



SENT VIA ELECTRONIC TRANSMISSION/FIRST-CLASS MAIL

June 27, 2011

Charlie Hoppin
Frances Spivy-Weber
Tam Doduc
State Water Resources Control Board
1001 I Street
PO Box 2815
Sacramento, CA 95812-2815

Re: Narrative Standard

Dear Members of the Board:

This letter is written on behalf of the San Joaquin River Group Authority. We would request that the State Water Board hold a one-day workshop in order to gather information on the Doubling Goal, which appears to be a major objective of the SWRCB's revised San Joaquin River flow objectives. At the hearing on June 6, 2011, no one from the resource agencies could explain the source of the data, the methodology, or the analysis for how the Doubling Goal was defined or computed. If the Doubling Goal is to be the objective, then it is critical that the meaning of the Doubling Goal be well-defined and understood, so that actions specifically designed to achieve the Doubling Goal can be implemented and progress towards the Doubling Goal can be measured.

What was the source of the data? Did the source of the data change over time? What is the reliability and/or accuracy of the data? How were hatchery fish accounted for? How was natural production accounted for? What equation or methodology was used to differentiate between hatchery/natural fish in the ocean harvest? Carcass surveys? Angling? What methodology was used for carcass surveys? Has the same methodology been applied consistently throughout the time-period in question?

We believe, as we did in 1995 when we sued on the Bay-Delta Plan, that there has to be a scientific, rationale basis for the narrative standard. If the State Water Board is going to set this as an objective, it should clearly understand what it means and how it was arrived at before demanding hundreds of thousands of acre feet of water to fulfill what, in our opinion, is an illusory objective.

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We look forward to bringing our information to a workshop and sharing with you our concerns with this proposed objective.

Very truly yours,

O'LAUGHLIN & PARIS LLP



TIM O'LAUGHLIN

TO/tb

cc (via email only): Thomas Howard
San Joaquin River Group Authority
Byron Buck
Jerry Johns
David Guy
Doug Demko