



*To promote the economic, social and environmental viability of Northern California by enhancing and preserving the water rights, supplies and water quality of our members.*

October 26, 2004

Mr. Art Baggett  
Chairman  
State Water Resources Control Board  
1001 I Street  
Sacramento, CA 95814

**Re: Comments on October 27-29, 2004 Public Workshop Regarding Progress  
Toward Meeting the Narrative Salmon Protection Objective in the 1995 Bay-Delta Plan**

Dear Chairman Baggett and Members of the Board:

Northern California water users over the past several years have embarked on an integrated water management program that has broad support from water suppliers and local governments throughout the Sacramento Valley. This integrated program is the cornerstone for the landmark Sacramento Valley Water Management Agreement, which led to your Order WR 2001-05 to postpone and possibly dismiss the Phase 8 Bay-Delta water rights proceedings. A central part of this integrated water management program is a sustained, long-term commitment to fish passage and other ecosystem improvements throughout the Sacramento Valley. These efforts are intended to further the goals that Congress established in section 3406(b) of the Central Valley Project Improvement Act, Pub. L. 102-575, and the goal that the State Water Resources Control Board (Board) established in the narrative salmon doubling standard contained in Table 3 of the 1995 Water Quality Control Plan.

The Northern California Water Association (NCWA) represents seventy water suppliers and individual landowners that rely upon the waters of the Sacramento, Feather and Yuba rivers, smaller tributaries, and groundwater to irrigate nearly 890,000 acres of farmland in the Sacramento Valley. Many of our members also provide water supplies to state and federal wildlife refuges, and much of this land serves as important seasonal wetlands for migrating waterfowl, shorebirds and other wildlife. We also represent local governments and the business leadership in the region. NCWA was a signatory to the Sacramento

Valley Water Management Agreement and, working closely with its members, has been a leader in the numerous efforts to improve fish passage and related habitat.

Since the State Water Resources Control Board (Board) adopted the Water Quality Control Plan in 1995, including the narrative salmon doubling provision, tremendous efforts have been made in the Sacramento River watershed to improve fish passage and related habitat. In response to your workshop notice, the enclosed packet highlights the current status of existing programs designed to improve the production of anadromous fish and other species in the Sacramento River watershed. These extensive measures are in addition to similar actions taken by upstream interests and others in the San Joaquin River watershed. All of these efforts evidence the Board's prior finding that "statutorily mandated non-flow fish restoration programs currently being implemented in other forums (e.g., CVPIA implementation and CALFED) will help implement the salmon objective." (WR 2001-05, footnote 6d.)

Finally, these efforts must be afforded a sufficient period of time for their effects and benefits to be measured, before any additional actions to improve natural salmon production are considered for implementation. NCWA suggests that an appropriate period of time to assess the effectiveness of these measures would involve the Board conducting a further workshop in approximately 2010. Accordingly, no additional action by the Board is necessary at this time.

If you would like to discuss this further, please call.

Very truly yours,



David J. Guy  
Executive Director