



October 30, 2014

Ms. Felicia Marcus, Chair  
c/o Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
1001 I Street, 24th Floor  
Sacramento, CA 95812-2000

Subject: Support for Restoration of Freshwater Flows from the San Joaquin River and its  
Tributaries to the Bay-Delta Estuary

Dear Chairwoman Marcus:

We are writing in support of, and to reiterate, the concerns of over 40 other California's non-profits who care deeply about the public trust resources of the San Francisco Bay-Delta Estuary. We are urging the State Water Resources Control Board (SWRCB) to set much more protective standards for freshwater flows from the San Joaquin River and its tributaries to the San Francisco Bay-Delta Estuary and to limit salinity in the lower San Joaquin and southern Delta. A large body of scientific studies indicates that major improvements in flow and salinity conditions are necessary to protect public trust resources and associated beneficial uses in these waters.

The Central Valley's native fish, wildlife, and supporting habitats depend on healthy rivers and clean water. Healthy riverine and estuarine ecosystems support fisheries including: recreational fishing for steelhead, sturgeon, and flounder and both recreational and commercial fishing for Chinook salmon and Pacific herring. These fisheries provide jobs in communities throughout the Central Valley and along California's coast. Similarly, adequate freshwater flows and water quality affect recreational opportunities, municipal water use, and agricultural operations in the Delta.

The SWRCB has heard repeatedly that the status quo – Delta inflows averaging only one-third of the runoff available in the San Joaquin watershed during the winter and spring and highly degraded south Delta water quality – has resulted in impairment of numerous public

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trust resources and beneficial uses. We regard Phase 1 of your update to the Bay-Delta Water Quality Control Plan (WQCP) as a litmus test of the SWRCB's support for implementing the Public Trust Doctrine across the state and for achieving established targets to double anadromous fish populations in the Central Valley. We also regard Phase 1 as a forerunner of how the Board will approach Phase 2 of the WQCP update (regarding Sacramento River basin, in-Delta, and through-Delta flows). Adopting the recommendations of the scientific and management communities (including the SWRCB's own 2010 staff report) in Phase 1 will set the appropriate physical and regulatory context for consideration of much needed, larger-scale improvements throughout the Bay-Delta Estuary. A failure to follow the best available science in Phase 1 will auger poorly for the SWRCB's willingness and ability to set adequate water quality conditions in Phase 2.

In order to address the unacceptable conditions in the lower San Joaquin River and southern Delta, we urge the SWRCB to require that:

- As close as possible to 60% of the San Joaquin River's natural flow (and no less than half) reach the Delta during the first six months of each year.
- To the maximum extent possible, winter-spring flows recreate natural patterns (magnitude, duration, timing, and frequency) of freshwater flow.
- Adaptive management of flows and other non-flow restoration measures focus on attainment of specific and measurable biological and physical outcomes including the Central Valley Project Improvement Act/Anadromous Fish Restoration Program and existing WQCP anadromous fish doubling targets).
- Flows in summer and fall be sufficient to maintain fish, wildlife, water quality, and recreational uses in the Bay-Delta, lower San Joaquin, and San Joaquin tributaries.

The ongoing drought and over-allocation of freshwater supplies are causing precarious and desperate conditions in Central Valley riverine and estuarine ecosystems. We urge the SWRCB to seize this once-in-a-generation opportunity to restore the balance between the needs of consumptive water users and the ecosystems of the lower San Joaquin River and Bay-Delta Estuary.

Sincerely,



Barbara Salzman,  
President

