



**Mount Diablo Audubon Society**

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March 17, 2017



**Via Email**

Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
1001 I Street, 24th Floor  
Sacramento, CA 95814-0100

**RE: Comment Letter – 2016 Bay-Delta Plan Amendment & SED**

To the Board:

Mt. Diablo Audubon Society, a chapter of The National Audubon Society, is a 501(c)(3) non-profit organization dedicated to protecting the well-being of our community's people, birds, other wildlife and habitat through conservation, education and advocacy.

We are based in Contra Costa County, which borders the Sacramento-San Joaquin Delta, Suisun Marsh and San Francisco Bay, regions that will be affected by the proposed 2016 Bay-Delta Plan Amendment. Our members are active in communities throughout Contra Costa County, working with schools, local governments, and other civic organizations to educate and engage youth and adults in educational, recreational, scientific, and habitat restoration activities.

We appreciate the opportunity to submit the following comments on the 2016 Bay-Delta Plan Amendment & SED (Substitute Environmental Document):

1. We are concerned that, on average, only one-third of all water from the rivers of the San Joaquin basin can currently reach the San Francisco Bay-Delta Estuary (Bay-Delta) due to water diversions.<sup>1</sup> Excessive water diversions from the San Joaquin river basin threaten the water quality of the Bay-Delta which supports vital habitat for birds and fish (including native salmon), thousands of jobs, Delta farming and fishing communities, recreational opportunities and drinking water for millions of Californians.

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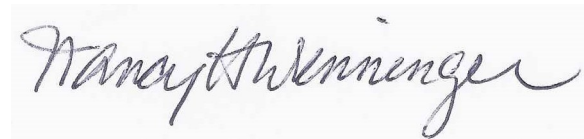
<sup>1</sup> Natural Resources Defense Council (NRDC), [Help Protect California's Waterways](https://secure.nrdconline.org/site/Advocacy?cmd=display&page=UserAction&id=4200), <https://secure.nrdconline.org/site/Advocacy?cmd=display&page=UserAction&id=4200>

2. We urge the State Water Resources Control Board (Board) to adopt stronger water quality standards that increase water flows from the San Joaquin basin to the Bay-Delta. Substantial evidence demonstrates that approximately 50% - 60% unimpaired flow is the minimum necessary to reestablish and sustain fish and wildlife beneficial uses.<sup>2</sup>
3. We urge the Board to strengthen, not weaken, salinity standards for the South Delta.
4. The health of the Bay-Delta is vitally important to California's birds:
  - a. The Bay-Delta is the largest estuary on the Pacific coast and provides critically important habitat for migratory birds, supporting more than 200 different species;
  - b. Many birds have declined dramatically. Now at least 22 bird species from the Bay-Delta are listed as endangered, threatened, or of special concern – along with many others whose populations are dramatically reduced;
  - c. Up to 50% of the Pacific Flyway's migrating or wintering waterfowl (as much as 20% of the North American population) depend on habitats in the Bay-Delta; and
  - d. Audubon California has identified 18 Important Bird Areas in the Bay-Delta region, which provide essential habitat for breeding, wintering, and migrating birds.<sup>3</sup>

Increasing flows from the San Joaquin river basin into the Bay-Delta ecosystem will be particularly beneficial to avian wildlife in the Bay-Delta.

Thank you for your consideration.

Sincerely,



Nancy Wenninger  
Conservation Chair  
Mt. Diablo Audubon Society

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<sup>2</sup> California Department of Fish & Wildlife, Comments regarding the Substitute Environmental Document in Support of Potential Changes to the Water Quality Control Plan for the San Francisco Bay –Sacramento / San Joaquin Delta Estuary: San Joaquin River Flows and Southern Delta Water Quality (March 28, 2013), 10 available at [http://www.waterboards.ca.gov/waterrights/water\\_issues/programs/hearings/baydelta\\_pdsed/docs/comments032913/scott\\_cantrell.pdf](http://www.waterboards.ca.gov/waterrights/water_issues/programs/hearings/baydelta_pdsed/docs/comments032913/scott_cantrell.pdf)

<sup>3</sup> <http://ca.audubon.org/protecting-bird-habitat-bay-delta-region>