

July 28, 2014

BDCP Comments  
Ryan Wulff, NMFS  
650 Capitol Mall, Suite 5-100  
Sacramento, CA 95814



Dear Mr. Wulff:

Re: **Bay Delta Conservation Plan Administrative Draft and Draft EIR/EIS**

Marin Conservation League is concerned that any measures taken in the Draft BDCP to modify flow through the Delta will also affect the health of the San Francisco Estuary, its water quality and aquatic species.

In the Plan it is acknowledged that “the effects of implementing the BDCP may extend to aquatic systems beyond the Delta, both upstream and downstream.” Impacts downstream in San Francisco Bay have been identified as potentially significant. The Plan’s downstream boundary, however, ends in Suisun Bay near Benicia, when in fact the downstream *impacts* of altered flow extend all along the west shoreline of San Pablo Bay and the Central San Francisco Bay to the Golden Gate Bridge. This area includes not only the shallow water habitats of San Pablo Bay but also many sensitive wetlands along the shores of Solano, Napa, Sonoma, and Marin Counties. As you are aware, this area includes thousands of acres of existing wetlands as well as diked former tidelands that are undergoing extensive restoration at great public expense. Potentially affected habitats lie both within and outside the San Pablo Bay National Wildlife Refuge and support species such as the threatened green sturgeon and endangered Chinook salmon. Impacts on these areas and their fish and wildlife inhabitants are not addressed in the EIR/EIS!

A major concern, one voiced by county officials and many other agencies, organizations and individuals, is that the Plan should provide for sufficient freshwater flow to insure the health of the San Francisco Bay complex and the fish and wildlife it supports. Our bay is a blend of fresh and saline waters that nourishes a vast array of aquatic species adapted to this mixture, and reduced freshwater flow threatens this important resource.

We ask that the impacts on the San Francisco Bay estuary, including San Pablo Bay and the shoreline waters of Solano, Napa, Sonoma, and Marin Counties be fully considered in the Plan and its environmental review documents. Downstream impacts of any flow regimen considered for the Delta must be fully analyzed and, when impacts are identified, the Plan must be changed or acceptable mitigation measures included.

Thank you for this opportunity to comment.

A handwritten signature in blue ink that reads 'Jon Elam'.

Jon Elam, President

PHONE: 415.485.6257  
FAX: 415.485.6259

EMAIL: [mcl@marinconservationleague.org](mailto:mcl@marinconservationleague.org)  
WEB: [marinconservationleague.org](http://marinconservationleague.org)

ADDRESS: 175 N. Redwood Dr., Ste. 135  
San Rafael, CA 94903-1977

