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I have reviewed the current Board Proposal and Fact Sheet, and encourage the Board to provide at least 50% of the San Joaquin River's natural flow to 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. As your fact sheet states, "a higher and more variable flow regime is needed in salmon bearing tributaries to the SJR to protect fish migrating through the Delta."

Low river flows impede fish passage, concentrate pollutants, raise water temperatures, decrease dissolved oxygen, and eliminate migratory clues. 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 less than 2,000 fish. 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 almost dead. The salmon population was so low in 2008 and 2009 that the commercial fishing season had to be cancelled.

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. Diversion of great amounts of water from this estuary harms human, fish and bird life.

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. Your fact sheet states that "The draft SED also relies upon recent studies that conclude that current surface water salinity conditions in the southern Delta are suitable for irrigation of all agricultural crops." While it would be nice to be able to irrigate "all" agricultural crops, this watershed is overdrawn by several generations of over-diversion for both agricultural and urban use. We no longer have the option to grow "all" agricultural crops. Think of the anadromous fish as the first crop to go, among many. I suggest that an unimpaired flow of 50% is necessary and achievable. It is likely that water prices for many users will rise in this watershed, as throughout most of the arid southwestern United States.

Increased water prices are a natural consequence of scarcity. Killing off our salmon fisheries by artificially diverting excess streamflows away from streams has great economic and environmental consequences also. I still see plenty of sidewalks being watered, so perhaps water is still too cheap. Rather than relying on my observations of sidewalks being over-watered, you might consider the well-established rate of preventable water loss in our distribution system, which many studies put at about 5%. Wow, the streams really could use that water. Through better management of snowmelt, water efficient irrigation practices, and replacing lower-value, water-intensive crops with higher-value, water-efficient crops, we could grow more food with less water.

Thank you for the opportunity to comment.

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