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
314	5	In the long run we need to build additional surface and underground storage. The population of California has grown by 42% since New Melones was built and we have only increased surface storage by 3%. That just doesn't make sense	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
314	6	<ul> <li>We urge you to take action in suspending anymore water releases for fish enhancement until we have a better understanding if there will be adequate precipitation this winter in order to substantially refill the reservoirs.</li> <li>I further urge you to make a request to President Obama to have the Secretaries of Interior, Agriculture and Commerce use their power to suspend the use of the Endangered Species Act until we have refilled our reservoirs and have developed a workable and balanced plan for water usage in the state.</li> </ul>	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
315	1	Your plan to increase flows on the Stanislaus River will cause unnecessary effort for my retired parents to get equipment out of the water at their Tulloch Lake house much too frequently. For that reason, I am opposed.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
316	1	If surface water deliveries are cut back, then urban areas and agricultural areas will have to depend on groundwater and further deplete overstressed aquifers.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
316	2	There are better ways to increase fish numbers with habitat restoration and combating predation on young fish.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
316	3	We need to wisely store our water and release it at the appropriate time for the future of fish and people.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
316	4	The economic impact to this unfair water taking to people and regional economies would be huge.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
317	1	Years ago, decisions were made to make the valley the bread basket to the world. Generations of people have built on that commitment and have been good stewards of the land. Now they have to fight for the water used to create this industry. It is not right. Please do not require more water to be sent down our rivers.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.

		Table 4-1. Response	s to Comments
Ltr#	Cmt#	Comment	Response
318	1	It does not seem reasonable that any additional water diversions would not be beneficial for the welfare of the San Joaquin/ Sacramento Delta. It is your responsibility to safe guard this unique resource. I am reminding this board to satisfy my concerns and guard against any water diversion, pollution or misuse of this necessary resource. The local people and local fish populations need to be your priority not the water districts politics. Please remember we all currently reside here and I want to be assured the water resources will be improved and continue to get back to the possible historical resource it once sustained. That is your job. All the current residents want their children's, children's children to benefits from this unique resource. Do not disappoint. I will be watching your success.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
319	1	I support your proposal to increase flow standards for the lower San Joaquin River and its primary tributaries. The flow standards you are recommending will have a real chance to help struggling Central Valley salmon and steelhead runs. Please do not be dissuaded from this action by the self-serving, convoluted logic and misinformation of the agricultural interests and their supporters. I feel we have a responsibility to preserve the health of our environment.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
320	1	I certainly support the State Water Board proposal to increase river flows.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
321	1	The unfair water grab has potentially devastating consequences for people and the regional economies in the valley as well as the foothills, where New Melones and Tulloch reservoirs are located.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
321	2	The South San Joaquin and Oakdale irrigation districts are stewards of the Stanislaus River. Since 1993, they have devoted millions of dollars to collect information about the salmon and rainbow trout who live in the river. Simply flushing water down the river in the spring and fall does not work – a fact supported by more than two decades of proven science.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
321	3	Predation remains the biggest threat to young salmon, rainbow trout and steelhead in the river. An estimated 95% of baby salmon and steelhead are eaten by non-native predators like striped bass before they ever reach the Delta. Reduce predationand salmon and steelhead numbers will go up.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
322	1	California is the nation's supreme agricultural provider. Our nation is in dire need to be able to provide safe, healthy, wholesome food for its ever expanding population. Taking water from California's Central Valley will carry a devastating impact. Not only will jobs be lost, family farms devastated, but the people who live in the Central Valley will experience a myriad of hardships. Other states are blessed with much more rainfall each year and could provide relief for Southern California. Eventually cities will be so large, farmers will be their main source for survival-unless we as a nation fail ourselves and are forced to rely on outside sources-for example, China?! Farmers, producers and the Central Valley citizens are not willing to allow big government and money to steal our livelihood and lifestyle.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
323	1	What planet are you residing on? Your proposed water plan will be a disaster for our state and the people that reside in it. Historically CA has not had adequate water storage capacity and it doesn't look like any additional storage is in the plans even though we have experienced the worst drought in decades recently. Your plan to move additional water resources to the ocean to feed the fish is flat out ridiculous. Go back to the planning board and try again.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.

		Table 4-1. Response	es to Comments
Ltr#	Cmt#	Comment	Response
324	1	I am writing to support the water board proposal to increase river flow for the benefit of water quality for fish and wildlife to at least 40% of the natural flow in the Stanislaus, Tuolumne, and Merced Rivers, We live next to the Stanislaus River, and have a strong interest in seeing its flow increased to benefit fish and wildlife, and the riparian habitat.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
324	2	I research old newspapers, and found an article telling about a mill in Avery (approximately 10 miles west of the Park) that was supplying lumber for the mines in Murphys. This article told about pack trains that would go to the Stanislaus River and load up the pack train with salmon to feed the mill workers. It was a very productive river, but without increased flow it has no hope of being naturally productive of wildlife.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
325	1	I am a strong advocate for wildlife, which needs a steady supply of water to thrive. There is no question in my mind that [at] least half of the natural flow from the Stanislaus, Tuolumne, Merced and lower San Joaquin Rivers should make it to the Bay-Delta to maintain its historical vitality. Flows should also be sufficient to cover floodplains, which serve as critical habitat for juvenile salmon and other fish.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
325	2	Water birds must have fish to survive. The Bay-Delta forms the West Coast's largest estuary, providing habitat for more than 500 species of wildlife. It serves as a major stopover for Pacific flyway birds and as a migration pathway for salmon, steelhead and sturgeon traveling to and from their home streams to the Pacific Ocean. Through better management of melting snow, water efficient irrigation, and replacing lower-value, water-intensive crops with higher-value, water-efficient crops, we can grow more food with less water. Doing all this will help the birds and other wildlife I love.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
326	1	I am writing to help protect the home of the American Bittern. As the West Coast's largest estuary, the Bay-Delta provides habitat for numerous birds and other species of wildlife. It is a major stopping point on the Pacific Flyway and also acts as a migration pathway for salmon, steelhead and sturgeon traveling to and from home streams to the Pacific Ocean. This vast estuary is slowly drying because of insufficient flow of water.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
326	2	As a scientist, I believe that a very minimum of half of the natural flow from the Stanislaus, Tuolumne, Merced and lower San Joaquin Rivers should go into the Bay-Delta in order to reverse its decline. Evidence supporting this threshold comes from the 2010 State Water Board report titled Development of Flow Criteria for the Sacramento-San Joaquin Delta Ecosystem, which determined that approximately 60% of unimpaired flow between February and June would adequately protect fish and wildlife in the lower San Joaquin River and its three major tributaries. The current damage to the Delta is the result of the state not setting and meeting such a target.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
326	3	Better management through efficient irrigation technologies and practices, and replacing lower-value, water intensive crops with higher-value, water-efficient crops, is needed. Irrigation-intensive crops such as almonds, much of which are exported outside the U.S., are not the best or wisest use of our precious water resource. Agricultural exports often benefit corporations at the expense of small farmers or other beneficial uses. It is essential to give as much priority to nature's needs as to the enriched political forces that are starving our Delta of water.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
327	1	Unless flushing more water can absolutely be proven to dramatically help the salmon and trout populations, I am opposed to the state taking water that can currently goes for	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
valuatio	n of San Jor	aquin River Flow and	July 2018

		Table 4-1. Response	as to Comments
Ltr#	Cmt#	Comment	Response
		agricultural use.	
328	1	Why make us pay unneeded funds for something that in the long run is a waste and the end result will be giving all our water to Southern California and leave nothing for us in the valley? Leave the rivers alone; the fish will come back on their own. Stop messing up our environment and leave things be. Nature takes care of her own.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
329	1	I am writing to comment on the Bay-Delta Amendment plan as recently presented. California agriculture is dependent on an adequate supply of water. We all need a healthy agriculture for the very food we eat and the clothes we wear. I am also an animal lover and a person who has a vital relationship with nature. I agree there needs to be an adequate supply of water for our rivers, but the current plan does not provide enough water for agriculture. This will have a devastating effect on Northern California's economy.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
330	1	I feel that by passing this unwise water management idea to raise river flows that you will be wasting precious resources (water! We are still in a drought!) In favor of unfair distribution of this resource.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
331	1	I have seen first-hand the depredation of the river habitat caused by too-little water flow. The banks are now, in many places, choked with willows right up to the water level of an August run. Tributary rivers, the Clavey and the North Fork of the Tuolumne, are choked with algae in the standing pools. All of this spells death to salmon spawn, which depends on free-running water over gravel. The eggs cannot survive in the oxygen-depleted algae- clogged waters. The Clavey is not dammed, so in these years of extreme drought, the main trunk of the Tuolumne becomes even more essential for the health of the salmon run.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
331	2	It is absolutely imperative to protect the health of the rivers of California in order to protect against the collapse of California's wild salmon run and all the life that depends on that run (the fishing industry and wildlife), but to protect the fertile farmlands of the Delta from salt water incursion.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
331	3	Our children's children may never know what a healthy river looks like, much less what chinook salmon tastes like, unless we allow more water to run through our river canyons. As you are aware, the State Water Board's own report, Development of Flow Criteria for the Sacramento-San Joaquin Delta Ecosystem, determined that approximately 60% of unimpaired flow between February and June would be fully protective of fish and wildlife in the lower San Joaquin River and its three major tributaries. It's disappointing that the draft Substitute Environmental Document (SED) for Phase I of The Bay Delta Plan proposes establishing February through June unimpaired flow requirements of only 30% to 50% for the Merced, Tuolumne and Stanislaus Rivers. Please take full advantage of this once-in-a-generation opportunity to advance a comprehensive, long-term strategy for restoring the Bay-Delta ecosystem. Sufficient instream flows must be central to your decision.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
332	1	I am opposed to your plan to increase flows on the Stanislaus, Tuolumne and Merced rivers because it will kill the valley farmers and make the valley a desert again. Please remove your heads from the sand and look at what you are doing.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.

		Table 4-1. Response	es to Comments
Ltr#	Cmt#	Comment	Response
333	1	It is more important to store water for future drought years and build more dams than waste water by requiring increased flows for fish.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
334	1	Flow levels in the San Joaquin River watershed are important to me from both agricultural and environmental perspectives. Increasing flow levels could simultaneously stimulate environmentally friendly and economically efficient agricultural innovation in California while protecting our natural resources and biodiversity to conserve the ecosystem services they provide to humans and the environment.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
334	2	The recent California drought has driven conversations, innovation, and investment from the public and private sectors in research, technology, and policy incentives to manage snowmelt, improve the water use efficiency of irrigation systems, and increase soil health to enhance water infiltration and retention (e.g. Healthy Soils Initiative (August 2016), California Department of Food and Agriculture (CDFA) Office of Environment Farming and Innovation; Soil Health Summit (January 2017), CDFA and United States Department of Agriculture Natural Resources Conservation Services; Almond Board of California-funded research (previous and ongoing)). This positive reaction to declining irrigation water availability and use suggests that increasing flow levels in the Stanislaus, Tuolumne, and Merced rivers would, rather than signaling the end of California agriculture as opponents have suggested, continue to nurture these advances in technology and management practices, similarly to those observed in Australia during its 10-year drought in the 2000s or those for which Israel is renowned due to its naturally semi-arid and arid climates. In other words, increasing flow levels in the San Joaquin River watershed would incentivize current and future investment in more efficient water, soil, and crop management, cultivars, and technologies.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
334	3	In addition to stimulating green innovation in California agriculture, increasing flow levels in the San Joaquin River watershed would reflect California's leadership in environmental sustainability and commitment to treating water as the public trust resource that it is. California's water belongs to the people and environment of California, in addition to water agencies and agricultural users. Beneficial uses of the California water by citizens include boating, fishing, swimming, backpacking, birdwatching, science education, and others, many of which are important drivers of California's rural economies via tourism.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
334	4	Importantly, entire ecosystems depend on flows that have been too low for too long: current flow averages are 40%, 21%, and 26% of unimpaired flow for the Stanislaus, Tuolumne, and Merced Rivers, respectively. Between 1975 and 2014, the natural fluctuations in unimpaired flows should have resulted in only one "supercritically dry" year in the San Francisco Bay, but due to upstream diversions of runoff the Bay experienced such conditions in approximately half (19 out of 40) of all years instead of only once. Historically, population estimates of spawning salmon in the San Joaquin River Basin may have exceeded 400,000 fish, but have been as low as a few thousand in several recent years. Salmon are a keystone species, which means that they are not the only animal or plant species dependent on increased flow levels. Salmon migration from the ocean to spawning grounds and their subsequent death represents a critical nutrient input into foothill ecosystems (for both animals and eventually plants), and the many eggs and young salmon that do not ultimately reach the ocean are an important food source in river and Delta food webs. Increasing flow levels would improve fish passage, dilute pollutants, lower water temperature, increase dissolved oxygen, and enhance migratory cues for fish returning to spawn. Flow increases should be high enough to inundate floodplains, which provide important habitat for juvenile	

	Table 4-1. Responses to Comments			
Ltr#	Cmt#	Comment	Response	
		salmon and other fish.		
334	5	Within the agricultural and environmental sciences globally, there is growing recognition of the need to reconcile agricultural production and conservation goals; we can no longer continue to promote agricultural production at the expense of the environment and natural resources on which we, and agriculture, depend. The issue of flow levels in the San Joaquin River watershed encapsulates these global debates at our local level. According to the State Water Board's 2010 report, Development of Flow Criteria for the Sacramento-San Joaquin Delta Ecosystem, approximately 60% of unimpaired flow between February and June is needed to fully protect fish and wildlife in the lower San Joaquin River and the Stanislaus, Tuolumne, Merced Rivers. I urge the Board to respect these findings. Please act to raise flow levels, drive agricultural innovation in California, and conserve our river ecosystems.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.	
335	1	I am writing to you today in support of the State Water Board proposal to require that 40% of the unimpaired water flow in the Tuolumne, Stanislaus and Merced rivers be protected between February and June.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.	
335	2	State agency studies have shown that salmon, steelhead and other species of fish have been adversely affected by the diversion of water for commercial and agricultural use. The effects on these three rivers include too little water for effective spawning, as well as increased water temperature that is detrimental to these fish. The long term viability of these valuable species of fish are at risk by maintaining the current water use levels. Additionally, other species of wildlife rely on these fish for survival and will also suffer if there is no change in current water management in these three rivers.		
336	1	Whatever Frank Bigelow says is wrong, he is a big AG shill and any policy you implement that upsets him is likely the right one, it is time that AG pays a fair price for water which is the best way to compel them to conserve.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.	
337	1	I am writing in support of the State Water Resources Control Board's 40 percent river flow target to help mitigate the collapse of the San Francisco Bay ecosystem. It is unacceptable for us to allow human uses to so outpace water needs of other species that we cause widespread population decline of fish, birds, and phytoplankton, perhaps to the point of extinction.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.	
337	2	We need to be bold, innovative, and forward-thinking. Solutions exist. California can take lessons from Australia on water recycling and rainwater catchment. We must ask if it makes sense to grow food in an arid climate for export. If agriculture cannot continue on its current scale in California because it is simply not the right climate, it is time that we ask our government to assist in retraining farmers and agricultural workers in other industries, just as we look to update skills for miners. As we consider job losses in agriculture, we must also consider job losses in the fishing industry. Our goal needs to be for long-term sustainability, not to preserve one particular set of jobs for this generation.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.	
337	3	We have a moral imperative to protect other species, their habitats and the ecosystems that ultimately contribute to human life as well.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.	
338	1	We are ranchers and farmers. Our domestic well went dry this year and it cost us \$25,000 for drilling a new well and replacing the 53-year-old pump. We don't have that kind of	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.	

	Table 4-1. Responses to Comments			
Ltr#	Cmt#	Comment	Response	
		money to keep doing that. More and more deep wells are going in all around us because of our drought. Taking this much water from the ground only means it won't take long for this to happen again.		
338	2	Your ways of playing with our water only ruins lives. Look what has happened out near the I- 5 freeway. Fish cannot take priority over humans and the food it takes to feed them. Take the studies that the OID has done and leave us alone. Go ruin your own lives by turning the water to your home off.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.	
339	1	Please ask the governor to let go of his Delta plans. I am sure he did not realize the problems it would cause. We did not vote for him for this reason, but in spite of it. The governor thought he would save water for people instead of letting it go out to sea. He didn't realize the consequences, i.e. letting salt into the Delta. He didn't know that it would hurt people. He needs to let go of his pride in this project and think about those people that will be hurt it.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.	
340	1	Please, we need to save our water. Do not increase flows from our rivers.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.	
341	1	I am writing this letter to show my support of the position Assembly member Frank Bigelow has taken in regards to this issue. The water supply for the Central Valley is important to not only folks who live and work here, but for the nation and the world. Please devise a responsible plan that puts "all people" first. Please don't be pressured by the so called environmentalists to the detriment of us all. Special interests of a minority should not be heard louder than the interests of all. We may not be the vocal ones, but we are the majority and believe in common sense approaches to our real world problems.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.	
343	1	I am opposed to an increase in unimpaired flows on the Stanislaus River. This would hurt agribusiness, the local economy and home users. It would have a devastating effect on agriculture and thousands of jobs. Encouraging ground water use is irresponsible and can deplete all water resources. Our area provides food supplies for the U.S. and many countries. The economic devastation will be felt worldwide. There must be fair and logical use of our water supply.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.	
344	1	I would like to add my voice to all who are concerned that farmers and their communities need to be allowed to use sufficient water for crops and life. California is in a weaker state than in the past and ensuring farmers are sustained helps everyone.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.	
345	1	Salmon is one of the healthy foods we have for protein. How can you think of not doing your upmost to keep them alive and healthy? People can grow their own vegetables but not their own salmon.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.	
346	1	We purchased a house in Jamestown in 2012, since which time we have seen New Melones shrink to a mere puddle of its former self. I drive through Oakdale to get to Jamestown and am dismayed to see how much water is used in the summer (flood irrigation everywhere,	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.	

	Table 4-1. Responses to Comments			
Ltr#	Cmt#	Comment	Response	
		sprinklers on at 3:30pm to 5pm, etc.). Selling of a precious commodity like water should not be unregulated (if allowed at all, frankly).		
347	1	What are you all thinking? This agenda is against commonsense thinking and you are to hold up the life of people before all else. Please drop this ideathis state has gone crazy with over-regulations and taxes beyond what is right!	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.	
348	1	Please do not allow Governor Brown to further erode our way of life in the Central Valley. There are solutions such as desalination plants for Southern California. Water conservation by encouraging residents to convert their yards to drought-resistant vegetation that requires less water. Support local farmers by way of your local farmers market. We are an agricultural community, not a commuter community. Protect our farmers. Protect our way of life.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.	
349	1	<ul> <li>The balance of nature has been toyed with by humans for much too long; there must come a time when the damage must be redeemed. Use the natural laws of nature to, at the very least, allow the 40% flow of the Merced, Stanislaus, and Tuolumne rivers to create a healthier benefit for fish, water quality, and recreation.</li> <li>I live only 10 minutes from the North Fork of the Tuolumne where ponds used to flourish. We no longer see those glorious big ponds, only little puddles. Before it's too latedo something!</li> </ul>	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.	
350	1	We take exception to the increased flows from reservoirs on the Stanislaus, Tuolumne and Merced rivers as proposed by the State Water Board, as these reservoirs are well below their average normal level, thereby adversely impacting agriculture, local water supplies and recreational activities of the region affected.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.	
350	2	Should the current drought conditions continue into 2017 and beyond, the reservoir levels of the above mentioned watersheds, especially that of New Melones, would be devastated. Even now, New Melones is barely accessible for recreational purposes, being at about 20 percent of capacity. Drinking water supplies will be threatened for about 10,000 people living in the Lake Tulloch area.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.	
350	3	All this to save some fish? It would seem that the well-being of agricultural production and drinking water supplies of people would take precedence over the survival of less than a dozen or so fish.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.	
		Based on available information, the State Water Board's proposals are based on pseudo- science and are politically motivated to serve some special interest groups.		
351	1	One might think that because of this history, I am all for increased flows in our rivers. Nothing could be further from the truth! Along with everyone else at Monday's hearing, I am very concerned about the lack of sound science behind, and the seemingly myopic solution to our fisheries problem that the board has proposed. I am also concerned about how the dominos will fall in our area should this solution be enforced.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.	
351	2	Water is the lifeblood of agriculture in this "breadbasket of the world." As author Mark Arax said in West of the West, "Nowhere else in the world brings together land, sun, soil and water in such harmony." Taking 40 to 60 per cent of our water is simply untenable because, without this sustaining liquid, our crops will wither, our fields will be fallowed and,	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.	

	Table 4-1. Responses to Comments				
Ltr#	Cmt#	Comment	Response		
		ultimately, we will perish. To turn the tables, I would like the board to consider how each of you would react if you were directed to eat and drink 40 to 60 per cent less food and water? While I understand that this is a simple analogy, still, the message is clear – you would perish.			
351	3	As an educator, I also am very concerned about my students' well being should our access to clean water be shockingly limited. I'm also concerned that the timing of these hearings may have excluded many Latinos who traditionally return to Mexico for the holidays.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.		
351	4	I ask, that you drop the questionable science behind the "one size fits all" approach and adopt the comprehensive alternatives provided by MID's Merced River SAFE Plan.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.		
352	1	40% Default and 30-50% Unimpaired Flow Range. NMFS believes an unimpaired flow of 60% would be most protective of fish and wildlife beneficial uses; however, we recognize the Board's determination to adaptively manage a 30-50% range and a 40% starting point based on other beneficial uses. According to our assessment, a 40% of unimpaired flow on the Stanislaus River would be slightly higher than the minimum February to June flow on the Stanislaus River required by the 2009 Biological Opinion on the Long-Term Operations of the Central Valley Project and State Water Project. In addition, the 40% scenario would appear to improve flows on the Tuolumne and Merced rivers compared to existing flow requirements.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment regarding the plan amendments or do not raise significant environmental issues. Please see Master Response 1.1 for responses to comments that generally support the plan amendments, a specific percent of unimpaired flow, or an LSJR alternative.		
352	2	Year-Round Flow Schedule. Flows are needed year-round, not just the February to June period, to support all CCV steelhead and Chinook salmon life stages and their habitat needs. Fall-run Chinook salmon have instream flow needs from October through June, while spring-run Chinook salmon and CCV steelhead have instream flow needs year-round. We recommend assigning a default year-round flow schedule for each tributary consistent with the default 40% unimpaired flow in February through June, and also include default flow criteria at Vernalis to further support salmonid outmigration. Assigning a default year-round schedule is essential to ensure there are not unintended consequences to species in other times of year, as a result of increasing flows in the late winter and spring.	<ul> <li>Please see Master Response 2.1, Amendments to the Water Quality Control Plan, for information regarding modifications to the plan amendments, including the section that discusses the February through June time period for the LSJR flow objectives.</li> <li>Please see Master Response 3.1, Fish Protection, for information regarding ecological benefits of February through June LSJR flow objectives.</li> </ul>		
352	3	Reservoir Constraints. Reservoir constraints similar to those assumed in the modeling must be included as standards in the Water Quality Control Plan in order for the program to work. The Water Supply Effects spreadsheet modeling set some constraints for carryover storage, minimum water deliveries, and refill-after-drought provisions in order to limit the frequency of severe reservoir drawdown and associated impacts to water temperatures, deliveries, and ability to meet instream flow requirements. However, those constraints are not currently proposed as a requirement in the Water Quality Control Plan, either in Table 3 or in the Program of Implementation. Without some certainty that the assumed or comparable constraints will be in effect, the modeled flows, temperatures, and water deliveries cannot be reasonably assumed to occur.	<ul> <li>Please see Master Response 2.1, Amendments to the Water Quality Control Plan, regarding the LSJR flow program of implementation, including discussion of carryover storage. Reservoir carryover storage is important to attain the narrative LSJR flow objective. Specific carryover requirements are not established to avoid constraining future implementation. Please also see Master Response 2.1 regarding modifications to the plan amendments suggested by commenters. Please see Master Response 1.2, Water Quality Control Planning Process, regarding implementation of the plan amendments through separate water rights proceedings.</li> <li>Please see Master Response 3.2, Surface Water Analyses and Modeling, regarding reservoir operations assumptions, including carryover storage. The model results in the SED present a range of potential and likely generalized operations, sufficient to evaluate water supply and other effects of the project from a programmatic perspective. The State Water Board modeled potential reservoir operations (including carryover storage) to show the range of potential environmental impacts in such a way that the public and the State Water Board can compare the relative effects.</li> </ul>		
352	4	Environmental Baseline of Chinook salmon and CCV steelhead in the San Joaquin River	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment regarding the plan amendments or do not raise significant environmental issues.		
		Basin. NMFS continues to be concerned about the poor instream conditions in the San			

Table 4-1. Responses to Comments			
Ltr#	Cmt#	Comment	Response
		Joaquin River Basin that contribute to the low abundance of anadromous fish species. The Environmental Protection Agency will be requesting consultation from NMFS at a later time for the approval of the implementation program for Phase 1. NMFS will be required to ensure Phase I will not jeopardize the continued existence of listed species under NMFS jurisdiction. In order to analyze the effects of this project, the current "baseline" condition is determined, and the current project effects as well as expected future effects, are analyzed.	
352	5	Adaptive Management. NMFS supports the use of adaptive management, however, the Board should provide more clear direction in the adaptive management process. The decision making process should be well defined with clear guidance, for example, that any adjustment of protective measures should be linked to observed population trends and conditions needed to meet the narrative fish and wildlife protection objectives.	<ul> <li>Please see Master Response 2.2, Adaptive Implementation, for information related to adaptive implementation.</li> <li>As described under Adaptive Implementation, this guidance will be based on recommendations of the STM Working Group following ongoing review and evaluation of best available scientific information (including observed population trends) to inform adaptive implementation of flows and other protective measures to meet the narrative fish and wildlife protection objectives (see Comment 352-20).</li> <li>Master Response 2.2 provides additional description and examples of how adaptive implementation may proceed, and the bounds under which it may do so.</li> </ul>
352	6	Protecting flow through the San Joaquin River and Delta. It is important for there to be adequate flows at Vernalis for outmigrating salmonids and the scientific basis for the minimum base flow in the revised SED appears unclear. We suggest a higher range of minimum flows at Vernalis, particularly during the April-May period. Current survivals in this corridor are very low, and significant improvements are needed. The San Joaquin River and Delta are major migratory corridors for upstream and downstream migrating salmonids. We recommend that the Board protect the unimpaired flow released from each of the tributaries and provide that protection not only to Vernalis but also through the entire Delta for the success and survival of anadromous fish species.	Please see Master Response 2.1, Amendments to the Water Quality Control Plan, regarding suggested modifications to the plan amendments made by commenters and for more information regarding the protection of migratory corridors. Adaptive implementation and water rights and water quality actions will ensure that migratory pathways are protected for LSJR salmonids and other migratory fish species. Please also refer to Master Response 2.1 for clarification regarding the base flow requirement. Please refer to Master Response 1.1, General Comments, Master Response 2.1, and Master Response 3.1, Fish Protection, for responses to comments asserting that higher flows are needed than what is proposed in the plan amendments.
352	7	Agricultural Economic Effects. The analysis of agricultural production forecasts that dedicating 40% of unimpaired flows to environmental purposes would lead to a less than three percent change in regional economic output and employment. We believe the forecasted economic impacts likely overstate the true impacts, as these estimates are the upper bound of job and output losses, and in addition, the context for the forecasted change within the regional economy is absent from the analysis.	Please see responses to comments 352-26 and 352-29 regarding agricultural economic effects.
352	8	[From ATT1: Environmental Baseline of Chinook salmon and CCV steelhead in the San Joaquin River Basin] The Environmental Protection Agency will be requesting ESA section 7 consultation from NMFS at a later time. In order to analyze the effects of this project, the Section 7 consultation will take into account the current "baseline" conditions, and the expected effects of the proposed action, both at the time of implementation and in the future. Through this consultation, NMFS will be required to ensure that Phase I will not jeopardize the continued existence of listed species under NMFS jurisdiction. The NMFS Central Valley Recovery Domain 5-Year Review of California Central Valley steelhead Distinct Population Segment (DPS) concluded that CCV steelhead remain listed as threatened, and that the DPS is likely to become endangered within the foreseeable future throughout all or a significant portion of its range (NMFS 2016). The CCV steelhead in the San Joaquin River Basin are currently not considered a viable population. Poor baseline conditions in the San Joaquin River Basin contribute to the low abundance of anadromous fish species, including CCV steelhead. Thus, significant improvements are needed to reverse these conditions within	Please see Master Response 1.1, General Responses, for responses to comments that either make a general comment regarding the plan amendments or do not raise significant environmental issues.

	Table 4-1. Responses to Comments			
Ltr#	Cmt#	Comment	Response	
		the foreseeable future.		
352	9	<ul> <li>[From ATT1: Environmental Baseline of Chinook salmon and CCV steelhead in the San Joaquin River Basin]</li> <li>Flow Related Salmonid Stressors</li> <li>The NMFS (2014) Recovery Plan identified many threats (stressors) to listed salmonids in the Central Valley and the San Joaquin River and eastside tributaries (Stanislaus, Tuolumne, and Merced rivers) that are related to salmonid flow requirements. Several of the threats of High importance identified for the Southern Sierra Diversity group (San Joaquin River Basin) involve direct impacts to salmonids and their habitats from flow alterations during every life stage. Several threats that are indirectly related to flow were also identified in the Recovery Plan, such as: high water temperature, loss of natural river morphology and function, loss of riparian habitat and instream cover, predation, and poor water quality. Inadequate flow in the San Joaquin River Basin is a primary threat to CCV steelhead and Chinook salmon (NMFS 2014). The NMFS has identified flow-related recovery actions needed to ameliorate these stressors, including: releases to support all CCV steelhead life history stages, dedicated instream flows for fish, assessment of the benefits of pulse attraction flows for adult steelhead, and negotiation of water right purchases and/or increased flow releases. Inadequate flow in the San Joaquin River Basin (NMFS 2014), and the adverse effects of these stressors could be alleviated with higher flows.</li> </ul>		
352	10	<ul> <li>[From ATT1: Environmental Baseline of Chinook salmon and CCV steelhead in the San Joaquin River Basin]</li> <li>Climate Change</li> <li>Climate Change</li> <li>Climate and indirect adverse effects to salmonids. Multiple predictions indicate that water supply in the Central Valley is likely to decrease throughout the 21st century as warming trends continue. The combination of low precipitation and high ambient air temperatures favor elevated stream temperatures, further impacting salmonids in the future. Drought cycles in the San Joaquin River Basin, including the severe drought during 2012 through 2015, have reduced the already limited habitat quality and range for CCV steelhead. The frequency of these drought events is predicted to increase (NMFS 2016). The NMFS remains concerned that because of the current low levels of abundance and productivity, some populations may not be able to recover during long dry spells, and reestablishment of these predictions, NMFS expects that substantial efforts will be required in order to reverse declining abundance trends.</li> </ul>	Please see Master Response 1.1, General Responses, for responses to comments that do not raise significant environmental issues associated with the analysis contained within the SED or request a modification to the plan amendments.	
352	11	[From ATT1: Year-round Flow Schedule] NMFS appreciates the Board's improvements on their proposed flows in the revised SED. The Board has proposed a flow objective of 30 to 50% of unimpaired flow, with a starting flow of 40% of unimpaired flow, from February to June for the Stanislaus, Tuolumne, and Merced rivers. However, a year-round flow schedule is necessary to protect all the life stages for ESA-listed CCV steelhead and for Chinook salmon. While CV fall-run Chinook salmon have instream flow needs from October through June, listed CV spring-run Chinook	Please see Master Response 3.1, Fish Protection, for responses to comments regarding flows in the February through June timeframe and year-round flows.	

		Table 4-1. Response	is to Comments
Ltr#	Cmt#	Comment	Response
		and CCV steelhead have instream flow needs year-round. Year-round flows could be protective for each salmonid life-stage: adult migration, spawning, egg incubation, juvenile rearing, and smoltification.	
352	12	[From ATT1: Year-round Flow Schedule] We understand there is a paucity of data for CCV steelhead in the Central Valley, especially in the San Joaquin River Basin. However, it is known that CCV steelhead may remain in freshwater for a year or more before migrating to the ocean, and thus year-round flows are needed to maintain suitable habitat and temperature conditions in order to mitigate for the loss of access to cold-water habitat blocked by dams. In addition, observations at the fish counting weirs on the Stanislaus River indicate that CCV steelhead enter the river as early as October. This timing coincides with the release of fall attraction flows that provide cooler water and flow cues for CCV steelhead and fall-run Chinook salmon. Thus it is recommended to provide an unimpaired flow schedule beyond the February through June period. An example of a year-round flow schedule on the Stanislaus River is provided in Enclosure 3 (Appendix 2-E Stanislaus River Minimum Flows for Fish Needs). This flow schedule is one of a suite of actions deemed necessary to avoid jeopardy for CCV steelhead as part of the 2009 Biological Opinion on the Long-Term Operations of the Central Valley Project and State Water Project (NMFS 2009). Many of the features in the schedule (fall and spring pulse flows, winter storm pulses, see Figure 1) could be achieved using the percent of unimpaired flow approach proposed for the February to June period. We urge the Board to consider setting a percent of unimpaired flow approach based year-round flow standard for each of the tributaries.	
352	13	[From ATT1: Year-round Flow Schedule] There have been some discussions at recent hearings about whether or not June could be omitted from the current February to June period for implementing the unimpaired flow approach. While NMFS agrees that in some years Delta conditions by mid- to late June may not be suitable for salmonids, and that should be considered in the adaptive shaping of flows, protecting the "tails" of the outmigration distribution can be important for population resilience. In addition, June represents a significant contribution to unimpaired inflow in the snowmelt-driven southern Sierra. Therefore, June inflow should not be excluded from the annual water budget.	The commenter is in agreement with the analysis in the SED, and does not present new information. Please see Master Response 3.1, Fish Protection, for a discussion of flows during the February through June timeframe.
352	14	[ATT1:ATT2: Figure 1. Graphic depiction of Stanislaus River Minimum Flows for Fish Needs (2-E)]	The commenter is providing this attachment for reference purposes in support of their comments. Those comments are addressed in these responses to comments; therefore, no additional response is required.
352	15	<ul> <li>[From ATT1: 40% Default and 30-50% Unimpaired Flow Range]</li> <li>The Board has incorporated some important updates into the revised draft SED from their 2012 draft. Again, those updates include a numeric flow objective with a required percent of unimpaired flow range from 30% to 50%, with a starting flow at 40% of unimpaired flow. In addition, adaptive implementation of the flow schedule will allow flow shifting in time and shape to provide the greatest benefits to fish and wildlife.</li> <li>The NMFS believes an unimpaired flow of 60% would be more protective of fish and wildlife. However, we recognize the Board's determination to adaptively manage a 30-50% range and a 40% starting point based on other beneficial uses. According to our assessment, 40% of unimpaired flow on the Stanislaus River would be slightly higher than the minimum</li> </ul>	

		Table 4-1. Response	s to Comments
Ltr#	Cmt#	Comment	Response
		February to June flow on the Stanislaus River required by the 2009 Biological Opinion on the Long-Term Operations of the Central Valley Project and State Water Project (NMFS 2009). In addition, the 40% scenario would appear to improve flows on the Tuolumne and Merced rivers compared to existing flow requirements. We support the Board's efforts to improve conditions in the San Joaquin River Basin and their proposed range of unimpaired flows.	
352	16	[From ATT1: 40% Default and 30-50% Unimpaired Flow Range] The scientific basis for the proposed range of 30% to 50%, with a starting point at 40% of unimpaired flow is not clear and NMFS remains concerned that the proposed levels of flow continue to be too low and not protective enough for anadromous fish species. The proposed percent of unimpaired flow (40%) is likely insufficient to support recovery in the eastside tributaries. The Stanislaus River is the only one of the three tributaries that currently outputs flows close to 40%, and while it has the highest fall-run Chinook salmon escapement of the three tributaries, the majority of spawners are strays of hatchery origin, indicating that the current flow regime is still inadequate for natural reproduction.	Please see Master Response 3.1, Fish Protection, regarding justification and description of the plan amendments for protecting fish, including the unimpaired flow approach, and discussion of adaptive implementation. Also refer to Master Response 2.2, Adaptive Implementation, regarding implementation of the plan amendments across the range of flows and utilizing different methods of adaptive implementation (e.g., flow shaping).
352	17	[From ATT1: 40% Default and 30-50% Unimpaired Flow Range] We recommend to the Board to consider the "shaping" and variability of the hydrograph when incorporating the unimpaired flow. Shaping the unimpaired flow (magnitude, timing, and frequency) plays an important role in the survival and resilience of salmonid populations. In addition, the variability of flows is also beneficial for salmonids. The San Joaquin salmonid populations occupy an important spatial diversity component of the Central Valley populations. There are data that support the importance of inter-population diversity for the stability of salmonid populations (Carlson and Satterthwaite 2011). Variable flows stimulate outmigration of salmonids at different sizes to promote diversity and increase the resilience of returning adults.	Master Response 2.2, Adaptive Implementation, provides additional description and examples of implementing adaptive implementation and the constraints under which it may do so. The methods of adaptive implementation, including "shaping" the hydrograph to mimic natural variability in flows is one of the bases for the State Water Board's proposed flow requirements. Within certain operational constraints, this does not preclude managing flows within or outside the February through June period to mimic events of variable timing, duration, and magnitude if identified as an important action through the adaptive implementation process.
352	18	[From ATT1: Reservoir Constraints] The Water Supply Effects spreadsheet modeling effort set some reservoir constraints for carryover storage, minimum water deliveries, and refill-after-drought provisions in order to limit the frequency of severe reservoir drawdown and associated impacts to water temperatures, deliveries, and ability to meet instream flow requirements. However, those constraints (Table F.1.2-23c [ATT1:ATT1]) are not currently proposed as a requirement in the Water Quality Control Plan (WQCP), either in Table 3 or in the Program of Implementation. Without some certainty that the assumed or comparable constraints will be in effect, the modeled flows, temperatures, and water deliveries cannot be reasonably assumed to occur. NMFS recommends that the Board include similar constraints in Table 3 of the WQCP.	Please see response to comment 352-3 regarding the modeling and carryover storage and modifications to the plan amendments suggested by commenters.
352	19	[ATT1: ATT1: Table F.1.2-23c. Minimum Diversion, Minimum September Carryover Guideline, Maximum Draw from Storage, and Flow Shifting for the Merced River]	The commenter is providing this attachment for reference purposes in support of their comments. Those comments are addressed in these responses to comments; therefore, no additional response is required.
352	20	[From ATT1: Adaptive Management] There is a need for additional description and development of the adaptive management process. The Board proposes to task the management of the Vernalis base flow and percent of unimpaired flow, to the Stanislaus, Tuolumne, and Merced Working Group (STM Working Group). The assumption is that the STM Working Group will use adaptive management to	Please refer to Master Response 2.2, Adaptive Implementation, for responses to comments regarding how adaptive implementation will be used to achieve the goals of reasonable fish and wildlife protection. Many elements of adaptive implementation of the LSJR flow objectives are not rigidly prescribed in order to provide maximum operational and implementation flexibility to achieve the program goals.

	Table 4-1. Responses to Comments			
Ltr#	Cmt#	Comment	Response	
		implement the Board's plan to achieve biological goals that benefit fish and wildlife while incorporating the expertise and opinions of all of the stakeholders involved. While NMFS recognizes the value of collaboration, we have several concerns. The STM Working Group's purpose, requirements, structure, assets, and authority is vague. The NMFS does not recommend deferring the protocols and details of the process entirely to the STM Working Group. Rather, said details should be described by the Board. The NMFS also is concerned that the STM Working Group may not be able to come to consensus on anything but the default 40% = of unimpaired flow. The Board needs to provide clear biological goals and objectives that can guide the working group as it manages within the adaptive range, and implement flexibilities such as flow shifting. Importantly, the STM Working Group will need a way to measure those biological goals and objectives.		
352	21	<ul> <li>[From ATT1: Protecting flow through the San Joaquin River and Delta]</li> <li>Protecting flow</li> <li>The revised Water Quality Control Plan (Appendix K, p. 28) states that the "State Water Board will exercise its water rights and water quality authority to help ensure that the flows required to meet the lower San Joaquin River flow objectives are used for their intended purpose and are not diverted for other purposes." This is critical because downstream diversion of flows for other purposes will lessen the benefit to the intended fish and wildlife beneficial uses. The Board should clarify how it will ensure that flows are used for their intended purposes.</li> </ul>	Please see Master Response 2.1, Amendments to the Water Quality Control Plan, responding to comments regarding the program of implementation for a discussion about using water rights, water quality certifications, and other regulatory tools to require that LSJR flows provided by responsible parties to meet the LSJR flow objectives are not diverted by other parties.	
352	22	<ul> <li>[From ATT1: Protecting flow through the San Joaquin River and Delta]</li> <li>Vernalis Minimum Base Flow</li> <li>The Board has proposed a Vernalis flow requirement with an adaptive range of 800 to 1200 cubic-feet-per-seconds (cfs), which establishes a minimum flow in the event that the percent of unimpaired flow would have resulted in decreased flow released, such as in critically dry years. The scientific basis or rationale for the minimum base flow range of 800 to 1200 cfs is unclear. NMFS believes that the minimum base flows are biologically insufficient, and it is important for there to be adequate flows at Vernalis to be protective of outmigrating salmonids. Therefore, we suggest a higher range of minimum flows at Vernalis, particularly during the April-May period.</li> <li>While there are not instances of consistent large-scale flow releases intended to benefit fish since the installment of the Central Valley rim dams, there is some evidence that anadromous fish populations in the Central Valley do respond positively to timely increased flows. Small, variable flow experiments have been conducted, such as the Vernalis Adaptive Management Plan (VAMP), and have demonstrated a high positive correlation between managed spring-time pulse flows and adult escapement returns 2.5 years afterwards. This demonstrates that increased flow at the right times can yield results, which is the purpose of the Board formally allocating some of the unimpaired flow for fishes during the spring-time melt. However, that study, and other modeling efforts, as detailed in Appendix C of SWRCB's 2016 review, suggest that a Vernalis base flow of about 5,000 cfs would be necessary to elicit positive, consistent population growth. And to reach such a base flow, about 60% of unimpaired flow would be required (as estimated by SWRCB). The proposed 800 to 1,200 cfs base flow at Vernalis and 40% unimpaired flow (with a cap at 50% for</li> </ul>	<ul> <li>Please refer to Master Response 1.1, General Comments, Master Response 2.1, Amendments to the Water Quality Control Plan, and Master Response 3.1, Fish Protection, for responses to comments asserting that flows are needed that are higher than the LSJR flow objectives. Please also see Master Response 2.1 regarding responses to modifications to the plan amendments suggested by commenters.</li> <li>As described in Appendix C, Technical Report on the Scientific Basis for Alternative San Joaquin River Flow and Southern Delta Salinity Objectives, (see Section 3.6, Analyses of Flow Effects on Fish Survival and Abundance), studies that examine the relationship between fall-run Chinook salmon population abundance and flow in the SJR Basin generally indicate that: 1) additional flow is needed to significantly improve production (abundance) of fall-run Chinook salmon; and 2) the primary influence on adult abundance is flow 2.5 years earlier during the juvenile rearing and outmigration life stage (AFRP 2005; DFG 2005; Mesick 2008; DFG 2010; USDOI 2010). Results from studies during VAMP are summarized in detail throughout this section. Additionally, studies conducted more recently (after release of the Scientific Basis Report [Appendix C]) further emphasize the importance of higher, more variable flows during the February through June time period in enhancing juvenile survival and life history diversity, which are both important for population health and can result in more adult salmon returning approximately 2.5 years later (Sturrock et al. 2015; USFW 2014; Zeug et al. 2014).</li> <li>Please refer to Master Response 3.1 regarding the current trend of fish decline and the need for increased and higher flows. Please also refer to Master Response 2.1 regarding the base flow requirement.</li> </ul>	

	Table 4-1. Responses to Comments			
Ltr#	Cmt#	Comment	Response	
		estimates of base flow at Vernalis are fairly consistent and suggest that these values (5,000 cfs and 60% unimpaired flow) are a good starting point to maintain viable salmonid populations in these tributaries.		
352	23	<ul> <li>[From ATT1: Water Quality Objectives for Fish and Wildlife Beneficial Uses (Narrative Objective)]</li> <li>In our 2013 comment letter to the Board, we provided recommendations on the language in the narrative objective. However, our recommendations were not incorporated into the revised narrative objective. The narrative objective remains vague and lacks the incorporation of the default requirement for 40 % of unimpaired flow. Additionally, we would like to see language regarding a year-round flow schedule and quantitative measures incorporated into the narrative objective.</li> </ul>	Please see Master Response 2.1, Amendments to the Water Quality Control Plan, for information regarding modifications to the plan amendments, including the section that discusses the February through June time period for the narrative and numeric flow objectives and year-round flow schedules. Please also refer to the section in Master Response 2.1, Amendments to the Water Quality Control Plan, that discusses biological goals and their relationship to the LSJR narrative objective.	
352	24	[From ATT1: 7-day Running Average] We appreciate that the Board changed the "implementation window" from a 14-day running average in the first draft SED to a 7-day running average in this revised SED. This is closer to the recommendation we made in our 2013 comment letter for an even shorter period of three to five days, with no limit on maximum flows. Our recommendation of a shorter period of three to five days would achieve a more natural hydrograph.	Please see Master Response 2.1, Amendments to the Water Quality Control Plan, for information regarding modifications to the plan amendments including flow averaging periods and responses to modifications to the plan amendments suggested by commenters.	
352	25	<ul><li>[From ATT2: The methods used in the economic analysis are consistent with standard economic practice.]</li><li>Overall, the methods used to generate the economic impacts seem to be consistent with standard practice. The SWAP model used to estimate acreage and revenue is the same model used to generate the popular series of annual drought impact estimates produced by UC Davis.</li></ul>	The commenter confirmed the economic analysis used in the SED is consistent with standard economic practice. Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment regarding the plan amendments or do not raise significant environmental issues.	
352	26	<ul> <li>[From ATT2: The forecasted economic impacts likely overstate the true impacts of the proposed alternatives.]</li> <li>When interpreting the results of the economic analysis it is important to note that the results likely represent an upper bound on job and output losses. It is unlikely that any observed impacts of the proposed policies will be larger than the forecasted values. That is, the forecasted impacts contained in the SED are likely greater in magnitude than what the effects will be in practice.</li> <li>Two points support this assertion:</li> <li>1. Input-output analysis (the IMPLAN component of the SED economic analysis) generally overestimates the impact of changes in production. The SED economic analysis acknowledges this (see Appendix G, page G-63). Input-output analysis imposes fairly rigid assumptions that businesses cannot find alternative ways to employ resources and that the relative prices of goods do not change in response to changes in economic conditions (see, for example, Midmore 1993 or Berck and Hoffman 2002).</li> <li>2. Retrospective analyses show that the SWAP-IMPLAN method of estimating the economic impacts of changes in water supply overstated those impacts during the 2009 drought. Initial estimates of the projected impacts of policy actions, including changes in water</li> </ul>	The SED SWAP-IMPLAN analysis was intended to give a conservative, but reasonable estimate of potential economic impacts. Conservative analysis inherently overestimates potential effects to avoid potential underestimation. In the first point the commenter makes, the commenter is acknowledging the information is in the SED. The second point the commenter makes suggests that the SWAP-IMPLAN method overstates economic impacts based on the results of a retrospective study in 2010 looking at the economic impacts of the 2009 drought (Howitt 2010). However, it is not the SWAP-IMPLAN method that caused the overestimation of impacts in the study, but the lack perfect foresight. The study indicates that actual water transfers were much higher than expected in 2009, which caused the retrospective economic impacts to be much lower than the pre-drought estimates. In addition, there is no evidence that the results of the 2010 study are indicative of the results in the SED.	

		Table 4-1. Response	es to Comments
Ltr#	Cmt#	Comment	Response
		<ul> <li>supply, are rarely checked for accuracy after the fact. However, in the case of the 2009 drought and Delta export restrictions some retrospective analysis exists. Table 1 [ATT2:ATT1] summarizes successively updated estimates of revenue and job losses due to the export restrictions produced by the SWAP and IMPLAN models.</li> <li>Economist Jeffrey Michael provided alternative ex ante and ex post estimates that are summarized in Table 2 [ATT2:ATT2]. These results were also produced with IMPLAN, but did not use SWAP to estimate changes in acreage.</li> <li>An additional retrospective check on changes in employment due to changes in water supply from the Delta was provided by economist David Sunding and others. Sunding, et al (2011) estimate a very simple regression model with employment as function of CVP and SWP deliveries by county. Their results estimate 4,965 lost agricultural jobs due to Delta export restrictions in 2009.</li> <li>Three conclusions can be drawn from the preceding sequence of results. First, both ex ante and ex post results vary considerably. This is due to different assumptions, methods, and in some cases different data sources. Second, the SWAP-IMPLAN estimates are always higher than alternatives estimates by Michael. Third, as more information becomes available on observed employment outcomes estimated impacts decrease. The most updated ex ante projection by SWAP-IMPLAN of total job losses from May 2009 is 2.8 times greater than the retrospective analysis in 2010.</li> <li>None of this implies that the estimates of economic impacts from the SWAP and IMPLAN models are not useful. IMPLAN is widely used as a planning tool in many applications and is a standard method. The SWAP model has been used previously in water resources planning exercises in general. The positive math programming approach upon which is based is also frequently used and is grounded in accepted economic theory. It is important, however, to</li> </ul>	
		keep in mind that these tools predict outcomes of uncertain processes, but are not able to provide estimates of the degree of uncertainty surrounding those predictions.	
352	27	[ATT2:ATT1: Table 1. Impact estimates for 2009 San Joaquin water supply reductions generated by SWAP-IMPLAN method (reproduced from Table 1 in Howitt, et al 2011)]	The commenter is providing this attachment for reference purposes in support of their comments. Those comments are addressed in these responses to comments; therefore, no additional response is required.
352	28	[ATT2:ATT2: Table 2. Impact estimates for 2009 San Joaquin water supply reductions generated by county crop report data and IMPLAN]	The commenter is providing this attachment for reference purposes in support of their comments. Those comments are addressed in these responses to comments; therefore, no additional response is required.
352	29	<ul> <li>[From ATT2: Context for the forecasted changed within the regional economy is absent from the analysis]</li> <li>Though the SED economic analysis appears to be performed correctly and consistently with standard practice, it fails to put the magnitude of the forecasted employment and output changes into the context of the larger regional economy. For some of this context, we can look at historical water diversions and employment data to see if large job losses occurred in years where the volume of diversions was reduced from the previous year. Historical diversions data can be constructed using flows at specific USGS gauges on the Stanislaus, Tuolumne, and Merced Rivers. [Footnote 1: OID/SSJID North (USGS Gage #11300500), OID South (USGS Gage #11289500). Merced ID diversions from October 1969-September 2006 are from the Merced ID operations model.] These flow records do not represent all diversions in the study area (diversions by riparian rights holders and smaller districts are</li> </ul>	counties (San Joaquin, Stanislaus, and Merced) are presented in Tables G.5-4 through G.5-7 to provide context for changes in economic output and employment under LSJR Alternatives 1–4.

	Table 4-1. Responses to Comments			
Ltr#	Cmt#	Comment	Response	
		<ul> <li>not included), but we can construct a time series of OID, SSJID, MID, and TID diversions from 1990-2013 and diversions from Merced ID, SEWD, and SJWCD from 1998-2006. The California Employment Development Department provides historical employment data by industry for all counties in California.</li> <li>Between 1991 and 2013, we observe 11 years when diversions on the Stanislaus and Tuolumne Rivers (by OID, SSJID, MID, and TID) declined from the previous year. These declines averaged about 6.5 percent relative to the previous years. In those 11 years, total employment across the three county study area declined in only two years2008 and 2009, the years most affected by the national recession and the national and local housing price collapse. In those 11 years, the average change in total employment was an increase of just under one percent. Further, observed diversions from the Stanislaus and Tuolumne Rivers declined by magnitudes similar to the differences between LSJR Alternative 3 (40 percent of unimpaired flows left in the river) in two years: by 14 percent in 1991 (a critically dry year) and by 16 percent respectively).</li> <li>Between 1999 and 2006, we observe 4 years when reported diversions on all three rivers</li> </ul>		
		Between 1999 and 2006, we observe 4 years when reported diversions on all three rivers declined. The decline in diversion volume averaged just under 4 percent. Total employment across the three county study area did not decline in any of these nine years. The average change in total employment was just under 2 percent. Further, observable diversions in all three rivers declined by 13 percent in 1998. Total regional employment increased by 3 percent.		
		This analysis does not imply that there will be no adverse employment impacts to reductions in allowable diversions. In fact, lower agricultural employment is observed in some years where diversions are reduced. [Footnote 2: Note that farm/nonfarm employment is defined differently in the EDD data than in the SED economic analysis. EDD county employment is reported as farm employment and nonfarm employment. EDD farm employment data includes both direct employment by farms and employment by farm contractors. The SED model classifies changes in farm contractors as an indirect impact. Therefore it is difficult to directly compare the direct and indirect/induced impacts in the SED analysis to the farm/nonfarm data in the EDD data.] The economic analysis presented in the SED indicates that total regional employment will be lower than it would otherwise be as a result of improved instream flow conditions for fish. This is a plausible result given that inexpensive irrigation water is a key input to local agricultural production. However, past changes in local water diversions and coincident employment changes have not been associated with disruptions in the local labor market.		
352	30	[ATT3: Excerpt from 2009 NMFS BiOp. Appendix 2-E Stanislaus River Minimum Flows for Fish Needs]	The commenter provided this attachment for reference purposes in support of their comments. Those comments are addressed in these responses to comments; therefore, no additional response is required.	
353	1	I am writing to advocate for the proposed increase of water to the Stanislaus, Tuolumne and Merced Rivers from February to June to benefit the water quality and provide sufficient water for salmon and steelhead to survive. The proposed requirement that 40% of the flow be maintained for wildlife and fish still leaves 60% for agriculture, industry and other uses. We are in a symbiotic relationship and must work to preserve a habitat that nurtures the creatures we share the earth with.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.	
356	1	The San Francisco Bay Delta is the largest estuary on the Pacific Coast of North America.	Please see Master Response 1.1, General Comments, for responses to comments that either make a gener	

	Table 4-1. Responses to Comments			
Ltr#	Cmt#	Comment	Response	
		Water quality in the San Francisco Bay Delta Estuary is the most critical issue facing the State of California. The Delta Estuary is a fragile ecosystem that depends on significant, fresh, cool, unpoisoned water flow from the San Joaquin River.	comment regarding the plan amendments or do not raise significant environmental issues.	
356	2	I am concerned that the Substitute Environmental Document (SED) for the Delta Water Quality Control Plan, will actually further degrade our precious Resource. A statewide water plan must mandate permanent reduction of exports in order to restore and protect the Delta. The San Joaquin River must reach Chipps Island to preserve the entire estuary. The bifurcation of the upper San Joaquin River unreasonably shifts this incompatible burden to the southern San Joaquin. Unsustainable water exports must stop now to comply with State law: Water Code Section 11460 states that no water shall be diverted for export unless all the needs of the Delta watersheds are met including irrigation, municipal, industrial, and fish and wildlife. The SWRCB's current proposal is in direct violation of State law.	Please see Master Response 1.2, Water Quality Control Planning Process, for a discussion of the scope of the Bay-Delta Plan proceedings and exports. In addition, Water Code 11460 neither requires the State Water Board to, nor prevents it from, addressing exports in the Bay-Delta Plan. Section 11460, which was enacted in connection with authorization of the Central Valley Project (CVP), is part of a watershed protection statue that protects areas of origin from exports of water to other areas where the water is reasonably required to adequately supply the beneficial needs of the area of origin. (Wat. Code, §§ 11460-11463; State Water Resources Control Bd. Cases (2006) 136 Cal. App.4th 674, 754.) Section 11460, read in conjunction with section 11128, operates as a prohibition on the Department of Water Resources and United States Bureau of Reclamation in the construction and operation of the CVP. "On its face at least, the statute does not purport to limit the Board's power in administering water rights." (Id., at p. 756.) Nor does the State Water Board propose any water right term requiring the USBR to operate the CVP in violation of section 11460. The State Water Board has not violated this provision.	
530	3	<ul> <li>When I speak of Chipps Island, I know where that is, just before entering Suisun Bay by</li> <li>sailboat. I have sailed back and forth from Stockton to San Francisco many times in the past 30 years. Chipps Island is where the San Joaquin waterway meets the Sacramento. In sailor's terms, this is the naturally evolved system to flush out the estuary which creates</li> <li>the balanced ecosystem.</li> <li>From observation while sailing and swimming, I know salt water has migrated, now past</li> <li>the Antioch Bridge toward Stockton. During the past 30 years, water exports have</li> <li>increased. Salinity standards in the South Delta must not be weakened. Water quality</li> <li>standards must be protected for agriculture, drinking water, municipal discharge, fisheries, and ground water recharge.</li> </ul>	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment regarding the plan amendments or do not raise significant environmental issues. Please see Master Response 3.3, Southern Delta Water Quality, regarding the justification for updating the southern Delta salinity objectives and why there will not be degradation in water quality. Additional information regarding water quality effects associated with the SDWQ alternatives is provided in Chapter 5, Surface Hydrology and Water Quality.	
356	4	The State Water Board must consider environmental justice communities in terms of drinking water and domestic use. Phase 1 Recirculated Draft SED fails to consider environmental justice communities in chapters 5 and 9 (hydrology/water quality and groundwater). It is unconscionable in terms of environmental justice, that water protected by the great	Environmental justice communities are part of the disadvantaged communities considered in Chapter 22, Integrated Discussion of Potential Municipal and Domestic Water Supply Management Options. For further discussion regarding consideration of disadvantaged communities in the SED, and the financial and technical resources available to assist them as regards their water supply, please refer to Chapter 22 as well as Master Response 2.7, Disadvantaged Communities. As described in Chapter 5, Surface Hydrology and Water Quality, Impacts WQ-1, WQ-2, and WQ-3, the plan amendments would not cause deterioration of water quality in the three eastside tributaries, Lower San Joaquin River, or the southern Delta and impacts were determined to be less than significant. As such, the	

		Table 4-1. Response	es to Comments
Ltr#	Cmt#	Comment	Response
		state of California is unfit for fishing, human contact and recreation. There are significant health, human suffering and economic costs associated with poor water quality in the San Joaquin Delta.	plan amendments would not deteriorate water quality for human contact or recreation in the Lower San Joaquin River or the southern Delta. Chapter 10, Recreational Resources and Aesthetics, Section 10.4.2, Methods and Approach, identifies that the water quality would remain within baseline conditions in the southern Delta and as such would not affect water-based recreational users. Please refer to Master Response 3.3, Southern Delta Water Quality, regarding water quality in the southern Delta and of the Southern Delta Water Quality alternatives.
356	5	<ul> <li>Water Quality will never improve if unsustainable exports continue.</li> <li>This year, cyanobacteria, commonly called Blue-Green algae, throughout the Delta made any human contact unpleasant to deadly.</li> <li>The Delta I love as a magnificent estuary has become inhospitable to animals and humans. Cyanobacteria are naturally occurring phenomena. It sometimes turns toxic when there are large surface blooms. The BLOOM of 2016 was encouraged by poor water quality conditions in the south San Joaquin Delta.</li> <li>Blue-green algae multiply quickly in water bodies with high nutrient levels such as phosphorous or nitrogen, and particularly when the water is warm and the weather is calm. Blue-green algae growth can become seemingly explosive when lots of nutrients are present,</li> <li>Waters that flow slowly with low turbulence are at particularly high risk of algal blooms.</li> <li>There is no remedy for this bloom outside of reducing nutrient levels and increasing water flows. The BLOOM of 2016 is a symptom of the poor health of the fragile Delta ecosystem.</li> <li>In late summer this year, I visually monitored the bloom condition at low and high tide. I was hoping that the water would be clear at high tide! But it wasn't. My location was the Stockton Sailing Club, particularly because I wanted to use a paddle board in the Delta waters. The San Joaquin River meets the Shipping Channel nearby. If the estuary was working properly, there might not have been a bloom!</li> </ul>	Please see Master Response 1.1, General Comments, for discussion of harmful algal blooms in the southern Delta. Most of the factors affecting harmful algal blooms in the Delta are unaffected by the plan amendments. However, the plan amendments are generally expected to increase flow and fresh water dilution of nutrients in the Delta, so are not expected to result in any increase in harmful algal blooms and could actually be helpful.
356	6	The Sailing Club has a strong youth, learn to sail, program in the summer. The classes are open to the community. One of the first exercises is tipping over – falling out of the sailing dinghy, into the water and then righting the boat and getting back in. This is an essential skill when learning to sail a small boat. In August and September warning signs stating "water not safe for human contact" were posted all around the docks and levee of the Sailing Club. Blue-green algae will have a huge negative economic impact to the recreation and tourist industry in the Delta and to the city of Stockton. Sailing has given me the adventure and indeed the privilege of exploring the Pacific Coast from Glacier Bay, Alaska to Panama. All of the sailing trips start from Stockton on the San Joaquin River. It gives me great joy to intimately know how Stockton is connected to Bays and Ports north and south of the Golden Gate. Pacific salmon, up and down the coast, are dependent on the flow of Sierra snowmelt to thrive. The interconnection of the ecosystem is exciting!	Please refer to Master Response 1.1, General Comments, regarding harmful algal blooms.
356	7	The Great San Francisco Bay Delta Estuary is so unique in its 1,000 miles of waterways, unmatched on the Pacific Coast of the Americas. The Delta is a treasure and a public trust	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment regarding the plan amendments or do not raise significant environmental issues.

	Table 4-1. Responses to Comments				
Ltr#	Cmt#	Comment	Response		
		for all of California. Preservation of this great Estuary cannot be compromised. If unsustainable water exports are not dealt with, water quality and quantity objectives for the Delta cannot be met. A statewide water plan that establishes permanent reduction of exports is essential.	Please see Master Response 1.2, Water Quality Control Planning Process, regarding the approach to the Bay- Delta Water Quality Control Plan updates and the review of export restrictions as part of subsequent independent proceedings.		
357	1	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 seaenough water to irrigate over 100,000 acres of farmland or meet the domestic needs of 2 million people for a year.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.		
357	2	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.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.		
357	3	California flushed over 1 million acre-feet of water out to sea in 2016 in a misguided 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: 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.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.		
357	4	California flushed over 1 million acre-feet of water out to sea in 2016 in a misguided 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: Water temperatures soared, resulting in fish kills.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.		
357	5	California flushed over 1 million acre-feet of water out to sea in 2016 in a misguided 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: Fish and wildlife in reservoir ecosystems, particularly shoreline ecosystems were heavily impacted.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.		
357	6	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.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.		

	Table 4-1. Responses to Comments				
Ltr#	Cmt#	Comment	Response		
		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.			
357	7	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.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.		
357	8	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.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.		
357	9	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.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.		
357	10	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.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.		
358	1	You can't save something by killing off 10 others. Everyone loses. To send water down the Stanislaus River and others without reserving water for other resources, then everything ends up in a deficit. The fish, farmers and residents all end up losing. Sending water down the river in an attempt to save a fish species is throwing it all away.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.		
359	1	This a misguided water policy and should not go forward. Policy made by people who don't know the issues that will affect families and jobs. This kind of policy should not [be] adopted or imposed on people of [the] state of California.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.		
360	1	I do not believe your idea to take more water out of the Stanislaus and other rivers will have an impact on salmon. It will cause our farms and cities to pump more water out of the aquifers.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.		
360	2	Leave the water in the reservoirs for hydroelectric power when the demand for power is needed.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.		
361	1	Please improve the current water quality standards for the San Francisco/Delta region. We must have clean, fresh water in the Delta to maintain the health of our communities in and on the Delta.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.		
362	1	I am very worried about the drawdown of Lake Tulloch. This lake provides drinking water for myself and about 10,000 others. It is also a recreation area for us.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.		
362	2	This project isn't even working. New Melones was drained down to about 10% of its capacity last summer, and 80% of the fish died because the water was too warm. The state	Please see Master Response 1.1, General Comments, for responses to comments that either make a general		

	Table 4-1. Responses to Comments			
Ltr#	Cmt#	Comment	Response	
		is planting striped bass and they are eating the salmon. We are losing water to a failing project. Last year 30,000 acre feet of water was released to move nine fish. This was done at the cost of \$21 million. How can you let this happen? Water is too valuable to just release down the river.	comment on the plan amendments or do not raise significant environmental issues.	
362	3	I urge you to extend the public comment period from 60 to 90 days. I also hope to see public hearings in Merced, Stockton, and Modesto on this matter. Water can't be taken lightly. This is a huge problem.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.	
363	1	Since 2009, the hallmark of California water policy has been a commitment to the coequal goals of improving both water supply reliability and ecosystem health. Managing for coequal goals means recognizing that the needs of our economy and our environment are both legitimate. It means taking a balance approach to policy decisions and regulatory proposals to better meet those needs and reduce conflict. It also means moving away from narrow, single-stressor actions that fail to protect our water supply and species.	Please see Master Response 1.1, General Comments, regarding the Delta Reform Act, the State Water Board's authorities and the consideration of beneficial uses. Please see Master Response 3.1, Fish Protection regarding the justification of the plan amendments for protecting fish.	
363	2	Draft flow objectives for the San Joaquin released in November by the State Water Resources Control Board staff raise serious questions about their commitment to a state policy founded on the coequal goals. Requiring up to 50% of unimpaired flow to remain in the river for the purported benefit of fish species, as proposed by State Water Board staff, does not reflect a balanced approach. Nor does it recognize the missions of dollars agencies have invested in fishery science, modeling, habitat restoration and coordinated flow regimes to improve salmon populations and other aquatic resources.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment regarding the plan amendments or do not raise significant environmental issues. Please see Master Response 1.1 regarding consideration of beneficial uses and the co-equal goals as defined by the Delta Reform Act.	
363	3	The State Water Board staff's draft plan would deal a severed blow to many communities already struggling with drinking water quality and quantity challenges. It also would make it extremely difficult for local agencies to achieve state-mandated goals under the Sustainable Groundwater Management Act of 2014, both by compelling growers to pump more groundwater and by reducing the amount of surface water available to recharge groundwater basins.	The SED does not require or encourage increases in groundwater pumping as a response to reductions in surface water. The SED merely reflects the historical response of water users to increase groundwater pumping when surface water availability is reduced. It will be up to local entities to determine the precise actions that would be taken in response to the implementation of the plan amendments, with or without the future condition of SGMA. The State Water Board acknowledges it will be challenging, but implementation of the plan amendments does not conflict with SGMA; together they allow for integrated planning of scarce water resources that does not trade impacts between surface water and groundwater. For further discussion on SED consideration of SGMA and groundwater recharge, please see Master Response 3.4, Groundwater and the Sustainable Groundwater Management Act. For discussion regarding the resources available to assist disadvantaged communities in dealing with water supply issues and improve water supply resiliency, please see Master Response 2.7, Disadvantaged Communities.	
363	4	The draft flow objectives go against the hard work and investments made by water agencies throughout the state such as CVWD who have worked tirelessly over the past decade to change our customers' behavior to use water more efficiently and that every drop of water is important. This type of behavior is inconsistent with the message of being in a drought and undermines our credibility with our customers.	The State Water Board acknowledges Cucamonga Valley Water District's water conservation effort and ongoing commitment to demand management. The recent California drought illustrated that water users have the ability to reduce demand through conservation, which will help offset the reduction of surface water supplies in response to the implementation of the plan amendments. Please refer to Master Response 1.1, General Comments, regarding the consideration of beneficial uses by the State Water Board.	

	Table 4-1. Responses to Comments			
Ltr#	Cmt#	Comment	Response	
363	5	Reliable water supplies and healthy ecosystems are the very crux of coequal goals. Let's put them back at the forefront of discussion today and pursue the kinds of collaborative, voluntary approaches that can get real results to improve habitat stream flows while maintaining the water supplies so critical to our local communities and the state as a whole.	Please see Master Response 1.1, General Comments, for information regarding the Delta Reform Act and co- equal goals as well as scientific basis for the LSJR flow objective to reasonably protect fisheries beneficial uses.	
364	1	Please stop uncontrolled release of water to the ocean. We need it for farming or we all lose.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.	
365	1	I am opposed to your idea of increasing flows in the Stanislaus and other rivers because of its negative financial impact on our entire region.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.	
366	1	I believe your proposal is a good proposal. If anything it errs on the side of the flows being too conservative. We all have to share California's water.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.	
367	1	I strongly urge and support the Water Board's river flow proposal. The clean water act mandates water quality to ensure the survival of threatened salmon, and maintain cold water temperatures essential for aquatic species. A 40% flow of natural, would seem to be a minimum to meet that obligation.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.	
367	2	The beauty and environmental stability of areas that surround these rivers are a national treasure and essential as part of an ever eroding ecosystem in or country and the world. We cannot continue to degrade our resources. Agriculture and urban development have to work within the means of sustainability. There is no future for the ecosystem that is required for nature and humanity otherwise.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.	
368	1	I am opposed to your proposal to increase flows in our rivers to allegedly help salmon. It will destroy jobs and family farms that depend on our water.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.	
369	1	I am writing in opposition to the unimpaired flow proposal (Phase 1 Revised Substitute Environmental Document of the Bay-Delta Water Quality Control Plan). Farmers in my region need water to grow the crops that feed us (and the world) and maintain our local economy. As a lover of nature and environmentalist, I understand the need for a healthy river, but the cost to the region is too great to save a small amount of fish. In addition, our region is struggling with over pumping ground water, and the implementation of this plan would certainly make such concerns worse.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.	
370	1	I don't want to see our ag drying up and our trees die. We won't have any beauty left in our city.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.	
370	1	I am writing to oppose the proposed increase in flows on the Tuolumne River. As a resident of Turlock, even though I consider myself and environmentalist, I don't think the severe economic damage that will occur from these reduced flows are justified by potential gains, especially when such "gains' may not be substantiated by the best science. (My understanding is that research shows that increasing water flows into the Delta has done nothing to increase fish populations.) In addition, the reduced flows would increase groundwater pumping which would be extremely damaging to the environment. Please reconsider this proposal.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.	
371	1	San Joaquin County and the many of the other areas that will be affected by your plan to increase river flows are dependent on agriculture as their primary industry. Not only is agriculture a source of livelihood and a priceless part of our culture, it also provides	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.	

Table 4-1. Responses to Comments			s to Comments
Ltr#	Cmt#	Comment	Response
		thousands of jobs and billions of dollars to the Central Valley and the California economy. I believe that the "significant, but unavoidable" consequences are far too significant to ignore and are definitely avoidable. This is especially true when one recognizes the ramifications this proposal would have on the residents of not only the Central Valley, but California as a whole.	
		California's agriculture industry is the most important in the United States with over \$50 billion in annual sales. The Stanislaus River Basin is an integral part of that amount with San Joaquin and Stanislaus counties contributing about \$6 billion to California's economy. While that may not seem important in a \$2 trillion economy like California's, when one takes into account the subsidiary industries that are dependent on agriculture like transportation and food processing, the paychecks thousands feed their families with, as well as the California grown food millions feed their families with, that number swells to colossal proportions. Much of this would be swept away if your proposal took effect.	
371	2	The argument that surface water resources can simply be replaced by groundwater is not only unfeasible, but also environmentally irresponsible. Groundwater is a limited resource that should be used sparingly and when no other practical option is possible. The drought of the last several years has shown the dangers of excessive groundwater pumping as the water table of the Central Valley has dropped rapidly with the ground level following suit in the form of subsidence. If surface water access for farmers were curtailed, as this plan proposes, the drought would be artificially prolonged as it would force farmers to continue this unsustainable practice.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
371	3	While it is understandable that many would like to improve salmon populations, this is not the way to do it. Instead of depriving the Valley of its clear-colored lifeblood, we should work to eradicate the invasive predators of the native salmon so that California salmon can live long enough to spawn while still providing the water the Valley needs to thrive. This is just one of the many common-sense projects that would be more effective than increased unimpaired flows and better for Californians.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
371	4	Residents of the Valley often feel left out of California's political system. Many can't help but wonder if this proposal would succeed if the water were being taken from San Francisco, Los Angeles, or San Diego, instead of the Valley. I ask that you contemplate this and prove us wrong with your decision. Show us that we aren't just a place Sacramento politicians cross on I-5 or 80 to cater to their voters in Los Angeles and the Bay Area. Show us that we, in the Valley, have a government that represents the interests of all Californians and will protect our livelihood and way of life.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
371	5	As an FFA member, I fear that there would be no future for the future farmers of the Central Valley if this proposal is implemented.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
372	1	The Central Valley Farmland Trust (CVFT) works throughout the north San Joaquin Valley (NSJV) to permanently conserve irrigated farmland on good soils to prevent them from being converted to urban or non-farm uses. We do this using State, Federal and mitigation funding.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.

		Table 4-1. Response	es to Comments
Ltr#	Cmt#	Comment	Response
		The availability of reliable surface irrigation is a major factor contributing to the conservation value of the land. Our conservation easements specifically state that the water rights cannot be severed from the land being protected.	
		The significant loss of surface water in the NSJV undermines our ability to achieve our mission to protect prime farmland in California. We view our efforts as important to the State Department of Conservation's initiative to slow the conversion of good farmland to other uses.	
		We ask the Board to consider the above prior to making a decision on increasing un- impaired flows in the afore-mentioned rivers.	
373	1	We are very lucky that some of our output is exported, because for every billion in Ag exports, 27,000 jobs are created in this state – many in the Bay Area and Southern CA. For every dollar in exports, 1.40 is generated in economic activity. Because of our unique combination of climate, soils and availability of water in the summer,	Please see Master Response 1.1, General Comments, for responses to comments that do not raise significant environmental issues or make a general comment regarding the plan amendments and general information regarding the economic analysis.
		production of specialty crops that is lost here, will not shift to another part of the US economy - it will shift overseas and the jobs will be created there.	
		For every job in Agriculture, 2.2 additional jobs are created in other parts of the economy. The largest economic multiplier in is in the Ag processing sector: Canneries, almond hullers, wineries, cheese companies, nut processors, meat processors, tomato paste manufacturers, milk processing, frozen fruits and vegetables, and fresh product shippers. These are found all over the state.	
373	2	Some social and economic justice issues to consider: By almost any measure - unemployment rates, mal-nutrition, teenage pregnancy rates, dropout rates - Merced County is a poor county on average. Try as we may, we do not have a way to replace the economic activity that surface water brings to our region. The State has a responsibility above all others to consider the welfare if its citizens when making these types of decisions.	As set forth in the Program of Implementation (described in Appendix K, Revised Water Quality Control Plan), the State Water Board will "take actions as necessary to ensure that implementation of the LSJR flow objectives does not impact supplies of water for minimum health and safety needs". For further discussion regarding disadvantage communities and the resources available to assist them as regards their water supply, please refer to Chapter 22, Integrated Discussion of Potential Municipal and Domestic Water Supply Management Options, and Master Response 2.7, Disadvantage Communities.
373	3	<ul> <li>[ATT 1] San Joaquin Valley crops are often high value commodities and in many cases a considerable amount of processing activity is generated in the regional economy as a result of their production.</li> <li>To estimate the impact on our local economy of an acre of irrigated land, and consequent loss as a result of conversion to other uses, we used a University of California study on the economic multiplier of crops grown in Stanislaus County [Footnote 1: Sarquist, Armen V. Economic impacts of agricultural production and processing in Stanislaus County. University of California Cooperative Extension, Stanislaus County. 49pp (March 1981)] which gives the economic multiplier factors for individual crops. The economic multiplier summarizes the</li> </ul>	The economic analysis in the SED used a similar approach for estimating regional economic impacts. Regional economic multipliers were derived from the more recent 2010 IMPLAN database and used to estimate the total regional economic impact (including the direct, indirect, and induced economic impacts) associated with changes in gross agricultural revenue. The SED employed the 2010 IMPLAN database because it was the best available information on regional economic relationships corresponding to the baseline time period of the SED. Please see Appendix G, Agricultural Economic Effects of the Lower San Joaquin River Flow Alternatives: Methodology and Modeling Results, for discussion of how IMPLAN multipliers were used in the regional economic analysis.
		total direct spending and indirect re-spending effects of farming activity and agricultural processing in the local economy. The agricultural economies of Merced and Stanislaus counties are very similar in that they grow similar crops and they both have substantial agricultural processing industries. We consulted reliable industry sources to obtain typical yields for well-managed operations and multiplied those by recent average prices to give the farm-gate value of the crop. By multiplying the farm-gate value by the multiplier factor, we are able to get a rough estimate of the total economic impact of and acre of irrigated	

		Table 4-1. Response	es to Comments
Ltr#	Cmt#	Comment	Response
		cropland on the local economy.	
		Almonds	
		Average yield of a well-managed orchard = 2400 lbs/acre	
		Average price = \$4.00/lb	
		Economic multiplier = 2.5	
		(2400 lb/ac)(\$4.00/lb)(2.5) = \$24,000/acre/year impact on local economy.	
		Cling Peaches	
		Average yield for a well-managed orchard (all varieties) = 19 tons/acre	
		Average price = \$460/ton (2015 negotiated price)	
		Economic multiplier = 6.0	
		(19 tons/ac)(460/ton)(6) = \$52,440/acre/year impact on local economy.	
		Processing Tomatoes	
		Average yield for drip-irrigated, well-managed field = 43 tons/ac	
		Average price = \$80.00/ton	
		Economic multiplier = 6.0	
		(43ton/ac)(\$80.00/ton)(6) = \$20,640/acre/year impact on local economy	
		Shipping Tomatoes	
		Average yield for well-managed field = 1200 boxes/ac	
		Average price = \$6.50/box	
		Economic multiplier = 3.0	
		(1200 boxes/ac)(\$6.50/box)(3) = \$23,400 /acre/year impact on local economy	
		Sweetpotatoes	
		Average yield for well-managed field = 650 boxes/ac	
		Average price = \$15.00/box	
		Economic multiplier = 3.0	
		(650 boxes/ac)(\$15.00/box)(3.0) = \$29,250/acre/year impact on local economy	
381	1	Having spent the vast majority of my life working for county, state, and federal agencies who needed to develop sound, sustainable, multi-use policies to manage water resources, I	Please see Master Response 1.1, General Comments, for responses to comments that either make a general

		Table 4-1. Response	is to Comments
Ltr#	Cmt#	Comment	Response
		am recommending that you maintain the 50-60 percent flow levers that scientific evidence indicates would provide the flows needed to support delta ecosystem biology and anadromous fish species. Although this is just one major use associated with Delta and river flows, it is the use that best indicates the general health of the entire system.	comment on the plan amendments or do not raise significant environmental issues.
381	2	My professional experience showed again and again that (1) communities do not change their consumptive use patterns, and in particular never voluntarily reduce their consumptive use for an extended period of time, and (2) that only truly do so when required by laws with punitive consequences or there are economic incentives to do so. Inevitably, I have seen this irrational behavior lead to the complete mining of groundwater from aquifers, or complete capture of stream water from rivers systems, leading to sterile water-barren ecosystems, within one or at most two generations. Often the above has occurred with many other costly consequences-complete loss of river systems for any other use purposes, land subsidence, saline water intrusion, and damages to subterranean and surface infrastructure. When the initial actions were taken, no one really wanted to know, or more often listened to those who more clearly understood, what the consequences would be.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
		The day the Water Board no longer clearly strives to preserve the flows needed to maintain the Delta ecosystem and anadromous fish populations is the day the Delta and the rivers that flow to it simply become a pond and pipe system to provide water solely for southern California consumptive use. It is clear that southern California will never conserve, reuse, or otherwise diminish their demand for water in any meaningful way as long as the Board just keeps giving them water from the north. It is also clear that those in northern California has no real political sway when it comes to State actions.	
		What is really needed and California has managed to dodge for the last half century (since the AZ vs CA 1968 Supreme Court decision) is a state wide groundwater and surface water management plan. Whereas AZ has succeeded and California has miserably failed is not that they won but that they also were required in this SC decision to develop such a plan and they did based on a sound scientific basis and many interagency negotiations. If they Board takes measures which forces the State to develop such a plan more quickly, that is the best decision it could make. If the Board simply rolls over and allows large diversions of delta water south then they will simply have told southern Californians that they once again can just turn on the taps.	
382	1	Your idea to push more water down the Stanislaus River for fish will spell the death knell for New Melones and Tulloch reservoirs and all of the recreational use they get. Melones is already running around 21-22% of normal; more flows will turn it into a shallow mud puddle.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
383	1	Poor choices based on bad science have caused statewide water shortages. Plans to divert more water to Southern California will only further damage the salmon population and harm local agriculture.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
384	1	Please stop the waste. Please stop sending the water out to sea. Build more storage. I am a consultant who teaches safe efficient operation and provide PSM and RMP programs for producers [and] growers and they are so hurting. Way too many of my students have lost family farms or are just hanging on.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.

		Table 4-1. Response	es to Comments
Ltr#	Cmt#	Comment	Response
385	1	We support the "2016 Bay-Delta Plan Amendment & SED" and State Water Board proposal to increase river flows to 40% of the unimpaired river flows to benefit fish, other aquatic life, and water quality in the Tuolumne, Merced and Stanislaus River. We support all actions by the Board that will keep more water in the rivers.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
385	2	A higher river flow will not only benefit the wildlife within the rivers as well as the warming temperatures but also the overall water quality of the rivers. These three rivers drain into the Bay Delta and water quality is crucial to support the aquatic wildlife and many species living within this region.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
		The current water demand on all three rivers have left many aquatic species with not enough water. The temperature increases, low flow, and water quality are currently threatening the long term population of these aquatic species. For example, the number of salmon migrating up the Tuolumne River to spawn and the number that manage to return to the ocean has greatly diminished. Of the tens of thousands of salmon that have historically attempted this journey, currently only hundreds are able to return to the ocean. Another example of the dramatic effects of the low flow rivers is the steelhead population within these rivers. The population is collapsing and a major contributing factor is the low inadequate water flow. This proposal to the State Water Board to increase river flows is critical to the survival of these populations as well as the other aquatic wildlife.	
385	3	We support this proposal and the significant direct benefits it would have on wildlife and water quality. Please pass this proposal and help protect our beautiful rivers and important habitat for the aquatic wildlife.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
386	1	I am writing in fear of losing our existence. Yes soon to be extinct. We are very concerned for our future, our family's very way of life. There are people living out here that their, our, lives depend on the water from these rivers. Not only here but from Bakersfield to Chico.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
386	2	The economic impact will be much greater than is advertised or anticipated, it will decimate the farms and cities of the valley. This is more than economic impact, it is human impact!	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
386	3	Wasting precious water does not save fish. There are much better ways of supporting fish populations. Repeating the current failures by increasing flows is plain ludicrous.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
386	4	It is very difficult to write this letter knowing my very way of life is being threatened by man, yes man, a man made drought.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
386	5	<ul> <li>Please consider to work together, to design and build sufficient water storage and supply so "all may flourish".</li> <li>Pipe it from another source.</li> <li>Gate the Carquinez.</li> <li>Be bold and do something great! So all can benefit and enjoy the abundance, water wealth contentment health, for generations to come. After all this is America!</li> </ul>	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
387	1	With the current weather conditions the allocation of our water would be suicide for this	Please see Master Response 1.1, General Comments, for responses to comments that either make a general

	Table 4-1. Responses to Comments				
Ltr#	Cmt#	Comment	Response		
		area to supply Tulare & Kern county. Let's build more reservoirs!	comment on the plan amendments or do not raise significant environmental issues.		
388	1	But over the last decade, I have seen how serious our ecosystem has degraded. No doubt the drought has contributed but so has population and agricultural growth that has cut significantly the amount of water that flows to the San Francisco bay. Water flow is critical to the survival of endangered salmon fisheries as well as that of countless other species. Adequate freshwater flows will also protect against incoming salinity from the Bay.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.		
388	2	I hope you will take into serious consideration the State Water Board report titled Development of Flow Criteria for the Sacramento-San Joaquin Delta Ecosystem and their finding that 60% of unimpaired flow between February and June would be fully protective of fish and wildlife in the lower San Joaquin River and its three major tributaries. I understand and appreciate how critical agriculture is to our state economy but firmly believe that through more advanced irrigation technologies and conservation, water flows can be restored without severe impacts on our farmers.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.		
389	1	I am writing you because I am in favor of the State Water Board's proposal to increase river flows to 40% of the unimpaired river flows that would naturally be in the river if agriculture or other water users didn't divert so much water. This will not only benefit the fish but will help protect the riparian environment around the rivers. PLEASE KEEP MORE WATER IN THE RIVERS. Thank you very much!	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.		
390	1	I have grave concerns regarding the latest proposal by the State of California to divert additional water from our already stressed river basins. My husband and I farm in the Manteca area. The last few years have been hard on us and all the other farmers in the area because of drought conditions. In our agricultural area, farmers have tried to decrease the harmful ramifications by coming together to implement more efficient irrigation practices, fallowing ground and looking for drought resistant species to plant. Despite these efforts, the crops have suffered. Farmers have had to sacrifice some crops so that others can be sustained. We have been forced to make decisions regarding the future without knowing how much water will be available or if water will be available.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.		
390	2	Farming constitutes a large part of the economy in the San Joaquin/Stanislaus area. Diverting more water will cause further economic damage to a region that is already suffering. More acres will have to be fallowed and thousands of jobs will be lost. It is just not people who work in the fields, but all the related industries that farming supports.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.		
390	3	I am not convinced that releasing water actually helps the fish. It would seem that measures such as habitat restoration, controlling water temperatures, and reducing predators are methods more likely to aid the fish. It would appear that releasing water is a type of knee jerk reaction. More careful thought should be given to how best implement a solution that will increase fish population without further damage to the farmers and crops in the area.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.		
391	1	NO on increasing the flow diverted from rivers in the Merced & Modesto areas.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.		
391	1	No on increasing the flow diverted from rivers in the Merced and Modesto areas.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.		

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Ltr#	Cmt#	Comment	Response		
392	1	State Water Board Members: Do you like to eat? I hope you really enjoy salmon because if you are successful convincing Bay Area and Los Angeles voters to choose saving hatchery- bred salmon over the remaining 399 food commodities produced in this state, then not only will Californians suffer, but every other state in this country, and most countries around the globe.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.		
393	1	I am sending this to voice my opposition to Assembly Member Frank Bigelow's letter to Chairwoman Felicia Marcus. He is requesting the destruction of California by taking more water for an area that continues to overplant permanent crops. The river diversions from the California Delta and out to sea have already exceeded healthy levels that are damaging long-term food chains. These farmers have over-drafted our aquifers to the point of the earth sinking, taking water that took thousands of years to accumulate. They have switched from row crop to permanent crops to grow nuts using migrant workers to be shipped overseas. How is that good for America? Mister Bigelow has an investment, along with his parents, that if he can get his hands on more water, he can make millions developing land they own. They environmental laws were already a compromise when enacted; why get rid of them for greed? The percentage of water diverted is already excessive. Save California.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.		
394	1	As a life member of Trout Unlimited and a member of California Trout, I strongly support increasing flow standards for the lower San Joaquin River watershed, and reserving at least 40 percent of unimpaired flow for environmental needs.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.		
394	2	California's populations of native anadromous fish are not just in decline, they are in collapse. It is disheartening to see so many rivers formerly thriving with salmon and steelhead reduced to "Silent Spring" conditions where a day on the river can be spent without even sighting a fish during spawning season.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.		
394	3	I recommend: Establishing new flow standards higher than those proposed. Scientific surveys show that a minimum of 60 percent unimpaired flow is required to recover salmon and steelhead runs in the San Joaquin River system to self-sustaining levels.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.		
394	4	I recommend: The Water Board consider the wide-ranging benefits that all Californians receive from healthy fisheries and river ecosystems. This is not just about fish, but saving rivers that support healthy communities, a source of food and recreation, and jobs for the fishing industry and tourism.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.		
394	5	I recommend: Dedication of more water, delivered at key times, as the primary tactic for recovering fisheries and the Bay-Delta's ecosystem. California has already tried approaches favored by large water users to save salmon and steelhead, and these have failed. Central Valley salmon and steelhead runs are on the brink of extinction. We are out of time to experiment with strategies that don't include more water, and which only treat symptoms and not the cause: lack of enough cold, clean water to sustain native fish populations.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.		
395	1	If you increase river flows and take away water from our farmers, they can't grow their crops and feed their livestock! This is not good for Northern California or our farmers. It's all bad.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.		
395	2	Southern California should build dams in their mountain areas to catch the runoff. We do it here in the central and northern areas. We need our water for our farmers and the people	Please see Master Response 1.1, General Comments, for responses to comments that either make a general		

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Ltr#	Cmt#	Comment	Response	
		who live up here.	comment on the plan amendments or do not raise significant environmental issues.	
396	1	Increasing flows on the Stanislaus River will devastate the economy of Stanislaus County, affecting the lives of some of the poorest families and children in the state and doing nothing to improve the number of fish that you claim to be trying to save.	Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.	
396	2	Why not try something different? Why not open your minds to the fact that, just maybe, there is a better way to achieve a balance between the fish, farms and lives that utilize the water from the Stanislaus, Tuolumne and Merced rivers.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.	
397	1	We need our water. Taking our water will only drain our rivers and put our ground water in disrepair. Our communities paid for those dams. The state did not contribute a dime. It's our water and before you decide to take it I suggest you do studies to back up your farce claims. MID, TID, OID, and SSJID have done just that and have the research and specialist to back up their work	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.	
397	2	Do justice for people in our community and leave our water alone. Go build dams down in Southern California if they need water that bad. They receive more rain water than we do and they let it run off into the ocean. Teach them to be responsible and good stewards, like we have here. Don't punish us for their mistakes and the state's inadequate responsibilities.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.	
398	1	We need to take the health of our planet seriously in order to develop habits that will allow us and future generations to enjoy what this world has to offer. We need water, clean air, and healthy food in order to survive, which is why I am opposed to your plan to increase unimpaired flows on the Stanislaus River. We are stewards of all of our natural resources. What is important at this time is conserving water in major ways, in California especially. We need to invest in our future by keeping our water locally.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.	
398	2	In order to help our local fish populations, we need to maintain the natural habitats and augment them where our past behaviors have created disruptions in order to repair the damage done. We will need to reduce predation in local waterways by relocating non-native predators and, for the most part, keep our water where it is.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.	
398	3	I hope that you take this letter and the many others seriously because we must help our environment right away. Time is of the essence and this matter is life and death. Some people may not see it that way, but it's well known that hindsight is 20-20. We have ha many warning signs and opportunities and if we continue to ignore them, we will not have the resources essential to survive.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.	
399	1	Though we absolutely need to do so much more to help our planet, your plan to increase flows in the Stanislaus and two other rivers will do more harm than good. Water is such a precious resource and we too often take it for granted. We must do what we can to save water and make ecologically conscious decisions.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.	
399	2	As someone who works in an intensive care unit for newborns and someone who has	Please see Master Response 1.1, General Comments, for responses to comments that either make a general	

	Table 4-1. Responses to Comments			
Lt	tr#	Cmt#	Comment	Response
			wanted to be a mother for most of her life, I hope that you will hear me out.	comment on the plan amendments or do not raise significant environmental issues.