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**Sent:** Wednesday, February 22, 2023 4:02 PM  
**To:** Delta Council ISB [DeltaCouncilSB@deltacouncil.ca.gov](mailto:DeltaCouncilSB@deltacouncil.ca.gov)

**Subject: Environmental and fishing group comments on the Scientific Basis Report for the VAs**

Dear Delta Independent Science Board,

I asked my NGO and fishing colleagues for some information to send you on the Draft Supplemental Scientific Basis Report in Support of Proposed Voluntary Agreements. They asked me to send you these comments.

1. [NRDC et. al.](#)

Extensive comments from Natural Resources Defense Council, California Sportfishing Protection Alliance, San Francisco Baykeeper, The Bay Institute, Golden Gate Salmon Association and Defenders of Wildlife.

NRDC et al. sought to refute the thesis that lack of physical habitat is limiting for key native fish species and that physical habitat improvements such as in-channel and floodplain restoration can substitute for adequate flow.

2. [CSPA et. al.](#)

Supplemental comments by the California Sportfishing Protection Alliance, California Water Impact Network, and AquaAlliance.

[CSPA-et-al-comments-Draft-Supplement-Sci-Basis-020823.pdf \(calsport.org\)](#)

CSPA et al. focused on the following:

- The Draft Supplement doesn't explain the operating rules that would make water agencies add flows on top of the flows that result from existing requirements.
- The Draft Supplement thus approximates the flows proposed by the proponents of the Voluntary Agreements, and almost certainly inflates those flows when it models them.
- The Draft Supplement doesn't explain how often and for how long the Voluntary Agreements would increase flows past flow thresholds that science has shown are key for fish.

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Deirdre Des Jardins  
California Water Research  
Integrative scientific synthesis



"We aren't just failing to address the growing climate crisis to come; we're unprepared even for the impacts already here—in part because they keep surprising us with their intensity and in part because we can't seem to fathom our genuine vulnerability." – David Wallace Wells

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