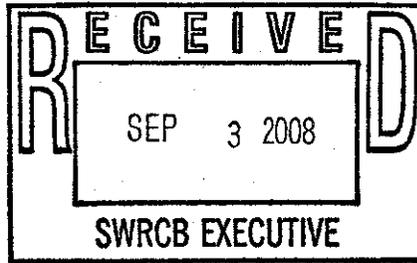




# CALIFORNIA FARM BUREAU FEDERATION

## NATURAL RESOURCES AND ENVIRONMENTAL DIVISION

2300 RIVER PLAZA DRIVE, SACRAMENTO, CA 95833-3293 · PHONE (916) 561-5655 · FAX (916) 561-5691



September 3, 2008

*Via First-Class Mail & Email*  
[commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)  
[Ccarr@waterboards.ca.gov](mailto:Ccarr@waterboards.ca.gov)

Jeanine Townsend, Cleak to the Board  
State Water Resources Control Board  
P.O. Box 100  
Sacramento, CA 95812

**Re: *Comments on September 17 and November 5, 2008 Workshops on San Joaquin River Flow Objectives and Update on Southern Delta Salinity***

Dear Chair Doduc and Members of the Board:

The California Farm Bureau Federation ("Farm Bureau") is a non-governmental, non-profit, voluntary membership California corporation whose purpose is to protect and promote agricultural interests throughout the state of California and to find solutions to the problems of the farm, the farm home and the rural community. Farm Bureau is California's largest farm organization, comprised of 53 county Farm Bureaus currently representing approximately 91,000 members in 56 counties. Farm Bureau strives to protect and improve the ability of farmers and ranchers engaged in production agriculture to provide a reliable supply of food and fiber through responsible stewardship of California's resources.

Farm Bureau appreciates the opportunity to submit these written comments in anticipation of the upcoming September 17 and November 5, 2008 Workshops on the San Joaquin river Flow Objectives and Update on Southern Delta Salinity.

### GENERAL COMMENTS

Declining salmon populations and low escapement of recent years are dependent to a very large extent on changing ocean conditions and natural oscillations in ocean productivity.

If it is correct that the VAMP has not yet produced any "conclusive results regarding needed changes to spring pulse flow objectives" (and we, in fact, make no assumptions in this regard), this is quite probably because the effect of things occurring in the ocean system completely overwhelm any marginal effect from such human manipulations of riverine flows.

Landward of the Pacific Ocean we are very much indeed managing within the margins and this imposes serious limitations on what can be achieved through or expected from management measures based on possible modification of the existing San Joaquin River Flow objectives.

Attraction flows and habitat may, in some greater or lesser proportion that is difficult to gauge, benefit migrating fish returning to or departing the system. They cannot, however, benefit fish lost in the ocean that therefore never return.

As is well known, the large export facilities of the CVP and SWP cause some mortality of fish in the system. By no means, however, are those facilities the sole culprit and, by no means, can problems related to the export facilities not, to a very large extent, be addressed through various non-flow measures, that need not unreasonably or disproportionately impact water supply for human use.

In addition to ocean conditions, introduced species and a radically altered food web are another largely uncontrollable factor that has likely tended, in recent years, to push our best attempts at responsible management into the narrow margins of the totality of factors influencing long-term population trends for San Joaquin River salmon.

We currently lack sufficient data to serve as a sound scientific basis on which to pursue or prescribe any specific set of measures on a range of possible "other stressors" that could be ensured to appreciably improve current conditions in any way.

To a very large extent, the risk from the major diversions in the system, including the existing export facilities of the SWP and CVP in the South Delta, can be effectively addressed through various physical measures, including (1) potential relocation or coordinated operation of the existing and some new point or points of diversion; (2) reasonable long-term adaptations, to the extent feasible, to avoid or minimize alterations to the Delta's natural hydrology, including large proportional extractions of freshwater flows during dry periods or at times when inflow is low, as well as induced reverse flows above certain thresholds; (3) as both a near- and a long-term strategy, some level of possible "isolation" of fish migration corridors from adverse effects of such diversions; (4) new or improved fish screens and improved salvage operations; (5) other potential modification or optimization of the operations and coordinated integration of existing and potential new facilities and structures; (6) physical structures, such as the South Delta Improvement Project operable barriers.

The Water Board's August 11 notice alludes to a parallel trend of declining pelagic fish populations and to various interim measures calculated to stem or reverse that trend and the effect this has had on implementation of salmon-related measures relating to the VAMP (examples include removal of the Head-of-Old-River Barrier, as well as reservoir releases that may tend to deplete cold water reserves that might otherwise become available to anadromous fish at another time). The Board should note and consider such potential trade-offs between pelagic and anadromous species.

September 3, 2008

Tam Doduc, Chair & Members of Board

Comments on SJR Flows / South Delta Salinity Workshops

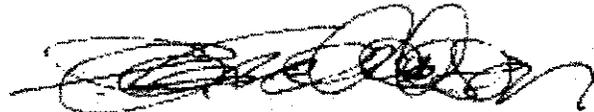
---

In the Sacramento-San Joaquin Delta, salinity control, environmental, and upstream, in-Delta, and export water supply needs and priorities all are frequently pitted, one against the other, in fierce competition. To the greatest extent possible, both the State Water Boards look back at interrelated San Joaquin River Flow and South Delta salinity issues and its broader review of the existing Water Quality Control Plan should seek to harmonize these competing priorities, remove undue asperities, and to fullest extent practicable, reliably and consistently meet all reasonable and beneficial uses, as a matter of pertinent right and law.

### CONCLUSION

Thank you for the opportunity to provide our comments and concerns. We look forward to further involvement and discussion with Delta Vision on the development of the Strategic Plan.

Sincerely,



**Justin E. Fredrickson**  
Environmental Policy Analyst

JEF\mmm