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July 1, 2011

Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
P.O. Box 100, Sacramento, CA 95812-2000



RE: SF Bay Basin Planning Project: Addition of Unnamed Water Bodies & Beneficial Uses

Dear Ms. Townsend:

Save The Bay is writing in response to the Water Board's announcement regarding the addition of water bodies and beneficial uses to Table 2-1 of the Basin Plan ("*Existing and Potential Beneficial Uses of Water Bodies in the San Francisco Bay Region*"), including surface water bodies throughout the San Francisco Bay region, with a particular focus on the South Bay. These comments were submitted to the SF Bay Regional Water Quality Control Board on March 23, 2009, but not made part of the record nor responded to.

In order to more completely represent the existing and potential beneficial uses of water bodies in the Bay region, the Water Board should list active and retired salt ponds and their neighboring sloughs as significant water bodies in the Basin Plan. The Basin Plan emphasizes that an "important characteristic of the Estuary is the fresh, brackish, and salt water marshes around the Bay's margins. These highly complex communities are recognized as vital components of the Bay system's ecology. Most marshes around the Bay have been destroyed through filling and development. The protection, preservation, and restoration of the remaining marsh communities are essential for maintaining the ecological integrity of the Estuary." (Basin Plan, Section 2.2.3.)

We propose the addition of the following water bodies to Basin Plan Table 2-1:

1. EDEN LANDING AREA: Eden Landing/Baumberg salt ponds (including all ponds identified on the enclosed map with the letter "E") and Mt. Eden Creek, Old Alameda Creek, Alameda Creek
2. DON EDWARDS/NEWARK AREA: The Cargill salt pond complex in Don Edwards Wildlife Refuge (including all ponds identified with the letter "N" or "M"), as well as Newark Slough, Plummer Creek, Mowry Slough
3. ALVISO AREA: The Alviso salt ponds (including all ponds identified with the letter "A"), as well as Mud Slough, Coyote Creek, Artesian Slough, Guadalupe River, Guadalupe Slough, Alviso Slough, Moffat Channel, Mountain View Slough, and Stevens Creek.
4. RAVENSWOOD AREA: The Ravenswood salt ponds (including all ponds identified with the letter "R," "S" or "SF"), as well as Charleston Slough, Mayfield Slough, San Francisquito Creek, and Ravenswood Slough.



5. REDWOOD CITY AREA: Bair Island and the Redwood City salt ponds (including ponds 1-9 & 9A, 7A-7C, 8E, 8W), as well as Flood Slough, Westpoint Slough, Redwood Creek, Smith Slough, Corkscrew Slough, and Steinberger Slough.
6. NAPA AREA: The Napa-Sonoma Marsh (Ponds 1-8) and Napa Plant sites, as well as Napa Slough, South Slough, China Slough, South Slough, Devil's Slough, Mud Slough, and Dutchman Slough.

There are many existing and potential beneficial uses for these water bodies. The US Environmental Protection Agency has stated that San Francisco Bay and its adjacent waters are "critically important aquatic resources" (Jan. 2010 letter). Many of these areas are being managed as saline pond habitat for wildlife, or are undergoing restoration to tidal marsh and related wildlife habitat. For others, such management and restoration purposes are currently being planned or are possible in the future. As spelled out in the Basin Plan,

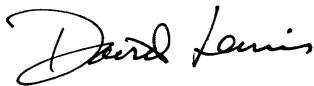
there are many potential beneficial uses of wetlands, including Wildlife Habitat (WILD); Preservation of Rare and Endangered Species (RARE); Shellfish Harvesting (SHELL); Water Contact Recreation (REC1); Noncontact Water Recreation (REC2); Ocean, Commercial, and Sport Fishing (COMM); Marine Habitat (MAR); Fish Migration (MIGR); Fish Spawning (SPAWN); and Estuarine Habitat (EST). Some of these general beneficial uses can be further described in terms of their component wetland function. For example, many wetlands that provide groundwater recharge (GWR) also provide flood control, pollution control, erosion control, and stream baseflow. Chap 2, p.9.

We suggest including other beneficial uses to this list, such as Industrial Process Supply (PRO) in active salt ponds, and Navigation (NAV) in relevant areas like Westpoint Slough, as well as other specific beneficial uses as appropriate.

In conclusion, we strongly encourage the inclusion of these salt ponds and neighboring water bodies in the Water Board's Table 2-1 in order to help ensure the comprehensive nature of the Basin Plan.

We thank you for your attention to this matter.

Sincerely,



David Lewis
Executive Director

Cc: Jan O'Hara, SF Bay Regional Water Quality Control Board