



December 16, 2016

Submitted via email: commentletters@waterboards.ca.gov

Ms. Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-2000

Subject: Comment Letter – Bay-Delta Phase II Working Draft Science Report

To Whom It May Concern:

The Coalition for a Sustainable Delta (Coalition) provides the following comments on the Working Draft Scientific Basis Report for New and Revised Flow Requirements on the Sacramento River and Tributaries, Eastside Tributaries to the Delta, Delta Outflow, and Interior Delta Operations (Phase II Report) released by the State Water Resources Control Board (State Board). The Coalition appreciates the opportunity to comment on this important regulatory proposal, which has the potential to significantly impact all water users in the Delta, including members of the Coalition.

The Coalition and its members depend upon water from the Sacramento-San Joaquin Bay-Delta (Delta) for their livelihoods. Individual Coalition members use the Delta for environmental, aesthetic, and recreational purposes – making their economic and noneconomic interests, and the interests of the Coalition, dependent on a healthy and sustainable Delta ecosystem. Because changes to the manner in which the Delta is operated, including additional flow requirements, has the potential to dramatically influence those interests, the Coalition offers the following comments regarding the Phase II Report.

The Phase II Report does not provide a sufficient scientific basis for the proposed Delta solutions. Much of the science that the Phase II Report is based upon is either outdated or has not been subject to peer review. Further, the Phase II Report does not contain a discussion of the best available science, and fails to discuss the uncertainties associated with the science cited. The State Board was provided with valuable guidance from at least two independent expert panels regarding the best available science related to an update to the Water Quality Control Plan for the Delta, but this guidance was largely ignored. For such a critically important decision, with potentially

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devastating impacts on millions of water users throughout the State, this is especially troubling.

Fundamentally, the Coalition does not support the State Board's continued focus on unimpaired flow as the answer to the challenges facing the Delta ecosystem. Recent experience does not support throwing more water at the system as the solution. Regulators have required such actions for the last decade with no positive results. Rather, the best available science suggests that we must address the myriad other stressors on the system – including habitat, invasive species, and water quality. That does not mean that some flow is not necessary to sustain the ecosystem. The Coalition believes that properly designed functional flows – like those over floodplains – are a part of the solution. The Phase II Report fails to acknowledge these issues and instead continues to promote unimpaired flows with little scientific basis for doing so.

The Coalition supports the technical comments submitted by the State Water Contractors on the Phase II Report.

The Coalition looks forward to continuing to work with the State Board on updating the Water Quality Control Plan for the Delta, including the development of appropriately balanced and scientifically supported flow criteria.

Sincerely,

A handwritten signature in black ink, appearing to read 'W. D. Phillimore', with a stylized flourish at the end.

William D. Phillimore
President, Coalition for a Sustainable Delta

wdp/pt



Coalition for a Sustainable Delta