



June 14, 2016

The Honorable Sally Jewell
Secretary
U.S. Department of Interior
1849 C Street, NW
Washington, D.C. 20240

Dear Secretary Jewell:

The Coalition for a Sustainable Delta (Coalition) is writing to express concern regarding recent proposed actions to require additional outflow in an attempt to benefit delta smelt this summer. There is no scientific justification for imposing these additional flow actions. And, it is troubling that the action is being proposed entirely outside of the collaborative process that has been established to examine Delta operations, the Collaborative Science and Adaptive Management Program (CSAMP), of which the Fish and Wildlife Service is a participant. We call on Interior to examine all stressors on the delta smelt and develop a plan that addresses the multiple stressors on the species, and to do so in the collaborative science process that has been established.

The Coalition is a California nonprofit corporation comprised of agricultural, municipal, and industrial water users, as well as individuals in the San Joaquin Valley. The Coalition and its members depend on water from the Sacramento-San Joaquin Delta for their continued livelihood. Individual Coalition members frequently use the Delta for environmental, aesthetic, and recreational purposes; thus, the economic and non-economic interests of the Coalition and its members are dependent on a healthy and sustainable Delta ecosystem. The Coalition is actively engaged in scientific endeavors, including collaborative science and adaptive management programs, as well as regulatory and litigation activities in efforts to contribute to a sustainable Delta.

There is considerable scientific uncertainty surrounding the potential benefits of additional outflow for delta smelt. We believe that the data shows that increased outflows at any time of the year are unlikely to result in more spawning adults the following winter. Further, additional outflow will come at an enormous water cost – moving X2 in the summer months just one mile (or 1.5 km) requires 200,000 acre feet of water. Finally, we believe that any such action carries the possibility of potential harm to the species we are trying to benefit. In short, there does not appear to be sufficient support at this time for management actions that increase outflows for the purpose of increasing the abundance of delta smelt. We have

provided data and analysis to your staff on numerous occasions on this issue and are happy to discuss further.

Given the uncertainty surrounding the relationship between outflow and the impacts on delta smelt, and the enormous water costs associated with such proposed actions, we ask that the CSAMP be asked to consider the issue, along with other non-flow actions that could be taken to improve conditions for delta smelt. Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read 'William D. Phillimore', with a stylized flourish at the end.

William D. Phillimore
President
Coalition for a Sustainable Delta

cc: Mark Cowin, Director, California Department of Water Resources
Mike Connor, Deputy Secretary of the Interior
John Laird, Secretary, California Natural Resources Agency