

March 20<sup>th</sup>, 2013

Jeanine Townsend  
Clerk of the Board  
State Water Resources Control Board  
P.O. Box 100  
Sacramento, CA 95814-0100



Comment Letter – Bay Delta Plan SED

Dear Ms. Townsend:

I am writing to express my concerns over the debate surrounding the updating of the The Bay Delta Water Quality Control Plan and the future of the San Joaquin River Delta. According to the California Department of Fish and Wildlife, “current Delta water flows for environmental resources are not adequate to maintain, recover, or restore the functions and processes that support native Delta fish.” However, despite the State Water Board’s report entitled *Development of Flow Criteria for the Sacramento-San Joaquin Delta Ecosystem*, which 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 Substitute Environmental Document detailing Phase 1 of the Plan proposed only 35% of unimpaired flow requirements for the Merced, Tuolumne and Stanislaus Rivers. This is the wrong choice for the sustainability of the Delta.

Salmon, a keystone species of the ecosystem, provide food for other animals and transport nutrients from the ocean to upland habitats. More than 100 species depend on salmon to survive. The salmon, in turn, depend on a healthy river environment. Low river flows impede fish passage, concentrate pollutants, raise water temperatures and decrease dissolved oxygen – all of which are dangerous or fatal to migrating salmon. Additionally, the commercial salmon fishery in California is on the brink. While there used to be 10,000 commercial fishing permits, now there are less than 2,000. The salmon population was so low in 2008 and 2009 that the commercial fishing season had to be cancelled.

The San Francisco 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 traveling to and from their home streams to the Pacific Ocean. 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, drastically reducing the habitable area available to local fauna. Threatening this vibrant ecosystem would prove disastrous for the regional environment, and the ripple effect would have huge consequences.

To preserve the health of the estuary, 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. Despite the argument of the opposition, 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 - allowing the Delta to thrive without sacrificing the water usage California's farmers, fishermen, and consumers depend on.

I leave you with the words of the Delta Stewardship Council: "Minimum flows must be established for the Delta and its major tributaries as part of a comprehensive effort to address all ecosystem stressors." Please adopt the flow recommendations outlined in the State Water Board's report, *Development of Flow Criteria for the Sacramento-San Joaquin Delta Ecosystem*.

Thank you.

Sincerely,

Julia Thollaug  
P.O. Box 371018  
Montara, CA 94037