

The Bay Institute

Protecting and Restoring San Francisco Bay from the Sierra to the Sea

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October 27, 2004

Arthur G. Baggett, Jr., Chair
State Water Resources Control Board
P. O. Box 100
Sacramento, CA 95812-0100

RE: BAY-DELTA PLAN PERIODIC REVIEW

Dear Mr. Baggett,

This letter is submitted as the opening comments of the Bay Institute regarding Topics 2 (Delta Cross Channel gates closure) and 3 (Salmon protection objective) for the State Water Resources Control Board's (SWRCB) public workshops to consider potential amendments or revisions of the Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary (Bay-Delta Plan).

We recommend that the SWRCB consider the following amendments and revisions to the Bay-Delta Plan:

1. Allow up to 15 additional days of closure of the Delta Cross Channel gates between November 1 and January 31.
2. Adopt quantitative salmon doubling objectives for each Chinook salmon run, each basin (e.g., Sacramento and San Joaquin), and each salmon-producing stream.
3. Quantify the narrative salmon doubling objective in terms of "in-river escapement" measured as multi-year average return ratios for each run, basin and stream.

In addition, the SWRCB should consider the following actions to support attainment of the narrative salmon protection objective:

4. Revise permit requirements for operation of Red Bluff Diversion Dam.
5. Review and revise the current minimum flow requirements on the salmon-producing tributaries of the Sacramento and San Joaquin Rivers.
6. Enforce compliance with the dissolved oxygen objective, and require the release of additional flows during periods when this objective is not being met and salmonids are present.