



CENTRAL VALLEY JOINT VENTURE

Conserving Bird Habitat in California's Central Valley

October 15, 2010

**Management Board
Members:**

**CA Association of
Resource Conservation
Districts**

**California Waterfowl
Association**

Defenders of Wildlife

Ducks Unlimited, Inc.

**National Audubon
Society**

River Partners

**The Nature
Conservancy**

**The Trust for Public
Land**

**PRBO
Conservation Science**

California Department of Fish and Game
Attn: Mr. Chad Dibble
Water Branch
1416 9th St. 12th Floor
Sacramento, CA 95814

Subject: Comments on DFG Delta Flow Report

Dear Mr. Dibble:

On behalf of the Central Valley Joint Venture (CVJV), a public-private partnership working to conserve habitats in California's Central Valley for the benefit of migratory birds, we write to comment on the recent draft advisory report entitled "Quantifiable Biological Objectives and Flow Criteria for Aquatic and Terrestrial Species of Concern Dependent on the Delta" (Draft Report). We also acknowledge and appreciate the amount of work that has gone into complying with the Legislature's mandate to quantify water needs for Delta species of concern (Water Code, Section 85084.5).

The Draft Report summarizes its recommended flow criteria for aquatic species in Table 16 (pgs. 104-106), but we would like to emphasize the preceding Section 9.3 which notes that these recommendations are only one factor in the development of specific flow criteria and managing the Delta:

Before any specific criteria are implemented, the following should be considered:

1. Balancing of the need to protect the Delta's aquatic and terrestrial ecosystem with the need for reliable water supply.
2. The proposed project description as presented in the context of the available scientific understanding provided in this document.
3. New research and monitoring not available when this report was completed that may better protect species of concern (Draft Report, p. 103).

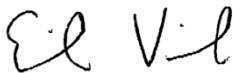
Going forward, the additional information identified in Section 9.3, as well as consideration for upstream impacts to biological resources, will be critical to inform the development of any flow criteria standards by the State Water Resources Control Board (SWRCB), Bay-Delta Conservation Plan, Delta Stewardship Council, or any other entity or planning process.

In addition, the CVJV appreciates the Draft Report's acknowledgement of the *CVJV 2006 Implementation Plan* (Draft Report, p. 9). Among other things, the *2006 Implementation Plan* identifies water needs for wetlands, harvested rice, and other habitats to meet the energetic needs of waterfowl, shorebirds, waterbirds, and riparian songbirds. If such information is not taken into account in the development of flow criteria standards, we fear numerous adverse impacts to migratory birds will result.

Finally, we encourage the Department of Fish & Game to build upon the substantial work and analysis embodied in the draft report and support its encouragement to SWRCB "to ensure impacts on beneficial uses of the Delta are comprehensively addressed when balancing environmental protection and water supply reliability" (Executive Summary, page v).

The Central Valley Joint Venture appreciates the opportunity to provide comments. Thank you for your time and consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Erik Vink". The signature is written in a cursive, slightly slanted style.

Erik Vink
Management Board Chairman

cc: Central Valley Joint Venture Management Board
Mr. Phil Isenberg, Chair, Delta Stewardship Council
Mr. Charles Hoppin, Chair, State Water Resources Control Board