



August 30, 2024

Hon. Deb Haaland, Secretary
U.S. Department of the Interior
1849 C Street, N.W.
Washington DC 20240
Sent electronically

RE: MAINTAIN 2024 FALL X2 ACTION FOR DELTA SMELT

Dear Secretary Haaland,

On behalf of Friends of the River, California Sportfishing Protection Alliance, San Francisco Baykeeper, Golden State Salmon Association, Defenders of Wildlife, and Restore the Delta we are writing in regard to the August 26, 2024 letter recently sent by the Water Blueprint for the San Joaquin Valley and the Southern California Water Coalition requesting the temporary suspension of the Fall X2 water operational component of the Delta Smelt biological opinion's Summer Fall Habitat Action for the 2024 water year. According to their press release, the letter asserts that "this request is based on scientific findings that demonstrate the ineffectiveness of the measure for its intended purpose of aiding the delta smelt..."¹ We are also writing in regard to the August 21, 2024, letter to US Bureau of Reclamation Regional Director Karl Stock from Westlands Water District, the State Water Contractors, the San Luis & Delta-Mendota Water Authority, and the Friant Water Authority, which asserts that "peer-reviewed scientific conclusions indicat[e] that the measure is ineffective for its stated purpose."

These assertions are incorrect, and we urge you to reject the requests. A review of the recent scientific literature confirms earlier studies regarding the value of improving Fall X2 conditions for Delta Smelt. Both modeling studies and empirical observations show that the location of Fall

¹ Please note that an actual copy of the letter is not publicly available for review, and so we are addressing the substance in the letter based on what was summarized in the press release. See Press Release by the Water Blueprint for the San Joaquin Valley and the Southern California Water Coalition, August 26, 2024, *Mavens Notebook*. Available online: <https://mavensnotebook.com/2024/08/26/press-release-water-blueprint-for-the-san-joaquin-valley-and-southern-california-water-coalition-submit-urgent-request-to-governor-newsom-and-interior-secretary-haaland-to-suspend-action-reducing-wat/>

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X2 is one of the primary influences on Delta Smelt recruitment in the following year (Polansky et al. 2021). These improved fall outflows support lower temperatures in October and November (Bashevkin and Mahardja 2022) and increased transport of *Pseudodiaptomus forbesi* – a key Delta Smelt prey species– from fresh/very low salinity waters to the low salinity zone inhabited by juvenile Delta Smelt (Hassrick et al. 2023; Kimmerer et al. 2018).

These positive effects on Delta Smelt habitat in the low salinity zone are increasingly apparent as low salinity habitat moves further to the west, and X2 is less than 80km (Hassrick et al. 2023). Indeed, a recent analysis using multiple population models showed positive population growth when fall outflow was set to month- specific locations < 80km following Wet and Above Normal year-types and showed that Delta Smelt populations would have experienced a faster decline than observed historically over the 1994-2014 period if fall outflow had been set to month-specific locations > 80 km in those same year-types (Compass 2024).

The current Fall X2 action may not be sufficient in and of itself to recover Delta Smelt. Recent studies indicate that summer outflow may be even more important in supporting positive population growth for the species (see, for instance, Compass 2024, Polansky 2024). (Indeed, the parties requesting suspension of the Fall action should have written earlier to request implementation of a Summer X2 action if they were concerned with anything other than water supply impacts). However, it is clear that improving fall outflows has played an important role in preventing extinction of Delta Smelt, and choosing between enhancing fall outflow versus summer outflow is a false choice, given the need to provide benefits throughout the fish's life history. Considering the dire population status of the species, suspending the Fall X2 action would be irresponsible and indefensible.

This is especially so because years when the Fall X2 action is triggered are infrequent. In contrast, environmental protections for Bay-Delta fish species have been waived 6 out of the last 10 years, with tragic consequences. If we can't help Smelt and other species in the period following two wet winters, when will we ever do so?

Please contact Gary Bobker at Friends of the River and Dr. Jonathan Rosenfield at San Francisco Baykeeper (cc'd) if you have any questions regarding this topic.

Sincerely,



Jann Dorman
Executive Director
Friends of the River

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On behalf of California Sportfishing Protection Alliance, Defenders of Wildlife, Friends of the River, Golden State Salmon Association, Restore the Delta, San Francisco Baykeeper, and Save California Salmon

Cc: Hon. Gavin Newsom, Governor, State of California
Karla Nemeth, California Department of Water Resources
Camille Calimlim Touton , John Watts, Karl Stock, Dave Mooney, US Bureau of Reclamation
Martha Williams, Paul Souza, Kaylee Allen, US Fish and Wildlife Service
Gary Bobker, Keiko Mertz, Friends of the River
Chris Shutes, California Sportfishing Protection Alliance
Ashley Overhouse, Defenders of Wildlife
Scott Artis, Barry Nelson, Golden State Salmon Association
Barbara Barrigan-Parilla, Restore the Delta
Jon Rosenfield, San Francisco Baykeeper

LITERATURE CITED

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Polansky L., Newman K.B., Mitchell L. 2021. Improving inference for nonlinear state-space models of animal population dynamics given biased sequential life stage data. *Biometrics* 77:352–361. <https://doi.org/10.1111/biom.13267> [Including appendices available at: <https://doi.org/10.1111/biom.13267>]

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