

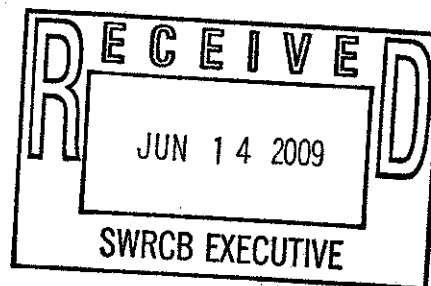
HERUM \ CRABTREE  
ATTORNEYS

Kama E. Harrigfeld  
kharrigfeld@herumcrabtree.com

June 14, 2009

VIA ELECTRONIC MAIL

Ms. Jeanine Townsend  
Clerk to the Board  
State Water Resources Control Board  
1001 I Street, 24<sup>th</sup> Floor  
Sacramento, California 95814



Re: Staff Report Periodic Review of 2006 Water Quality Control Plan

Dear Ms. Townsend:

Stockton East Water District has the following comments on the Draft Staff Report for the Periodic Review of the 2006 Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary (Draft Staff Report). The Draft Staff Report fails to include two very important issues that the District believes are adversely affecting both the health of the Bay-Delta Estuary and the overall fishery population in the Bay-Delta Estuary and tributaries to the estuary.

**Impacts of Non-Native, Imported Species on Fishery Populations**

Since implementation of the 1995 Bay-Delta Water Quality Control Plan, releasing water from upstream reservoirs has been the primary focus for increasing fishery populations. Clearly, this has not worked. The affects of the introduction of non-native species into the Bay-Delta has not been fully explored. The State Water Board should include as part of the periodic review an evaluation of the state of non-native species in the Bay-Delta and the affect of these species on native fishery population. The State Water Board must evaluate the historical and current information on the affects these species are having on the native population.

**Impacts of Ocean Conditions and Harvesting on Fishery Populations**

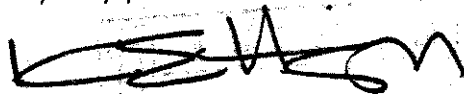
The State Water Board should include as part of the periodic review the affects ocean conditions are having on the fishery population. Moreover, a review of local and ocean harvesting practices and the resulting affect on fishery populations should be

Ms. Jeanie Townsend  
June 14, 2009  
Page 2 of 2

evaluated. The State Water Board should also review the current information available to evaluate the potential affects of climate change on ocean conditions.

We appreciate the opportunity to comment on these very important issues.

Very truly yours,



KARNA E. HARRIGFELD  
Attorney-at-Law

KEH:lac

cc: Kevin M. Kauffman