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The Board mismanaged public comment at the recent hearing; it was unfair to those supporting a balanced, intelligent approach to water management, favoring those who profit from cheap public water.

The 2010 report *Development of Flow Criteria for the Sacramento-San Joaquin Delta Ecosystem* determined that about 60% of unimpaired flow between February and June was necessary to protect fish and wildlife in the ecosystem.

In 2012, the draft environmental impact report for Phase I of the Bay Delta Plan analyzed impacts from 20% to 60% of unimpaired flow.

The Water Board is proposing 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, resulting in unmitigated, unmitigatable, and unnecessary damage to the environment to favor politically powerful vested interests.

Sound water policy based on the best science requires:

1. At least half of the San Joaquin River's natural flow must reach the Delta during the first six months of each year, and summer and fall flows must be sufficient to maintain fish and wildlife, water quality and recreational opportunities.
2. Low river flows must be prevented because they impede fish passage, concentrate pollutants, raise water temperatures, decrease dissolved oxygen, and eliminate migratory clues.
3. Salmon runs can and should be restored. Historical San Joaquin River spawning salmon in the hundreds of thousands have, in many recent years, plummeted to a few thousand.
4. Salmon should be restored for the human spirit, human food, and food for over 100 animals, from the ocean to the uplands.
5. Salmon should be restored for the economy. The commercial salmon fishery is near bankruptcy; the commercial fishing season had to be cancelled due to too few fish.

6. 60% of unimpaired flows must be required to provide habitat for more than 500 species of wildlife in the Bay and Delta.

7. The Bay and Delta must be protected as major habitat for the Pacific Flyway and for salmon, steelhead and sturgeon traveling to and from their home streams to the Pacific Ocean.

8. Diverted water can be reduced and still meet agricultural, industrial, and urban needs through better management of snowmelt, water efficient irrigation practices, replacing lower-value, water-intensive crops with higher-value, water-efficient crops, growing more food with less water, and cost-effective urban conservation programs.

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