

From: Audrey Patterson [mailto:apatterson@olaughlinparis.com]
Sent: Wednesday, March 27, 2013 4:15 PM
To: norgaard@berkeley.edu
Subject: SJTA Model 1.6 Results

Dear Dr. Norgaard,

Thank you for the opportunity to comment this morning at the ISB teleconference; this is in response to the ISB request to provide a brief summary of the San Joaquin Tributaries Authority (“SJTA”) Model 1.6 results.

The State Water Board’s SED relies on its Technical Report as a scientific basis to support the general concept that more flow equals more fish. The Technical Report directly bases this theory on the Department of Fish and Wildlife’s Salmon Model 1.6. Doug Demko of FishBio ran Model 1.6 at 35% and presented the attached material to the State Water Resources Control Board at its informational hearing on March 20 and 21, 2013. As shown on slide 22, the modeled results predict that fewer salmon return over a ten-year period compared with existing conditions. Put another way, over the last ten years actual return yielded approximately 19,300 salmon; Model 1.6 predicts that over the last ten years at 35% unimpaired flow, approximately 16,000 salmon would return. The model, therefore, actually predicts 3,300 fewer salmon returning under a 35% flow regime over the past ten years. This evidences that Model 1.6 is unreliable and suggests that conclusions in the Technical Report (and therefore the SED) are flawed.

It is alarming that the State Water Board did not run the model which is the foundation of its proposed unimpaired flow objectives, and that the State Water Board is proposing these objectives which predict less benefit to fish resources at an enormous cost to the region’s water supply. I would also like to reiterate that the SED does not analyze dry year impacts to either fish resources or water supply. These serious impacts are smoothed into an 82-year average which illustrate less significant impacts than what would actually occur.

The SJTA requests the ISB to consider these comments when modifying the language of its SED comment letter this evening. Please do not hesitate to contact me with any further questions.

Thank you,

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