

Jeanine Townsend
Clerk of the Board
State Water Resources Control Board
P.O. Box 100, Sacramento, CA 95814-0100

March 19, 2013



RE: California Water Plan / Bay Delta Conservation Plan

Dear Members of the Board,

In deliberations on your latest update of California's Water Plan and the Bay Delta Conservation Plan please give top priority to retaining basic sustainable levels of water flow throughout this irreplaceable estuary, and to a management plan that can ensure integrity for California's prime natural resource into the next century.

In consideration of an American Indian ethic to conserve natural resources for up to seven future generations, the invaluable salmon streams that descendants of Scottish lairds militantly preserve, and in south of France the 300 mile inspirational Dordogne River which since prehistoric times has supplied water and fish to region, please do justice to comparable national treasure you have mandate to protect, our San Francisco Estuary.

The flow criteria presented in your 2010 Bay Delta Water Plan that retained 60 % unimpaired flow between February and June had some sustainability for the estuary's keystone species of Pacific salmon. I believe this base flow criteria is critical not only for its viability to allow spawning salmon to return to historic levels of runs, with benefit for 100 other species in Delta dependent on them, but for survival of a Pacific Coast fishery.

Attendant to this basic element of supporting estuary fish populations of salmon, steelhead and sturgeon, is the critical support for marsh and upland habitat for waterfowl of the Pacific Flyway. Scientists document the levels of food intake that migrating flocks need to find in estuary marshes in order to reach breeding grounds in north or wintering grounds to the south. I frankly think this consideration alone should dictate to your staff what water levels are necessary to sustain healthy delta marshes.

Aside from the beauty of flights of migratory waterfowl in flight, or resting or foraging in wetlands, there might be a distinct public health concern in fragmented flocks, stressed by degraded refugia to level of ill health. As the Pacific Flyway is protected by international treaty, viability of flows to sustain estuary marshes is critical. Please consider this in your water flow formula.

The level of flow throughout estuary sustains riparian edges of Delta islands as well as marshes and this contributes to sustainability of island levees. There is an enormous economic factor at play here if these island levees are left to degrade beyond capabilities of routine maintenance. Their agriculture, such as rice fields, can be a boon to migratory waterfowl as well as produce prime California crops. It is prime example of successful 'conjunctive use' if islands are farmed well and this should factor strongly into your deliberations. Riparian edges to estuary do aid fish habitat by providing shade to cool delta waters and give woody refugia.

There is substantial beneficial use of storm water flows that travel from delta through San Francisco Bay to Pacific Ocean in that they carry sediment throughout the estuary system. Studies by San Francisco Corps of Engineers have scientifically evaluated tons of sediment carried by levels of flow throughout past century and this needs to also be critical element factored into your flow formula. This sediment is not only important to South Bay salt marsh restoration but aids in cliff and shoreline erosion protection outside Golden Gate. Is there modelling of effects diminished flows will have on bay tidal prisms, in Suisun Bay and in South Bay?

The inherent and historical beneficial uses that sustain a San Francisco Estuary, as supplied by Sierra runoff flowing through the Bay Delta, must not be superseded by inadequate resource evaluation or engineering, or short term political compromises and pressures. Afraid I find the proposed bypass water tunnels short circuit the majority of inherent natural functions of the estuary's delta bay interface. As ocean levels rise, to where will saltwater intrusion extend up through the river systems? Can a bay model illustrate these conditions?

One last thought in regards conjunctive use for critical beneficial uses is that migrating anadromous fish need cool waters and travel often at night so increased flows would be most beneficial then, and recreational uses would benefit from increased flows over weekends while agriculture can be geared for week day use. Believe Florence regulated Arno River with such considerations in mind.

Please open up present deliberations on Bay Delta to all possible alternative analysis and public comment as do not believe what is being proposed can preserve quality of life for us or flora and fauna of the Estuary.

Thank you for kind consideration of my concerns.

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