

# Appendix C

## Comment Letters Received by August 20, 2018

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#### DIRECTORS

AZIZ AKBARI  
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#### MANAGEMENT

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Engineering and Technology Services  
JONATHAN WUNDERLICH  
Finance

August 20, 2018

Mr. Richard Looker  
California Regional Water Quality Control Board  
San Francisco Bay Region  
1515 Clay Street  
Oakland, CA 94612

Dear Mr. Looker:

Subject: Alameda County Water District Comments on the Prioritization of Basin Planning Projects for the San Francisco Bay Basin Water Control Plan (Basin Plan) 2018 Triennial Review

Thank you for the opportunity to provide comments on the San Francisco Bay Regional Water Quality Control Board's (Regional Board) newly-prioritized list of basin planning projects. The Alameda County Water District (ACWD) previously provided comments on the initial list of candidate basin planning projects and offers the following additional comments for your consideration:

## 2.5 Modification of Groundwater Sub-Basin Boundaries

Despite the low prioritization of the Modification of Groundwater Sub-basin Boundaries project in the Regional Board's July 2018 Staff Report, ACWD wishes to reemphasize its request to update the Basin Plan to correctly identify the Niles Cone Sub-basin boundary and to ensure consistency with the California Department of Water Resources' (DWR) Final 2016 Bulletin 118 Groundwater Basin Boundaries. However, if the Modification of Groundwater Sub-basin Boundaries project remains ineligible for update during this 2018 triennial review process due to low prioritization, ACWD respectfully requests that the Regional Board insert a footnote in all figures showing basin boundaries (such as Figure 2-10 and Figure 2-10D) in the existing Basin Plan to explain that some basin boundaries have been modified through DWR's Basin Boundary Modification Request system and that the reader should refer to DWR's most recent Bulletin 118 publication for up-to-date boundary information.

## 3.11 Develop Flow Criteria for Selected Bay Area Streams and Rivers

As summarized in the section on *Public Input in Support of Candidate Projects* in the Regional Board's July 2018 Staff Report, ACWD supports the general concept of the Regional Board developing new objectives for in-stream flow on a tributary- or watershed-specific basis. However, ACWD's support is based on the assumption that such flow objectives can benefit fisheries restoration while simultaneously protecting critical local water supply. Accordingly,

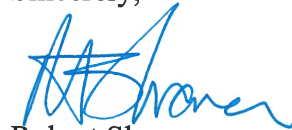
Mr. Richard Looker  
Page 2  
August 20, 2018

ACWD respectfully requests that any in-stream flow criteria for Alameda Creek be developed in conjunction with existing scientific studies characterizing the Alameda Creek watershed and that the updated Basin Plan not contradict ACWD's previously issued Biological Opinions and/or CDFW operating agreements.

Again, ACWD appreciates the opportunity to provide input at this stage of the Basin Plan review process. Should you have any questions about our comments or need more information, please contact Steven Inn, Manager of Water Resources, at (510) 668-4441, or by e-mail at [steven.inn@acwd.com](mailto:steven.inn@acwd.com).

We look forward to working with Regional Board staff during the Triennial Review to explore these issues further and learn more about the proposed changes to the Basin Plan. Thank you for your consideration of our comments.

Sincerely,



Robert Shaver  
General Manager

db/jm

By E-mail

cc: Steven Inn, ACWD  
Laura Hidas, ACWD  
Thomas Niesar, ACWD  
Evan Buckland, ACWD  
Michelle Myers, ACWD

**From:** Vincent Ayala  
**To:** [Looker\\_Richard@Waterboards](mailto:Looker_Richard@Waterboards)  
**Subject:** Recognize Subsistence Fishing Now  
**Date:** Friday, August 17, 2018 5:34:23 PM

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Dear Mr. Looker,

I am writing to ask the San Francisco Bay Regional Water Quality Control Board to “Designate Tribal Traditional and Culture, Tribal Subsistence Fishing, and Subsistence Fishing Beneficial Uses in the San Francisco Bay Region,” as a priority project in the 2018 Triennial Review.

San Francisco Bay is dangerously polluted by mercury, industrial chemicals, and pesticides, which put the health and safety of low-income communities and communities of color most at risk. This is because many in these communities practice “subsistence fishing” out of economic need and or cultural tradition. Subsistence fishers, unlike many recreational fishers, depend on the Bay for sustenance. Moreover, subsistence fishers are often part of communities that bear a disproportionate burden from water, air, and land pollution.

While we recognize that addressing the Bay’s contaminants is complex and will take decades, a first step in protecting all Bay Area residents, and not just recreational anglers, is to designate the Bay as supporting subsistence fishing and tribal cultural uses.

Please take this important first step as part of this Triennial Review so that more protective water quality standards and implementation plans can be adapted in the years to come.

Mr. Vincent Ayala  
707 Moana Way  
Pacifica, CA 94044  
NA

*Transmitted via email*

August 20, 2018

Richard Looker  
San Francisco Bay Regional Water Quality Control Board  
1515 Clay Street, Suite 1400  
Oakland, CA 94612  
email: rlooker@waterboards.ca.gov

**Re: 2018 Triennial Review – Designate Tribal Tradition and Culture, Tribal Subsistence Fishing, and Subsistence Fishing Beneficial Uses in the San Francisco Bay Region**

Dear Mr. Looker:

On behalf of San Francisco Baykeeper, Clean Water Action, The Environmental Justice Coalition for Water (EJCW), California Indian Environmental Alliance, and Bayview Hunters Point Community Advocates (collectively, “Commenters”), we provide these comments on the San Francisco Bay Basin Water Quality Control Plan 2018 Triennial Review Staff Report (“Staff Report”). We thank the San Francisco Bay Regional Water Quality Control Board (“Regional Board”) staff for recognizing the importance of Project 2.6, Designate Tribal Tradition and Culture, Tribal Subsistence Fishing, and Subsistence Fishing Beneficial Uses. Commenters strongly believe that recognizing that tribal and non-tribal subsistence fishing, as well as tribal cultural uses (collectively referred to as “tribal and subsistence uses”), are occurring in the San Francisco Bay reflects an existing reality and is a key step in working towards protecting the public health of all users of the Bay and other regional waters.

The Staff Report defines a high priority project as a project with a score of 60 or greater. Project 2.6 received a score of 59, only one point below a high priority ranking. We appreciate that the Staff Report states that the Regional Board will dedicate resources to accomplish some elements of Project 2.6 during this Triennial Review period, even though the Project did not receive a high priority ranking. Commenters are committed to working with the Regional Board to accomplish as much of Project 2.6 as possible in this next Triennial Review period. As stated in our initial comments and explained more below, Commenters believe that we can help the Regional Board gather the information necessary to build a record that supports designating tribal and subsistence uses for the Bay.

Although Commenters appreciate that the Staff Report recognizes that Project 2.6 scores high in the priority ranking matrix, the Staff Report undervalues Project 2.6 in several areas. We urge the Regional Board to reconsider the score of Project 2.6 for the reasons detailed below and to recognize that Project 2.6 should be considered a high priority project.

First, Commenters believe that the Staff Report undervalues the amount of external resources already expended on Project 2.6. The Staff Report gives Project 2.6 a score of 1 out of a possible 5 points. As we discussed in our initial comments, several studies have been conducted showing that

subsistence fishing occurs in the Bay regularly.<sup>1</sup> In meetings between Commenters and Regional Board staff, staff has recognized the studies documenting subsistence uses are already available. While these studies were not prepared expressly for the Project, the studies evaluate the extent of subsistence uses in the Bay and are available to the Regional Board to use in implementing this Project. Accordingly, Commenters urge the Regional Board to increase the score for this factor to a minimum of 3.

Second, Commenters believe that the Staff Report undervalues the amount of external resources likely available for Project 2.6 and that it should be accorded more points, as a result. The Staff Report gives Project 2.6 a score of 3 out of a possible 10 points in this category. Commenters are committed to using their organizational resources and garnering additional resources to gather the information Regional Board staff needs to evaluate tribal and subsistence uses in the Bay and, in fact, have already started doing so. Clean Water Action has received a grant to fund research and outreach to groups that work directly with subsistence fishers around the Bay. In addition, EJCW is the grant administrator and program director for the \$6.5 million Proposition 1 San Francisco Bay Area Integrated Regional Water Management Disadvantaged Community Involvement Program, which, among other activities, will conduct outreach to and build upon EJCW's already broad set of relationships with Environmental Justice organizations that work with low-income, Bay Area communities on water-related issues, including subsistence fishing, towards the development of a regional water needs assessment for disadvantaged communities. For the past few months, Baykeeper has kept a log of fishers on piers during its boat patrols of the Bay, which can help identify the specific places where people typically fish.

With regards to tribal uses in particular, CIEA has a grant pending to provide safer fish consumption education in the Bay and administer a fish consumption survey, and CIEA has general support funding to augment this effort. Additionally, as part of the Bay Area Integrated Regional Water Management (IRWM) work, CIEA is meeting with Tribes and Tribal descendants of nine (9) Bay Area Tribes and ten (10) Tribal Organizations to address water needs in the Bay Area. One project in the IRWM includes documenting historical and cultural uses of water in the Bay.

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<sup>1</sup> The staff report prepared when the State Water Resources Control Board adopted Resolution No. 2017-0027, recognizing tribal and subsistence uses, refers to at least three fish consumption and other studies from the Bay Area. See State Water Resources Control Board. Final Staff Report for Part of the Water Quality Control Plan for Inland Surface Water, Enclosed Bays, and Estuaries of California – Tribal and Subsistence Fishing Beneficial Uses and Mercury Provisions (“State Board Staff Report”), May 22, 2017, at Appendix G, Table G-1 (citing San Francisco Estuary Institute 2000), G-10 (citing Ma-at Youth Academy, *Fish Consumption and Methylmercury Contamination in Contra Costa County*), and Table G-4 (citing SFEI 2000, Ma-at Youth Academy, and Contra Costa Boater Survey, 2005). In addition, the Asian Pacific Environmental Network conducted a study in 1998 that documented consumption of Bay fish in the Laotian community in West Contra Costa County. Audrey Chiang, Asian Pacific Environmental Network, *A Seafood Consumption Survey of the Laotian Community in West Contra Costa County, California* (1998). This list of fish consumption studies is not exhaustive.

As demonstrated, Commenters are bringing significant knowledge and resources to help the Regional Board gather the information necessary to implement Project 2.6. Commenters would like to work with Regional Board staff to ensure that we are gathering the information that will be useful to the Regional Board in evaluating these designations, but it is important for the Regional Board to recognize that organizations such as the ones that have commented on this Project during the triennial review process are committed to helping provide information and, in some cases, have more access to subsistence fishers and tribes than Regional Board staff itself would. The Staff Report points out that some dischargers have provided contract support to complete at least two projects listed as high priority. (Staff Report at 15.) While Commenters do not have the financial means to hire consultants to provide outside resources for Project 2.6, the Regional Board should not discount the non-monetary resources, including experience with affected communities, that are available to help implement Project 2.6. Such recognition of non-monetary resources is also within the scope of Environmental Justice and avoids a situation where projects that impact local communities are not prioritized because they cannot compete with discharger resources. Accordingly, Commenters urge the Regional Board to increase the score for this factor to a minimum of 6.

Finally, Commenters believe that the Staff Report undervalues the amount that Project 2.6 will further protect beneficial uses. The Staff Report gives Project 2.6 a score of 10 out of a possible 15 points in this category. While we appreciate that the Staff Report recognizes that Project 2.6 significantly protects beneficial uses, Commenters believe that Project 2.6 should receive a score of 15 for this category. Designating beneficial uses is the first step in protecting such uses. Thus, it is a necessary prerequisite before the Regional Board can consider these uses in future planning.

Moreover, the current uses designated for the Bay are not protective of tribal and subsistence uses. The State Board Staff Report importantly recognized that whether people are fishing for cultural reasons or due to economic need, “the fishing rate is not optional or elective as the recreational term connotes, and the amount of fish consumed can be greater than that consumed by recreational fishers.”<sup>2</sup> Thus, the tribal and subsistence uses “are necessary because existing beneficial uses do not take into account the greater consumption of finfish and shellfish by some cultures or individuals.”<sup>3</sup> Tribal subsistence fishers and activities related to cultural uses have been maintained and are in fact increasing. This is a unique opportunity to provide the Regional Board with information on what these activities are and how they are changing since CIEA will already be out in the field through 2020 collecting information on the Tribal uses of Bay Area watersheds and to identify solutions.

In our initial comments, Commenters recognized that designating tribal and subsistence uses would not automatically result in changes to the numeric water quality standards in the Basin Plan or revising the mercury or PCB TMDLs. However, this fact should not lessen the importance of designating these uses. Setting a goal to protect all users of the Bay is important as a matter of policy and responsibility to environmental justice and other impacted communities and individuals. Moreover, designating tribal and subsistence uses may be leveraged by the Regional Board, other agencies, or non-governmental organizations, like the Commenters, to acquire funds to study whether technologies exist to reduce these persistent pollutants or to reduce exposures to impacted

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<sup>2</sup> State Board Staff Report at 105.

<sup>3</sup> *Id.* at 24; *see also id.* at 104-106.



communities. Finally, the designated uses would not only apply to persistent pollutants like mercury and PCBs, but other contaminants that can affect public health. Some of these contaminants may be emerging or will occur in the future, and efforts to ensure the Bay is not impaired by these contaminants should consider all users of the Bay, including tribal and subsistence users. Without designating the Bay for these uses, those users would not be considered in planning efforts.

Thank you for your consideration of these comments. In sum, Commenters thank the Regional Board staff for meeting with us and for recognizing the importance of Project 2.6. We urge the Regional Board to increase the score of Project 2.6 and recognize it as a high priority project. However, even if this does not occur, Commenters are committed to working with Regional Board staff in the short term to designate tribal and subsistence uses in the Bay. If you have questions, please do not hesitate to contact any of us for further discussion.

Sincerely,

Andria Ventura  
Clean Water Action  
(415) 369-9160, x 306  
[aventura@cleanwater.org](mailto:aventura@cleanwater.org)

Colin Bailey  
The Environmental Justice Coalition for  
Water  
(916) 432-EJCW(3529)  
[colin@ejcw.org](mailto:colin@ejcw.org)

Erica Maharg  
San Francisco Baykeeper  
(510) 735-9700, x 106  
[erica@baykeeper.org](mailto:erica@baykeeper.org)

J. Michelle Pierce  
Bayview Hunters Point Community  
Advocates  
(415) 269-3663  
[jmichellepierce@gmail.com](mailto:jmichellepierce@gmail.com)

Sherri Norris  
California Indian Environmental Alliance  
(510) 848-2043  
[sherri@cieaweb.org](mailto:sherri@cieaweb.org)

**From:** Maris Bennett  
**To:** [Looker\\_Richard@Waterboards](mailto:Looker_Richard@Waterboards)  
**Subject:** Recognize Subsistence Fishing Now  
**Date:** Thursday, August 16, 2018 1:41:42 PM

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Dear Mr. Looker,

I am writing to ask the San Francisco Bay Regional Water Quality Control Board to “Designate Tribal Traditional and Culture, Tribal Subsistence Fishing, and Subsistence Fishing Beneficial Uses in the San Francisco Bay Region,” as a priority project in the 2018 Triennial Review.

San Francisco Bay is dangerously polluted by mercury, industrial chemicals, and pesticides, which put the health and safety of low-income communities and communities of color most at risk. This is because many in these communities practice “subsistence fishing” out of economic need and or cultural tradition. Subsistence fishers, unlike many recreational fishers, depend on the Bay for sustenance. Moreover, subsistence fishers are often part of communities that bear a disproportionate burden from water, air, and land pollution.

While we recognize that addressing the Bay’s contaminants is complex and will take decades, a first step in protecting all Bay Area residents, and not just recreational anglers, is to designate the Bay as supporting subsistence fishing and tribal cultural uses.

Please take this important first step as part of this Triennial Review so that more protective water quality standards and implementation plans can be adapted in the years to come.

Mrs. Maris Bennett  
3401 Dimaggio Way  
Antioch, CA 94509  
925-555-1234

**From:** Michelynn Buch  
**To:** [Looker\\_Richard@Waterboards](mailto:Looker_Richard@Waterboards)  
**Subject:** Recognize Subsistence Fishing Now  
**Date:** Monday, August 13, 2018 12:39:47 PM

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Dear Mr. Looker,

I am writing to ask the San Francisco Bay Regional Water Quality Control Board to “Designate Tribal Traditional and Culture, Tribal Subsistence Fishing, and Subsistence Fishing Beneficial Uses in the San Francisco Bay Region,” as a priority project in the 2018 Triennial Review.

San Francisco Bay is dangerously polluted by mercury, industrial chemicals, and pesticides, which put the health and safety of low-income communities and communities of color most at risk. This is because many in these communities practice “subsistence fishing” out of economic need and or cultural tradition. Subsistence fishers, unlike many recreational fishers, depend on the Bay for sustenance. Moreover, subsistence fishers are often part of communities that bear a disproportionate burden from water, air, and land pollution.

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Ms. Michelynn Buch  
1110 Loryn Ln  
Oakland, CA 94019  
NA

**From:** Amy Chen  
**To:** [Looker\\_Richard@Waterboards](mailto:Looker_Richard@Waterboards)  
**Subject:** Recognize Subsistence Fishing Now  
**Date:** Wednesday, August 15, 2018 12:51:14 PM

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Dear Mr. Looker,

I am writing to ask the San Francisco Bay Regional Water Quality Control Board to “Designate Tribal Traditional and Culture, Tribal Subsistence Fishing, and Subsistence Fishing Beneficial Uses in the San Francisco Bay Region,” as a priority project in the 2018 Triennial Review.

San Francisco Bay is dangerously polluted by mercury, industrial chemicals, and pesticides, which put the health and safety of low-income communities and communities of color most at risk. This is because many in these communities practice “subsistence fishing” out of economic need and or cultural tradition. Subsistence fishers, unlike many recreational fishers, depend on the Bay for sustenance. Moreover, subsistence fishers are often part of communities that bear a disproportionate burden from water, air, and land pollution.

While we recognize that addressing the Bay’s contaminants is complex and will take decades, a first step in protecting all Bay Area residents, and not just recreational anglers, is to designate the Bay as supporting subsistence fishing and tribal cultural uses.

Please take this important first step as part of this Triennial Review so that more protective water quality standards and implementation plans can be adapted in the years to come.

Ms. Amy Chen  
2 Whitehall Dr  
Orinda, CA 94563  
NA

**From:** Martyn Gunn  
**To:** [Looker\\_Richard@Waterboards](mailto:Looker_Richard@Waterboards)  
**Subject:** Recognize Subsistence Fishing Now  
**Date:** Friday, August 17, 2018 6:33:47 PM

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Dear Mr. Looker,

I am writing to ask the San Francisco Bay Regional Water Quality Control Board to “Designate Tribal Traditional and Culture, Tribal Subsistence Fishing, and Subsistence Fishing Beneficial Uses in the San Francisco Bay Region,” as a priority project in the 2018 Triennial Review.

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Mr. Martyn Gunn  
1219 Edgebrook Dr  
Modesto, CA 95354  
NA

**From:** Lillian Hanahan  
**To:** [Looker\\_Richard@Waterboards](mailto:Looker_Richard@Waterboards)  
**Subject:** Recognize Subsistence Fishing Now  
**Date:** Monday, August 13, 2018 2:58:58 PM

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Dear Mr. Looker,

I am writing to ask the San Francisco Bay Regional Water Quality Control Board to “Designate Tribal Traditional and Culture, Tribal Subsistence Fishing, and Subsistence Fishing Beneficial Uses in the San Francisco Bay Region,” as a priority project in the 2018 Triennial Review.

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Ms. Lillian Hanahan  
25 Arroyo Ln  
Novato, CA 94947  
NA

**From:** Greg Johnson  
**To:** [Looker\\_Richard@Waterboards](mailto:Looker_Richard@Waterboards)  
**Subject:** Recognize Subsistence Fishing Now  
**Date:** Monday, August 13, 2018 12:34:59 PM

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Dear Mr. Looker,

I am writing to ask the San Francisco Bay Regional Water Quality Control Board to “Designate Tribal Traditional and Culture, Tribal Subsistence Fishing, and Subsistence Fishing Beneficial Uses in the San Francisco Bay Region,” as a priority project in the 2018 Triennial Review.

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Mr. Greg Johnson  
5918 Maccall St  
Oakland, CA 94609  
NA

**From:** Penny Keating  
**To:** [Looker\\_Richard@Waterboards](mailto:Looker_Richard@Waterboards)  
**Subject:** Recognize Subsistence Fishing Now  
**Date:** Friday, August 17, 2018 5:35:50 PM

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Dear Mr. Looker,

I am writing to ask the San Francisco Bay Regional Water Quality Control Board to “Designate Tribal Traditional and Culture, Tribal Subsistence Fishing, and Subsistence Fishing Beneficial Uses in the San Francisco Bay Region,” as a priority project in the 2018 Triennial Review.

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Ms. Penny Keating  
69 Shoreside Dr  
Pacifica, CA 94044  
NA



**From:** Sarina Kennerly  
**To:** [Looker\\_Richard@Waterboards](mailto:Looker_Richard@Waterboards)  
**Subject:** Recognize Subsistence Fishing Now  
**Date:** Monday, August 06, 2018 5:03:09 PM

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Dear Mr. Looker,

I am writing to ask the San Francisco Bay Regional Water Quality Control Board to “Designate Tribal Traditional and Culture, Tribal Subsistence Fishing, and Subsistence Fishing Beneficial Uses in the San Francisco Bay Region,” as a priority project in the 2018 Triennial Review.

San Francisco Bay is dangerously polluted by mercury, industrial chemicals, and pesticides, which put the health and safety of low-income communities and communities of color most at risk. This is because many in these communities practice “subsistence fishing” out of economic need and or cultural tradition. Subsistence fishers, unlike many recreational fishers, depend on the Bay for sustenance. Moreover, subsistence fishers are often part of communities that bear a disproportionate burden from water, air, and land pollution.

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Please take this important first step as part of this Triennial Review so that more protective water quality standards and implementation plans can be adapted in the years to come.

Ms. Sarina Kennerly  
357 Elsie St  
San Francisco, CA 94110  
NA

**From:** Jonathan D Knight  
**To:** [Looker\\_Richard@Waterboards](mailto:Looker_Richard@Waterboards)  
**Subject:** Triennial Review -- recognize subsistence fising  
**Date:** Thursday, August 16, 2018 6:44:34 AM

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Dear Mr. Looker,

Thanks for your work on improving our Bay's water quality. I'm concerned that the levels of mercury in the Bay may still be too high, particularly for those Bay residents who rely substantially on fishing to provide protein for their families. So I write today to urge the board to **formally designate the Bay as supporting subsistence fishing** during the current Triennial Review.

Yours sincerely,

Jonathan Knight  
921 Santa Fe Ave.  
Albany, CA 94706

**From:** Monika Leitz  
**To:** [Looker\\_Richard@Waterboards](mailto:Looker_Richard@Waterboards)  
**Subject:** Recognize Subsistence Fishing Now  
**Date:** Monday, August 13, 2018 7:34:53 PM

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Dear Mr. Looker,

I am writing to ask the San Francisco Bay Regional Water Quality Control Board to “Designate Tribal Traditional and Culture, Tribal Subsistence Fishing, and Subsistence Fishing Beneficial Uses in the San Francisco Bay Region,” as a priority project in the 2018 Triennial Review.

San Francisco Bay is dangerously polluted by mercury, industrial chemicals, and pesticides, which put the health and safety of low-income communities and communities of color most at risk. This is because many in these communities practice “subsistence fishing” out of economic need and or cultural tradition. Subsistence fishers, unlike many recreational fishers, depend on the Bay for sustenance. Moreover, subsistence fishers are often part of communities that bear a disproportionate burden from water, air, and land pollution.

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Please take this important first step as part of this Triennial Review so that more protective water quality standards and implementation plans can be adapted in the years to come.

Ms. Monika Leitz  
833 Spring Dr  
Mill Valley, CA 94941  
NA



# Marin Audubon Society

P.O. Box 599 | MILL VALLEY, CA 94942-0599 | [MARINAUDUBON.ORG](http://MARINAUDUBON.ORG)

August 19, 2018

Richard Looker  
Regional Water Quality Control Board  
1515 Clay Street, 13<sup>th</sup> Floor  
Oakland CA 94612

RE: Comment on TMDL for San Francisco Bay.

Dear Mr. Looker:


This is to convey Marin Audubon Society's support for including the Petaluma River as a highest priority project for a TMDL as part of the amendment to the Bay Plan being conducted over the next three years. Petaluma River's natural resources have long been neglected, even though their value is extremely high locally and for the entire estuary. Impacts to the river's water quality come from agricultural runoff and increasing industrial and urban development.


The Petaluma River supports the largest historic tidal marsh in the State of California, the Petaluma Marsh, most of which is owned by the CA Department of Fish and Wildlife. It also supports a marsh fringe along most of its banks along the lower reach, and other large areas of marsh including the Rush Creek and Mira Monte. Marin Audubon Society also owns a 185-acre section of the Petaluma Marsh most of which we restored to tidal marsh more than ten years ago. MAS also purchased and restored the 325-acre Bahia marsh which we purchased and restored ten years ago and transferred to the CDFW, and the Rush Creek marsh, also owned by the CDFW. Another restored marsh, Carl's Marsh, is near the mouth on the east bank. These restorations and others have been implemented primarily with public funds. Although much of the land along the eastern banks is still in private ownership, we understand the Sonoma Land Trust will be beginning a planning effort for the east side.

It is time the Regional Board focused on the Petaluma River's water quality to assure the health and viability of all of its critical natural resources. We're sorry we did not comment on this earlier, but trust it is not too late to register our support.

Thank you for considering our input.

Sincerely,

  
Barbara Salzman, Co-chair  
Conservation Committee

  
Phil Peterson, Co-chair  
Conservation Committee

**From:** Krishna Mohandos  
**To:** [Looker\\_Richard@Waterboards](mailto:Looker_Richard@Waterboards)  
**Subject:** Recognize Subsistence Fishing Now  
**Date:** Wednesday, August 15, 2018 12:50:03 PM

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Dear Mr. Looker,

I am writing to ask the San Francisco Bay Regional Water Quality Control Board to “Designate Tribal Traditional and Culture, Tribal Subsistence Fishing, and Subsistence Fishing Beneficial Uses in the San Francisco Bay Region,” as a priority project in the 2018 Triennial Review.

San Francisco Bay is dangerously polluted by mercury, industrial chemicals, and pesticides, which put the health and safety of low-income communities and communities of color most at risk. This is because many in these communities practice “subsistence fishing” out of economic need and or cultural tradition. Subsistence fishers, unlike many recreational fishers, depend on the Bay for sustenance. Moreover, subsistence fishers are often part of communities that bear a disproportionate burden from water, air, and land pollution.

While we recognize that addressing the Bay’s contaminants is complex and will take decades, a first step in protecting all Bay Area residents, and not just recreational anglers, is to designate the Bay as supporting subsistence fishing and tribal cultural uses.

Please take this important first step as part of this Triennial Review so that more protective water quality standards and implementation plans can be adapted in the years to come.

Mr. Krishna Mohandos  
9 Roosevelt Cir  
Palo Alto, CA 94306  
NA

**From:** Hans Rasmussen  
**To:** [Looker\\_Richard@Waterboards](mailto:Looker_Richard@Waterboards)  
**Subject:** Recognize Subsistence Fishing Now  
**Date:** Monday, August 13, 2018 12:24:08 PM

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Dear Mr. Looker,

I am writing to ask the San Francisco Bay Regional Water Quality Control Board to “Designate Tribal Traditional and Culture, Tribal Subsistence Fishing, and Subsistence Fishing Beneficial Uses in the San Francisco Bay Region,” as a priority project in the 2018 Triennial Review.

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Mr. Hans Rasmussen  
117 Burlington Dr  
Petaluma, CA 94952  
NA

**From:** Cynthia Resendiz  
**To:** [Looker\\_Richard@Waterboards](mailto:Looker_Richard@Waterboards)  
**Subject:** Recognize Subsistence Fishing Now  
**Date:** Friday, August 17, 2018 5:40:11 PM

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Dear Mr. Looker,

I am writing to ask the San Francisco Bay Regional Water Quality Control Board to “Designate Tribal Traditional and Culture, Tribal Subsistence Fishing, and Subsistence Fishing Beneficial Uses in the San Francisco Bay Region,” as a priority project in the 2018 Triennial Review.

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Ms. Cynthia Resendiz  
1685 Merrill Loop  
Apt 1  
San Jose, CA 95124  
NA

**From:** John Sargent  
**To:** [Looker\\_Richard@Waterboards](mailto:Looker_Richard@Waterboards)  
**Subject:** Recognize Subsistence Fishing Now  
**Date:** Wednesday, August 15, 2018 12:32:13 PM

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Dear Mr. Looker,

I am writing to ask the San Francisco Bay Regional Water Quality Control Board to “Designate Tribal Traditional and Culture, Tribal Subsistence Fishing, and Subsistence Fishing Beneficial Uses in the San Francisco Bay Region,” as a priority project in the 2018 Triennial Review.

San Francisco Bay is dangerously polluted by mercury, industrial chemicals, and pesticides, which put the health and safety of low-income communities and communities of color most at risk. This is because many in these communities practice “subsistence fishing” out of economic need and or cultural tradition. Subsistence fishers, unlike many recreational fishers, depend on the Bay for sustenance. Moreover, subsistence fishers are often part of communities that bear a disproportionate burden from water, air, and land pollution.

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Please take this important first step as part of this Triennial Review so that more protective water quality standards and implementation plans can be adapted in the years to come.

Mr. John Sargent  
1137 Island Dr  
Alameda, CA 94502  
NA



**From:** Kim Takacs  
**To:** [Looker\\_Richard@Waterboards](mailto:Looker_Richard@Waterboards)  
**Subject:** Recognize Subsistence Fishing Now  
**Date:** Wednesday, August 15, 2018 12:54:01 PM

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Dear Mr. Looker,

I am writing to ask the San Francisco Bay Regional Water Quality Control Board to “Designate Tribal Traditional and Culture, Tribal Subsistence Fishing, and Subsistence Fishing Beneficial Uses in the San Francisco Bay Region,” as a priority project in the 2018 Triennial Review.

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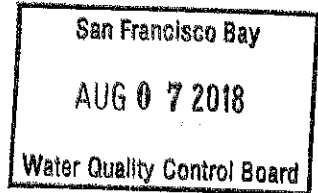
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Ms. Kim Takacs  
38655 Chrisholm Pl  
Fremont, CA 94536  
NA

8/1/18

Dear Members of the Regional Board,



Environment Justice demands that we protect low income communities and communities of color. I'm asking you to designate the Bay as supporting subsistence fishing so that families who fish out of economic need or cultural tradition are protected.

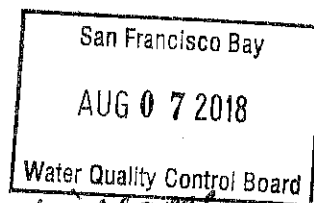
Sincerely,

Eva Verner

1346 El Centro Ave, Oakland, CA

8/1/18 —

Dear Members of the Regional Board



Environmental Justice demands that we protect low income communities and communities of color. I'm asking you to designate the Bay as subsistence fishing so that families who fish out of economic need or cultural tradition are protected.

Sincerely,

Theo Verner

1346 El centro Ave, Oakland, CA

**From:** Jessie Winsted  
**To:** [Looker\\_Richard@Waterboards](mailto:Looker_Richard@Waterboards)  
**Subject:** Recognize Subsistence Fishing Now  
**Date:** Wednesday, August 15, 2018 12:47:18 PM

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Dear Mr. Looker,

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Ms. Jessie Winsted  
37231 2nd St  
Fremont, CA 94536  
NA

**From:** Valerie Zabb-Parmley  
**To:** [Looker\\_Richard@Waterboards](mailto:Looker_Richard@Waterboards)  
**Subject:** Recognize Subsistence Fishing Now  
**Date:** Monday, August 13, 2018 12:27:11 PM

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Dear Mr. Looker,

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Ms. Valerie Zabb-Parmley  
5801 Chelton Dr  
Oakland, CA 94611  
NA