



## Marin Audubon Society

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March 16, 2017

Felicia Marcus, Chair  
State Water Resources Control Board  
1001 I Street, 24 floor  
Sacramento, CA 95814-

RE: Proposed San Joaquin River Inflow requirements to Restore Fisheries and Water Quality in the San Francisco Bay-Delta Estuary

Dear Chairwoman Marcus and Board Members,

Thank you for the opportunity to submit comments on the Proposed Inflow requirements for the proposed Phase 1 San Francisco Estuary - Joaquin River and South Delta Flows. Marin Audubon Society's primary interest is in ensuring that fresh water flows are sufficiently restored to support sustainable populations of salmonids and other food web species dependent on the San Francisco Estuary. Fresh water flows to the estuary and ocean have been declining for 60 years causing significant degradation of the entire ecosystem and species that depend on it. What happens in this Phase 1 will not only impact the San Joaquin River system but the entire estuary and the ocean ecosystems. The current proposal will not provide adequate protections for the estuary's fish, other natural resources and water quality. Stopping and reversing the decline of the estuary resources is critical.

All four federal and state agencies with responsibility for fisheries resources have "identified the absence of sufficient flows at critical times as a primary driver of population declines." The proposed 40% UF does not achieve CDFW flow recommendations to protect fall-run salmon or the USFWS recommended flow targets to meet protect salmon. Many scientific studies have indicate that flows higher than 40% of UF are needed to support ecosystem species.

The State Board must exercise its responsibility to protect the estuary resources. As recommended by responsible scientific sources:

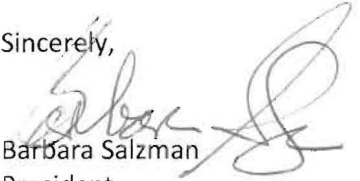
- At least 50-60% of the unimpaired flow must be dedicated to the Estuary. The CDFW has commented that "Substantial scientific evidence demonstrates that 50-60%
- Unimpaired flow to the Estuary is "the minimum necessary to reestablish and sustain fish and wildlife beneficial uses."
- Narrative objectives should "protect fish and wildlife beneficial uses in all months" of the year.
- Proposed approach is to identify a "block of water" with adaptive management decisions made by a working group consisting of biologists, water managers, interested stakeholders, and water users. This sounds like an invitation for inefficiency and failure. Members with knowledge about and commitment to protecting natural resources have the potential to be greatly outnumbered by users with other interests. Decisions must be based on science to ensure survival of the estuary's species.

- Specific criteria should be identified that would trigger management actions regarding flows.
- A comprehensive monitoring and assessment framework to determine the effectiveness of the new water quality standards as recommended by the USEPA

With one-third or less of the unimpaired flow now reaching the estuary, more fresh water flowing through the estuary is clearly needed to protect its beneficial uses. The fate of the estuary and its resources rests with you. Do not let the estuary collapse.

Thank you for considering the interest of the estuary and the species that depend on it.

Sincerely,



Barbara Salzman  
President