



CENTRAL VALLEY JOINT VENTURE

Conserving Bird Habitat in California's Central Valley

March 12, 2014

Conservation Organizations

Audubon California

California Waterfowl
Association

Defenders of Wildlife

Ducks Unlimited, Inc.

Point Blue Conservation
Science

River Partners

The Nature Conservancy

The Trust for Public Land

Governor Edmund G. Brown
State Capitol, Suite 1173
Sacramento, CA 95814

RE: Drought-Response Actions to Protect Basic Habitat for Waterfowl and
Migratory Birds

Dear Governor Brown:

We recognize the complex and difficult choices confronting California in response to the on-going drought across the state. On behalf of the Central Valley Joint Venture (CVJV) Management Board, we are writing to inform you about the continuing stress and adverse consequences that the drought is causing to critical ecosystem values that are at stake along the Pacific Flyway. Recognizing that complex interests must be balanced in this critical—and now compounded—third dry year, we strongly urge your support for the priorities and actions we've identified below to protect basic habitat needs for waterfowl and migratory birds, especially in the Central Valley refuge areas. The historical habitat for these birds is nearly gone and this complex of remnant wetlands and wildlife-compatible crops is virtually all that remains for these wetland-dependent species.

The CVJV is a partnership of 21 public and private entities comprised of government agencies, science and conservation organizations, and one corporation. Our mission is to work collaboratively to protect, restore, and enhance habitats for birds, in accordance with conservation actions identified in the CVJV Implementation Plan. This Plan provides a cohesive vision for bird conservation in the Central Valley within the context of the entire Pacific Flyway and in association with four international bird conservation initiatives. The Plan is based on the best available science and sets quantitative habitat and population objectives that are key to ensuring the health of migratory bird populations in California and throughout the Pacific Flyway.

In sum, our concerns are that the ongoing drought this year will compound impacts to wetland wildlife, already stressed by declining water supplies to our state and federal refuges and other managed wetland habitats over the last 2 dry years. This year, Central Valley refuges anticipate receiving little more than one-quarter of their legally-mandated water supplies, and possibly less. Furthermore, post-harvest flooding of wildlife-friendly farmland—a collaborative success

story for agriculture and the environment that provides a vital component of the flyway habitat mosaic necessary to support birds by supplementing public and private managed wetland habitat—could decline severely this year because of potential water supply curtailments.

The loss of flooded agricultural habitat places overwhelming pressure on our public and private refuges, and cuts to refuge water deliveries make refuges less able to provide food resources and nesting habitat for millions of birds and other species. Collectively, available habitat may be reduced to levels not seen since the early 1980s. We must consider these collective and compounding effects on birds and other wetland-dependent wildlife and safeguard against so much habitat loss in the Central Valley.

We appreciate and recognize the complex challenges before your Administration, and the State Water Resources Control Board (Board), in particular, to balance all interests in response to the drought and increasingly scarce water resources. We understand through the proposed revisions to the Board's Emergency Order (February 28, 2014) that the Board staff continues to seek an overall water management strategy that addresses multiple public interests, including contractual obligations for both urban and agricultural water users, water quality considerations, and conservation of fish and wildlife. We also recognize the important objective of maintaining salinity control in the Delta throughout 2014. In making water management decisions, we hope that your Administration will directly engage multiple stakeholders, including non-governmental organizations, the state and federal water projects, relevant agencies, and incorporate creative solutions to more effectively achieve multiple outcomes with severely limited water resources.

Protecting Central Valley wetlands is critically important – especially during drought.

California's public refuges, private wetlands, and some agricultural land provide indispensable habitat along the Pacific Flyway—together piecing together less than one-tenth of the four million wetland acres that once supported migrating birds and other wildlife before human development over a century ago. Millions of birds depend on these wetlands to rest and feed between long flights of hundreds or even thousands of miles. Their over-winter survival and breeding success from one season to the next is critically linked to the quality, abundance, and distribution of wetlands in the Central Valley. These relatively few remaining wetland areas are not incidental; their existence depends on dedicated water supplies and active management.

During the last severe California drought in the late 1970s, curtailments to refuge water deliveries resulted in significant impacts to wetland habitat and waterbird populations, especially wintering waterfowl. Further declines in the 1980s ultimately led to federal legislation and international agreements to mitigate for and reverse the damage.

Since the 1980s, thousands of acres of wetland habitat have been restored, and thousands more have been supplemented through compatible agricultural practices such as post-harvest flooding of rice and corn. Central Valley rice fields and wetlands collectively have been designated one of the largest internationally significant shorebird ecological sites in North America. Populations of many once-listed or declining species, such as the Aleutian Canada goose and White-faced ibis, have improved significantly. Recreation opportunities such as hunting and birdwatching have benefitted local communities and economies.

This drought—now entering a third consecutive dry year—threatens to dramatically impact the value of these long-term public investments. In particular, the cumulative impacts of habitat lost on both refuges and agricultural land presents an unprecedented challenge to birds and other wetland-dependent wildlife, and it may take many years for populations to recover. Unquestionably, our farms and communities are suffering during this drought. So, too, are migratory birds, resident waterfowl, and other wetland wildlife.

These species have no insurance policy to recover from the significant loss of habitat they could suffer this year if no action is taken. To protect our public investments and international commitments, we must provide a backstop to so much habitat loss in the Central Valley by prioritizing and augmenting water supplies to the remaining 5 percent of California wetlands.

We hope that the Board will revise their order so that this and related actions will help provide a backstop to severe cutbacks in agricultural wetland habitat by prioritizing water supplies to public and private wetlands, especially in dry years.

In consideration of substantial public investments in Pacific Flyway habitat over many years as well as international commitments to recover migratory bird species in the Central Valley, we hope that considerations of the Board and related agency actions will:

- Recognize that the remaining wetlands are a fraction of historical wetlands in the Central Valley, and thus require adequate water to be optimally managed to support the millions of migratory birds that depend on them in wet and dry years. With dwindling flooded agricultural habitat, these wetlands face overwhelming pressure to provide for birds.
- Maintain water deliveries to managed wetlands. Legal commitments to refuge water contracts should not be compromised, especially in drought years. This is exactly the moment when larger ecological values in the flyway are most at risk.
- Provide funding for refuge infrastructure improvements and operations, such as groundwater wells for critical-year supplies, wherever feasible and appropriate.
- Allow refuges to manage forecasted water supplies optimally and efficiently by providing assurances that conserved water will be kept available for delivery in fall, when needed most by refuges to flood up wintering habitat for millions of arriving birds.
- Duly consider our obligations under international commitments as a signatory to the North American Waterfowl Management Plan, an international treaty recognizing the importance of recovering and maintaining waterfowl and other wetland wildlife through wetland restoration throughout North America, by providing water to wetlands in all years.

To minimize wetland habitat losses this year and protect flyway habitat values, we recommend that the Board consider measures to help ensure some wildlife benefits from water transfers, improve infrastructure, and fund emergency water supply operations. Such measures should include actions that:

- Maximize opportunities to build environmental benefits into water management activities that enhance habitat for resident and migratory waterbirds.
- Recognize that water transfers that take water away from habitat-providing rice and other seasonal crops will likely impact birds and other listed terrestrial species.
- Enhance fallowed farmland resulting from water transfers through landowner incentives to provide habitat for resident nesting birds and other wildlife. For example, cover crops can provide critically important waterfowl nesting habitat with minimal precipitation and little to no supplemental irrigation.
- Seek out collaborative measures between state and federal programs to make additional funding available to refuges so that existing water supply wells and pumps can operate as necessary to support habitat units, without funding restrictions.
- Rehabilitate existing wells and construct new wells at refuges and easement lands to provide supplemental or alternative water supplies in critical years to safeguard the longevity of established managed wetlands. Groundwater and surface water is conjunctively managed on these lands, explicitly considering water quality implications and overall net benefits to the water balance, and groundwater is a vital water resource option in critical years.

- Install and rehabilitate existing infrastructure to improve water use efficiency of public and private wetland units. For example, functional lift pumps and pipelines can provide wetland managers the ability to reuse water flowing through the wetland units to provide spring irrigations to augment food resources to support migratory waterbirds. Grading ponds can also allow more efficient flooding targeted to foraging waterfowl and shorebirds.

We urge you to begin monitoring conditions on the ground to adaptively build and manage a better systemic response to emergency drought circumstances, now and in the future.

- Investments are needed immediately to gauge stress and impacts during this drought year so wetland managers can best optimize conditions for birds across the valley and provide habitat more precisely when and where it is in greatest demand. Disease outbreaks can signal overcrowding on too little available habitat. Supplemental funding is needed for disease detection, diagnosis, and control so that federal and state refuge managers can manage changing conditions and coordinate water and habitat management across the Valley to minimize disease outbreaks.
- Additionally, long-term monitoring programs should be established or existing programs given renewed support to assess habitat conditions for waterfowl and shorebird populations. Impacts of the drought are complex and long-lasting, and current bird population surveys may not adequately reflect drought impacts.

We, appreciate your consideration of these measures, and we urge your Administration to fully consider the cumulative effects that comprehensive “dewatering” of the Flyway may cause. The long-term viability of wetlands and flyway habitat requires an integrated approach through public and private managed wetlands and seasonal wetland habitat created from wildlife-friendly agricultural practices. Our state and federal refuges and public easement lands are founded on generations of public investment and serve as a counter-balance to the loss of 95% of wetlands habitat in the Central Valley. In effect, we all share a “public trust” responsibility to protect the viability of wetland habitat—especially in critically dry years—for future generations, to demonstrate our commitment to wildlife conservation, more sustainable water management practices overall, and to honor international agreements.

We appreciate your attention to these matters, and look forward to continued dialogue to address the myriad challenges of this drought for the benefit of people, farms, cities, and wildlife.

Sincerely,



John Carlon
Management Board Chair

CCs via email:

David Murillo, Mid-Pacific Regional Director, Bureau of Reclamation
Dave Mooney, CVPIA Program Manager, Bureau of Reclamation
Maria Rea, Assistant Regional Administrator, National Marine Fisheries Service
Ren Lohofener, Pacific Southwest Regional Director, U.S. Fish and Wildlife Service
Carlos Suarez, State Conservationist, Natural Resources Conservation Service
Letty Baylin, Counselor to the Deputy Secretary, Department of the Interior
Michael Connor, Deputy Secretary, Department of the Interior
Daniel Ashe, Director, U.S. Fish and Wildlife Service
Karen Ross, Secretary, Department of Food and Agriculture
John Laird, Secretary, California Natural Resources Agency
Matt Rodriguez, Secretary, California Environmental Protection Agency
Chuck Bonham, Director, Department of Fish and Wildlife
Mark Cowin, Director, Department of Water Resources
Nancy McFadden, Executive Secretary, Office of the Governor
Thomas Howard, Executive Director, State Water Resources Control Board
Caren Trgovcich, Chief Deputy Director, State Water Resources Control Board
Sandra Schubert, Undersecretary, Department of Food and Agriculture
Martha Guzman-Aceves, Deputy Legislative Director, Office of the Governor
Debbie Davis, Community & Rule Affairs Advisor, Governor's Office of Planning and Research
Cliff Rechtschaffen, Senior Advisor, Office of the Governor
Central Valley Joint Venture Management Board