



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
Sacramento Area Office
650 Capitol Mall, Suite 8-300
Sacramento, California 95814-4706

November 6, 2006

Tam M. Doduc
Chair, State Water Resources Control Board
P.O. Box 100
Sacramento, California 95812



Dear Mr. Doduc:

This letter provides comments from NOAA's National Marine Fisheries Service (NMFS) concerning the draft amended 1995 Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary (WQCP). NMFS was actively involved in the periodic review of the WQCP, providing 18 separate letters or sources of information (see draft Referenced Documents, Appendix 2 to the 2006 Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary, September 2006. State Water Resources Control Board) regarding topics related to Water Quality Objectives for Fish and Wildlife Beneficial Uses. For detailed information concerning NMFS authorities and jurisdiction related to the periodic review, we refer you to previous exhibits submitted by NMFS during the periodic review (NOAA-01, and 14).

Our general comments related to the draft amended WQCP follow:

- Southern Distinct Population Segment of North American Green Sturgeon. NMFS informed you of the proposed listing of the Southern Distinct Population Segment (DPS) of North American green sturgeon during the periodic review and in a submitted letter (NOAA-01). Since this time, NMFS listed the Southern DPS as threatened under the Endangered Species Act (71 FR 17757, April 7, 2006) and are currently in the process of developing take prohibitions. NMFS was prompted to list the species based on a severely reduced range (spawning populations now limited to the Sacramento River only), and the persistence of severe threats impacting the population. Key threats include the presence of impassible barriers such as Keswick and Shasta dams, migration barriers, insufficient instream flows, water diversions, and increased water temperatures. NMFS is available to provide the State Water Resources Control Board (Board) with additional information related to this species if necessary.
- Salmon Doubling Narrative. NMFS is available to provide the Board with updated status information related to Federally listed species under our jurisdiction. We also understand the Board's desire to keep the salmon narrative protection objective consistent with the Federal Central Valley Project Improvement Act. The Federal natural production goals for anadromous fish (DOI-16C) specify production targets for all races of Chinook



salmon, and for steelhead, American shad, white sturgeon, and green sturgeon. NMFS recommends including Federally listed green sturgeon and steelhead in the narrative objective. The draft Plan Amendment Report indicates the expansion of the objective to include steelhead trout (page 35) is not recommended due to lack of information regarding the population abundance, however, the existing salmon narrative is primarily qualitative, and relies on the Federal doubling effort to determine Chinook doubling. It would be appropriate to also rely on the Federal doubling effort to determine doubling goals of steelhead and sturgeon. In addition, the absence of population abundance information should be indicated and population sampling measures should be recommended in the WQCP, in a similar manner to required sampling for water quality.

- February-April 14 and May 16-June San Joaquin River Flow and 31-day April 15-May 15 San Joaquin River Pulse Flow Objectives. In light of the decline of Chinook salmon and Central Valley steelhead in the San Joaquin basin (DFG-10, NOAA-17), and the additional scientific information indicating the positive relationship between Vernalis flow and adult escapement (DFG-09, DFG-10, NOAA-17), NMFS recommends including these two objectives on the emerging issues list. We believe the evidence relating flow to juvenile salmon survival and resultant escapement and production in the San Joaquin basin provides sufficient evidence warranting revisions to these objectives. We are apprised of California Department of Fish and Game's recent modeling work regarding this topic.

We appreciate the opportunity to provide the Board with comments related to draft WQCP and look forward to future workshops and topics. If you have any questions regarding this correspondence or if NMFS can provide further assistance, please contact Mr. Jeff McLain in our Sacramento Area Office, 650 Capitol Mall, Suite 8-300, Sacramento, CA 95814. Mr. McLain may be reached by telephone at (916) 930-5648, or by Fax at (916) 930-3629.

Sincerely,



Michael E. Aceituno
Supervisor, Sacramento Area Office

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