



February 17, 2023

Joaquin Esquivel, Chair  
State Water Resources Control Board  
1001 I Street  
Sacramento, CA 95814

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**RE: Comments on and Protest of Temporary Urgency Change Petition  
Regarding Delta Water Quality**

Dear Chair Esquivel and Members of the Board:

On behalf of the Natural Resources Defense Council, Sierra Club California, Pacific Coast Federation of Fishermen's Associations, Institute for Fisheries Resources, Golden State Salmon Association, California Sportfishing Protection Alliance, the Bay Institute, San Francisco Baykeeper, Defenders of Wildlife, Restore the Delta, and Save California Salmon, we are writing to urge the State Water Resources Control Board ("Board") to deny the Temporary Urgency Change Petition filed by the U.S. Bureau of Reclamation ("Reclamation") and California Department of Water Resources ("DWR") to waive requirements that the Central Valley Project and State Water Project Delta meet certain Delta water quality objectives (Port Chicago X2) from February 1 to March 31, 2023 ("2023 TUCP"). Reclamation and DWR have continued to violate these requirements of Decision 1641 while the TUCP is pending. The Board should deny the TUCP as proposed because: (1) granting the 2023 TUCP will cause unreasonable effects on fish and wildlife; (2) granting the 2023 TUCP is not in the public interest; and (3) Reclamation, DWR and the Board have failed to exercise due diligence.

**I. The Board Should Deny Approval of the 2023 TUCP as Proposed Because Approval Will Cause Unreasonable Effects to Fish and Wildlife**

The Board should deny the 2023 TUCP because it will result in unreasonable effects on fish and wildlife. Since 2008, when the Board formally began the regulatory process to update the Bay-

Delta Water Quality Control Plan, the Board has repeatedly acknowledged the inadequacy of the existing fish and wildlife water quality objectives and the need to strengthen those objectives to provide reasonable protection of fish and wildlife, including in its 2010 Public Trust flows report and July 2018 Framework. Indeed, in Water Right Order 2022-0095, the Board acknowledges that,

currently implemented flow and water quality requirements in D-1641 and the Bay-Delta Plan need to be strengthened based on current scientific information regarding the needs of fisheries and other instream beneficial uses.

Water Rights Order 2022-0095 at 51.

In addition, the Board and its Executive Director in 2015 and 2016 found that approval of TUCPs were unsustainable and leading to extinction of native fish. Then-Executive Director Tom Howard admitted, in the February 18, 2015 Board workshop, that his 2014 findings that these actions would not cause unreasonable effects on fish and wildlife “were just wrong.”<sup>1</sup> In 2016, the Board issued an order addressing petitions for reconsideration of approval of TUCPs in 2015, which waived Delta water quality objectives through the year and failed to protect salmon from lethal water temperatures below Shasta Dam. In that Order, the Board concluded that

the Executive Director’s decisions were reasonable at the time they were made and therefore the petitions for reconsideration should be denied in large part. *However, the State Water Board also determines that the status quo of the past two years is not sustainable for fish and wildlife and that changes to the drought planning and response process are needed to ensure that fish and wildlife are not unreasonably impacted in the future and to ensure that various species do not go extinct.*

Water Rights Order 2015-0043 (Corrected January 19, 2016), at 39 (emphasis added).

In particular, the Board has repeatedly concluded that, based on the best available science, existing Delta outflow requirements in the winter-spring months are inadequate to protect the environment, and increased Delta outflow during these months is critical to protect and restore the health of the Delta. For instance, in 2018 the Board concluded that, “**Existing regulatory minimum Delta outflows are too low to protect the ecosystem**, and without additional regulatory protections, existing flows will likely be reduced in the future as new storage and diversion facilities are constructed, and as population growth continues.” 2018 Framework at 5 (emphasis added). In the 2018 Framework, the Board emphasized that,

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<sup>1</sup> [https://www.waterboards.ca.gov/board\\_info/media/feb2015/swrcb\\_brdwrkshp021815\\_1](https://www.waterboards.ca.gov/board_info/media/feb2015/swrcb_brdwrkshp021815_1) (at 45-minute mark).

The Science Report also documents the needs for new and modified Delta outflow requirements to protect estuarine species and to contribute to protection of species in the Bay and near shore ocean. The survival and abundance of many of these native species is closely related to Delta outflows. **The dramatic declines in population size of these species, like longfin smelt, indicate that current Delta outflows are not sufficient to protect the ecosystem.** Freshwater outflow influences chemical, physical, and biological conditions through its effects on food, pollution, and the movement of flows not only in the Delta, but throughout the watershed and into the Bay and ocean. Outflows affect the location where freshwater from the rivers mixes with seawater from the ocean, referred to as the low salinity zone (the location of the 2 parts per thousand salinity isohaline or X2 position). The quality, location, and extent of habitat in the estuary fluctuates in response to outflows and other factors. Coastal and near-shore marine species also rely on flows to aid the migration of their young into the estuary. Generally, more downstream X2 locations past the confluence of the Sacramento and San Joaquin rivers benefit a wide variety of native species, including commercial seafood species, through improved habitat conditions for various life stages. These benefits extend all the way through the Bay and out into the ocean.

*Id.* at 8 (emphasis added); *see id.* at 16-17 (reiterating that, “As discussed above, current outflow volumes are inadequate to protect the ecosystem, and current outflow requirements are even lower and less protective.”). The Board’s peer-reviewed 2017 final Scientific Basis Report similarly concluded that existing Delta outflows are inadequate, identified Delta outflow thresholds for numerous native fish species and zooplankton, and proposed increased Delta outflow requirements to adequately protect native fish and wildlife. *See, e.g.*, 2017 Scientific Basis Report at 1-21, 3-6 to 3-10, 3-55 to 3-66, 3-73, 3-82 to 3-92, 5-17 to 5-21, 5-24 to 5-34.

Other agencies share the Board’s conclusion that existing water quality objectives are inadequate to protect the Bay-Delta ecosystem. For instance, in its 2010 report to the legislature, the California Department of Fish and Wildlife stated, “...current Delta water flows for environmental resources are not adequate to maintain, recover, or restore the functions and processes that support native Delta fish .”

And just last year, in proposing to list Longfin Smelt under the federal Endangered Species Act, the U.S. Fish and Wildlife Service concluded that existing regulatory mechanisms, including D-1641 and the State Water Project’s incidental take permit, are inadequate to prevent the extinction of the San Francisco estuary’s population of this species. U.S. Fish and Wildlife Service, Endangered and Threatened Wildlife and Plants: Endangered Status for the San Francisco Bay-Delta Distinct Population Segment of the Longfin Smelt, 87 Fed. Reg. 60957, 60970 (Oct. 7, 2022).

Yet despite repeatedly finding that existing water quality objectives fail to provide reasonable protection of fish and wildlife beneficial uses in the Delta, that prior TUCPs were unsustainable

and leading to extinction, and that outflows greater than existing regulatory requirements are needed to protect the ecosystem, the Board is considering approval of this 2023 TUCP that would significantly reduce Delta outflow by waiving the Port Chicago X2 requirement for February 1 to March 31, 2023. Table 4 of the Bay-Delta Water Quality Control Plan explains that Delta outflow of 29,200 cfs is sufficient to meet the X2 objective at Port Chicago, whereas Delta outflow of 11,400 cfs is sufficient to meet the X2 objective at Chipps Island. As a result, approval of the TUCP would dramatically reduce Delta outflow and the availability of low salinity habitat in the highly productive regions of Suisun Bay and Suisun Marsh.

Despite the fact that native fish and wildlife are imperiled and are continuing to decline under status quo conditions, even Reclamation and DWR's analysis in the 2023 TUCP itself acknowledges that approval is likely to further harm native fish and wildlife including Longfin Smelt, winter-run Chinook salmon, spring-run Chinook salmon, Delta Smelt, fall-run Chinook salmon, and Central Valley steelhead, including: reducing through-Delta survival of already-imperiled<sup>2</sup> winter-run Chinook salmon, *see* TUCP at page 2-17; increasing the number of winter-run trapped and killed in the CVP and SWP pumps, *id.* at 2-19; reducing survival of spring-run Chinook salmon and steelhead through the Delta, *id.* at 2-26, 2-28, 2-36; harming Delta Smelt and therefore chances for the survival of this nearly extinct species, *id.* at 2-39–2-40; and reducing the abundance of Longfin Smelt, *id.* at 2-46.

Moreover, the TUCP's biological analysis substantially underestimates the harm to Longfin Smelt from reduced Delta outflow under the TUCP, misleadingly claiming that the results are uncertain. The California Department of Fish and Wildlife ("CDFW") has previously rejected DWR's self-serving and statistically improper claims that the relationship between outflow and Longfin Smelt abundance is uncertain, concluding in its analysis of the State Water Project's Incidental Take Permit that DWR's analysis tends to "obscure" and "have the consistent effect of downplaying the effect" of reduced outflow. *See* California Department of Fish and Wildlife, Findings of Fact of the California Department of Fish and Wildlife Under the California Endangered Species Act, Attachment 7 (Effects Analysis, State Water Project Effects on Longfin Smelt and Delta Smelt, March 2020), at 74. In that analysis, CDFW also rejected a similar methodology for estimating impacts to Longfin Smelt as that presented in the TUCP.

Notwithstanding DWR's attempts to "obscure" the scientific consensus, numerous peer reviewed scientific studies going back decades have consistently found that winter-spring Delta outflow is a driving factor in Longfin Smelt recruitment and population dynamics. *See, e.g.,* Nobriga and Rosenfield 2016; Thomson et al 2010; MacNally et al 2010; Kimmerer 2002; Kimmerer 2009; Jassby et al 1995. The best available science indicates that the negative effects of decreasing

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<sup>2</sup> State and federal agencies have concluded that egg-to-fry survival of winter-run Chinook Salmon in 2022 was the lowest recorded in the past 25 years (2.17%), and in 2023 the U.S. Fish and Wildlife Service has documented the fewest numbers of juvenile winter-run Chinook salmon passing Red Bluff Diversion Dam in at least 20 years.

Delta Outflow on Longfin Smelt are certain. In determining that Longfin Smelt should be listed under the federal Endangered Species Act last year, the Fish and Wildlife Service concluded that,

We consider reduced and altered freshwater flows resulting from human activities and impacts associated from current climate change conditions (increased magnitude and duration of drought and associated increased temperatures) as the main threat facing the Bay-Delta longfin smelt due to the importance of freshwater flows to maintaining the life-history functions and species needs of the DPS. However, because the Bay-Delta longfin smelt is an aquatic species and the needs of the species are closely tied to freshwater input into the estuary, the impact of many of the other threats identified above are influenced by the amount of freshwater inflow into the system (i.e., reduced freshwater inflows reduce food availability, increase water temperatures, and increase entrainment potential).

*Id.* at 60963.

In addition, the TUCP results in much more negative OMR flows than if the projects were to comply with D-1641. *See* TUCP at 2-19 (for February, the analysis estimates -5,000 cfs OMR under the TUCP and +100 cfs under D-1641. This increases the risk of entraining and killing Delta Smelt at the pumps, and according to CDFW's fish salvage monitoring, Delta Smelt have been salvaged at the pumps on February 8 (expanded count of 4), February 12 (expanded count of 4), February 13 (expanded count of 8), and February 14 (expanded count of 4), which appears to be the highest number of Delta Smelt salvaged at the pumps since 2017.

The harms caused by the 2023 TUCP's reduction in Delta outflow are unreasonable and are inconsistent with the Board's obligations to protect beneficial uses identified in the Bay-Delta Water Quality Control Plan and to protect Public Trust resources. In addition, the TUCP provides no evidence that cutting Delta outflow in February and March would provide any environmental benefits later in time.

For instance, the TUCP admits that it is unlikely to affect releases from or water storage levels at Shasta Dam, and thereby would not have any potential water temperature benefits for salmon in the Sacramento River:

Absent a TUCP in February and March, DWR and Reclamation would attempt to meet all D-1641 water quality requirements including the Port Chicago standard through a combination of upstream releases from Lake Oroville and Folsom Lake, as well as export reductions. **Releases from Lake Shasta would likely not be needed.**

TUCP at 2-2 (emphasis added). Without any evidence that waiving Delta outflow requirements as proposed in the TUCP would improve conditions for fish and wildlife at other times or locations, there is simply no basis for the Board to rely on this assertion. This is particularly true

since it has been repeatedly shown that approval of TUCPs have not resulted in adequate temperature protection for salmon upstream of the Delta. For instance, the Board found that while the TUCP in 2015 was intended to improve Shasta storage and temperature management for salmon,

the actions taken this year to protect winter-run, while reasonable at the time, were unsuccessful. Significant changes to the temperature management process must be implemented immediately to ensure that winter-run do not go extinct, to avoid further serious indirect impacts, and to ensure that there is timely, transparent and accurate information provided to inform temperature management decisions.

Water Rights Order 2015-0043 at 40. Similarly, exploratory modeling by Reclamation in 2022 has also demonstrated that reducing Delta outflow generally does not improve Shasta storage or water temperatures for salmon. And the TUCP provides no evidence that increasing Oroville storage would improve water temperature for salmon, which is not surprising given the dam's low level outlets allow for releasing adequate water temperatures even at lower reservoir storage levels.

In light of the experience in 2014, 2015, and 2021, and Reclamation's exploratory modeling, and the lack of any substantial evidence in the TUCP, there is no reasonable basis to conclude that approval of the TUCP would conserve upstream reservoir storage sufficient to adequately protect salmon from deleterious water temperatures.

Even incrementally greater adverse effects on fish and wildlife species are patently unreasonable, given that state and federal agencies have already concluded that baseline conditions are inadequate to prevent extinction and are inadequate to provide reasonable protection of fish and wildlife. Approval of the TUCP would cause unreasonable effects on fish and wildlife, and as a result, the Board should deny the 2023 TUCP.

## **II. The Board Should Deny Approval of the TUCP as Proposed Because Approval is Not in the Public Interest**

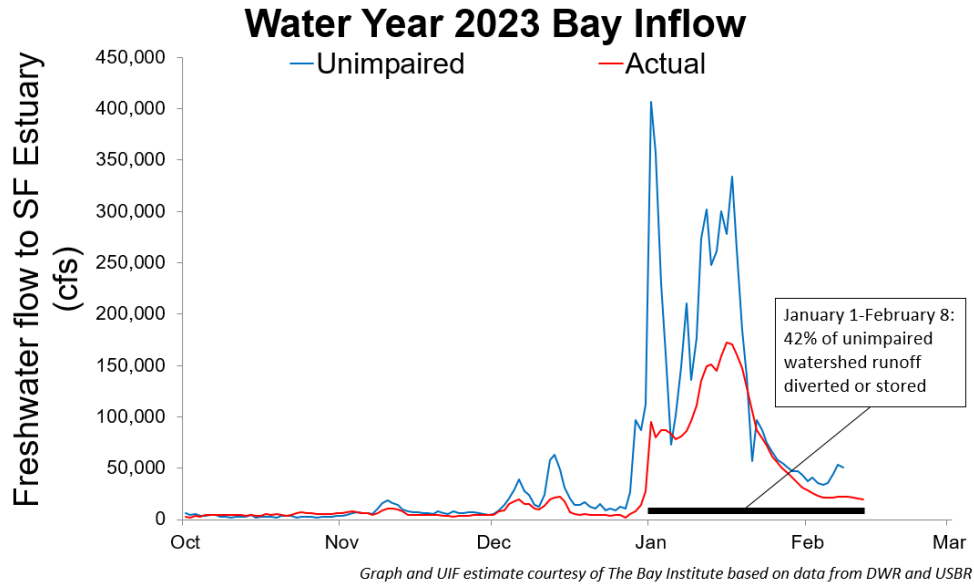
The Board should also deny approval of the TUCP because approval is contrary to the public interest, given that the TUCP does not propose or require Reclamation and DWR to reduce water supply allocations, water deliveries, and water diversions by their contractors, including settlement and exchange contractors, except for: (a) human health and safety,<sup>3</sup> *see* Cal. Code Regs., tit. 23, § 871.1; and (b) wildlife refuges (Level 2) as required by federal law, *see* section 3406 of P.L. 102-575. Indeed, the TUCP does not propose any reduction in SWP and CVP

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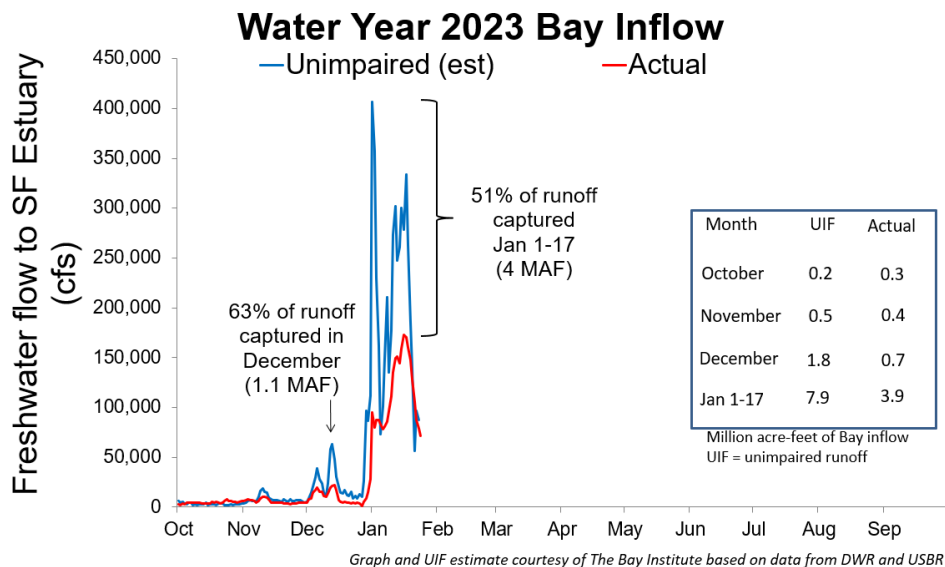
<sup>3</sup> All references to water diversions for human health and safety refer to these cited regulations of the Board and do not include water diversions for commercial or agricultural uses (including water diversions for the CVP and SWP's settlement or exchange contractors).

exports from the Delta or reductions in allocations to their contractors, even though the TUCP admits that reducing exports and reducing the SWP’s and CVP’s water supply allocations would eliminate the need for this TUCP. See TUCP at 2-2.

Water supply conditions have significantly improved compared to recent years, and millions of acre feet of water was stored in upstream reservoirs from the recent storms. In fact, analysis by the Bay Institute shows that between January 1, 2023 and February 8, 2023, approximately 42 percent of the unimpaired runoff in the Bay-Delta watershed has been stored or diverted.



The Bay Institute’s analysis shows that an even higher percentage of unimpaired flow – 51 percent – was captured and stored between January 1 to January 17, before upstream reservoirs increased reservoir releases to maintain capacity for flood control purposes.



In addition to the millions of acre feet of runoff that has already been captured and stored, snowpack this year is far above average. As of February 16, 2023, DWR estimates that statewide snowpack is 138 percent of the April 1 average and 186 percent of average for this date. DWR, Daily Statewide Summary of Snow Water Content, <https://cdec.water.ca.gov/reportapp/javareports?name=DLYSWEQ>.

As a result, DWR has already publicly announced a discretionary 30% allocation for SWP contractors. Moreover, DWR is likely to announce an increased allocation for SWP contractors in late February, as the January 26, 2023 allocation announcement did not consider the anticipated runoff from January storms, and it was instead based on water supply conditions as of January 1, 2023. *See also* DWR, Allocation Analysis for 2023 dated January 26, 2021.

In addition, we expect that DWR will announce a 100% allocation to their Feather River Settlement Contractors. *Id.* Similarly, we expect that Reclamation has or will shortly announce 100% allocations for Sacramento River Settlement Contractors and San Joaquin River Exchange Contractors, a 100% allocation for CVP contractors on the Stanislaus River, and is likely to announce a 100% allocation for Friant Division contractors (Class 1). The TUCP simply takes water from the environment without requiring reductions in water deliveries to the CVP and SWP contractors.

While the TUCP proposes to cut water for the environment, the TUCP does not require Reclamation and DWR to reduce, curtail or eliminate water supply allocations to, water deliveries to, and/or water diversions by all of their contractors. The TUCP admits that it could meet D-1641 requirements by reducing Delta exports and increasing reservoir releases from Folsom and Oroville reservoirs. TUCP at 2-2. Requiring Reclamation and DWR to reduce water supply allocations (except those necessary for (a) human health and safety and (b) wildlife refuges, as required by federal law) would allow Reclamation and DWR to meet Delta water quality standards without impairing reservoir storage levels later in the year.

Granting the TUCP without first requiring DWR and Reclamation to reduce allocations to their contractors in order to comply with D-1641, including reductions in allocations to settlement and exchange contractors, would not be in the public interest.<sup>4</sup> Regardless of whether water deliveries under contracts may have been reasonable when they were entered into or whether they are reasonable in other years, the Board has a continuing duty to determine whether a use is reasonable under Article X, section 2 of the State Constitution. Given that the Bureau of Reclamation and DWR are violating their water rights obligations to the public under Decision

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<sup>4</sup> As the Board is well aware, no one in California has a right to use water unreasonably, and all water rights are subject to the reasonable use and Public Trust doctrines, under which the Board has ample authority to regulate pre-1914 water rights to protect fish and wildlife. *See, e.g., Stanford Vina Ranch Irrigation District v. State of California*, 50 Cal.App.5th 976, 983, 1002-1003 (2020); *Light v. State Water Resources Control Board*, 226 Cal.App.4th 1463, 1482-85 (2014); *U.S. v. State Water Resources Control Board*, 182 Cal.App.3d 82, 106, 129-130 (1987).



1641, and causing unreasonable impacts to Delta water quality, fisheries, and the Public Trust, maintaining contractual water allocations constitutes a waste and unreasonable use of water.

Because granting the 2023 TUCP as proposed is not in the public interest, the Board should deny approval of the 2023 TUCP.

**III. The Board Should Deny Approval of the TUCP as Proposed Because DWR, Reclamation and the Board Have Failed to Exercise Due Diligence**

The Board should also deny approval of the 2023 TUCP because Reclamation and DWR, and the Board itself, have not exercised due diligence.

Droughts are a fact of life in California, and the science is clear that climate change is increasing the frequency and magnitude of droughts. After the last drought, the Board emphasized that “changes to the drought planning and response process are needed to ensure that fish and wildlife are not unreasonably impacted in the future and to ensure that various species do not go extinct.” Water Rights Order 2015-0043. But instead of planning for drought, the CVP and SWP have wholly failed to plan for meeting water quality objectives under D-1641 and Water Rights Order 90-5 during drought conditions, as the Board acknowledged last year:

Although the current violations are exacerbated by the extreme dry conditions, they are in part the result of the overallocation of Project water during dry conditions. Additionally, risk management and operational decisions by the Projects were made that appear to have discounted the need to maintain regulatory compliance.

Letter from State Water Resources Control Board to DWR and Reclamation dated April 30, 2021.<sup>5</sup> Instead, ever since the Board granted TUCPs in 2014 and 2015, Reclamation and DWR’s “plan” for droughts appears to be using TUCPs in future droughts to waive the rules in order to allocate more water to their contractors; DWR and Reclamation have petitioned for, and the Board has granted, TUCPs in 2014, 2015, 2016, 2021, and 2022.

Moreover, unlike TUCPs that were granted in prior years classified as Critically Dry, DWR’s modeling shows that this year is extraordinarily unlikely to be classified as a Critically Dry year in either the Sacramento or San Joaquin River basins. DWR’s February 1, 2023 water supply index forecast predicts that the 2023 water year for the Sacramento Basin will be classified as a Dry water year type under the 99 percent forecast and 90 percent forecast, a Below Normal year

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<sup>5</sup> This letter is available online at:

[https://www.waterboards.ca.gov/waterrights/water\\_issues/programs/compliance\\_monitoring/sacramento\\_sanjoaquin/docs/2021/20210430\\_swbltr\\_bdcompliance.pdf](https://www.waterboards.ca.gov/waterrights/water_issues/programs/compliance_monitoring/sacramento_sanjoaquin/docs/2021/20210430_swbltr_bdcompliance.pdf). It is hereby incorporated by reference.

under 75 percent forecast, and an Above Normal year under the 50 percent forecast.<sup>6</sup> Similarly, DWR's February 1 forecast predicts the 2023 water year for the San Joaquin Basin would be classified as an Above Normal water year type under the 99% forecast.<sup>7</sup> Thus, approving this TUCP would expand the pattern and practice of violating D-1641 from Critically Dry years to years that are likely to be classified as Dry or wetter.

In addition, only a few weeks ago, DWR publicly announced that a Temporary Urgency Change Petition was "unlikely" to be needed this year. DWR News Release, January 26, 2023, Recent Storms Allow State Water Project to Increase Expected Deliveries to 1.27 Million Acre Feet, online at: <https://water.ca.gov/News/News-Releases/2023/Jan-23/Recent-Storms-Allow-State-Water-Project-to-Increase-Expected-2023-Deliveries>. Yet despite knowing that D-1641 would require compliance with Port Chicago X2 objective by at least early February, Reclamation and DWR did not submit the 2023 TUCP until after they had already violated D-1641, which further demonstrates the failure to exercise due diligence.

The Water Code imposes a non-discretionary duty on the Board to find the petitioner's need for change is not urgent if the Board determines that "the petitioner has not exercised due diligence either (1) in petitioning for a change pursuant to provisions of this division other than this article, or (2) in pursuing that petition for change." Cal. Water Code § 1435(c); *see* Draft Order at 25-26, 39. There is no evidence that DWR and Reclamation have petitioned the Board at any time since 2015 to change these requirements other than through TUCPs. Instead, DWR and Reclamation have sought to delay the Board's completion of the updated Bay-Delta Water Quality Control Plan and implementation of those updated water quality objectives through pursuit of voluntary agreements and by other means.<sup>8</sup> Reclamation, DWR and the Board have all failed to exercise due diligence, and the result is this ongoing pattern and practice of the Board waiving compliance with water quality objectives via TUCPs.

Because DWR and Reclamation have failed to exercise due diligence, the Board should deny approval of the 2023 TUCP.

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<sup>6</sup> <https://cdec.water.ca.gov/reportapp/javareports?name=WSI>

<sup>7</sup> Indeed, DWR earlier this week identified several likely storms in the coming weeks, which it explained "should increase the yearly totals for an **already wet year.**" DWR, Forecast Discussion, February 14, 2023 Bulletin 120 Update, <https://cdec.water.ca.gov/reportapp/javareports?name=WSFCastDiscussion.pdf> (emphasis added).

<sup>8</sup> In addition, we note that the voluntary agreement proposed by DWR and Reclamation proposes that "The VA flows described in Appendix 1 **will be additive to the Delta outflows required by Revised Water Rights Decision 1641 (Revised D-1641)** and resulting from the 2019 Biological Opinions, although the 2019 Biological Opinions may be modified, including to resolve litigation concerning those opinions." *See* Section 4.1 of the Term Sheet (emphasis added). Thus, the TUCP is inconsistent with the proposed voluntary agreement.

**IV. Conclusion**

For the foregoing reasons, the Board should deny the 2023 TUCP as proposed, find that granting the 2023 TUCP would result in unreasonable effects on fish and wildlife and is not in the public interest, find that DWR and Reclamation have failed to exercise due diligence, and require Reclamation and DWR to comply with D-1641.

Thank you for consideration of our views.

Sincerely,



Doug Obegi  
Natural Resources Defense Council



Brandon Dawson  
Sierra Club California



Glen Spain  
Pacific Coast Federation of Fishermen's  
Associations  
Institute for Fisheries Resources



John McManus  
Golden State Salmon



Gary Bobker  
The Bay Institute



Ashley Overhouse  
Defenders of Wildlife



Jon Rosenfield, Ph.D.  
San Francisco Baykeeper



Chris Shutes  
California Sportfishing Protection Alliance



Barbara Barrigan-Parrilla  
Restore the Delta



Regina Chichizola  
Save California Salmon