## Public Comment 2016 Bay-Delta Plan Amendment & SED Deadline: 3/17/17 12:00 noon

3-17-17 SWRCB Clerk

From: Chris Lish
To: commentletters

Subject: Revive our Rivers and the Bay-Delta -- Comment Letter - 2016 Bay Delta Plan Amendment & SED

**Date:** Friday, March 17, 2017 7:56:52 AM

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Jeanine Townsend, Clerk of the Board State Water Resources Control Board 1001 I Street, 24th Floor Sacramento, CA 95814-0100

Subject: Revive our Rivers and the Bay-Delta -- Comment Letter – 2016 Bay Delta Plan Amendment & SED

Dear California State Water Resources Control Board Chair Marcus,

Thank you for your efforts to revive the San Francisco Bay-Delta and the rivers that provide it with essential freshwater inflow. I urge the State Water Resources Control Board to adopt stronger water quality standards for the San Francisco Bay-Delta. The health of our rivers is extremely important to me, the twenty-five million Californians who depend on the delta for some of their drinking water, and the thousands of individuals who depend on the fishing industry for their livelihoods.

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 pathway for salmon, steelhead, and sturgeon traveling to and from their home streams to the Pacific Ocean.

On average less than 50% of the freshwater flow from the Central Valley reaches the San Francisco Bay-Delta, and in some years less than 35%. Reduced inflows shifts the size and location of the ecologically-important salinity mixing zone, affecting everything from plankton to marine mammals. Between 1975 and 2014, the natural unimpaired runoff in the watershed was only low enough to create a "supercritically dry" year once, but upstream diversions captured so much runoff during those four decades that the Bay experienced "supercritically dry" conditions in 19 years instead of just one.

As a result of insufficient water flow, populations of salmon and other native species have plummeted and water quality downstream has continuously worsened. Reduced freshwater inflow has changed the chemistry of the Delta, enabling cyanobacteria to thrive. These blue-green algae produce neurotoxins that can make people sick and kill plankton and wildlife.

Low river flows impede fish passage, concentrate pollutants, raise water temperatures, decrease dissolved oxygen, and eliminate migratory cues for fish returning to spawn. 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 just a few thousand. 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, so it's not just about salmon, it's about restoring our salmon-based ecosystem.

It's also about jobs. 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, resulting in the loss of more than 2,200 jobs and \$255 million in annual revenue.

It's also about more efficient use of irrigation water and water use by municipalities. In California, water is a public trust resource, meaning it belongs to the people of California. Water agencies have water rights, but the State can determine which beneficial uses have priority. It could be argued that food grown for Californians is a beneficial use of our water, but it's harder to make that case for exports. Agricultural exports benefit a few farmers—more often than not corporations posing as "family farmers"—at the expense of other beneficial uses. Through better management of snowmelt, water efficient irrigation technologies and practices, and replacing lower-value, water-intensive crops with higher-value, water-efficient crops, we could grow more food with less water. In the South San Joaquin Water District, a pressurized irrigation system reduced water use by 30% while increasing crop yields by 30%. In the Hetch Hetchy service area, water use decreased by 30% between 2006 and 2016 as a result of water conservation. We can accomplish great things when we all work together.

In 2010 the State Water Resources Control 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. In 2013, the California Department of Fish and Wildlife recommended higher flow standards than the State Water Resources Control Board has proposed. Flows should be sufficient to inundate floodplains, which serve as critical habitat for juvenile salmon and other fish. At least 50% of unimpaired flow on the Lower San Joaquin River and its three major tributaries -- the Tuolumne, Stanislaus and Merced Rivers—will be necessary to improve water quality and conditions for fish and wildlife. I urge you to adopt these stronger, scientifically sound standards that will increase flows to restore water quality and the once thriving salmon fishery.

The updated Bay Delta Water Quality Control Plan will likely be our last chance to restore populations of salmon, steelhead, and other aquatic organisms. Please do everything in your power to help bring our amazing estuary back to life!

Thank you for your consideration of my comments. Please do NOT add my name to your mailing list. I will learn about future developments on this issue from other sources.

Sincerely, Christopher Lish