

**Golden Gate Salmon Association  
Sierra Club Bay Chapter  
Sierra Club Loma Prieta Chapter  
Sierra Club California  
Clean Water Action  
Natural Resources Defense Council  
California Sportfishing Protection Alliance  
Tuolumne River Trust  
Pacific Coast Federation of Fishermen's Associations  
institute for Fisheries Research  
The Bay Institute  
San Francisco Baykeeper  
Alameda Creek Alliance**

September 24, 2018

President Ike Kwon  
San Francisco Public Utilities Commission  
525 Golden Gate Avenue  
San Francisco, CA 94102

**Re: Bay Delta Water Quality Control Plan, Phase I**

Dear President Kwon and Commissioners;

On behalf of the above organizations, we're writing to express our concern over the public position the SFPUC has taken in opposition to the State Water Board's proposed flow requirements for the Tuolumne River in the Bay Delta Water Quality Control Plan. We understand and appreciate the importance and challenge of ensuring reliable dry-year water supplies, but given the inevitability of climate change, and the desperate condition of the Bay-Delta, the San Joaquin River and the state's iconic salmon populations, we believe your position is short-sighted. We are writing to offer three specific suggestions.

The decline of the Bay-Delta and of San Joaquin River salmon over the past decade has been dramatic and catastrophic. For example, San Joaquin River salmon populations fell from 70,000 in 1984 to 40,000 in 2010 and just 8,000 in 2014. San Francisco's commercial and recreational salmon fishing community cannot withstand another shutdown in fishing, as was experienced in 2008 and 2009. The State Water Board must act now to improve flows on the San Joaquin River, to prevent extinctions and permanent damage to California's salmon runs and fishing economy.

We are particularly disappointed that the SFPUC has argued against a significant improvement in flow conditions. This position lacks credibility. The science regarding flow impairment in the Bay-Delta system is undeniable – and the Tuolumne is among the most flow-impaired rivers in the entire Bay-Delta watershed. The SFPUC has asserted that its position is supported by a Tuolumne River-specific salmon model. However, that model has not received peer review. Such a review would ensure that

the model reflects the best available science. Our first request is for the SFPUC to work with the NGO community to arrange for an objective peer review of the SFPUC model by independent scientists.

Over the past decade, the SFPUC has succeeded in reducing water demand significantly. Complying with the State Water Board's proposed flow requirements will require an acceleration of that effort, as well as a major investment in diversifying the SFPUC's water supplies. This won't be cheap. However, this is also something that we know must happen in order to adapt to our changing climate.

In order to judge the severity of the problem and the cost to ratepayers, several questions must be answered. How long will it take to implement habitat restoration efforts on the Tuolumne that you believe will restore the salmon population and allow you to petition the State Water Board to adjust flows, as allowed under the Board's proposal? How much dry-year supply will you need to replace and how long will it take to put those alternative supplies into place? What temporary changes to the SFPUC's current drought plan would need to be put into place in the interim?

Our second request is for the SFPUC to work with our community to explore and develop alternative supplies, including water recycling, a possible share of Contra Costa's expanded Los Vaqueros Reservoir, wheeling arrangements with EBMUD, dry year purchases and more. We believe that this work can help support a healthier San Joaquin River and Bay-Delta ecosystem, as well as a more reliable, climate resilient water supply.

Third and finally, it is clear that the Trump Administration is launching attacks on the State Board and an effort to undermine the use of credible science in setting new San Joaquin River standards. We urge the SFPUC to publicly oppose this interference with credible science-based regulations and this attack on California's largest aquatic ecosystem.

San Francisco just hosted a visionary climate change conference, and the SFPUC plays a national role in climate change planning for water agencies. We agree that climate change presents a major water management challenge, but it gives San Francisco an opportunity to live up to its reputation and ensure protections for the West Coast's largest estuary and one of California's most iconic species. We are prepared to work with you and to support you in this effort.

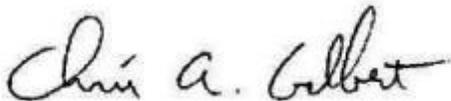
Sincerely,



John McManus  
Golden Gate Salmon Association



Becky Evans  
Sierra Club Bay Chapter, San Francisco Group



Chris Gilbert,  
Sierra Club Bay Chapter, Water Comm. Co-Chair



Heinrich Albert  
Sierra Club Bay Chapter, Water Comm. Co-Chair

Kathryn Phillips  
Sierra Club California

Katja Irvin  
Sierra Club Loma Prieta Chapter

Jennifer Clary  
Clean Water Action

Doug Obegi  
Natural Resources Defense Council

Chris Shutes  
California Sportfishing Protection Alliance

Peter Drekmeier  
Tuolumne River Trust

Pacific Coast Federation of Fishermens Assns.  
Institute for Fisheries Research

Gary Bobker  
The Bay Institute

Ben Eichenberg  
San Francisco Baykeeper

Cindy Charles  
Golden West Women Flyfishers

Jeff Miller  
Alameda Creek Alliance

