



May 7, 2021

Secretary Haaland
Department of the Interior
1849 C Street, N.W.
Washington DC 20240

Secretary Raimondo
Department of Commerce
1401 Constitution Ave, N.W.
Washington, DC 20230

Dear Secretary Haaland and Secretary Raimondo:

On behalf of the undersigned organizations, we are writing to urge the Biden Administration not to endorse so-called “voluntary agreements” that propose inadequate environmental requirements for California’s San Francisco Bay-Delta watershed (“Bay-Delta”), which some agencies of the State are negotiating behind closed doors with numerous water districts but without participation from conservation and environmental justice organizations, fishing industry groups, or Native American tribes.

We understand that these negotiations are being pursued based on the wholly inadequate proposed Framework for voluntary agreements announced by the State in February 2020. That Framework would utterly fail to protect and restore the health of the Bay-Delta watershed and the communities and jobs that depend on it, and it has not been substantively improved during the 14 months since it was released. We urge the Biden Administration to resist calls by water districts and State officials to endorse these voluntary agreements.

The Bay-Delta water quality standards that are being implemented today are a quarter-century old. Improved water quality protections are urgently needed, are long overdue, and are required by both state and federal law. California's salmon runs in the Central Valley, which sustain thousands of fishing jobs across the West Coast and are of inestimable cultural importance to tribal peoples of this area, continue to decline.¹ Harmful algal blooms are proliferating in the Delta,² threatening public health for communities like Stockton, which already bear the brunt of environmental injustice. Longfin Smelt and other native species that were once some of the most abundant species in the estuary are now trending towards extinction.³ The Obama Administration concluded in 2016 that protections for endangered and threatened species in the Bay-Delta watershed must be strengthened to avoid extinction and adapt to the effects of climate change.

Yet the 2020 Framework for voluntary agreements, which is guiding the current negotiations, fails to provide adequate instream flows and other critical environmental protections for fish and wildlife and lacks adequate consideration of the impacts of impaired water quality on communities in the Delta and Central Valley tribes. Moreover, negotiations over Bay-Delta voluntary agreements over the past decade have unacceptably delayed the adoption of updated water quality standards that would actually protect fish and wildlife and water quality in the Delta.

Rather than endorsing these backroom negotiations that are based on a fundamentally flawed Framework, our organizations strongly support the Biden Administration withdrawing the Trump Administration's 2019 biological opinions and fully engaging in a science-based, transparent, public process at the State Water Resources Control Board to adopt and implement improved water quality standards for the Bay-Delta watershed.

Thank you for consideration of our views.

Sincerely,



Rachel Zwillinger
Defenders of Wildlife



Doug Obegi
Natural Resources Defense
Council



Brandon Dawson
Sierra Club California
Council

¹ See California Department of Fish and Wildlife, California Central Valley Chinook Population Database Report, updated April 22, 2020, available online at: <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=84381&inline>.

² See Dr. Peggy Lehman, California Department of Water Resources, Presentation to the Delta Independent Science Board, December 11, 2021.

³ California Department of Fish and Wildlife 2021. Table of Monthly Abundance Indices from the Fall Midwater Trawl, available online at: <http://www.dfg.ca.gov/delta/data/fmwt/indices.asp>.



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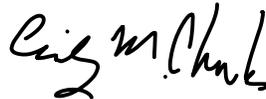
Mark Rockwell
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Fly Fishers International



Chris Shutes
California Sportfishing Protection
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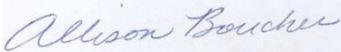
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