



Tuolumne River Trust

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February 7, 2011

Charles Hoppin, Chair
c/o commentletters@waterboards.ca.gov
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-0100

RE: REVIEW OF AND POTENTIAL MODIFICATIONS TO THE SAN JOAQUIN RIVER FLOW AND SOUTHERN DELTA SALINITY OBJECTIVES

Dear Chairman Hoppin,

The Tuolumne River Trust submits these comments regarding the review of and potential modifications to the San Joaquin River Flow and southern Delta salinity objectives included in the 2006 Water Quality Control Plan for the San Francisco Bay-Sacramento San Joaquin Delta Estuary.

We would like to commend Water Board staff for looking at the potential for the tributaries of the San Joaquin River (the Tuolumne, Merced, and Stanislaus) to provide water that would help to meet salinity objectives for the Lower San Joaquin and the southern Delta in the October 29, 2010, "Draft Technical Report on the Scientific Basis for Alternative San Joaquin River Flow and Southern Delta Salinity Objectives".

Recognizing that the Draft states that this analysis it is not intended to "address specifically from where the additional water will be provided within the SJR watershed" but rather to "demonstrate that water is physically available within the watershed", we would like to encourage the Board to seriously consider sources such as the Tuolumne River and other east side tributaries when it indeed comes time to address how the water will be provided. As an interested party working to restore the lower Tuolumne River, including water quality and native anadromous fish such as Chinook salmon and steelhead, we believe that it is both ecologically desirable and equitable for all tributaries to contribute water to meet salinity standards in the Lower San Joaquin River.

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Requiring that a significantly greater percentage of unimpaired runoff in the lower Tuolumne watershed be dedicated to help meet San Joaquin and Delta flow and water quality standards not only creates benefits for downstream habitats but makes sense ecologically - it mimics natural patterns and acknowledges the geographic and historical reality of the watershed. Using the unimpaired runoff approach to increase flows on the Tuolumne would create desired beneficial outcomes on both the tributary and the San Joaquin, contributing to fisheries restorations efforts more comprehensively and with better chances of success. Indeed, relying on this approach actually minimizes the potential for any disconnect between fisheries needs on the river and in downstream areas.

The Tuolumne River can play a significant role in the recovery of San Joaquin populations of anadromous fish including Chinook salmon and steelhead. As cited in the Draft Technical Report, Mesick (2009) points out that fall run populations of Chinook salmon on the Tuolumne were well over 100,000 in the 1940s, even though La Grange dam already blocked the same amount of habitat that is blocked today. There is considerable habitat on the Tuolumne, if it is given the flows needed. The Tuolumne also has greater potential for restoring flood plain habitat than is easily found on the lower San Joaquin, which was pointed out in the January 6 & 7 workshop on this subject.

The Tuolumne River Trust would like to support an approach that considers the potential water contributions of all San Joaquin River tributaries. We look forward to working with the Board considering the Tuolumne in the solution for the San Joaquin Basin.

Sincerely,

A handwritten signature in black ink that reads "Patrick Koepele". The signature is written in a cursive, slightly slanted style.

Patrick Koepele
Deputy Executive Director