

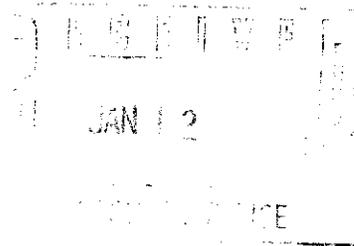


UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
Sacramento Area Office
650 Capitol Mall, Suite 8-300
Sacramento, California 95814-4706

January 10, 2005

In Reply Refer To:
151422SWR04SA9238:JSM

Arthur G. Baggett, Jr.
Chair, State Water Resources Control Board
P.O. Box 100
Sacramento, California 95812



Dear Mr. Baggett:

This letter provides comments from the National Marine Fisheries Service (NOAA Fisheries) concerning periodic review of the 1995 Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary. As you know, NOAA Fisheries participated in the October and November 2004 workshops regarding the Delta Cross Channel Closure Objective and the Salmon Protection Objective, as part of the Water Quality Objectives for Fish and Wildlife beneficial uses. This letter addresses potential amendments to the Delta Outflow Objective in the Water Quality Objectives for Fish and Wildlife Beneficial Uses. For detailed information concerning NOAA Fisheries authorities and jurisdiction related to the periodic review, we refer you to previous exhibits submitted by NOAA Fisheries (NOAA EXH-1, 2, and 14).

The Delta Outflow Objective is an important protective measure for the Sacramento-San Joaquin Delta Estuary ecosystem. Considerable evidence exists regarding the beneficial effects of high Delta outflow for species such as Chinook salmon (Kjelson and Raquel, 1981, Dettman et al., 1987; Stevens and Miller, 1983; and U.S. Fish and Wildlife Service, 1992), sturgeon (California Department of Fish and Game, 1992), and striped bass (Stevens, 1966). Evidence also exists of the beneficial effects of outflow on estuarine organisms such as phytoplankton, mysids and shrimp, and larval fish, all of which are valuable components of the Estuary food-web relied upon by many important species of fish (Jassby et al., 1995).

NOAA Fisheries recommends the following:

1. Footnote 14 of the Delta Outflow Objective should not be changed. This important objective should be retained to ensure adequate protection of listed species such as Chinook salmon and delta smelt, and in addition, prevent additional listings to occur.
2. To realize the adaptive management principles prescribed in the 2004 U.S. Fish and Wildlife Service and NOAA Fisheries biological opinions for the Central Valley Project and State Water Project Operation Criteria and Plan, fisheries



agencies should retain the ability to modify outflows as required in order to mitigate for adverse ecosystem impacts (such as upstream flow impacts).

We appreciate the opportunity to provide the Board with comments related to the 1995 Water Quality Control Plan revisions and look forward to future workshops and topics. If you have any questions regarding this correspondence or if NOAA Fisheries can provide further assistance, please contact Mr. Jeff McLain in our Sacramento Area Office, 650 Capitol Mall, Suite 8-300, Sacramento, CA 95814. Mr. McLain may be reached by telephone at (916) 930-5648, or by Fax at (916) 930-3629.

Sincerely,



Michael E. Aceituno
Supervisor, Sacramento Area Office

cc: NOAA Fisheries-PRD, Long Beach CA
Joe Dillon - Santa Rosa Area Office, CA.
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References

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