

SWRCB Bay Delta Water Quality Control Plan Phase I SED Comments

# U.S. Environmental Protection Agency



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March 20, 2013

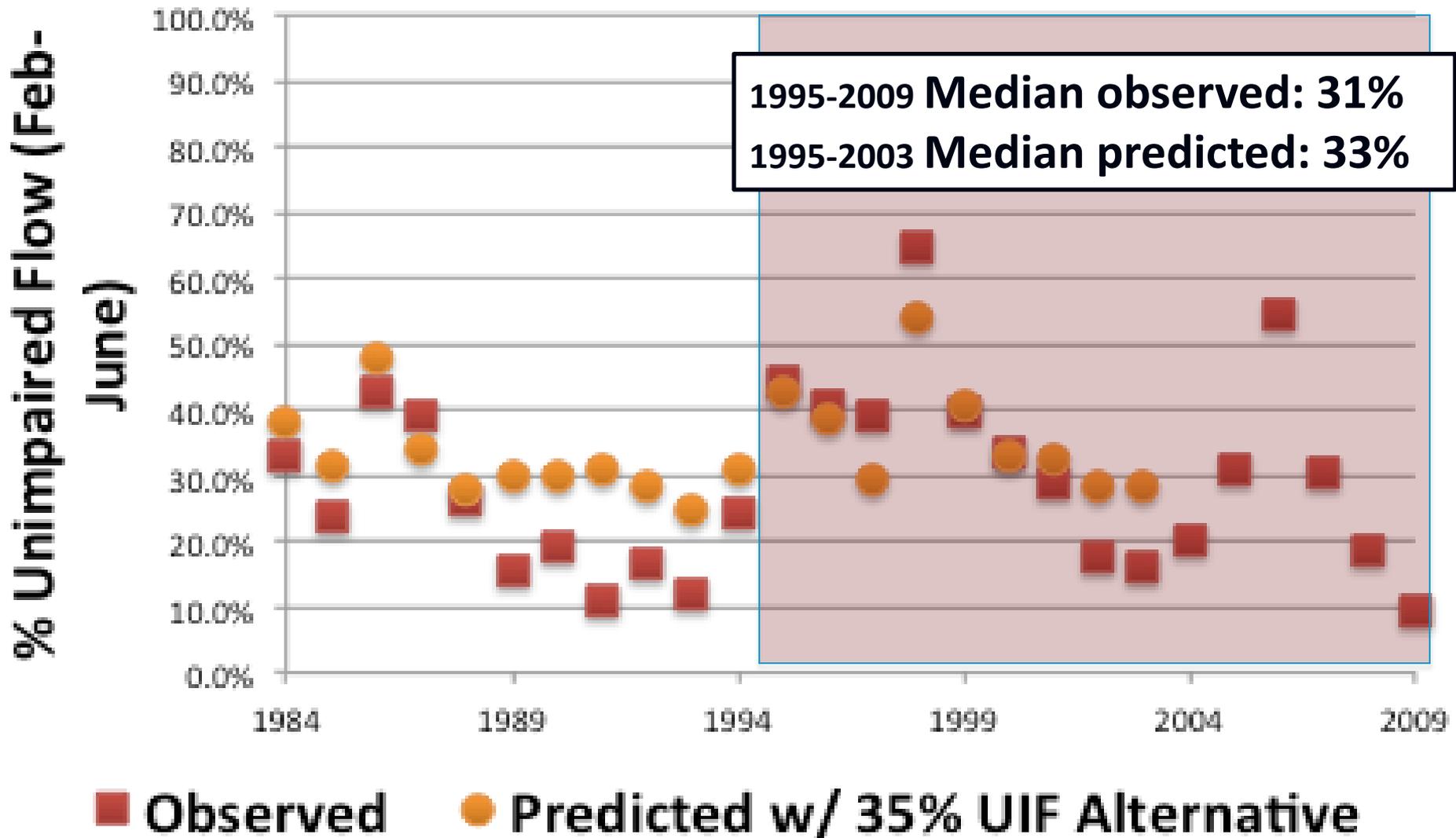
# Clean Water Act & Multiple Stressors



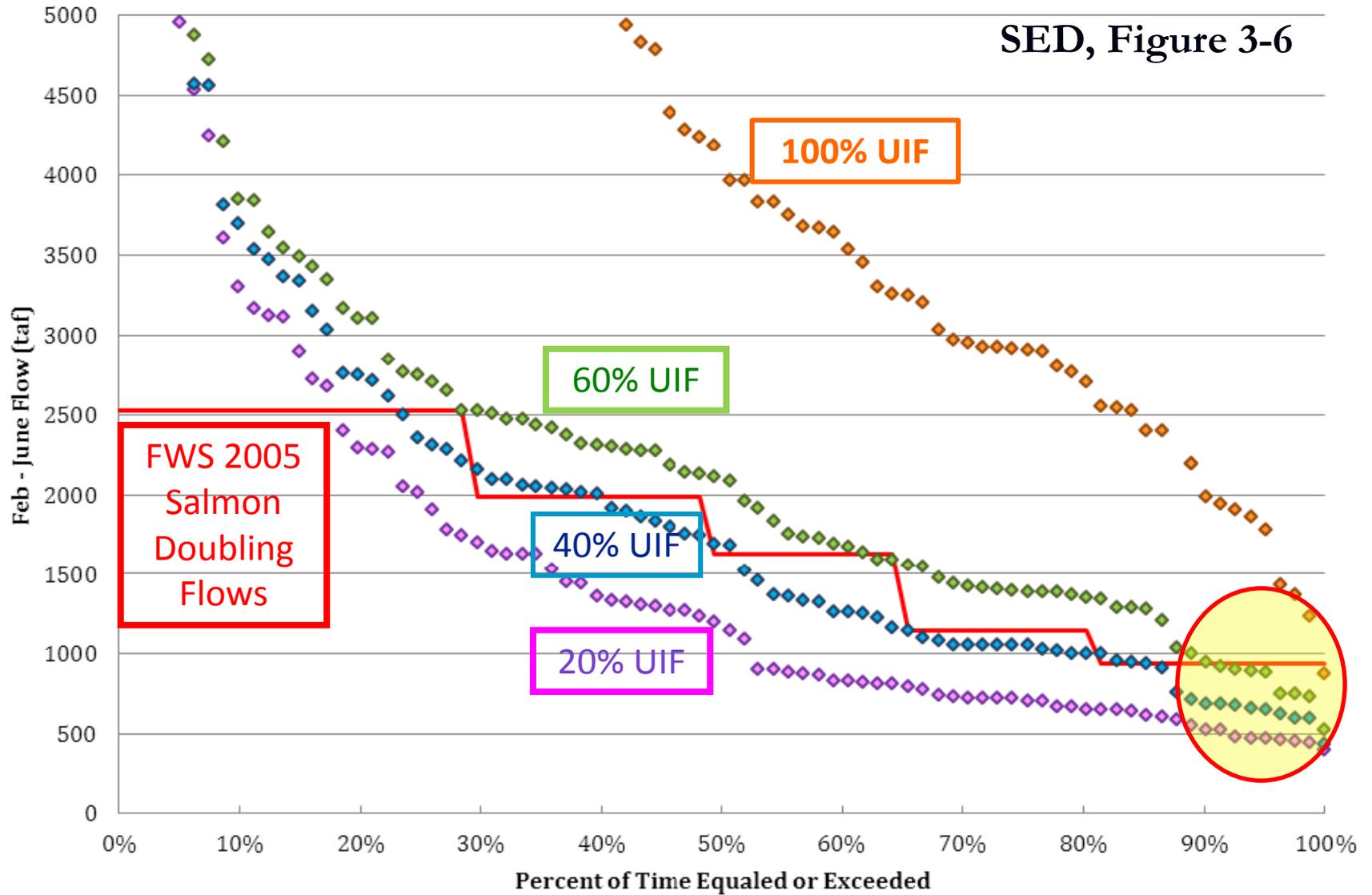
# State Board's proposed narrative objective

*“Maintain flow conditions from the San Joaquin River Watershed to the Delta at Vernalis, together with other reasonably controllable measures in the San Joaquin River Watershed, sufficient to support and maintain the natural production of viable native San Joaquin River watershed fish populations migrating through the Delta. Flow conditions that reasonably contribute toward maintaining viable native migratory San Joaquin River fish populations include, but may not be limited to, flows that mimic the natural hydrographic conditions to which native fish species are adapted, including the relative magnitude, duration, timing, and spatial extent of flows as they would naturally occur. Indicators of viability include abundance, spatial extent or distribution, genetic and life history diversity, migratory pathways, and productivity.”*

# Observed %UIF vs Predicted at Vernalis



SED, Figure 3-6



FWS 2005  
Salmon  
Doubling  
Flows

100% UIF

60% UIF

40% UIF

20% UIF

AR/NHI   Alt 2   Alt 3   Alt 4   100%UF

# Protect all life stages



# Ensure downstream protection



# Adaptive management needs greater definition



# SUMMARY

- Measurable performance targets
- Year-round protection for aquatic life
- 35% UIF is not enough freshwater flow to support native and migratory fish