Letter to State Water Resources Control Board Regarding California's Failure to Update Bay-Delta Water Quality Standards





American Cetacean Society San Francisco Bay Area Chapter



















BUENA VISTA AUDUBON A Chapter of the National Audubon Society

































Central Valley Bird Club





























































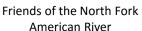










































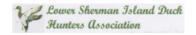






Local Agencies of the North Delta

















Mount Diablo Audubon Society









North Fork American River Alliance



















































































































April 5, 2016

Felicia Marcus, Chair State Water Resources Control Board P.O. Box 2000 Sacramento, CA 95812-2000

RE: ADOPT NEW BAY-DELTA STANDARDS IN NEXT 12-21 MONTHS

Dear Chairwoman Marcus:

Our organizations are writing to urge the State Water Resources Control Board to complete its update of the 2006 Water Quality Control Plan (WQCP) for the San Francisco Bay-Delta Estuary and adopt new water quality standards in the next twelve to twenty-one months.

There is no dispute in the scientific or resource management communities that the current water quality standards are failing to protect fish and wildlife and other beneficial uses of the estuary's water. The record is strong and clear that insufficient freshwater flows and inadequate water quality are primary drivers of the long-term degradation of ecological conditions for the public trust resources of the Bay-Delta estuary, and this state of affairs is only growing worse. The decline of pelagic organisms that was first detected in the early 2000s has accelerated, with many native fish species at record or near-record low population levels in recent surveys.

Yet the Board has not substantively or comprehensively updated the current water quality standards for the Bay-Delta estuary since 1995. The Board initiated its current review of the standards in 2009, but six years later has yet to adopt any amendments to the WQCP. Instead of adopting new protections, in fact, the Board relaxed standards over the last two years, completely devastating several year classes of multiple Chinook salmon runs, risking extinction of some native fish species, and causing significant injury to other fish and wildlife beneficial uses. Recently, the Board again revised its schedule for completing the WQCP update, this latest delay to mid-2018.

The Board is required under federal and state law to review the WQCP every three years. The latest delay would in essence start the 3-year clock ticking again, after six years of work. Water quality conditions in the estuary are simply too urgent to allow for such a delay. There is more than enough information available for the Board to adopt scientifically justified, more protective new standards in the next twelve to twenty-one months. We are united in urging you to take the information before you and make a decision as soon as possible.

Sincerely,

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