



Jeanine Townsend
Clerk of the Board
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95814-0100
RE: Comments on Bay Delta Plan SED

The Bay Delta Plan SED must require adequate flows to protect fish and wildlife in the lower San Joaquin River and its three major tributaries. 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 is not acceptable.

In 2010 the State Water Board issued a report titled *Development of Flow Criteria for the Sacramento-San Joaquin Delta Ecosystem* that 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.

At the end of 2012, the Water Board released a draft environmental impact document for Phase I 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 (what would occur if there were no storage or diversion of water upstream). **Inexplicably, 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.**

The SWRCB must reconsider the following to protect fish and wildlife:

- 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 opportunities.
- Low river flows impede fish passage, concentrate pollutants, raise water temperatures, decrease dissolved oxygen, and eliminate migratory clues.
- Historically, populations of spawning salmon may have exceeded 400,000 fish in the San Joaquin River Basin, but in many recent years that figure has plummeted to less than 2,000 fish.
- Salmon are a keystone species, providing food for other animals and transporting nutrients from the ocean to upland habitats. More than 100 species depend on salmon.
- The commercial salmon fishery in California is on the brink. The salmon population was so low in 2008 and 2009 that the commercial fishing season had to be cancelled.
- The Bay-Delta forms the West Coast's largest estuary, providing habitat for more than 500 species of wildlife. It serves as a major stopover 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.

Sincerely,

Steve Schramm
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