



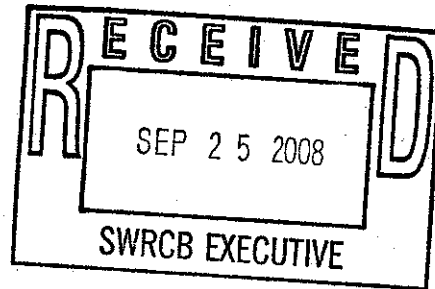
# CALIFORNIA FARM BUREAU FEDERATION

NATURAL RESOURCES AND ENVIRONMENTAL DIVISION

2300 RIVER PLAZA DRIVE, SACRAMENTO, CA 95833-3293 · PHONE (916) 561-5665 · FAX (916) 561-5691

Public Comment  
Bay-Delta Fact Finding Issues  
Deadline: 9/29/08 by 5:00 p.m.

September 25, 2008



*Via First-Class Mail & Email*  
[commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)

Tam M. Doduc, Chair  
c/o Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
1001 I Street, 24<sup>th</sup> Floor  
Sacramento, CA 95814

**Re: *Response to Solicitation for Input Relating to Fact Findings and Evidentiary Hearing on Ecosystem, Water Quality and Flow Issues in the Bay-Delta***

Dear Chairwoman Doduc and Members of the Board:

The California Farm Bureau Federation ("Farm Bureau") is a non-governmental, non-profit, voluntary membership California corporation whose purpose is to protect and promote agricultural interests throughout the State of California and to find solutions to the problems of the farm, the farm home, and the rural community. Farm Bureau is California's largest farm organization, comprised of 53 counties. Farm Bureau currently represents approximately 91,000 members in 56 counties. Farm Bureau strives to protect and improve the ability of farmers and ranchers engaged in production agriculture to provide a reliable supply of food and fiber through responsible stewardship of California's resources.

Farm Bureau submitted comments on the scope and contents of the State Water Resources Control Board's June 2008 Draft Strategic Workplan for the Bay-Delta on July 9, 2008. Farm Bureau appreciates the opportunity to further comment on the Bay-Delta ecosystem and its associated water quality and flow issues, and respectfully requests consideration of the following upon the rendering of any findings of fact.

Farm Bureau recommends the following changes and additions to the State Board's list of proposed topics:

1. **Change / clarify the topic "Biological benefits (if any) of fish screens in the legally defined Delta" as follows:**

Biological benefits (if any) of fish screens in the legally defined Delta and impacts (if any) of the different classes of diversions that might be screened.

**Reason for Recommendation:** The topic, as currently worded, refers only to the potential *benefits* of fish screens. To determine whether there is a benefit, it will be necessary to consider, as well, the magnitude of the impact or impacts the proposed remedy purports to address. Also, diversions throughout the Delta and any impacts of these diversions would likely vary widely by location, size, timing of diversions, etc. This type of specificity is necessary to meaningfully answer the question.

2. Change / clarify the topic "Biological impacts of ammonia discharges" as follows:

Biological impacts of ammonia discharges including both direct impacts to organisms and indirect impacts to their prey, the foodweb, habitats and water quality.

**Reason for Recommendation:** In addition to possible direct impacts to species, it is hypothesized that impacts to species may include indirect impacts to the species' prey, to the foodweb, habitats and water quality (as with *Microcystis* and algal blooms). The State Board's inquiry and statement of the issue should capture this nuance.

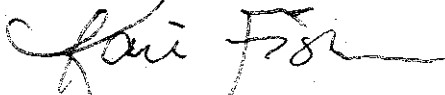
3. In addition to the current topics, Farm Bureau recommends that the State Board hear evidence and data concerning the potential adverse biological impacts of:

- a. invasive species (both animals and plants);
- b. water temperature;
- c. predation;
- d. alterations to the structure and composition of the foodweb, limitations on productivity or food production, feeding efficiency and food availability during key life stages of species;
- e. physical properties of the water column, including turbidity; and
- f. exogenous factors, including climate change, ocean conditions, and drought cycles.

**Reason for Recommendation:** All of these factors have been hypothesized to significantly impact beneficial uses and public trust values in the Bay-Delta, yet none are currently included among the Board's list of proposed topics. To properly contextualize the issues, all of the factors must be taken into account.

Thank you for the opportunity to provide comments. We look forward to further involvement and discussion with the State Board on the development of the Bay-Delta Strategic Workplan.

Sincerely,



Kari E. Fisher  
Associate Counsel



Justin E. Fredrickson  
Environmental Policy Analyst

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