



Central Sierra Environmental Resource Center

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Visit our website at: www.cserc.org or contact us at: johnb@cserc.org

July 20, 2018

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

Re: Comments regarding proposed changes to the State Water Resources Control Board's Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary

Dear Ms. Townsend,

This letter is to provide our Center's strongest possible support for the proposed changes to the State Water Resources Control Board's Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary. Our non-profit organization, the Central Sierra Environmental Resource Center (CSERC) strongly endorses the Water Board's plan to significantly increase minimum February-June river flows in the Tuolumne, Merced and Stanislaus Rivers.

As the Water Board is fully aware, studies by State agencies have shown that the current water demands on the three rivers have left salmon, steelhead, and other species with too little water (and too warm water temperatures) for the threatened fish to sustain populations over the long term. Not long ago, tens of thousands of salmon used to migrate up the Tuolumne River to spawn. In one recent year, only a few hundred salmon managed to return from the ocean. Steelhead are even more at risk, with very few surviving in the river.

Increasing the flows to 40% of unimpaired flow levels during February through June will be beneficial for the spring salmonid migration. In addition, increased flows will lower water temperatures, further benefiting salmonid populations. California salmon populations have been declining for more than a century and a half, in part due to over fishing, but more recently due to a decrease in quantity and quality of water in rivers throughout California. We feel the water quality objectives in Table 3 provide protection of fish and wildlife.

CSERC feels it is positive that the Water Board is assigning responsibilities to water right holders because the parameters to be controlled are primarily impacted by flows and diversions. We support that the USCOE, USBR, DFW, USFWS, FERC licensees, water districts and local landowners will undertake riparian and floodplain habitat corridor restoration.

It is also critical for salmonid populations that the water right holders should maintain an adequate supply of coarse sediment for salmonid spawning and rearing habitat. Salmonid spawning nests require coarse sediment to ensure adequate flow and oxygen to the eggs during incubation. Ground disturbing activities should be minimized in floodplain areas to avoid siltation. The plan to increase habitat complexity is also beneficial, because large woody debris creates cover for salmonids. CSERC supports an expansion of fish screening to decrease mortality and the improvement of fish passage above dams. Cold water pool management and the use selective withdrawal structures such as temperature control curtains or shutters are other positive aspects to the Water Quality Control Plan.

Overall, CSERC provides our extremely high support for the Water Board taking on so many water interest adversaries who are entrenched in advocating for the status quo. We gratefully support the changes made in the State Water Resources Control Board's Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary. We are highly in favor of increased flows and feel that making this change will greatly increase habitat quality in all three rivers and the Sacramento-San Joaquin Delta Estuary.

Thank you for your consideration of our comments.

A handwritten signature in black ink that reads "John Buckley". The signature is written in a cursive, flowing style.

John Buckley, Executive Director

From: Liz Gregg <lizg@cserc.org>
Sent: Friday, July 20, 2018 1:15 PM
To: LSJR-SD-Comments@waterboards.ca.gov; WQCP1Comments
Subject: Comment Letter – Revisions to Proposed Bay-Delta Plan Amendments
Attachments: Comments on state water board revisions.doc

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Please find attached comments from the Central Sierra Environmental Resource Center regarding the proposed changes to the Bay-Delta Plan.

Thank you,
Liz Gregg

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Liz Gregg
Associate Director/Botanist
Central Sierra Environmental Resource Center
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