

ORIGINAL



November 6, 2006

Via Facsimile and U.S. Mail

Re: Comments on Draft Water Quality Control Plan for San Francisco Bay /Sacramento-San Joaquin Delta Estuary and Draft Plan Amendment Report, Appendix 1 to the 2006 Water Quality Control Plan for San Francisco Bay/Sacramento San Joaquin Delta Estuary.

Dear Chairman Doduc and Honorable Board Members:

Suisun Resource Conservation District (SRCD) is a conservation district created by special legislation (Public Resources Code §§ 9962 et seq.), and has the primary responsibility for regulating and improving water management practices on privately owned lands within Suisun Marsh. SRCD actively participated in the development of the 1995 Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary (1995 Plan), and is party to the Suisun Marsh Preservation Agreement (SMPA) and related agreements. SRCD is also a principal agency in the formation of the Habitat Management, Preservation and Restoration Plan for Suisun Marsh (Suisun Marsh Plan).

This letter provides SRCD's comments on the Draft 2006 Water Quality Control Plan for San Francisco Bay/Sacramento-San Joaquin Delta Estuary (Draft 2006 Plan) and its companion document Draft Plan Amendment Report, Appendix 1 to the 2006 Water Quality Control Plan for San Francisco Bay/Sacramento-San Joaquin Delta Estuary (Appendix).

1. SRCD supports the SWRCB's intention to use the Suisun Marsh Plan and its associated environmental documents to address the narrative objective for Brackish Tidal Marsh in Suisun Marsh, as appropriate. However, page 33, Section B.4 implies that the Suisun Marsh Charter Group (SMCG) was initiated as a result of the Suisun Ecological Workgroup effort being unable to recommend a single numeric standard to replace the narrative standard. This characterization of the reasons for forming the SMCG is inaccurate, and the descriptions on page 44, Section E.4 and on page 72 of the Appendix provide more accurate descriptions of SMCG's formation. SRCD requests that the SWRCB amend the Appendix to include only the more accurate description of SMCG's formation.

2. SRCD supports the course of action described on page 33 of the Draft 2006 Plan regarding "Numeric Objectives for Suisun Marsh." In particular, SRCD supports the approach of allowing until

Directors

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District Biologist
Kristin Garrison
Biologist
Paul Garrison III
Water Manager
Vesta Thompson
Account Clerk
Mark Story
Lower Joice Island

**SUISUN RESOURCE
CONSERVATION DISTRICT**
2544 Grizzly Island Road
Suisun, CA 94585-9539
(707) 425-9302
(707) 425-4402 FAX
src.d@direcway.com

2015 to implement the suite of actions necessary to achieve "equivalent or better" protection to the water quality of the Suisun Marsh as measured at the S-35 and S-97 stations. Setting a deadline of 2015 allows sufficient time for implementation of the necessary actions, but also provides an added incentive to perform these actions in a timely manner. Many of the actions to address Suisun Marsh water quality have already been planned or committed to in the Revised SMPA and related agreements. Key actions remain outstanding, however, SRCD and the other parties are committed to their inclusion in the final Suisun Marsh Plan. Again, the 2015 compliance date provides a deadline that will encourage all parties to proceed with planning and implementing the Suisun Marsh Plan.

3. The Draft 2006 Plan proposes changes to Delta outflow. Existing objectives, such as the net Delta outflow index found in the 1995 Plan, provide ancillary benefits for the Suisun Marsh and were, in part, one reason for changes incorporated in the Revised SMPA. SRCD requests, therefore, that any proposed changes to Delta outflow objectives should consider the potential effects on Suisun Marsh.

4. There is an error in Item 4, page 44, of the Draft 2006 Plan. Item 4 suggests that a complete set of environmental compliance documents for the Suisun Marsh Plan has been issued. This is incorrect. To date, only the scoping report has been issued. The parties are now preparing the Programmatic Environmental Impact Statement/Programmatic Environmental Impact Report for the Suisun Marsh Plan.

5. On page 72 of the Appendix, the Principal Agencies in the SMCG are listed as two conflicting footnotes, 10 and 11. The SMCG includes an extensive array of agencies; all of which have interests (regulatory or other) in Suisun Marsh. An accurate list of the Principal Agencies is: SRCD, Department of Fish and Game, Department of Water Resources, U.S. Bureau of Reclamation, California Bay Delta Authority, National Marine Fisheries Service, and U.S. Fish and Wildlife Service.

SRCD appreciates your consideration of these comments. Please do not hesitate to contact me if you have any questions.

Yours Very Truly,



Steven Chappell
Executive Director