

NOAA's National Marine Fisheries Service



Summary of Comments on Substitute
Environmental Document for San
Joaquin River Basin Flows of Bay-Delta
Plan

Presented March 20, 2013

Previous Issues Raised by NMFS

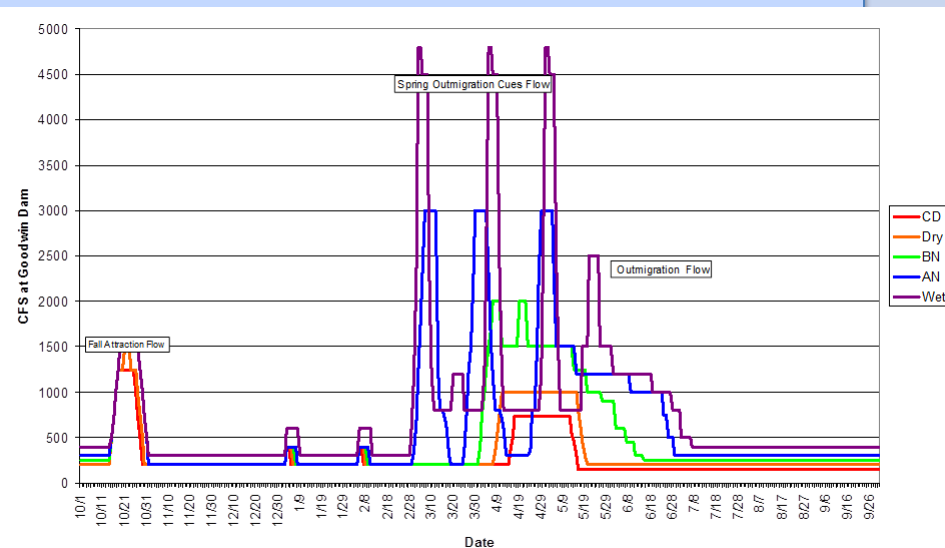
- Need standards at Vernalis and at each tributary
- % UF is good concept for natural functionality
- Managed system may not provide desired functionality using % UF
- SJR Basin salmonids need year-round flow schedule
- Summer temperature especially important for juvenile steelhead

SED Issues

- Vernalis standard is inadequate
- Justification for 35% UF is unclear
 - No analysis to show how doubling objective is met
 - Does not meet RPA flows; minimum to avoid jeopardy
 - Over-reliance on restoration to offset flow needs
 - Does not address 60% UF criteria for Delta inflow needs

SED Issues (cont.)

- 14 day average defeats purpose of UF metric
- Model time step issues
 - Not biologically relevant
 - Not comparative with Stanislaus RPA flows
- Base flows are important
- Peak flow caps do not allow for geomorphic flows



SED Issues (cont.)

- Adaptive management process is not likely to be successful
 - Decision making process is not defined
 - Unclear objectives
 - Board should staff and lead any adaptive management process they think is necessary
 - NMFS has limited resources

Economic Analysis Inadequate

- Preferred Alternative driven by economic analysis for presumed agricultural change from status quo
- Analysis does not consider economic benefits of doubling on recreational and commercial fishing, and related activities



Agricultural Effects

- Unrealistic to ignore shift to ground water
- Diversification of agricultural water supply is already underway



Agricultural Effects

- Models used in analysis are known to overestimate impacts
- Economic response to changes in surface water availability are difficult to predict reliably (Speir, 2012)



Salmonid Effects

- Fish cannot diversify their water supply
- Fish are completely dependent on flow in the channel



NMFS Recommendations

- Adopt protective standards at Vernalis and for each contributing tributary
- Adopt a year round flow schedule for each tributary that addresses temperature, summer conditions, and habitat maintenance
- If %UF used, start at higher level (45%) now and revise as populations respond and restoration actions are brought on line