

Memorandum

Date: October 10, 2008

To: Tam Doduc, Chair
State Water Resources Control Board
1001 I Street, 25th Floor
Sacramento, CA 95812-2000

From: Donald Koch, Director
Department of Fish and Game



Subject: Comments on the Periodic Review of the Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary

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DIVISION OF WATER RESOURCES
SACRAMENTO, CALIFORNIA

The Department of Fish and Game (Department) appreciates the opportunity to provide suggestions for topics that could be considered in the amendment of the Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary (Bay-Delta Plan).

We offer the following suggestions based on our review of the Bay-Delta Plan and our working knowledge of Bay-Delta issues.

1. Water Quality: The State Water Board should consider including in the Bay-Delta Plan acute and chronic water quality objectives for ammonia. At a minimum, the Water Board should consider new water quality objectives that would protect fishery resources from the effects of excess of ammonia and other nutrients in the system. The ammonia objectives could be based on the water quality criteria developed by the U.S. Environmental Protection Agency.¹ As research is completed, results should be reviewed to determine whether water quality objectives should also be developed to address the influence of nutrients on primary productivity in the Delta.
2. San Joaquin River Water Flow Objectives: The Department supports the Water Board's continued commitment to address water flow issues in the San Joaquin basin. As discussed in the August 29, 2008 Notice of Public Workshop, San Joaquin River flow issues are included in the list of topics scheduled to be addressed in the periodic review and amendment of the Bay Delta Plan. The Department continues to consider San Joaquin River flow a major issue, supports the Water Board's commitment to address flow issues in the San Joaquin River and its tributaries, and acknowledges the direct

¹ U.S. Environmental Protection Agency. 1999. Update of Ambient Water Quality Criteria for Ammonia. Duluth, MN: Office of Water. EPA-822-R-99-014. 147 pp.

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relationship of these flows to fish and wildlife beneficial uses in the Bay-Delta Estuary.

3. Bay Delta Conservation Plan (BDCP). The Department encourages the Water Board to continue to participate in the development of the BDCP and to consider mechanisms for initiating review of the Bay-Delta Plan when the BDCP is nearing completion. By doing this the Water Board would (1) minimize duplication of effort, (2) maximize coordination between the Department and the Water Board, and (3) benefit from the actions and discussions on protecting listed species in the Delta.
4. Regional Monitoring. The Department continues to support the Water Board's efforts to develop and implement a Delta regional monitoring program.
5. Agricultural diversions. The Water Board should consider developing a more complete assessment of the numbers, impacts, and timing of impacts of agricultural diversions in the Delta.

The Department appreciates the Water Board's effort to consider our comments for topics to be addressed in the review of the Bay Delta Plan. We look forward to our continued collaboration. Should you have any questions or require clarification regarding our comments, please contact Carl Wilcox at (916) 445-1231.

cc: Board Members
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