



O'Laughlin & Paris LLP

2006 Delta Plan  
Deadline: 11/13/06

Attorneys at Law

November 11, 2006

Tam Doduc, Chairperson  
State Water Resources Control Board  
1001 I Street  
Sacramento, CA 95814



Dear Chairperson Doduc:

These comments are submitted on behalf of the San Joaquin River Group Authority. Our comments will follow the Draft Staff Report.

3. **Salmon Protection.**

The SJRGA suggests the SWRCB require CDFG to tag all fish released from CDFG hatcheries.

4. **Dissolved Oxygen Objective.**

The timing and duration of the DO objective should be addressed by CDFG, NOAA, USFWS and interested shareholders. The standard is set to protect Fall Run Salmon. Fall Run Chinook Salmon are not present at the DWSC in July and August. There may be a need for a DO standard in that time period, but it would not be for migrating adult SJR Fall Run Chinook Salmon.

**CONCLUSION:**

We appreciate the Board's consideration of the South Delta EC standard, the February – June flow objectives and the April – May pulse objective. The SJRGA reserves its rights to challenge these standards when the VAMP experiment is completed. The SJRGA agrees with the SWRCB to take a cautious approach to setting standards based on sound science. The SJRGA will therefore not renew its lawsuit against the SWRCB on the 1995 Bay-Delta WQCP at this time.

Very truly yours,

**O'LAUGHLIN & PARIS LLP**

By:   
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