California WATERFOWL

Conserving California's waterfowl, wetlands, and waterfowling heritage.

September 23, 1998

Cindy Darling
Restoration Coordinator
CALFED Bay/Delta Program
1416 9th Street, Suite 1155
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Subject: Draft Recommended FY 1999 Priorities — September 16th, 1998 Version

Dear Cindy,

The California Waterfowl Association (CWA) appreciates the opportunity to review the Draft Recommended FY 1999 Priorities for the Action Plan established by the CALFED Bay/Delta Technical Panel. Our Association remains frustrated by the fact that the CALFED Program continues to largely overlook the significant loss of seasonal wetland habitat which has occurred over the last century, as well as the political and biological importance of the Bay/Delta watershed to Pacific Flyway waterfowl and other wetland-dependent species.

Seasonal wetland habitat plays an integral roll in California's Bay/Delta ecosystem. Yet, today, less than ten percent of our historic seasonal wetland habitat base remains. To address this concern, our Association has strongly advocated the need of CALFED to increase its relative preference for seasonal wetland habitat restoration in the Programs's ecosystem restoration effort. Although the four goals outlined in the draft FY 1999 Recommended Priorities appear to be reasonable, we do have serious concerns with the Management Team's recommendation that "75% of the funding be focused on actions which benefit the highest priority species identified under Goal A which are listed fish species which depend upon the Delta." We believe that the determination of which projects should be funded should not be driven by an arbitrarily percentage allocation, but rather by the relative merit of the projects offered. This arbitrary "75% mandate" will likely result in viable ecosystem restoration projects going unfunded, while other marginally beneficial projects receive full funding. With additional future federal funding dependent upon our wise use of current dollars, as well as our debt to the California electorate to deliver on Proposition 204, we believe it is imperative that project funding decisions be driven by the relative species benefits of restoration projects, not by arbitrary funding allocation mandates.

Our Association would also like to offer the following specific comments on the draft:

Section 3.0 -- Restoration Approaches

Subsection 3.2 -- Native species recovery and conservation

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Amend the third paragraph, as follows:

"The second priority is to support recovery of the listed water-, wetland-, and riparian-dependant species in the Bay/Delta Estuary and its watershed, and that are adversely affected to a lesser degree by water management than are the first priority species. These species ~~are~~ include, but are not limited to:"

The reasons for these changes are:

a) Because the short list of species provided in the draft recommended priorities is by no means wholly inclusive of all of the listed water-, wetland-, and riparian-dependent species in the Bay/Delta Estuary, and its watershed, and;

b) Because some of these species, including the Greater sandhill crane and the Aleutian Canada goose, are largely dependent upon wetland vegetation types which, in general, no longer occur naturally in the Bay/Delta watershed, but rather must be provided by managed wetlands -- habitat which must be artificially irrigated to create marsh conditions.

Also, because this type of seasonal habitat must typically be managed, it is dependent upon "water management". As such, we have concern regarding the portion of the above paragraph which states "...species... affected to a lesser degree by water management..." limiting the fundability of seasonal wetland restoration projects. To address this concern, we recommend that the following footnote be added:

"The phrase '... species...affected to a lesser degree by water management...' applies only to species which suffer negative impacts resulting from water management, and does not refer to those species -- such as listed waterfowl and other wetland-dependant species -- which benefit from habitat which is created by water management.

Our Association also takes strong exception to the edit in subsection 3.2 offered by Jason Peltier which states that "Populations of migratory waterfowl may be more dependent upon ecological conditions in their nesting and breeding grounds in the northern tier than on conditions along the migratory route." This statement is inaccurate for two reasons. First, similar to many fish species, waterfowl populations are dependent upon the quality and quantity of habitat throughout their migratory route. In fact, because California's Central Valley provides wintering habitat for 60% of Pacific Flyway waterfowl, ecological conditions of the Bay/Delta watershed are especially critical to migratory waterfowl species. Second, not all waterfowl species breed up north, only utilizing habitats in the Bay/Delta watershed during their winter migration. Many important species, including the mallard, gadwall and cinnamon teal, largely depend upon the Central Valley for nesting, as well as wintering habitat. CALFED Program technical experts would never consider addressing concerns in salmon spawning areas, without being sure that conditions throughout the migratory route also promoted their passage and survivability. Based on the same premise, CALFED experts cannot assume that addressing northern breeding habitat conditions for waterfowl will eliminate the need to address their habitat concerns in the Central Valley.

Subsection 3.3 - Recreational and commercial species

The second paragraph of this subsection should be amended as follows:
"... evidence of contamination. Northern pintail, salmon and steelhead are species that would be a priority ... opportunities for consumptive use."

The reason for this change is because northern pintail have long been the number one preferred bird in the bag of waterfowl hunters throughout the Pacific Flyway. However, over the course of the last ten to fifteen years, pintail populations have plummeted to roughly 50% of what they were in the mid-1970's. As a result, the U.S. Fish and Wildlife Service has reduced the pintail daily bag for the 1998/99 waterfowl season to only one bird, as compared to the seven allowed only a decade ago. In addition, conservation efforts which target pintail habitat have been elevated throughout the Pacific Flyway.

Our Association also takes strong exception to Jason Peltier's comments in subsection 3.2 which question how "Delta dependent" waterfowl species are, and thus which type treatment they should receive under the Bay/Delta Program. Nearly 25% of the continental waterfowl population depends upon our few remaining Central Valley wetlands for wintering and nesting habitat. As such, the Bay/Delta region is widely recognized as one of the most important waterfowl areas in North America. This is exemplified by the fact that the North American Waterfowl Management Plan recognizes our Central Valley as one of the top seven priority areas in North America in need of waterfowl habitat restoration and enhancement. Clearly, this signifies that waterfowl are truly "Delta dependent" and worthy of full inclusion in the CALFED Bay/Delta Program.

The California Waterfowl Association appreciates the opportunity to provide these comments on the Draft Recommended FY 1999 Priorities the Bay/Delta Program, and urges that CALFED include them in the final document. If you have any questions regarding these comments, please do not hesitate to give me a call at (916) 648-1406.

Sincerely,

Bill Gaines, Director
Government Affairs

/cs

cc: Lester Snow
Jason Peltier
CALFED Ecosystem Restoration Roundtable

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