

COMMENT LETTER - BAY DELTA PLAN SED

Public Hearing (3/20/13)
Bay-Delta Plan SED
Deadline: 3/29/13 by 12 noon

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



March 16, 2013

Dear Ms. Townsend:

I am writing you in regard to the updating of the Bay Delta Water Control Plan to meet the co-equal goals of ecosystem protection and maintaining a reliable water supply. The goal is to achieve a balanced approach that protects natural resources as well as economic interests.

In your report titled "Development of Flow Criteria for the Sacramento-San Joaquin Delta Ecosystem", you 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.

In late 2012 you released a draft environmental impact document for Phase 1 of the Plan that analyzed a range of unimpaired flows in the San Joaquin River and its tributaries from 20% to 60% of unimpaired flows. Now the Water Board is proposing requiring only 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 without an explanation of this reasoning. 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 uses.

Low river flows impede fish passage, concentrate pollutants, raise water temperatures, decrease dissolved oxygen, and eliminate migratory clues. We have seen in the past populations of spawning salmon exceed 400,000 fish in the San Joaquin River Basin, but in drought years the figure has plummeted to less than 2,000. Salmon are the keystone species, providing food for other animals, transporting nutrients from the ocean to upland habitats. More than 100 species depend on salmon including commercial salmon fishery in California. This year heralded a return of a sufficient supply after three years requiring cancelled seasons due to so few fish.

The Bay-Delta forms the West Coast's largest estuary, providing habitat for more than 500 species of wildlife. It serves as a major stop over for the Pacific Flyway and as a migration path for salmon, steelhead and sturgeon 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. Through 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.

I hope that you will consider some of these points when making your decisions for restoring the Bay-Delta and its tributaries, including the Tuolumne.

Thank you for your attention,

A handwritten signature in black ink that reads "Jone Small Manoogian".

Jone Small Manoogian
759 Maplewood Place
Palo Alto, CA 94303
jomanooogs@comcast.net