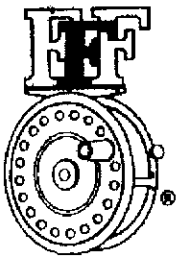


CT 3717 -ML



Northern California/Nevada Council Federation of Fly Fishers



May 30, 2005

Mr. Arthur G. Baggett, Chair

State Water Resources Control Board

P.O. Box 100

Sacramento, CA 95812-0100

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Dear Mr. Baggett:

This letter is being sent to you to provide the perspective of our organization, Northern California Council, Federation of Fly Fishers (NCCFFF), regarding the X2 Bay Delta Salinity Standard. (Issue #5 Delta Outflow Objective)

The NCCFFF represents 33 fly fishing clubs in Northern California with a membership of over 000. Over the past two years, we have been members of the Environmental Water Caucus which is becoming increasingly concerned about the impact of planned increases of delta exports on fisheries habitat in both the Bay Delta and upstream tributaries. We have two members of our conservation network who are members of the Sacramento Water Forum's Lower American River Operations Group (LAROG) who have contributed their perspective and researched this issue that has subsequently determined our position on the proposed changes to the X2 standard presented by various agencies and environmental groups during your recent SWRCB workshops.

Impact of Bay Delta Salinity Requirements on the Lower American River

The Lower American River Operations Group has been pressing the BR and the SWRCB to resolve the issue of fish kills due to short term high level flow releases required to meet Bay Delta Salinity Standards (X2 standard). These flow fluctuations caused the loss of approximately 50,000 salmon fry in 2003 as a result of stranding and isolation in side channels. Subsequent rapid flow reductions also led to the dewatering of steelhead redds. Again in the spring of 2004, flow releases were required to meet the X2 standard resulting in a significant loss of cold water from the Folsom cold water pool. These effects are discussed in detail in the report by Surface Water Resources Inc (SWRI). Provided by the Water Forum (WF) at the January workshop. (See Doc WF Ex 01 on the SWRCB web site)

At the workshop, WF consultants testified to the upstream impacts of the Bureau's

operation to meet salinity standards. BR and DWR both proposed a method to obtain flexibility to temporarily remove the X2 requirement to protect upstream resources. Both

agencies made a strong case for "flexibility". However, the Bay Institute (BI) and DFG argued just as strongly not to relax the X2 requirement. BI presented data showing the importance of maintaining and improving the salinity standard due to the degraded condition of the delta and the impact on aquatic species. BI also presented an analysis by the US EPA that showed how improved forecasting and operation by the Bureau could have avoided the 2003 incident and ironically saved water at the same time.

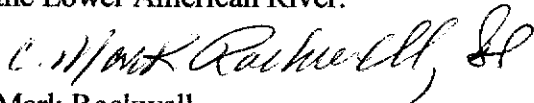
In subsequent discussions with Dr. Tina Swanson, BI Senior Scientist, it was concluded that the BI approach is the best for the Delta and the American River. We concluded that the best approach would be to use the 'CVP/SWP Operational Integrated Approach'(Pg. 16 SWRI WF Ex01) recommended by the Water Forum and the Bay Institute that would rely more on releases from Shasta, Oroville and other reservoirs rather than using the Lower American as the "real time, first response facility". In addition, BI recommends that the "SWRCB should modify water rights permits of the CVP and SWP to require implementation of an approved operational protocol to avoid upstream impacts" (See Doc BI Exhibit 04)

This approach could be quickly implemented and would not require the relaxation of the existing X2 standard. We propose the following actions by the SWRCB:

1. Limit the size and duration of the Folsom Reservoir releases. Require the Bureau not to exceed 4000 cfs. 4,000 cfs is the flow above which stranding and isolation will occur. as determined by DFG (Tech Report 01-2 Nov. 2001)
2. Set a "not to exceed" peak release size of 5,000 cfs This recognizes that in extreme situations more flows from Folsom will be required but these should be limited to a maximum of three days. (The travel time required for water released from Oroville to arrive at the delta)

Adopting these requirements will greatly reduce stranding and isolation of salmon and steelhead juveniles in the LAR and in addition, conserve more of the Folsom Cold Water Pool. Additionally, this approach would require fewer instances of the use of EWA water so that the EWA water could be redirected to other fisheries protection needs.

I appreciate your consideration of our recommendations for protecting the fisheries of the Lower American River.



Mark Rockwell
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Federation of Fly Fishers
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