

Heal the Bay



Friends
of
the
LOS ANGELES
River



CLEAN WATER ACTION

CALIFORNIA



7th GENERATION
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February 21, 2014

Chair Felicia Marcus
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95814

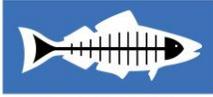
Re: Support of effort to develop biological objectives for freshwater streams and rivers in California, specifically a water quality objective with numeric endpoints.

Dear Chair Marcus and Board Members:

On behalf of the undersigned organizations, we write to express strong support for the effort to develop biological objectives for freshwater streams and rivers in California and urge the State Board to prioritize the adoption of a biological water quality objective in 2014. We are concerned that the effort is not currently being treated as a priority and that the policy option being favored by Board staff will not put us on track for meeting the stated goals of this effort: establishing consistent, statewide methods for biological assessments and interpreting results and endpoints for protection of warm and cold freshwater habitat; identifying streams that are in good biological condition and preventing degradation; identifying streams that are not in good biological condition and restoring them to good or “best attainable” conditions. Instead, we support the current regulatory “Option 1,” which would adopt a statewide water quality objective with biological endpoints. The other two proposed options would not provide adequate protection of streams across the state and would place California behind the curve in stream protection.

The importance of developing objectives for stream biology cannot be understated. The biological condition of a stream tells a meaningful and comprehensive story of the condition of the stream’s water quality, habitat, and biota. Benthic macroinvertebrates are relatively stationary, ubiquitous, and they show a diversity of responses to stressors, making them an ideal indicator group of biological and overall stream health. Further, using biological criteria to assess stream health relies on conditions in the stream environment and not in a laboratory, thus incorporating the effects of many factors that are difficult or impossible to replicate in a laboratory setting. The benthic macroinvertebrate community of a stream represents the actual conditions of the stream from an ecological perspective. It is incredibly important that we utilize and rely on the most comprehensive, ecologically relevant metrics to determine the state of California’s streams. Developing biological objectives for California’s streams is long overdue based on our knowledge of stream ecology.

The technical efforts to develop a statewide index of biological health (the California Stream Condition Index) have been thorough and technically strong. One of the main strengths of the scientific work has



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been the development of an index that can be applied consistently statewide and not region-by-region. We need the Board to develop an associated policy that will move California forward in the protection and attainment of beneficial uses. Thus, we urge the Board to adopt a statewide water quality objective and not adopt a policy (as proposed in Option 3) that sends the issue back to each Regional Board. Option 3 would create an approach that does not draw on the strengths of the technical tools and will undoubtedly leave some regions with inadequate protection of stream biological health. As State Board members, you have the opportunity to make a legacy decision that will put California at the forefront of protection of stream biological condition. The need to develop biological objectives is clear. We urge you to make biological objectives a policy priority and to adopt a statewide objective with numeric biological endpoints.

Sincerely,

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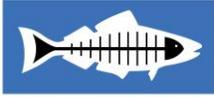
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