

CENTRAL VALLEY JOINT VENTURE

Conserving Bird Habitat in California's Central Valley

September 30, 2011

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Mr. John Laird
 Secretary
 California Natural Resources Agency
 1416 Ninth Street, Suite. 1311
 Sacramento, CA 95814

Gerald H. Meral, Ph.D.
 Deputy Secretary
 Bay Delta Conservation Plan
 California Natural Resources Agency
 1416 Ninth Street, Suite. 1311
 Sacramento, CA 95814

RE: Analysis of Bay Delta Conservation Plan Impacts on Pacific Flyway Habitat in the Sacramento and San Joaquin Valleys

Dear Secretary Laird and Dr. Meral:

California contains considerable areas of land that provide habitat for species migrating along the Pacific Flyway. These lands, which include National Wildlife Refuges, State Wildlife Areas, managed wetlands and rice lands, also provide valuable habitat for resident terrestrial species such as the giant garter snake. We are committed to the protection of these lands and land uses and the habitat they provide. If the lands do not receive reliable supplies of water, their habitat values will be lost.

It was with great interest that we read the April 19, 2011 correspondence from State Water Resources Control Board (SWRCB) Executive Director Thomas Howard regarding the "Environmental Analyses in Support of the Bay Delta Conservation Plan (BDCCP)." In the letter, Mr. Howard notes that, "any environmental analysis associated with changes to the Bay-Delta Plan must evaluate the significant environmental impact of any such changes and identify a reasonable range of potentially feasible alternatives to such changes."

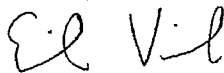
The letter goes on to recommend that changes be made to the operational criteria being evaluated for one or more of the alternatives being considered by the BDCP to incorporate two summary determinations contained in the SWRCB's Delta Flow Criteria Report established pursuant to the Sacramento-San Joaquin Delta Reform Act of 2009: "1) provide additional spring Delta outflow in all years to promote increased abundance and improved productivity for longfin smelt and other estuarine species; and 2) provide flows that promote a more natural hydrograph at all times." According to the letter, SWRCB staff suggests that modeling conducted reflecting these changes use "as a starting point...adding 1.5 million acre-feet per year to Delta outflow."

It is our hope that the evaluation of the "significant environmental impact" of these proposed changes include analysis of the impact these changes would have on water diversions necessary for refuge water supply, managed wetlands and wildlife compatible agriculture that provide essential habitat for migrating waterfowl and raptors utilizing the Pacific Flyway, as well as wintering shorebirds and resident terrestrial species such as the giant garter snake. The habitat values these water supplies facilitate are described in greater detail in the Central Valley Joint Venture 2006 Implementation Plan (<http://www.centralvalleyjointventure.org/science>).

For decades, considerable time and resources have been dedicated to the protection and enhancement of habitat in the Sacramento Valley for birds and other terrestrial species. We are concerned that restored habitat could be negatively impacted by the efforts to address problems in the Delta. This is more likely to occur if the BDCP environmental analyses do not include evaluation of the potential impacts on the availability of water supplies for these important lands upstream from the Delta. That being said the sustainability of water supplies that support significant waterbird values in the Delta and the San Joaquin Valley will depend on a balanced and fully mitigated approach to meeting the legislative and regulatory mandates that you are working to produce in the BDCP process. The Joint Venture and our member organizations stand ready to help provide information and expertise to help achieve this important outcome.

Please let us know how the Bay Delta Conservation Plan will include this analysis in the evaluation of the "significant environmental impact" of these proposed changes.

Sincerely,



Erik Vink
Management Board Chairman

cc: Mr. Thomas Howard, State Water Resources Control Board
Central Valley Joint Venture Management Board