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Felicia Marcus, Chairwoman
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-0100

Dear Chairwoman Marcus:

We are writing to express our concern over any further reductions in surface water supplies for wetlands that lie south of the Delta (SOD wetlands), and anticipated reductions in winter decomposition water for rice fields in the Sacramento Valley (winter-flooded rice).

We understand that surface water supplies for SOD wetlands may be allocated at 65% of full Level 2 supplies. This does not include Level 4 refuge deliveries, which have historically gone undelivered. A more accurate representation of 65% Level 2 water is <55% of total water deliveries mandated by CVPIA. Although no formal announcement has been made, we are aware of discussions that propose to further reduce SOD wetland water supplies to 30% allocation or less. Recent days have also seen several comments from high-ranking state officials regarding the plan to further reduce water supplies for winter-flooded rice, which provides over half of all waterfowl food supplies in the Central Valley. Such reductions would be unacceptable in terms of their specific impacts on waterfowl in the San Joaquin Valley and in the Central Valley as a whole.

The Central Valley of California supports the highest density of wintering waterfowl in the world. In a "normal" water year these birds rely on about 207,000 acres of managed seasonal wetlands, 350,000 acres of winter-flooded rice, and approximately 62,000 acres of harvested grain corn. South of Delta wetlands account for over 40% of all wetlands in the Central Valley (90,000 acres). A surface water allocation of 30% or less would reduce SOD wetlands below 30,000 acres, at best, and would produce valley-wide waterfowl food shortages even if habitats north of the Delta were fully functioning. Unfortunately, they are far from doing so. North of Delta wetlands are currently slated to receive 75% allocation (Level 2 only, close to <65% total). However, few wetlands north or south of the Delta will be summer irrigated, which is important for increasing the production of waterfowl foods. Wetlands that are not summer irrigated produce only half of their normal food values. A 30% or less allocation of Level 2 for SOD wetlands and a 75% allocation of Level 2 for NOD wetlands, combined with a lack of summer irrigation, means that Central Valley wetlands as a whole would only provide a quarter of the food they do in a normal water year.

The loss of wetland water supplies will be compounded by the loss of wildlife friendly agricultural habitat, which now accounts for more than half of all waterfowl foods in the Valley. Planted rice has declined to 375,000 acres, nearly 200,000 acres less than just two years ago, and large declines in planted grain corn acres also occurred in 2015. Moreover, only about 20% of these acres are expected to be winter-flooded (75,000 acres), and these estimates are prior to statements about further reducing water for winter-flooded rice. Further reductions in surface water supplies for rice habitats will only make a critical situation worse.

In a “normal” water year, wetland and agricultural habitats in the Central Valley are just sufficient to meet the food needs of the six to seven million waterfowl that rely on the region. Ducks Unlimited and its partners have modelled the effects of reduced wetland water supplies, little summer irrigation, and little to no winter-flooding of rice and corn on habitat and food supplies, and the results indicate that food resources will be exhausted by mid-winter, a time when bird populations are peaking in the Valley. The consequences to waterfowl include lower survival, decreased reproductive performance, and greater likelihood of disease outbreaks due to concentration of birds in limited areas. We are often asked these days what the “bare minimum” number of acres is necessary to get migratory waterfowl through this winter. The fact is there is little to no food surplus for waterfowl even during normal water years and any cuts to wetland and rice water supplies will result in negative consequences for migratory bird populations—the deeper the cuts, the larger the consequences.

Further reductions in surface water supplies for SOD wetlands also need to be viewed from the perspective of those who have traditionally supported healthy wetland systems. Two-thirds of all wetlands in the Central Valley are privately managed with landowners investing considerable resources in making these habitats available to waterfowl and other wetland-dependent wildlife. Private investments ultimately lessen the burden that public agencies must shoulder in providing adequate wetland habitat. However, we only need to look at the Tulare Basin to see the effects of chronic water shortages on private wetland investments, and how those investments have declined as surface water supplies have become increasingly unreliable.

Moreover, reductions in available wetland water disenfranchises the hunting community, which bears much of the cost associated with managing public and privately-owned wetlands. A lack of waterfowling opportunities will erode support for wetland conservation among hunters who rely on these habitats. Hunters represent an important constituency in keeping public lands well-funded and well-managed, and the California Department of Fish and Wildlife relies heavily on user fees and tax revenue to meet its responsibility for wetland-dependent wildlife. To illustrate, it’s no accident that Lower Klamath National Wildlife Refuge seems to have disappeared from the public consciousness, with all that entails for waterfowl and other wetland-dependent wildlife. This has happened due to the lack of water for the refuge and hence, the lack of areas to hunt.

We are hearing more frequently, as the conversations shift exclusively to the survival of fisheries, that waterfowl and migratory birds “can fly somewhere else.” A decade of chronic water shortages in the Klamath Basin has significantly diminished migratory waterfowl use from the Lower Klamath National Wildlife Refuge, once considered the most important waterfowl refuge in the Lower 48. The Salton Sea is similarly troubled, with significantly-reduced habitat values. Washington and Oregon are suffering severe water shortages with historically low snowpack levels. Drought is gripping the West. If the thinking is that birds can just fly elsewhere, Ducks Unlimited poses the question: where do you propose they fly?

There are some available solutions. First and foremost, we encourage you to work cooperatively among state and federal operators to provide funding and support for critical habitat programs that can make immediate positive impacts to the Pacific Flyway this fall and winter. Based on successful private models such as Bird Returns, and similar programs operated by NRCS and the California Rice Commission, financial incentives that encourage farmers to pump ground water for winter rice and private wetlands flooding are the most direct solution to creating habitat on the landscape in a critical year like this. These programs, which are oversubscribed and showing more interest than there is funding, are perhaps the only way to create habitat in the face of surface water shortages. This solution also does not impact surface water operations, with which the Board is currently wrestling.

Additionally, we encourage you to consider the necessary investments in conveyance and infrastructure associated with delivering available surface water supplies, or supplementing public refuge areas with wells and funding to operate pumps to achieve water management goals. It is a sad fact that several of the public refuges (East Bear, Sutter NWR, etc.) cannot achieve their full water deliveries because they lack the basic infrastructure improvements to convey water to their boundaries. Funding must come from a variety of sources, and a larger coalition of responsible parties pushing for such funding makes it more likely to be successful.

Finally, we ask that you consider the consequences to “real-time” operations, which may sound like an efficient management strategy, but in reality leaves refuge managers, private wetlands owners, and agricultural partners without solid projections and outlook for fall and winter water management, as well as wildlife-friendly, post-harvest field management strategies. The uncertainty of operations is a significant obstacle to overcome, and one that the SWRCB and other agencies can prevent by implanting a long term plan and allowing interested parties to adjust and manage accordingly.

We respectfully request that you consider the short and long-term consequences of further reducing surface water allocations for SOD wetlands and winter-flooded rice, both in terms of the birds that rely on these habitats and the people who have traditionally supported them. Relying on timely winter rains is not a strategy employed in planning for other species and Central Valley water objectives, nor should it be a strategy for migratory birds and waterfowl. Much progress has been made by public agencies and private sector partners in managing and supporting these critical ecosystems and wildlife resources. We urge you to rely on the facts as science presents them in order to set a path forward without erasing this progress in these difficult times.

Sincerely,



Mark Biddlecomb
Director Western Region, Ducks Unlimited

- Cc: Frances Spivey-Weber, Vice Chair, State Water Resources Control Board
Tam Doduc, State Water Resources Control Board
Steven Moore, State Water Resources Control Board
Doreen D’Adamo, State Water Resources Control Board
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Penny Pritzker, US Secretary of Commerce
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