

FACT vs FICTION

THE BAY-DELTA WATER QUALITY CONTROL PLAN claims it would help fish by releasing more water down the Tuolumne River. But there is a better solution: the Tuolumne River Management Plan. This alternative to the State Water Resources Control Board’s (SWRCB) Substitute Environmental Document (SED) would create the conditions for native fisheries to thrive significantly more than the state’s flow-centric demand. For more information visit WWW.TID.ORG/DONPEDRO

FICTION	FACT
More water is the only way to improve fish populations.	Scientific studies show that a combination of increasing water flow in the River at the right times, habitat restoration, and decreasing predation by non-native species will produce far greater numbers of Rainbow Trout, and Fall Run Chinook Salmon than dramatically larger water flows that are not based on the specific needs of the fish.
The Bay-Delta Water Quality Control Plan is the only option to help save fish.	While the Bay-Delta Water Quality Control Plan makes broad claims based on old science conducted elsewhere, the Tuolumne River Management Plan offers a balanced approach based on site-specific studies. By reducing predators, restoring habitat and increasing water flows, the TRMP would boost the Rainbow Trout and Chinook Salmon populations even more than the SWRCB’s SED.
Studies conducted by water agencies are biased and therefore should not be considered.	All studies conducted on the Tuolumne River were performed by well-regarded and respected consultants, scientists and academics who are experts in their fields. Each study underwent extensive review prior to publication. Studies were designed by a large, diverse group of stakeholders.
The Tuolumne River Management Plan does not consider public input.	The public and resource agencies were invited to participate and comment during every stage of development of the Tuolumne River Management Plan. The process started with a look at what types of studies would be needed and how they would be conducted. This input continued as the process progressed. The resulting Plan examined the facts obtained during this research and balanced this information to deliver the greatest benefits for the largest number of needs.
Reservoirs store more water than needed to weather any drought.	While the Don Pedro Reservoir did not run dry during the recent five-year drought, longer dry periods would further test the ability to maintain an adequate water supply. A recent drought in Australia stretched on for 15 years, demonstrating the need for long-term planning and preparation.
Dams along the Tuolumne River are to blame for lower fish populations.	There have been dams along the Tuolumne River for more than a century. Fish thrived in the River long after dams were first built. Water stored in reservoirs benefit both the environment and humans during extended droughts.
More flows will reduce predation.	While significant increase in flows might have a slight benefit in predation, it is not the solution. Rotary screw traps on the Tuolumne River show that over 80% of out-migrating juvenile salmon are consumed by non-native species in even the wettest years when river flows are high.
State Water Board is only proposing increased flows during February through June annually in its SED.	A new narrative objective (Appx. K, p. 18, Table 3.) requires that “[f]lows provided to meet these numeric objectives [on the Stanislaus, Tuolumne, Merced and San Joaquin Rivers from February through June] be managed in a manner to avoid causing significant adverse impacts to fish and wildlife beneficial uses at other times of the year”. The meaning of the phrase “other times of the year” is ambiguous, at best.
As recent as the 1940s, 100k salmon used to spawn in the Tuolumne River, now due to dams and excessive diversions, spawning is in the low 1,000s.	This narrative would have people believe that due to human actions within the last 80 years spawning has gone down dramatically. This is misleading at best and not factual at worst. Dams were constructed in the 1800s on the Tuolumne River. The Districts diversions have stayed almost the exact same since the 1940s while releases to the River for fish have increased. Spawning has fallen dramatically since the 1940s, but falsely casting a cause for this fall is disingenuous. Any serious look at the spawning estimates must look at the ecosystem as a whole – including introduction of non-native predators, ocean conditions, downstream diversions, invasive species, Delta imports/exports from state and federal water projects.

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The Districts have a political position on instream flows.

The Districts' position is more philosophical and factual than political. The Districts believe river flow is a vital component of fish health, but it is not the only factor. The Districts believe in protecting and improving the natural resources of the lower Tuolumne River, recognizing that the Districts' flow and non-flow measures would create better conditions for native fisheries. Science has led the Districts to believe "functional flows" will allow fisheries to thrive significantly more than the state's increased instream flow-first philosophy.

Irrigation districts are notorious for opposing environmental safe-guards.

TID has some of the oldest water rights on the Tuolumne River, and with that comes a responsibility to be good stewards of the environment; a role TID takes seriously. TID employs an aquatic biologist and hires biologist consultants to closely monitor the River's fishery and riparian habitat and provide critical data used by TID to ensure that flows meet the instream requirements to sustain a healthy River ecosystem.

The SED is the best hope to restore a balance between human needs and those of the natural environment.

The approach taken by the SWRCB is the wrong way to address the issues. Instead of asking how much water aquatic species need to reach "viability," the SWRCB should ask the broader question of what factors are impacting fish populations and how can those be mitigated in a holistic, scientific approach. The narrow objective selected by the SWRCB guarantees that other alternatives, such as non-flow habitat improvement measures and predator suppression, will not be undertaken and has resulted in the SWRCB's steadfast refusal to consider the best available scientific information regarding the Tuolumne River.

Steelhead are under threat in the Tuolumne River.

There is no tangible, recorded evidence of Steelhead populations (i.e. Rainbow Trout that go to the Ocean and later return) in the Tuolumne River.

It's time to leave water wars behind in favor of real action.

TID agrees. Throughout the relicensing of the Don Pedro Project the Districts have proposed a comprehensive \$158 million plan that includes flow and non-flow measures that apply the best available science to achieve the co-equal goals of fishery protection and improvement and water supply reliability for our communities.

The best available science is the SWRCB's 2010 flow criteria report.

This report relies on outdated studies, ultimately applying generic data across all river systems; making the inappropriate assumption that this data would equally apply to all river systems. Best available science must rely on the latest site-specific science on each river system. The report is also clear that it is only one factor to be used as the SWRCB looks at Delta flows (and did not take a holistic approach), yet it continues to be referenced as the scientific rationale for increased flows.

Fish numbers are low in the Tuolumne River due to lack of spawning areas and access to floodplain habitat.

Rearing habitat is not limited on the Tuolumne. There is plenty of in-river habitat available without having to use floodplains. In fact, increasing flows tends to decrease the available in-river habitat (due to depth and velocity) before achieving an equivalent amount of floodplain habitat.

The farms in the Turlock Irrigation District are large corporate farms.

Turlock Irrigation District was the first irrigation district formed in California. TID's irrigation service territory has stayed the same since its founding 130 years ago and the average parcel size is under 30 acres. Growers within TID are multi-generational farmers.

Flood irrigation is wasteful and must be stopped.

Flood irrigation provides the largest single-source recharge method in the Turlock groundwater basin. With the implementation of the Sustainable Groundwater Management Act in the coming decades, flood irrigation will continue to play a critical role in groundwater sustainability. In the Turlock Irrigation District service territory, average net groundwater recharge is 191,000 acre-feet.

Farmers are flexible and can successfully fallow land in dry years when increased River releases are required under the SED.

On top of being the original environmental stewards, farmers are indeed flexible. However, permanent agriculture such as tree fruits/nuts, dairy and dairy feed crops cannot be fallowed one year and then return to adequate production the next year, if they return to production at all. Three out of four TID farmers grow crops in this classification. SED proponents claim water shortages described in the SED would spur farmers to grow "higher value crops"; a statement that fails to take the above facts into consideration.

The irrigation districts are the sole reason for the change in the river channel.

By way of gold and gravel mining practices dating back to the mid-1800s, the Tuolumne River experienced significant changes long before TID was formed in 1887. Both gold mining and gravel extraction operations have severely impacted the River channel below La Grange Dam and degraded habitat conditions for native fish by destroying spawning areas and creating pools and ponds in the river.