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Projects and Facility Operations Committee
Pajaro Valley Water Management Agency
36 Brennan St.
Watsonville, CA 95076 **June 23, 2026**

RE: Comments on AMP 2025 Annual Report

Honorable Committee:

The Sierra Club has reviewed the WY2025 Annual Report, Pre-Operations, and submits these comments. In general, the Annual Report lacks attention to conserving wetlands and waterfowl. The termination of farming in the upper elevation bands of the lake basin provides a valuable opportunity to encourage, rather than inhibit, the waterfowl food plants already colonizing these areas. Adjustments to the methods and timing of woody and invasive vegetation control are essential to foster waterfowl food production. Emergent marsh vegetation supports not only waterfowl, but all of the profound biotic diversity associated with wetlands. The Sierra Club's position is that the waterfowl studies, plant studies, and results summary presented in the Annual Report failed to comply with the Adaptive Management Plan (AMP) adopted by the PV Water Board of Directors in 2022, particularly the objectives to preserve waterfowl habitat quality and to sustain seasonal wetland and native vegetation.

As your Committee is aware, no withdrawals are allowed from College Lake unless The Pajaro Valley Water Management Agency is implementing an Adaptive Management Plan (AMP) for waterfowl and wetland vegetation management that includes systematic studies of fish, wildlife and vegetation, along with measures to preserve waterfowl habitat quality. The AMP establishes requirements for plant and waterfowl studies, evaluation of study results, and thresholds for management recommendations.

> *Right holder shall prepare an adaptive management plan for waterfowl management and multi-species mitigation for College Lake in consultation with the State Water Board, California Department of Fish and Wildlife, and National Marine Fisheries Services, as required by mitigation measure BIO-2i.1 in the Mitigation and Monitoring and Reporting Plan adopted by the Pajaro Valley Water Management Agency Board of Directors for its 2014 Basin Management Plan Update (Resolution 2014-05). The plan shall include systematic studies of fish, wildlife, and vegetation. The plan shall also include measures to preserve waterfowl habitat quality. No diversion is*

authorized under this permit unless right holder is implementing the approved plan. - DWR Water Rights Application A032881.

Sample Disking Schedule	
Elevation Band	**Disking Dates**
63'-61'	July 1 – July 15
<61'-58'	August 1 – August 15
<58'-55	September 1 – September 15 if needed

The Adaptive Management Plan approved by your Board of Directors enshrines the permit's waterfowl requirement in Table 4-1, where the mandate is stated as follows: "Waterfowl—Preserve waterfowl habitat quality in the proposed water storage area."

The WY2025Annual Report's areas of noncompliance with the referenced AMP are described below.

Executive Summary and Results Discussion

Woody Vegetation Control

Intermittent disking to control woody vegetation and support waterfowl food plants such as swamp timothy and smartweed is appropriate. However, the WY 2025 Annual Report states that "*The work window for conducting the recommended actions is typically expected to be from September to October to maximize access to target sites (1-3)*. Section 3.1.1 states, *"Vegetation removal will occur after the lake has been drained, allowing for access for equipment to excavate the plant roots."* The problem with this "work window" is that September / October disking does not allow adequate time for maturation and seed setting by waterfowl food plants before flood-up in December-January. Additionally, the most important native food plant, smartweed (*Persicaria lapathifolia),* is a "cold-weather germinator" that requires starting early in the growing season. Furthermore, an October disking schedule risks getting rained out and provides insufficient time for woody residue to dry out before the onset of winter rains. To meet the AMP objectives to "preserve waterfowl habitat quality" and to "sustain seasonal wetland and native vegetation," disking should occur in stages as soon as areas are accessible – generally a month after drawdown. Steelhead bypass flows end on May 31, so drawdown below weir height (62.5) starts on June 1. A sample disking schedule is provided at right.

2025 Woody Vegetation Control Area (Part)

The reservoir should be emptied as rapidly as possible each year consistent with available demand, to allow time for emergent vegetation to germinate, set seed, and be measured. **Disking should be implemented in elevation bands as they dry.**

The 2025 Annual Report states that up to 213 acres could be subject to annual maintenance (p. 3-5). This conflicts with the PEIR, which was based on disking no more than 75 of the 190 acres below 59' (AMP p. 2). The area of the elevation band between 59' and 63' is 75 acres, of which about 30 acres is riparian woodland, leaving about 45 acres of seasonal wetlands subject to disking. The total area subject to disking is therefore approximately 120 acres.

The annual report proposes "proactive, preventive measures" including routine disking, as often as annually, to manage woody vegetation, based on "monitoring-informed priorities." **Annual, late-season disking would eliminate waterfowl food plants, and reduce waterfowl populations. The proposed woody vegetation management program fails to consider any mitigating alternatives, and violates the College Lake FEIR and multiple sections of the AMP.**

Disking frequency would also be reduced by improving the effectiveness of disking. Section 4.1.2 reports that "*4.20 acres of immature (<10 feet tall) woody riparian vegetation in the southern part of Field 3 had been mowed, and in some areas disked, immediately prior to 2025 vegetation surveys; however, these managed willow populations still showed evidence of root mass and small stems in place, suggesting the willows had not been completely eradicated from the area."* The Results section (3.1.1) proposes the following guidance for correcting this failure: *"The areas with colonizing willows can be disked without the need to collect and dispose of vegetated material as long as the material is allowed to dry out before the onset of winter rains,"* adding that disking may be preceded by mowing if cost effective. This prescription is unsupported and incomplete. For areas with established woody vegetation exceeding the threshold, specify maceration or deep ripping to destroy root crowns rather than surface disking alone, to reduce the likelihood of resprouting and extend the interval between disking. Also consider the effect of water regime. Lake soils were exposed down to 60.5 feet by June 1of 2025 and flood-up did not occur until February – ideal conditions for willow growth. Adaptive Management means monitoring all factors – vegetative cover, annual water regimes, episodic wet winters, disking, seeding – and applying the management schedule and treatments that produce the best emergent marsh vegetation while controlling willows.

Commit to annual revision of the woody vegetation management prescription based on vegetation monitoring data and hydrology records, consistent with AMP Section 6.3 and AMP Section 6.2.1 requirements for adaptive management.

Neither the College Lake FEIR nor AMP Table 4-1 allow "preventive" willow control. The AMP provides a threshold for management of "Woody riparian acreage (1 location) > 0.1 acres in area with >0.5% cover of seedlings of woody riparian plants and > 3 inches in height." Absent that threshold, willow control at any given site is not allowed. Once the threshold is reached, a measure to control woody riparian plants is provided, requiring impact mediation through measures including a) *Monitor treated areas and retreat **or revegetate as needed**,* and b) *Implement and evaluate seeding treatments to restore cover of waterfowl food plants or to enhance abundance or diversity of native species, particularly for revegetation following treatment of naturalized invasive plants*. These are in the AMP to meet the objective mandated by the water rights permit requirement, to "sustain seasonal wetland and native vegetation."

The annual report does not preserve waterfowl habitat quality unless adequate monitoring and adaptive management actions are implemented. FEIR mitigation measure BIO-2i,1 requires management to

“include habitat replacement and revegetation, protection during ground-disturbing activities, performance standards, maintenance criteria, and monitoring requirements for temporary and permanent impacts consistent with mitigation.” The agency is *required* to evaluate the effect of hydrology, seasonal vegetation management and other factors on willow recruitment and to adopt practices that control woody vegetation without decimating waterfowl food. More than 90 percent of the waterfowl food plants detected by the Vegetation Study in 2024 were found above the 57’ contour, as was all of the willow recruitment. Unrestricted “preventive” disking above the 57’ contour without limits on timing or rotation could potentially reduce waterfowl food plant cover to zero. At minimum, it would decimate native smartweed (*Persicaria lapathifolia)*, which is a cool temperature, early Spring germinator.

The waterfowl food plant composition found in College Lake is virtually identical to that of Central Valley refuges where a maintenance interval of 3-5 years is used to control willows and to maintain waterfowl food production. Usually the presence of dense, high quality emergent vegetation is sufficient. For College Lake, the interval of high rainfall / high turbidity years associated with atmospheric river events affecting the Central Coast may be sufficient to control willows primarily through inundation – disking may be necessary only when high rainfall years do not occur regularly. Also, disking should be avoided in very dry, early drawdown years when smartweed and other waterfowl food plants have the greatest opportunity to establish thick cover that can inhibit willow growth without disking.

The Vegetation Report also revealed that willow infestations were virtually absent (found only in small patches by existing riparian habitat) in fields 1 and 2, where dense seasonal vegetation shades and outcompetes first-year willow seedlings. Maintaining vigorous food-plant cover suppresses willow recruitment without any mechanical action, and should be the first option to control woody vegetation while maintaining waterfowl food plant production.

The AMP states (Sect. 6.2.1) that “Monitoring results will be an important basis not only for adaptive management decisions, but also for revising the AMP.” It states (Sect. 6.3) that “Revisions to the AMP in response to new information may be made annually by PV Water with input from the Committee.” These policies reflect adoptive management practices mandated by the FEIR / MMRP. This is particularly relevant to the Compensatory Mitigation Program, which was adopted prior to completion of baseline monitoring and analysis, and before any post-operation monitoring data was collected, but does not incorporate the 5-year update cycle enshrined in the AMP.

S**ection 3.1.2 must be revised to evaluate hydrologic factors and willow ecology and to recommend a prescription for woody vegetation control that considers inundation timing, timing and methods of woody vegetation removal, reseeding desired vegetation, irrigating, disking and other management measures to maintain waterfowl food plants and seasonal vegetation cover. Additionally, the AMP requires monitoring and ongoing revision to ensure that the AMP objectives to sustain seasonal wetland vegetation and to preserve waterfowl habitat quality are met. At minimum, the Annual Report must reflect that the AMP, AR and CMP documents are all subject to annual revision based on monitoring data and other new information.**

Failure to properly implement these AMP objectives would provide cause for terminating the agency’s water right. Substantive, unmitigated declines in emergent vegetation and habitat quality would also

violate the mitigation measures established by the FEIR and its Mitigation and Monitoring Program and would represent unmitigated, potentially significant impacts.

Floating Water Primrose

In the Annual Summary *Response to Monitoring Triggers,* Table 3-1 recommends specific management actions to control floating water primrose (*Ludwigia peploides*):

> *Implement invasive plant control measures. Recommended methods are to use an excavator to scrape off the top 10-20cm of soil and then dispose of the material offsite. Once removed, sediment collected onsite from an uninfected area should be added to match surround surface elevations.*

However, *Invasive and Woody Plant Removal Methods* (Section 3.1.1) omits the step of replacing removed sediments to match the level of surrounding soil. **Please revise the method to include replacement of removed soil.** Maintenance of soil topography and cover, without pooling, is critical to maintaining waterfowl food plants following removal of water primrose.

Waterfowl

Diving duck numbers have been below normal for two years and could have earned a red triangle in the Annual Report thresholds summary (below), as the action threshold was reached. The report notes that drought has impacted diving duck breeding areas. Although this is true, it is also true that diving duck populations in California were stable in 2024 and 2025.

	treatment			
Waterfowl—Preserve waterfowl habitat quality in the proposed water storage area.	Annual median of daily abundance of waterfowl guilds (diving and dabbling ducks) in each field and overall during December-March is below range of pre-Project (2015–2021) medians	Completed	Δ	In WY2025, the annual median of daily abundance of dabbling ducks across the lake was within, and on the higher end of the range of medians from 2015-2021. The annual median of daily abundance of diving ducks was below the historical range. Annual median of daily species richness for waterfowl guilds within the lake overall was within the range of medians from 2015-2021. Analysis for this metric was conducted for the lake as a whole, but not for each individual field.
	Annual median of daily species richness of waterfowl guilds (diving and dabbling ducks) in each field and overall during December-March is below range of pre-Project (2015–2021) medians	Completed	●	

Seasonal Wetland Vegetation

The Executive Summary and Results Discussion (Sect. 2.2) both conflate the terms “seasonal wetlands” and “seasonal wetland vegetation.” The Results Discussion states that in 2025, “monitoring at College Lake indicates an increase in seasonal wetland acreage,” but provides no discussion of either wetland vegetation or waterfowl foodplant cover, and no analysis of trends or causal relationships regarding the extent of seasonal wetland *vegetation*. This fails to implement the AMP requirement to evaluate the Seasonal wetland vegetation acreage. **The AMP is not implemented unless the annual report evaluates the aerial extent of seasonal wetland vegetation, excluding areas of bare earth.**

Seasonal wetland vegetation acreage is less than 2017–2022 range of acreage	Completed	●	Seasonal wetland acreage was mapped at approximately 204 acres in WY2025, slightly less than recorded area from WY2024 (207 acres). This reflects continued expansion relative to pre-Project conditions due to reduced agricultural use and prolonged inundation during construction. Minor boundary adjustments were made based on updated aerial imagery and field verification.

The transect data suggests a decline in the area of seasonal vegetation outside of farmed wetlands, which would trigger management actions. If such decline is confirmed, the AMP requires the annual report to "Evaluate potential relationships of change in vegetation to hydrology (e.g., duration of inundation) and operations and maintenance activities, particularly inundation period and vegetation management."

Proposed AMP Revisions

Vegetation Management

As discussed above, a late summer / early fall work window inhibits production of waterfowl food plants, and should occur earlier in the year to provide optimal timing for these plants to germinate, mature and set seed. Annual disking of willows is unnecessary if root balls and sprouts are macerated and ploughed under, because willows take 2-5 years to sprout and generate significant growth. As density of food plant cover increases, the ability of willow seeds to germinate decreases and the frequency or necessity of woody vegetation control drops.

Vegetation management—lakebed	~~Annually~~As needed, min. 2-year interval	75 acres	~~Late summer – early fall~~ Early-mid summer	Uncultivated areas of the lakebed that are not already in woody riparian vegetation may be disked, tilled, ripped or mowed every ~~1–~~2 years if necessary to prevent new establishment of woody plants that could trap sediment, or restrict flow or drainage.

Seasonal Vegetation Measurement

The annual report states that because seasonal wetland vegetation was previously mapped only in 2019 and 2023, "the monitoring trigger therefore needs to be adjusted to allow comparison with existing data" rather than follow the original AMP requirement to consider the range of acreage from 2017 through 2022. The AR recommends instead using the acreage range based solely on 2019, which happens to coincide with the least extent of seasonal vegetation.

The report's reasoning is false. Aerial photography is available for the date range originally specified. Such availability is precisely the reason the metric was inserted. Inclusion of years 2020-22 would broaden the vegetation acreage baseline by 50 acres (approximately 37%). **The revision is improper and should be rescinded**.

Waterfowl Management

Waterfowl management measures are required when waterfowl numbers drop below normal range. An appropriate revision would be to modify "range" of waterfowl abundance for the baseline period to "normal range." For example, dabbling duck numbers crashed in WY 2016-17, an extremely high water, high turbidity year, with atmospheric wind and rain events that washed surface algae and invertebrates out of the lake and rendered seasonal vegetation and seeds unavailable to dabbling ducks. Inclusion of this outlier year drops the lower end of the range of waterfowl abundance so low as to render the metric meaningless for evaluating trends in waterfowl numbers. Obviously, this was not the intention. The metric should be revised to read, "Annual median of daily abundance below **normal** range of pre-Project (2015–2021) medians.

This reflects the same logic proposed by the annual report in not recommending a management action despite low diving ducks numbers that met the abundance trigger – 2023 was an outlier year when diving duck numbers were unusually low, possibly because of high sedimentation and turbidity caused by rain events and breaching of the Corralitos Creek levee.

Waterfowl Report Comments

The Waterfowl Study results and analysis failed to meet AMP requirements in the following respects:

Waterfowl—Preserve waterfowl habitat quality in the proposed water storage area.	Annual median of daily abundance of waterfowl guilds (diving and dabbling ducks) in each field and overall during December-March is below range of pre-Project (2015–2021) medians
	Annual median of daily species richness of waterfowl guilds (diving and dabbling ducks) in each field and overall during December-March is below range of pre-Project (2015–2021) medians

1. The report correctly provides cumulative bird counts and average species diversity for the lake. The AMP (Table 4-1, right) also requires counts and species diversity ratings to be provided for each field. The purpose of analyzing by field is to evaluate declines in duck populations with reference to inundation periods and food plant composition. Disaggregated counts by species should also be included to support ecological analysis.
2. Tables 1 and 2 appear to represent the total number of waterfowl observed each day. If so, they are mislabeled as daily mean values, actually providing the base numbers used to calculate daily mean values.

Vegetation Report Comments

1. AMP Table 4-1 states that management thresholds are reached if the range of seasonal wetland *vegetation* is less than the 2017-2022 range of vegetation acreage. The Annual Report erroneously considers only seasonal wetland area, omitting consideration of seasonal wetland ***vegetation*** and thereby failing to implement the AMP.

AMP Table 4-1

Vegetation— Sustain seasonal wetland and native vegetation	Seasonal wetland vegetation—acreage	Acreage less than 2017–2022 range of acreage

The Vegetation Study must provide the extent of seasonal wetland vegetation and state whether the 2025 extent of seasonal wetland vegetation is below the 2022-23 range of seasonal wetland vegetation.

2. Assuming the **Vegetation** action threshold is triggered by reduced seasonal vegetation, the AMP requires the Annual Report to evaluate potential relationships of change in vegetation to hydrology (e.g., duration of inundation) and operations and maintenance activities, particularly inundation period and vegetation management (Table 4-1).

   The required evaluation of vegetation changes in response to maintenance activities is particularly important, as the Annual Report Sect. 3.1.2 recommends "routine mowing and disking" as a "proactive maintenance measure" to "discourage establishment of woody riparian vegetation." **The Annual Report must evaluate the potential adverse effect of this proposed maintenance activity on the productivity of waterfowl food plants.** The AMP provides numerous measures to minimize the adverse effects of vegetation maintenance on waterfowl food production, **none of which were included in the annual report,** to wit:

   a. Modify timing or techniques of vegetation management, including consideration of alternatives to mechanical and chemical treatments (e.g., grazing, controlled burns.
   b. Monitor treated areas and retreat or revegetate as needed.
   c. Reassess practices for limiting introduction and spread of invasive plants, and revise as appropriate.

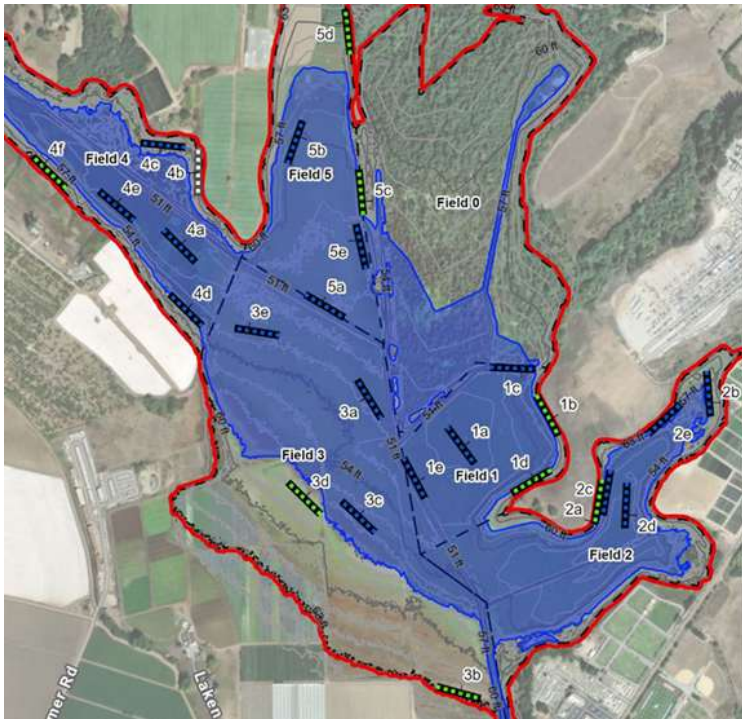
3. The report assigned a vigor rating of 4 to smartweed plants that were only two inches high. The vigor rating established by the Vegetation Report explicitly requires consideration of size as well as density and number of individuals in fruit. Smartweed matures at a height of three feet and produces abundant stalks with seeds, producing 800-20,000 seeds per plant. Plants two inches high in October will produce only a handful of seeds if they mature at all. The vigor rating is intended to bear on productivity, and is meaningless if high ratings are assigned to plants that are likely to have low productivity. A rating of 1 or 2 may have been more appropriate. The smartweed rating, based on one transect, represented an outlier in a year when the mean vigor rating for all three other food plants species was 1, which skewed the data distribution and variance for the four food plant species taken together.

4. Vegetation Report failed to provide a quantified analysis of trends in vegetation quality. The decline in waterfowl food plant vigor from 2022 to 2025 is statistically significant and ecologically important, as declines in plant productivity can correlate with reduced waterfowl numbers. The drivers of this decline are not only inundation period, but also displacement by cocklebur and marsh purslane (*Ludwigia peploides)*. Although waterfowl food plant quality is not a separate AMP metric, the AMP's Waterfowl row of Table 4-1 lists, a management action when the waterfowl abundance trigger is exceeded (see waterfowl survey), "evaluate College Lake monitoring data, regional data, and other information sources (including technical experts) to identify potential

causes of low abundance." Food-plant quality would potentially correlate to waterfowl density as both dabbling and diving ducks forage on seeds and vegetable matter, both of which rely on plant quality.

5. The Vegetation Report provides approximated observations of water surface elevation for discussions of WSE effects. For example, the report states that "At the time of the 2024 field surveys, the water level in the lake basin was estimated to be around 51 to 55 feet above mean sea level" (Appendix D, p. 4). The AR 2025 hydrograph indicates the water surface elevation on October 22-25 was ~52.75 feet NAVD878. All discussions of the extent and duration of inundation should use numeric data available from PV Water.

6. Only eight transects were accessible for surveying, which proved to be insufficient to generate significant data for most plant species (the data indicate that fat hen cover declined significantly in 2025 below the 2022-24 average). Numerous transects were inaccessible during 2024 surveys, conducted in late October. The non-surveyed transects were at lower elevations where the adverse impacts of extended inundation on food plants are potentially most severe. The omission of transects below 57' critically undermines the credibility of the vegetation data, and voids the study's ability to detect changes in food plant cover and quality. Absent valid transect data, The only remaining trigger for vegetation management was the seasonal vegetation metric, which was not performed. .



The 2024 plant survey was conducted late in October (10/22-25/2024) after October rains had already potentially contributed to raising water surface levels in the lakebed. Rain events frequently occur by mid-October, often heavy enough to raise water surface elevations. In 2026, the plant survey was conducted September 23, 24, 25, 26, 29, and December 9. Surveys should be completed by October 1 each year unless a delay is necessary to complete emptying the reservoir and weather forecasts do not predict rain. **For future studies it is critical that the reservoir be emptied before October 1 to enable vegetation surveys, whether or not the residual water is distributed to farmers.** This should be noted in the plant survey recommendations and general summary report.

7. The Vegetation Report is not in sync with the Waterfowl Report. For example, the current Vegetation Report provides plant survey results from October, 2025. The Waterfowl Report provides bird counts from the winter of 2024-25, when the birds were responding to crops produced in 2024. For reference purposes, the Vegetation Report could add an appendix with the tables from the previous year's plant survey. If any analysis of waterfowl declines is provided in the annual report, including a correlation between food plant production and waterfowl numbers, germane plant data would be useful.

8. The Vegetation Report does not reference PV Water's disking of Fields 1 and 2 in November 2022, which was inconsistent with the AMP and removed all emergent vegetation. Prior to the disking average percent cover of high-value waterfowl food plants in Fields 1 and 2 was 21% and 45%, respectively. The disking event could be relevant to future analysis of trends in waterfowl food plant composition and cycles in these fields, particularly swamp timothy and nodding smartweed *(P. lapathifolia),* both of which benefit from intermittent disking in managed wetlands to reduce competition from cocklebur and other plants.

Lakebed Excavation

WY2025 Annual Report
(From Table 2-1)

Formal monitoring was not conducted in WY2024 and WY2025. However, PV Water has observed sedimentation in the lakebed and channels due to winter storms. Sedimentation is anticipated annually, and PV Water is considering partnering opportunities for beneficial sediment reuse as a proactive management approach.

The WY2025 Annual Report Table 2-1 provides a revised management action for the objective to "Preserve water storage capacity within College Lake" that states (right), "*PV Water is considering partnering opportunities for beneficial sediment reuse as a proactive management approach.*" The Pajaro Bridge to Bay Trail and College Lake Borrow Study recently funded with Measure Q funds would evaluate removal of tens of thousands of cubic yards of earth from College Lake to construct levees for the Salsipuedes - Pajaro River Confluence project, a proposal to enhance flood control and riparian habitat on some 50 acres (PVWMA data) of fallow / marginal agricultural lands. The borrow project would excavate soil across acres of lakebed, in locations prioritized by soil qualities such as grain size and texture. Potential adverse impacts include reducing the soil surface elevation below the reach of waterfowl, reduced dissolved oxygen in deepened water columns and benthic soils, reduced wetland productivity (not only of food plants but invertebrates and algae), potential cultural impacts and impacts to steelhead through reduced shallow water habitat. The PEIR evaluated a lake deepening alternative and determined that it would have potentially greater impacts than the Project and require more extensive mitigation.

The AMP management action for sediment deposition allows consideration of sediment management only if the threshold metric is reached (right), includes evaluation and allows "*removal of sediment deposits that are reducing storage capacity or obstructing flow/impeding drainage.*"

Adoptive Management Plan, Table 4-1 (Part)

Presence of a flow obstruction or depth decrease of 25% or more.	Evaluate need for sediment removal. Remove sediment deposits that are reducing storage capacity or obstructing flow/impeding drainage.
Elevation increase > 3 inches by sediment/debris deposited on > 1,000 square feet (> 9 cubic yards).	Evaluate and consider modifications to ditch system Consider small sediment detention basins or other systems for managing the location of sediment deposition Identify watershed factors contributing to sediment production, transport, and deposition, and coordinate with upstream landowners and Resource

A comprehensive approach to sediment control could be valid if

sediment rates were confirmed to be substantive and not easily addressed through other means described in the AMP. Much of the sediment entering College Lake is trapped by the 90-acre willow copse located where Salsipuedes Creek enters the lake. Irrespective of the potential flood control and habitat benefits of the proposed confluence project, the borrow project would need to comply with the Adoptive Management Plan and PEIR, or amend both. Further, the proposed study would need to demonstrate that the project preserves waterfowl habitat quality and sustains seasonal wetland and native vegetation. The borrow study should consider whether lake deepening could facilitate early season drawdowns to increase the productivity of waterfowl food plants. Rapid drawdown of the top 1' could also discourage willow recruitment in the 61-62' elevation band, by drying soil prior to germination.

The proposed "management action" should be revised to read, "*If warranted by measured high sedimentation rates, PV Water ~~is considering~~ may consider partnering opportunities for beneficial sediment reuse as a proactive management approach where consistent with AMP objectives.*"

Conclusion

The WY2025 Annual Report contains numerous areas of disagreement with the agency's adopted AMP, FEIR and water rights permit, several of which – in particular, the failure to measure seasonal wetland vegetation, the proposed exclusive use of the 2019 base year to measure the extent of wetland vegetation, and annual, late-season disking – would needlessly curtail emergent vegetation and depress waterfowl populations, thereby violating the AMP and providing grounds for the Department of Water Resources to intervene. Annual disking is inconsistent with the AMP and with the management practices employed at analogous Central Valley refuges, where a maintenance interval of three to five years is standard; it is unnecessary where vigorous food-plant cover suppresses willow recruitment naturally, and its routine use would decimate native smartweed and other waterfowl food plants. To ensure that waterfowl management considerations are appropriately triggered, the waterfowl action threshold in the AMP should be revised to exclude extreme outlier years that render the metric meaningless.

The Sierra Club looks forward to working with your Committee to produce a compliant Annual Report and to implement a true multi-purpose project that benefits wildlife as well as water supply, and honors the AMP's commitment to sustaining seasonal wetland vegetation and preserving waterfowl habitat quality. The Sierra Club respectfully requests that your Committee direct staff to meet with stakeholders to address the following concerns and return to the PFOC in 60 days with recommendations:

- Revise the disking schedule to July–September by elevation band so waterfowl food plants have time to germinate and set seed before winter flood-up.
- Eliminate annual disking. A three-to-five-year interval, applied only when AMP woody-vegetation thresholds are triggered, is the appropriate standard. Limit total disking area to 120 acres in any given year per the PEIR and AMP.
- Measure and report seasonal wetland vegetation acreage as required by AMP Table 4-1.
- Rescind the revision to the 2019-only vegetation baseline and restore the AMP-required 2017–2022 range.

- Revise the waterfowl abundance threshold to reflect the normal range of pre-project medians (2015–2021), excluding extreme outlier years.
- Disaggregate waterfowl counts by field and species; correct mislabeled Tables 1 and 2; and revise smartweed vigor ratings to reflect actual plant productivity.
- Revise Section 3.1.2 to include a complete woody vegetation prescription incorporating AMP mitigation measures, hydrologic analysis, and multi-year rotation intervals.
- Require demonstrated AMP and PEIR compliance before proceeding with any lakebed borrow or sediment removal project.

Yours Sincerely,

Michael Guth

Chair, Santa Cruz Group, Ventana Chapter, Sierra Club