

From: Valerie Connor [mailto:VConnor@sfcwa.org]
Sent: Wednesday, May 16, 2012 4:56 PM
To: Brand, Marina@DeltaCouncil
Cc: Goodwin, Peter@DeltaCouncil; Byron Buck; Hastings, Lauren@DeltaCouncil
Subject: Please forward to DISB before 5/17 conference call

To Members of the Delta Independent Science Board:

I have read your current draft response to the SWRCB in response to the 5 questions posed by Les Grober. I cannot participate on the conference call on the 17th, but provide the following three comments.

First, I have noticed that on conference calls you have occasionally made your decision and then invited public comment. I encourage you to consider public comment before you finalize the letter.

Second, when the State Board released its report on flow it stated that a more comprehensive review and consideration of a broad range of public trust resources would be required before setting flow objectives. Such a process would consider:

- Impacts on other public trust resources, including cold water pool in upstream reservoirs.
- Impacts on fish habitat.
- Impacts on navigation, commerce and recreation on upstream rivers.
- Impacts on beneficial uses of water, including municipal, industrial, agricultural and other environmental uses.
- Impacts on power production.
- Economic impacts.
- Effects of flow measures on non-aquatic resources, such as habitat for terrestrial species.

These public trust resources have not received adequate attention, and must be considered when setting flow objectives. For example, initial analyses by public water agencies suggest that salmon may be negatively impacted by an objective based strictly on a percentage of unimpaired flows because of impacts on fish habitat, and the loss of the cold water pool in reservoirs that is currently managed through the biological opinions for salmon protection. I encourage you to modify your answers to SWRCB by providing the caveat that other impacts to fish and aquatic life and other beneficial uses need further analysis. It is my understanding that the SWRCB intends to do this through a series of public workshops this summer and fall. Your caveat is important because without it, your comments will be used to suggest that BAS supports the use of a simple percentage of unimpaired flow to protect aquatic life.

Third, Les Grober did not ask for your impressions of the scientific approach used to evaluate the other public trust resources. You might consider doing so at a later date, in order to further assist the SWRCB as they balance multiple beneficial uses in setting flow objectives.

I am attaching a summary of a report summary prepared by public water and energy agencies that looks at negative impacts associated with complete reliance on using percent unimpaired flow to protect public trust resources.

Thank you for considering my comments.

Valerie Connor, PhD
Science Program Manager
State and Federal Contractors Water Agency
1121 L St., Suite 806
Sacramento, CA 95814
office: (916) 476-5053
cell: (530) 219-9295

VConnor@sfcwa.org