



15701 Highway 178 • P. O. Box 60679 • Bakersfield, CA 93386-0679  
(661) 872-5050 • Fax: (661) 872-7141

June 15, 2015

Ms. Alicia Forsythe  
Program Manager – SJRRP  
Bureau of Reclamation

[FrameworkComments@restoresjr.net](mailto:FrameworkComments@restoresjr.net)

RE: San Joaquin River Exchange Contractors Water Authority and San Joaquin River Resource management Coalition  
Comments on San Joaquin River Restoration Program Draft 2015 Revised Framework for Implementation (May 2015).

Dear Ms. Forsythe:

This entire Framework document is flawed for three main reasons. One flaw you recognize in the document, one you mention by glazing over the implications, and one you fail to address even though you know it exists.

As you acknowledge, the funding is inadequate, even when you include optimistic, speculative sources. And, as acknowledged, many of your cost estimates are averages since you don't know what exactly is needed to mitigate the impacts and to construct the projects. How the Bureau can proceed with a project that is so underfunded is beyond belief.

You mentioned subsidence, but gloss over the fact that it will have a devastating effect on the project. The project cannot continue to go on and ignore the reality of subsidence. To state that it is someone else's problem and that "they" will provide the necessary funding is an unrealistic solution. To continue to spend public funds on a project that will fail is criminal.

Based upon the recent fish seminar held in Los Banos, it seems it is widely accepted by the scientists/biologists that the reality of successfully re-establishing a healthy salmon population on the San Joaquin River is questionable, especially with the predation, subsidence, brood-stock availability, limited spawning habitat, elevated water temperatures and poor success with trapping. I think it is acknowledged by most of the biologists that temperatures required cannot be achieved with the established restoration flows in most years, and that additional flows and/or a temperature control device will have to be installed on Friant Dam in an attempt to achieve the required temperatures. I feel it is extremely disingenuous for the project to continue to proceed without all the parties associated with the project being fully informed that the likelihood of the successful establishment of a salmon population is not achievable. And, if it is assumed that additional flows will be necessary in an ill-fated attempt to have a successful salmon population, you need to divulge that at this time.

I would request that you stop and take a realistic evaluation of what is achievable and then proceed from there. It is not fair to the public, the Friant water users, and the Third Parties to continue on a path that is doomed to failure.

Sincerely,

James L. Nickel  
JLN/rrd