



California Office

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May 19, 2015

Felicia Marcus
Chair, State Water Resources Control Board
1001 I Street
Sacramento, CA 95814

Sent via email

RE: Wildlife impacts from drought operations and water transfers.

Dear Chair Marcus and Members of the Board:

On behalf of Defenders of Wildlife and its more than two million members and supporters, I am writing to express support for The Bay Institute and Natural Resources Defense Council's ("NRDC") request to modify the preliminarily approved drought operations of the Central Valley Project and State Water Project relating to operation of Shasta Dam. The requested modifications include changing the operative TUCP orders and temperature plan for Shasta to reduce reservoir releases in the summer months to the levels needed for temperature control, and shift some releases and diversions/exports to the fall months when higher releases are necessary for temperature control. For the reasons set forth in the letter submitted by The Bay Institute and NRDC, we believe the requested changes are critically important for maintaining temperature control in the Sacramento River to protect endangered winter-run Chinook salmon.

We acknowledge that reducing summer releases from Shasta may impact the Sacramento River Settlement Contractors, and could affect rice production. Our request is not made lightly, as rice fields provide important habitat for migratory birds, the threatened giant garter snake, and other wetland species. The immediate risk faced by imperiled salmon, however, demands action. Further, the primary habitat value from rice fields for migratory birds is created through post-harvest flooding for rice decomposition. Shifting Shasta releases from the summer to the fall could actually benefit migratory birds by making more water available for rice decomposition.

Making additional water available for fall flooding is particularly important in light of the water transfers that are a critical part of this year's operational plan. We understand that approximately 200,000 acre feet of water will be transferred from Sacramento Valley water contractors in the fall, and that much of this water will be made available by fallowing rice fields. We are not opposed to water transfers, and believe they are an important tool for meeting water demand. However, because the destruction of wetlands has caused many species to rely on rice fields for habitat, the transfers must be structured to minimize and mitigate for wildlife impacts. Among other things, the agencies approving the transfers should:

- Carefully select parcels for fallowing to ensure sufficient, connected, high-quality giant garter snake habitat remains;
- Require the cultivation of non-irrigated cover crops on fallowed parcels to provide bird habitat;
- Ensure that some of the water remaining in the Sacramento Valley will be used for post-harvest rice decomposition; and
- Prioritize water deliveries to wildlife refuges over deliveries to entities purchasing the transferred water.

It appears, however, that the transfers are moving forward without these critical safeguards, and that they could have unreasonable and unnecessary wildlife impacts.

To the extent that shifting Shasta releases from the summer to the fall could make additional water available for rice decomposition, and there are commitments that the water will be used for that purpose, we believe the benefits to water birds and other wetland species could be substantial. We recognize that providing water for rice decomposition is costly, and suggest that some of the income generated by the water transfers should be used for this purpose.

Thank you for considering these comments.

Sincerely,



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