



February 6, 2017

Jeanine Townsend, Clerk of the Board

State Water Resources Control Board

1001 I Street, 24th Floor

Sacramento, CA 95814-0100

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



RE: Amendments to Bay-Delta Water Quality Control Plan- lower San Joaquin River

Dear members of the State Water Resources Control Board (SWRCB),

On behalf of the Central Sierra Chapter of the Audubon Society (CSAS), thank you for the opportunity to respond to the Draft Substitute Environmental Document for proposed amendments to the 2006 Bay-Delta Water Quality Control Plan in regards to flow objectives for the Lower San Joaquin River and its three major tributaries, the Merced, Stanislaus and Tuolumne rivers.

We do not support the continued taking of river water at current levels and practices since it is unsustainable. We are hopeful that CA will adopt sustainable, innovative and practical problem solving initiatives that other states and countries can emulate.

Our delta is the largest estuary on the west coast and is home to over 500 species of wildlife and is a major stopover on the Pacific flyway which provides food and habitat for these birds and resident wildlife. It's difficult to perceive the slow degradation of the Delta ecosystem and our groundwater resources. However studies have now shown that we have already made mistakes in our attempts to manage society's needs. These water diversions, and incidentally land use practices, have increased water temperatures, decreased dissolved oxygen levels, concentrated pollutants and decreased floodplain habitats in the Delta.

We should not continue to over-develop our resources at the expense of ecosystems. We must maintain our ecosystems and maintain our inevitable growth and land use patterns in a resource-constrained world.

This is not a fish vs people issue. This is a once in a generation opportunity to restore the Delta and river ecosystem for everyone's benefit. Your Board's Flow Criteria Report showed that 60% of the unimpaired February through June flows is protective of fish and wildlife and studies suggest the flows should mimic the natural hydrograph. This is an indicator of a healthy ecosystem.

We therefore support Alternative 4 as it comes closest to ensuring a healthy ecosystem. We support increased pulsed flows which mimic normal runoff from these tributaries, to ensure a functional delta ecosystem that:

- **maximizes groundwater recharge**

- **improves water quality**
- **minimizes detrimental effects on resident birds and other wildlife**
- **supports migrating birds on the Pacific flyway, and**
- **minimizes other unintentional consequences of the unsustainable taking and disruption of normal water runoff and channeling in the Delta**

We believe that the data supports that the degraded ecosystem can be improved, while maintaining a strong economy and the above stated functions of the Delta ecosystem. Water conservation efforts have already shown great success on water demand with no detrimental economic impact. The CA Employment Development Department actually cited job growth increases in 2010 and 2015 in all 4 Bay Area counties despite the drought and water conservation efforts. By and large agriculture, over time, has done very well but agricultural exports benefit only a few farmers. More often corporations benefit the most, at the expense of the ecosystems and small farm operations. Agriculture is an important part of California's current and future economy. But it too should re-invest for a sustainable future which must be innovative, smart, and water-wise. Continued support of old agricultural views and land use practices in a resource constrained world are not sustainable.

Government's role should be to help protect ecosystems and other public trust resources. Consistent with that, there should be no roadblocks that deter agencies from managing and capturing water flexibly so they can maximize supplies consistent with the law and protective of ecosystems. Then government should get out of the way, monitor and maybe provide incentives for ecosystem protection. With this caveat and oversight, we believe that California farmers, other private businesses, and public entities have the knowledge and ingenuity to meet our needs using innovative ways that are sustainable such as conservation, implementation of innovative water storage and waste water management, use of alternative food sources, replacing lower value, water intensive crops with higher value, water efficient crops, implementation of efficient technologies and irrigation practices, and alternative energy supplies.

We believe in California and its ability to pave the way for a sustainable Delta ecosystem by adopting innovative and practical problem solving initiatives that other states and countries can emulate. We should not continue to over-develop our resources at the expense of the Delta's ecosystem. Strongholds such as the Delta are key to birds and other wildlife's continued success in North America. We can conserve more, restore more and have water for beneficial uses.

Please make the difficult decision to adopt Alternative 4 which provides the leadership to maintain our ecosystems and other public trust resources. Your leadership will help support the inevitable growth and land use patterns in a resource-constrained world.

Sincerely,



Walter L. Kruse

Vice President, Conservation

Central Sierra Chapter of the Audubon Society