



Delta Independent Science Board

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



From: The Delta Independent Science Board

Re: Comment Letter – Bay-Delta Plan SED. Comments on the December 2012 Substitute Environmental Document (SED) on San Joaquin River Flows

Dear Ms. Townsend:

This memo provides a brief summary of the oral comments we provided to State Water Resources Control Board (SWRCB) staff during our meeting on February 15, 2013.

We were pleased to see the clear comparisons of the preferred alternative (35% of unimpaired flow) with the flows proposed by various stakeholders (Figures 3.2 – 3.5 in Appendix K). Those comparisons, in combination with the material in the earlier technical document, suggest that 60% of the unimpaired flow provides the greatest benefit to salmon. Forty percent of unimpaired flow appears to be pushing the limit of benefit to salmon, and the choice of 35% appears to be at the lower limit of what would be considered to be an improvement in flow conditions for salmon.

We were concerned about the lower end of the proposed adaptive range (25% - 45% of unimpaired flow). Managing flows at the level of 25% of unimpaired flow appears to provide little improvement over current conditions, indeed during low flows it could be considerably more harmful than current practice. During our discussion, SWRCB staff clarified the stringent criteria that would have to be met before reducing the flow below 35% of unimpaired flow. The SED needs to make this clearer.

The preferred alternative proposes using a 14-day running average. This will smooth out the hydrograph thereby making the flow regime less like a natural flow regime. We strongly recommend adding a figure showing the effect of using a 14-day running average as compared with using daily unimpaired flow values.

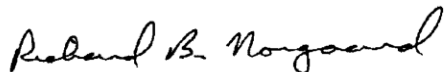
The ability to adaptively manage flow depends on the success of the San Joaquin River Monitoring and Evaluation Program. Monitoring plans have not been developed, indicators have not been chosen, and performance measures have not been established. Substantial progress on these items is needed before implementation.

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The SED contains very little discussion of possible geomorphological modifications such as sand bars, shoaling, and mouth blockages. These areas are more vulnerable to larger temperature variations and impact usable spawning habitats. Adverse flow modifications affect wetlands, encroachment by riparian vegetation and sediment suspension. Monthly spreadsheet models such as the Water Supply Effects (WSE) model are not capable of providing such details, although they provide useful information on lower San Joaquin River bulk flow alternatives. We recommend the use of appropriate models such as the USGS' CASCaDE modeling system.

A 2009 California Climate Change Center report indicates a reduction of snowpack that usually produces late spring runoff (the 30-year trend indicates a reduction of April-July runoff by approximately 35%). We recommend including text on the possible repercussions of such climate variations.

Sincerely,



Richard B. Norgaard
Chair, Delta Independent Science Board

cc: Phil Isenberg, Chair, Delta Stewardship Council
Chris Knopp, Executive Officer, Delta Stewardship Council