

Jeanine Townsend
Clerk of the Board
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95814-0100
Re: Comments from the North Coast Rivers Alliance on the Bay Delta Plan SED



Dear Ms. Townsend,

I write representing the North Coast Rivers Alliance. Our primary work is to protect, preserve and restore salmon fisheries from the Carmel River to the Oregon border although we monitor all rivers in the Western and mid-west portions of the United States and act when necessary against threats from all sources. Up to one half of the Trinity River, a key North Coast river for salmon spawning and rearing streams, is diverted over to the Sacramento where it is shipped down to the Sacramento-San Joaquin Bay Delta and then points South

The Bay-Delta forms the West Coast's largest estuary, providing habitat for more than 500 species of wildlife. It serves as a major stopover for the Pacific Flyway and as a migration path for salmon, steelhead and sturgeon traveling to and from their home streams to the Pacific Ocean.

Salmon are a keystone species, providing food for other animals and transporting nutrients from the ocean to upland habitats. More than 100 species depend on salmon.

The commercial salmon fishery in California is on the brink. The salmon population was so low in 2008 and 2009 that the commercial fishing season had to be cancelled.

Up to 6.8 million acre-feet (2.2 trillion gallons) of water per year are pumped from the southern Delta for agriculture and urban uses.

At least half of the San Joaquin River's natural flow should reach the Delta during the first six months of each year. Flows in the summer and fall should be sufficient to maintain fish and wildlife, water quality and recreational opportunities.

Historically, populations of spawning salmon may have exceeded 400,000 fish in the San Joaquin River Basin, but in many recent years that figure has plummeted to just a few thousand fish.

The Bay Delta Water Quality Control Plan, Phase I, was initiated in 2009 to update flow objectives for the San Joaquin River and its major tributaries to protect fish and wildlife, and to update salinity objectives to protect agriculture in the southern Delta.

In 2010 the State Water Board issued a report titled *Development of Flow Criteria for the Sacramento-San Joaquin Delta Ecosystem* that determined that approximately 60% of unimpaired flow between February and June would be fully protective of fish and wildlife in the lower San Joaquin River and its three major tributaries.

The draft environmental impact document for Phase I of the Plan that analyzed a range of unimpaired flows

in the San Joaquin River and its tributaries from 20% to 60%. The proposal requiring only 35% of unimpaired flows for the Merced, Tuolumne and Stanislaus Rivers from February through June, and no additional flows in the July through January season will be one of the last nails in the coffin of the Sacramento-San Joaquin Bay Delta's fishery.

The direction the Bay Delta Plan, the SED and the proposed Peripheral Tunnels with its will finish off what is left of our decimated salmon fishery.

You have heard the stories of spawning salmon so thick in small streams that you could walk on their backs. Well, I was there. I was a witness to that phenomena of nature in streams and creeks in the forties in both Marin and Sonoma counties.

I have personally been involved in the statewide fight to save salmon since 1966 when I joined fishers from all over California to stop the dam at Dos Rios on the Eel River. I served nine years on the original Prop 20 Coastal Commission (1972-1981), the first of the eighty four commissioners appointed where I focused on salmon issues.

Thank you,

Frank Egger

President, North Coast Rivers Alliance

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