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Chair Felicia Marcus c/o Jeanine Townsend, Clerk to the Board State Water Resources Control Board 1001 I Street, 24th Floor Sacramento, CA 95814

Sent via electronic mail to: commentletters@waterboards.ca.gov

Dear Chair Marcus:

Point Blue Conservation Science appreciates the complex and pressing decisions the California State Water Resources Control Board must make in this year of extreme drought. Founded as Point Reyes Bird Observatory, we have been studying birds and their environments in California and the West for over 45 years. Our scientific findings (and the findings of others) can enhance water management decisions.

## The importance of managed wetlands to birds

Our work on shorebirds has clearly demonstrated the importance of managed wetlands. We conducted surveys of shorebirds over multiple years across California's Central Valley during winter and migratory periods. We found that:

- The Central Valley is one of the most important regions in western North America to migratory and wintering shorebirds.
- Up to 40% of all shorebirds in the region rely on managed wetlands in winter and over 60% during spring migration.
- Areas in the Central Valley with the greatest acreage of managed wetlands were most important to shorebirds.

The importance of managed wetlands has been recognized by the Western Hemisphere Shorebird Reserve Network which designated the Grasslands Ecological Area of the San Joaquin Basin, and the ricelands and wetlands of the Sacramento Valley, as sites of international importance to shorebirds. In recognition of the value of wetlands to birds in the region, the National Audubon Society and Bird Life International have designated 11 Global and 14 State Important Bird Areas in the Central Valley.

The science on waterfowl is also definitive. While greatly reduced from their historic numbers, today:

- Nearly 40% of all the food that supports wintering waterfowl in the Central Valley comes from managed wetlands.
- The Central Valley supports up to 60% of the waterfowl in the entire Pacific Flyway, making it one of the most important places for waterfowl in North America.

## The importance of flooded agriculture to birds

California has lost over 90% of its wetland habitats. Flooded agriculture provides vital alternative habitat for waterbirds. In the Sacramento Valley, for example, rice provides 85% of the habitat available to wintering waterbirds.

## The concern of disease outbreaks

The loss of historic wetlands has already concentrated birds into fewer and smaller areas; crowding is well known to increase the chance of disease transmission and the frequency of disease outbreaks in waterfowl. Conditions that further exacerbate bird concentrations into even smaller areas may put bird populations at further risk of disease.

## Summary

We are concerned that if water allocations to refuges are severely reduced, wetland-depend birds of the Pacific Flyway would likely be negatively impacted. It is our understanding that Central Valley refuges are anticipating receiving little more than one-quarter of their legally-mandated water supplies and post-harvest flooding of farmland could decline severely because of water supply curtailments. Hence, a great reduction in available flooded habitat could lead to longer-term, population-level impacts to birds.

We strongly encourage the Board to engage stakeholders from relevant public agencies and nonprofit organizations, to develop creative, multi-benefit solutions, including water deliveries to refuges and croplands. We support the Board's efforts to plan ahead for more drought, making sure enough water is stored for the health and safety of all Californians and its wildlife. We believe that multi-benefit action, for health and human safety, local economies, and for birds and other wildlife are readily achievable and necessary to maintain our rich heritage and long-term conservation investments. Thank you for your consideration of our letter. For additional information, please contact Catherine Hickey (chickey@pointblue.org or 415-868-0371, ext. 307).

Sincerely,

Ellie Cohen
President and CEO
Point Blue Conservation Science

Cc: Catherine Hickey, Point Blue Conservation Science