

July 26, 2018

Felicia Marcus, Chair
State Water Resources Control Board
P.O. Box 2000
Sacramento, CA 95812-2000

RE: ADOPT STRONG NEW BAY-DELTA STANDARDS

Dear Chairwoman Marcus:

Our organizations are writing to urge the State Water Resources Control Board to adopt new, stronger water quality standards for San Joaquin River basin inflow to the Delta in its Phase 1 update of the 2006 Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary (Plan), and to strengthen its proposal for the Phase 2 update of the water quality standards for Delta outflow, Sacramento basin inflow, and in-Delta channel flows.

In August the Board will consider amending the San Joaquin basin inflow and south Delta salinity objectives in the Plan (Phase 1). The best scientific evidence – established by state and federal fish and wildlife agencies, independent researchers, our groups, and the Board itself – is clear and unambiguous; between 50 and 60 percent of the San Joaquin basin's natural winter-spring runoff must flow to the estuary in order to stabilize declining salmon and steelhead populations and support the recovery and doubling of these populations, and to protect water quality in the south Delta. However, the Board's draft final proposed flow standards, released on July 6th, call for just 30-50% of the flow from only three San Joaquin River tributaries to reach the Delta, with an initial starting point of 40% of the unimpaired flow of these tributaries. Given the dire state of salmonid populations, the public fisheries that depend on them, and water quality in the San Joaquin basin and south Delta, we urge the Board to require at least 50% of runoff from the three San Joaquin River tributaries as the starting point to protect fish and wildlife beneficial uses, public health, other public trust resources, and to allow flows to be adaptively managed above 50% as necessary to achieve the Board's biological restoration goals.

Later this year, the Board will release a full draft proposal for its update of the rest of the Plan (Phase 2). In the proceedings that led to the Board's 2010 flow criteria report to the legislature, findings of the scientific community, resource managers, and the Board itself demonstrated that between two-thirds and three-quarters of the runoff from San Francisco Bay's Central Valley watershed was necessary to reverse the trend toward extinction of numerous fish and wildlife species, restore a healthy, functional estuarine ecosystem that supports native species and habitats, and preserve water quality for a range of beneficial uses. Given that many native fish populations are at record or near-record low levels, public fisheries are increasingly constrained, and there is overwhelming evidence that the estuarine ecosystem is at risk of irreversible decline and permanent loss of fish and wildlife beneficial uses, we urge the Board to put forward a proposal that requires at least

two-thirds of Central Valley runoff to reach the Bay as the starting point for protection of beneficial uses, water quality and the public trust, and to adopt the new standards within one year.

As the Board noted in its 2010 flow criteria report to the state legislature “[t]he best available science suggests that current flows are insufficient to protect public trust resources” and “[t]here is sufficient scientific information to support the need for increased flows to protect public trust resources.” We are united in urging you to act on that information and adopt strong new water quality standards as soon as possible.

Sincerely,

Adam Stern, Executive Director
Acterra

Jeff Miller, Director
Alameda Creek Alliance

Barbara Vlamis, Executive Director
AquAlliance

Keith Miller, President
California Canoe & Kayak

Bill Wells, Executive Director
California Delta Chambers & Visitors
Bureau

Bill Jennings, Executive Director
California Sportfishing Protection
Alliance

Jim Cox, President
California Striped Bass Association

John Buse, Legal Director
Center for Biological Diversity

Carolee Krieger, Executive Director
California Water Impact Network (C-WIN)

Carolyn Curtis, Corresponding Secretary
Dean Democratic Club of Silicon Valley

Rachel Zwillinger, Water Policy Advisor
Defenders of Wildlife

Ron Forbes, Conservation Chair
Delta Fly Fishers, Inc.

Conner Everts, Executive Director
Desal Response Group

Grant Wilson, Directing Attorney
Earth Law Center

Brandie Owusu-Spencer, Executive
Director
Empowering Young Voices

Caryn Mandelbaum, Water Program
Director
Leonardo DiCaprio Foundation

Conner Everts, Facilitator
Environmental Water Caucus

Sammy Nunez, Executive Director
Fathers & Families of San Joaquin

Crystal Sanders, Director
Fish Revolution

Dan Bacher, Editor
Fish Sniffer

Brenna Norton, Senior Organizer
Food & Water Watch

Susan Schwartz, President
Friends of Five Creeks

Eric Wesselman, Executive Director
Friends of the River

Cindy Charles, Conservation Chairperson
Golden West Women Flyfishers

Robert Abraham, President
Grizzly Peak Fly Fishers

Roger Mammon, President
Lower Sherman Island Duck Hunters
Association

Michael Martin, Director
Merced River Conservation Committee

Anna Swenson, Action Committee
Member
North Delta CARES

Michael Warburton, Executive Director
Public Trust Alliance

Barbara Barrigan-Parrilla, Executive
Director
Restore the Delta

Crystal Sanders, Boardmember
SalmonAID Foundation

Larry Collins, President
San Francisco Crab Boat Owners
Association

Kristina Pappas, President
San Francisco League of Conservation
Voters

Amanda Nelson, Executive Director
Foothill Conservancy

Susan Levenson, Watershed Awareness
Coordinator
Friends of San Leandro Creek

Mitch Avalon, President
Friends of the San Francisco Estuary

Doug Wilhoit, Chief Executive Officer
Greater Stockton Chamber of Commerce

Dillon Delvo, Executive Director
Little Manila Foundation

Barbara Salzman, President
Marin Audubon Society

Doug Obegi, Senior Attorney
Natural Resources Defense Council

Jonas Minton, Senior Water Policy
Advisor
Planning and Conservation League

Hector Lara, Executive Director
Reinvent South Stockton Coalition

Preseton Brown, Director of Watershed
Conservation
Salmon Protection and Watershed
Network

M. Benjamin Eichenberg, Staff Attorney
San Francisco Baykeeper

Stuart Gross, Director
San Francisco Herring Association

Nicholas Hatten, Executive Director
San Joaquin Pride Center

Morning Star Gali, California Tribal
Water Organizer
Save California Salmon

Joseph Bogaard, Executive Director
Save Our Wild Salmon

Jan McCleery, President
Save the California Delta Alliance

Kyle Jones, Policy Advocate
Sierra Club California

Marty McDonnell, Owner
Sierra Mac River Trips

Conner Everts, Executive Director
Southern California Watershed Alliance

Margot Cunningham, Head
Tending the Ancient Shoreline Hill

Gary Bobker, Program Director
The Bay Institute

David Boucher, President
Tuolumne River Conservancy, Inc.

Peter Drekmeier, Policy Director
Tuolumne River Trust

Dr. Elizabeth Dougherty, Director
Wholly H2O

Gary Mulcahy, Government Liaison
Winnemen Wintu Tribe

From: Darcie Luce <friendsofsfestuary@gmail.com>
Sent: Thursday, July 26, 2018 8:02 AM
To: LSJR-SD-Comments@waterboards.ca.gov; WQCP1Comments
Cc: rosenfield@bay.org; nora@kovalesskipr.com
Subject: Comment Letter – Revisions to Proposed Bay-Delta Plan Amendments
Attachments: NGO community sign-on WQCP 7.26.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Hello,

Please find attached a comment letter from a coalition of 58 organizations and businesses on the proposed Bay-Delta Plan amendments. Thank you for the opportunity to comment.

Darcie Luce

Friends of the San Francisco Estuary

www.friendsofsfestuary.org

friendsofsfestuary@gmail.com

(510) 282-1254 - cell