

Department of Fish and Game Statement

Workshop on South Delta Salinity Objectives

January 16, 2007

The topic of water quality objectives for salinity in the San Joaquin River and the Delta is of interest to the DFG primarily because the water management strategies used to comply with salinity objectives in this region may affect the ability to protect beneficial uses of water for fish and wildlife.

The DFG urges that any approach to regulating salinity take into account other water quality and flow objectives related to protecting other beneficial uses, including fish and wildlife. Most of the questions posed by your staff at the meeting last week are outside our area of expertise. Our comments relate primarily to anadromous fish within the watershed and a group of pelagic fish found in the Bay-Delta estuary.

The particular values of the salinity objectives in the southern Delta in or near the range of the prior and current objectives likely are not critical for anadromous fish. On the other hand, which parties share responsibility for meeting those objectives and the water management actions that are employed to achieve compliance can have implications for the production of salmon and

steelhead populations in the San Joaquin tributaries. The DFG presented evidence in the recent periodic review indicating that the amount and timing of flow in the tributaries and the San Joaquin River flowing into the Delta, particularly in the spring months, is not sufficient to protect the beneficial use for anadromous fish and is constraining production of salmon in the basin. This will continue to be a high priority issue for the DFG. Your plan to conduct a workshop on this topic later this year indicates the topic is important for the SWRCB as well. We look forward to presenting more information on the importance of flow for salmon production at that time.

It is unclear if or how the salinity regime in the Delta in recent years may have contributed to the recent decline in abundance of numerous pelagic organisms, including the delta smelt, striped bass, and others. Investigations by the Interagency Ecological Program (IEP) into the causes of this decline are ongoing; a synthesis of results is anticipated late in 2007. The SWRCB intends to hold workshops to receive updates on any findings from the POD investigations. Conclusions drawn from this work will aid us in evaluating whether or not salinity is implicated in the decline and help the SWRCB determine whether changes to salinity objectives in the Delta should be considered. If Delta salinity were implicated, then a second question is whether salinity at the southern delta locations is relevant. At this point it is premature to try to answer either question.

Given the circumstances with respect to water rights in the San Joaquin basin and how available water is managed and used, meeting all the needs that have been identified is a serious challenge. Competition for limited supplies increases each year. This competition has led to proposals for solutions that involve new facilities, plumbing, or water routing (e.g. barriers, recirculation). Such approaches may solve some problems but can potentially create others. Careful evaluation of the full range of consequences for any particular remedy is warranted before any solution is accepted.

In summary, we recognize that the topic of southern Delta salinity objectives is complex and that the differing interests of many parties are involved. From our perspective, it is not the specific salinity objectives but rather who is responsible for compliance and the manner in which compliance is achieved that has the greatest implications for fish and wildlife. Much of the information that may be relevant to the salinity management consequences for fish and wildlife will be presented in subsequent workshops the Board will conduct later this year on San Joaquin River flow issues and the Pelagic Organism Decline. We look forward to participating in those workshops.

