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To: <dirvin@swrcb.ca.gov>
Date: 11/13/04 1:17PM
Subject: Comments of California Striped Bass Association

Debbie Irvin,
Clerk to the Board
State Water Resources Control Board
P.O. Box 100, Sacramento, CA 95812

The California Striped Bass Association (CSBA) is pleased to submit the attached review of the adequacy of the Bay-Delta Standards on striped bass that includes reviews of delta smelt and San Joaquin basin salmon. CSBA has petitioned the Directors of the Department of Water Resources and the Department of Fish and Game to renegotiate the 1986 Two-Agency Agreement on the operation of the State Water Project (often referred to as the Four Pumps Agreement). Our review, comments, and recommendations also apply the State Water Resources Control Board review of the 1995 Water Quality Control Plan.

Specifically our review pertains directly to the following issues identified in your staff report:

- a.. Delta Outflow Objectives
- b.. Delta Export Limits
- c.. San Joaquin Flow Objectives
- d.. Delta Cross Channel Gates Closure Objectives
- e.. Salmon Protection Objectives

Our primary recommendation for the protections of delta smelt, San Joaquin salmon, and striped bass relative to the above issues are the following:

- 1.. The Delta Cross Channel should not be closed in the spring unless Delta Outflow exceeds 12,000 cfs and such closure would not result in reverse flows in the lower San Joaquin River below the mouth of Old River.
- 2.. Export limits in the 1978 Plan (D-1485) and the 1982 Two-Agency Agreement should be reconsidered to protect fish populations.
- 3.. Export and Outflow limits should be set on at least a weekly time scale, not existing monthly averages.
- 4.. Operation limits on the additional four pumps of the State Project should be directly considered by the Board as in past plans.
- 5.. No additional exports should be allowed from the Delta unless fish protection facilities at the state and federal export facilities in the south Delta are significantly upgraded.

We also petition the Board to include as an issue a striped bass protection objective, which had been important in previous water quality control plans and has been overlooked in the 1995 Plan and subsequent reviews of that plan.

Sincerely,

California Striped Bass Association Board of Directors

Whitey Rasmussen, President
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