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18 *Local Counsel for Defendant-Intervenor Hoopa Valley Tribe*

19 **IN THE UNITED STATES DISTRICT COURT**
20 **FOR THE EASTERN DISTRICT OF CALIFORNIA**

21 SAN LUIS & DELTA-MENDOTA WATER
22 AUTHORITY and WESTLANDS WATER
23 DISTRICT,

24 Plaintiffs,

25 v.

26 SALLY JEWELL, et al.,

Defendants,

HOOPA VALLEY TRIBE; PACIFIC COAST
FEDERATION OF FISHERMEN'S
ASSOCIATIONS; INSTITUTE FOR
FISHERIES RESOURCES; and YUROK
TRIBE,

Defendant-Intervenors.

Case No. 1:13-cv-01232- LJO-GSA

**FRANKLIN DECLARATION RE:
HYDROLOGY**

Judge: Hon. Lawrence J. O'Neill

Date: No Hearing Set

Time: No Hearing Set

Crtrm.: No Hearing Set

1 I, Robert Franklin, declare as follows:

2 1. I am the Senior Hydrologist for the Hoopa Valley Tribe Fisheries Department. I
3 graduated from Humboldt State University with a Bachelor of Science in Fisheries in 1984. I
4 earned a Master of Science in Natural Resources, Watershed Management, from Humboldt
5 State University in 1989. I have worked for the Hoopa Valley Tribe Fisheries Department as a
6 Hydrologist since 1989, with a few interruptions for other positions.

7 2. I was involved in the development of the Trinity River Flow Evaluation Final
8 Report (“flow study”), found at AR 3710 in this proceeding. I am familiar with the
9 hydrographs of the Trinity River at Lewiston 1912 to 1997, which appear at Appendix F of the
10 flow study. The hydrographs in the flow study summarize information from the United States
11 Geological Service’s Flow Gage No. 11525500. This data is available for many years before
12 1989, and for recent years, this flow gage data is available at
13 <http://waterdata.usgs.gov/ca/nwis/uv?11525500>.

14 3. The USGS Flow Gage Data are public records and the accuracy of these
15 hydrographs can be readily determined from USGS sources whose accuracy cannot reasonably
16 be questioned.

17 4. Attached to this Declaration are hydrographs showing daily average discharge
18 (in cubic feet per second) from Lewiston Dam, August 1 through September 30, for the years
19 1989, 1991, 1993, 1995, 1997, 1999, 2001, 2003, 2004, 2005, 2007, 2009, 2011, 2012, and
20 2013.

21 I declare under penalty of perjury that the foregoing is true and correct. Executed at
22 Hoopa, California this 25th day of August, 2014.

23
24 /s/ Robert Franklin (as authorized on 8/25/14)
25 Robert Franklin

26 T:\WPDOCS\0020\05543\FallFlow\FranklinDec082514.docx
kfn:8/25/14

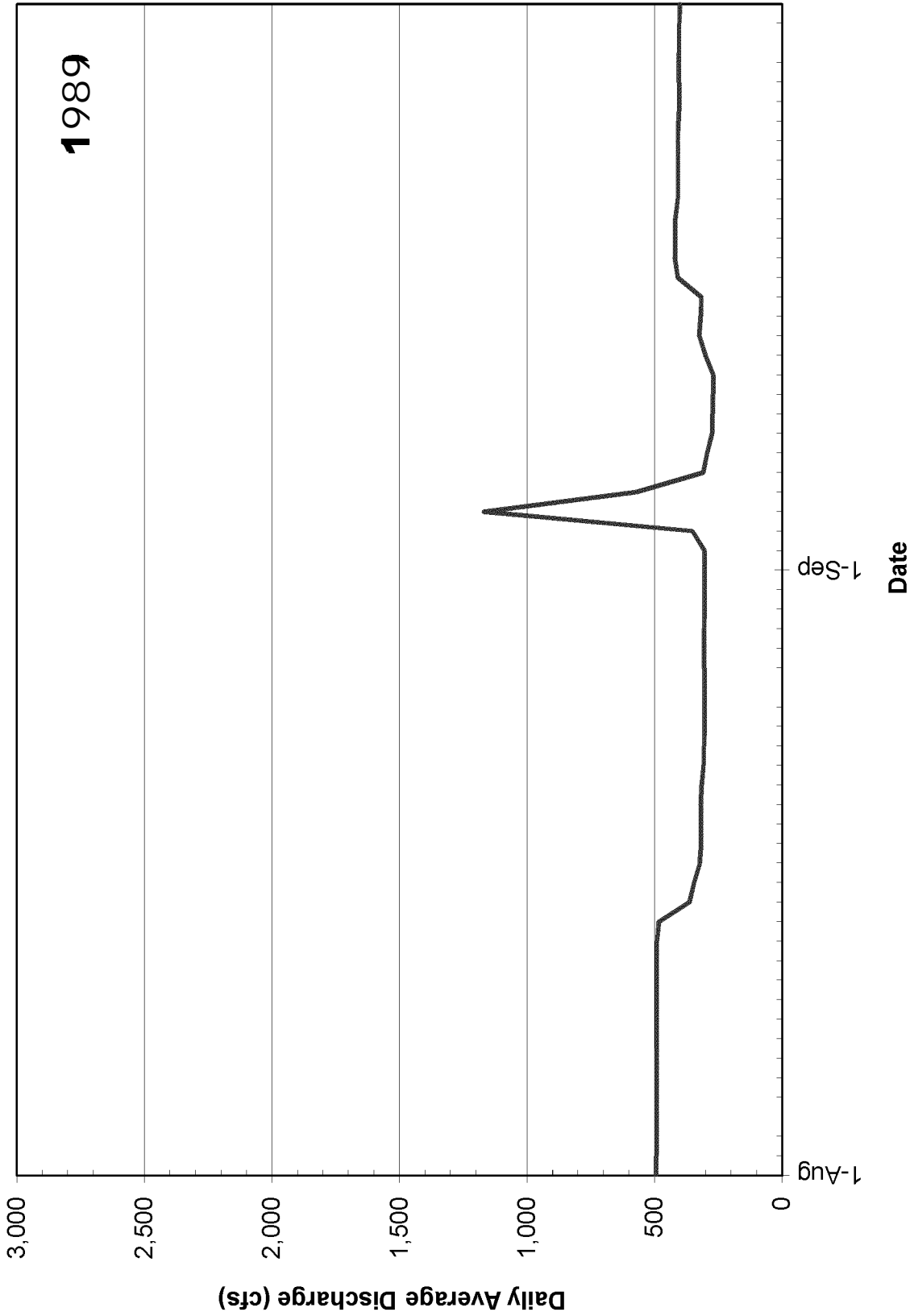


Figure 1. Daily average discharge (cfs) from Lewiston Dam, August 1, 1989 through September 30, 1989. USGS gage #11525500.

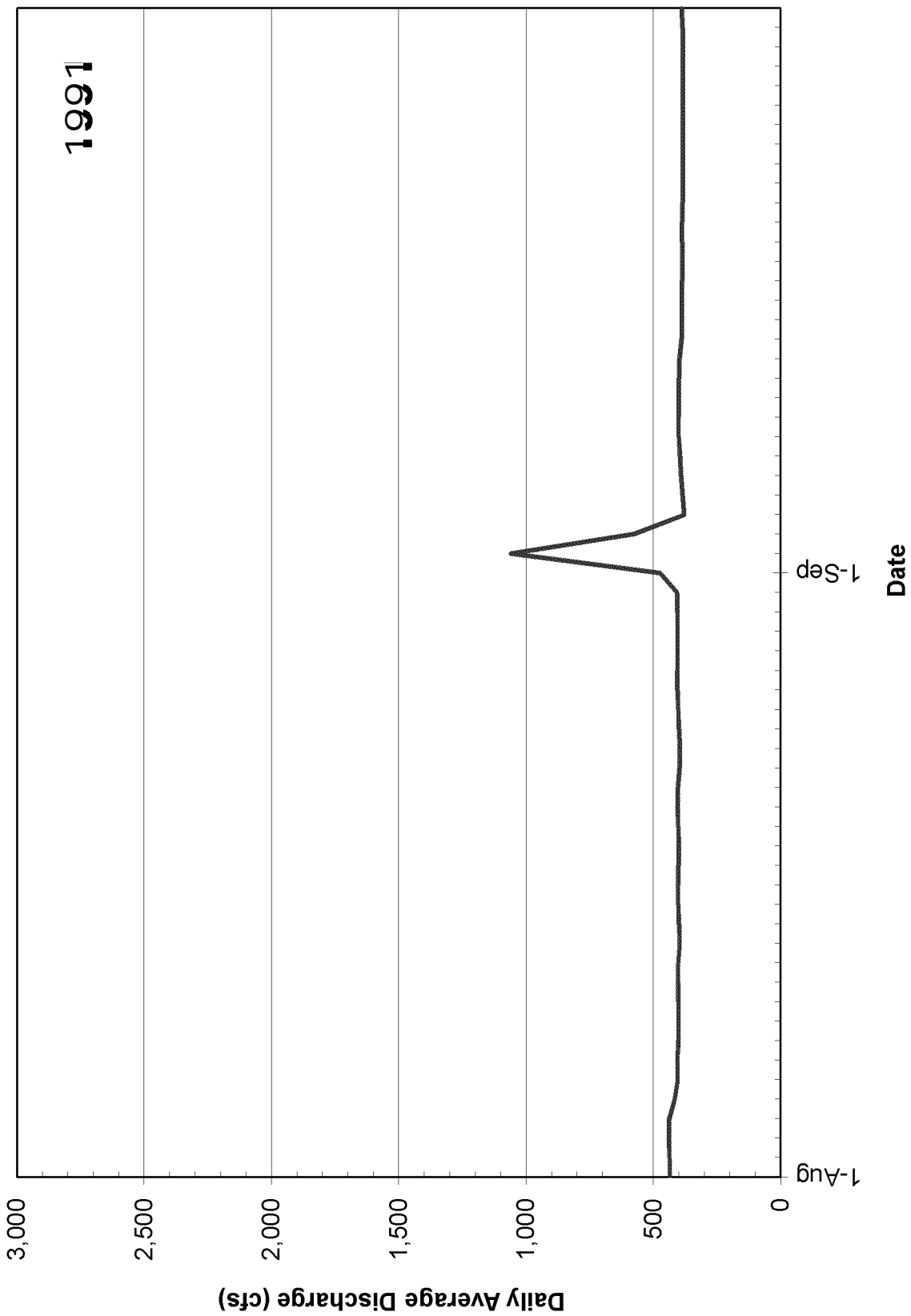


Figure 2. Daily average discharge (cfs) from Lewiston Dam, August 1, 1991 through September 30, 1991. USGS gage #11525500.

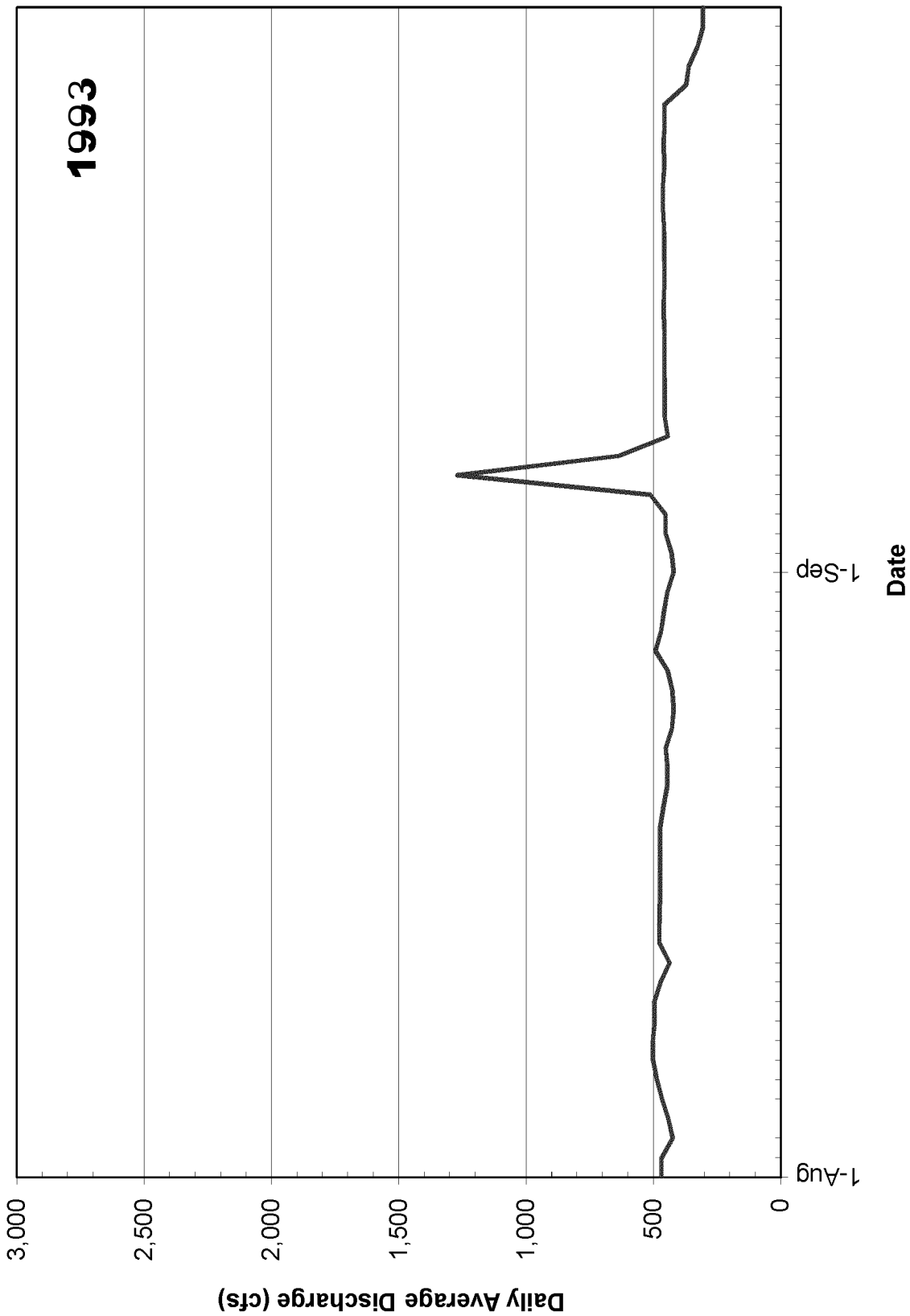


Figure 3. Daily average discharge (cfs) from Lewiston Dam, August 1, 1993 through September 30, 1993. USGS gage #11525500.

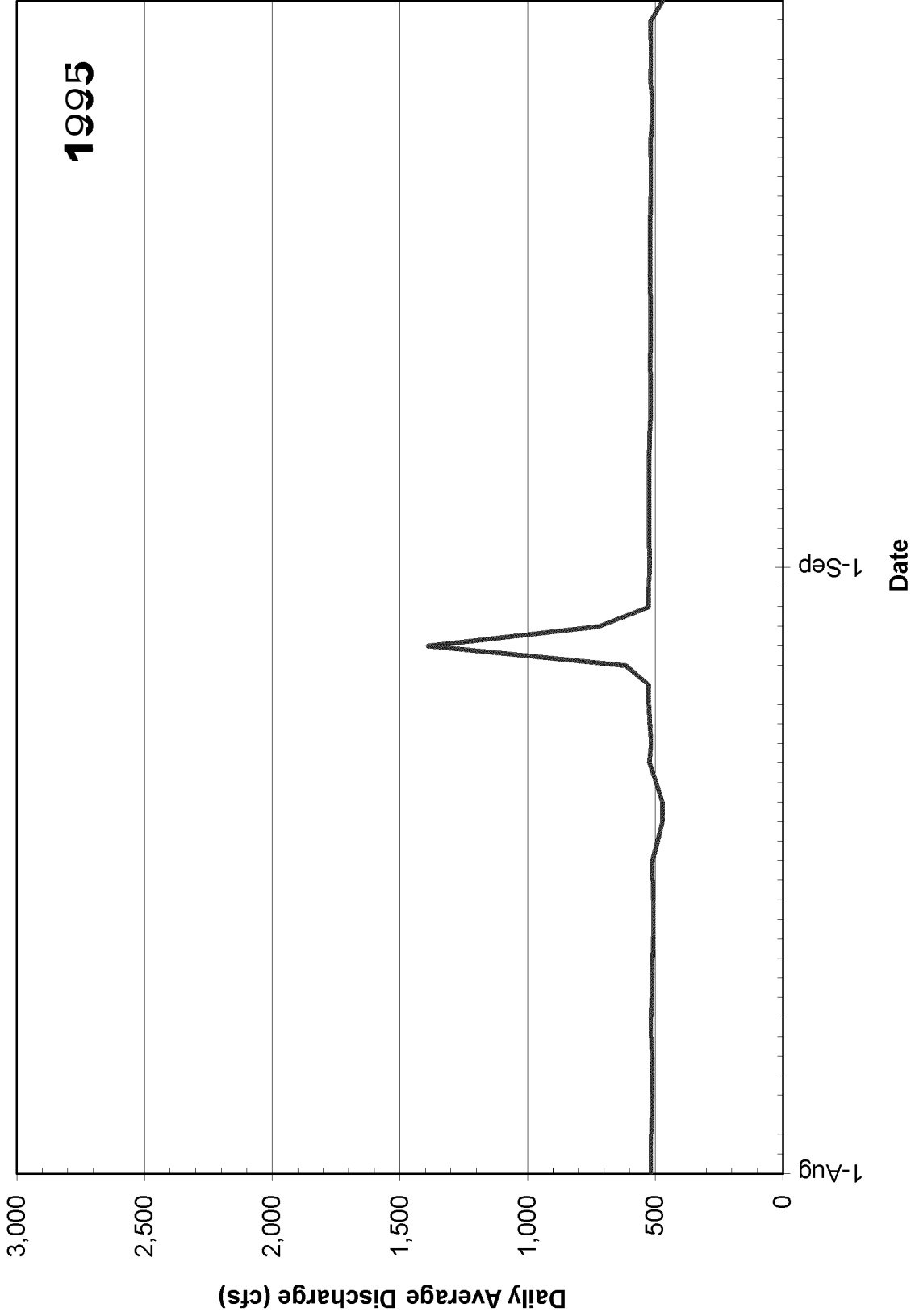


Figure 4. Daily average discharge (cfs) from Lewiston Dam, August 1, 1995 through September 30, 1995. USGS gage #11525500.

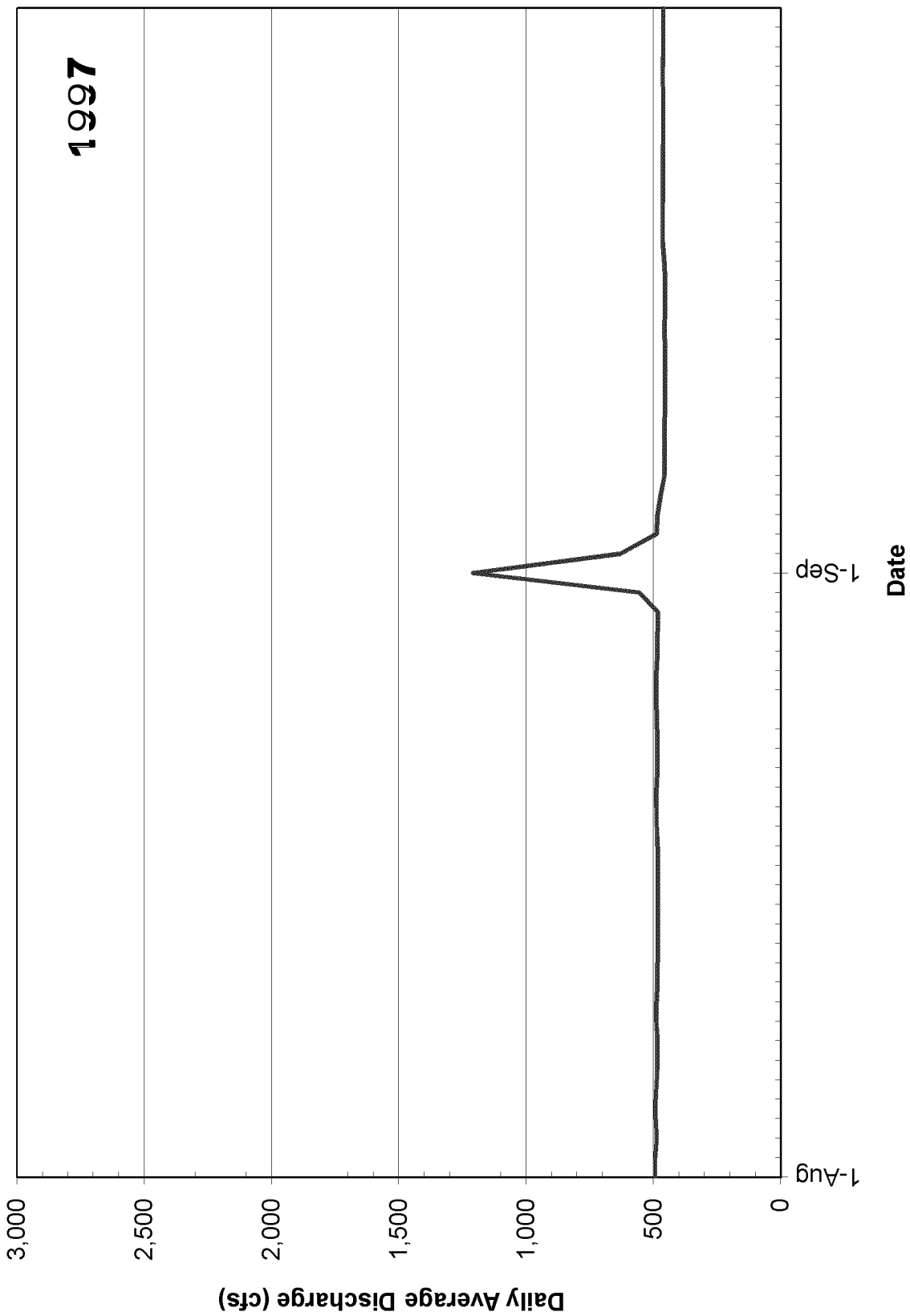


Figure 5. Daily average discharge (cfs) from Lewiston Dam, August 1, 1997 through September 30, 1997. USGS gage #11525500.

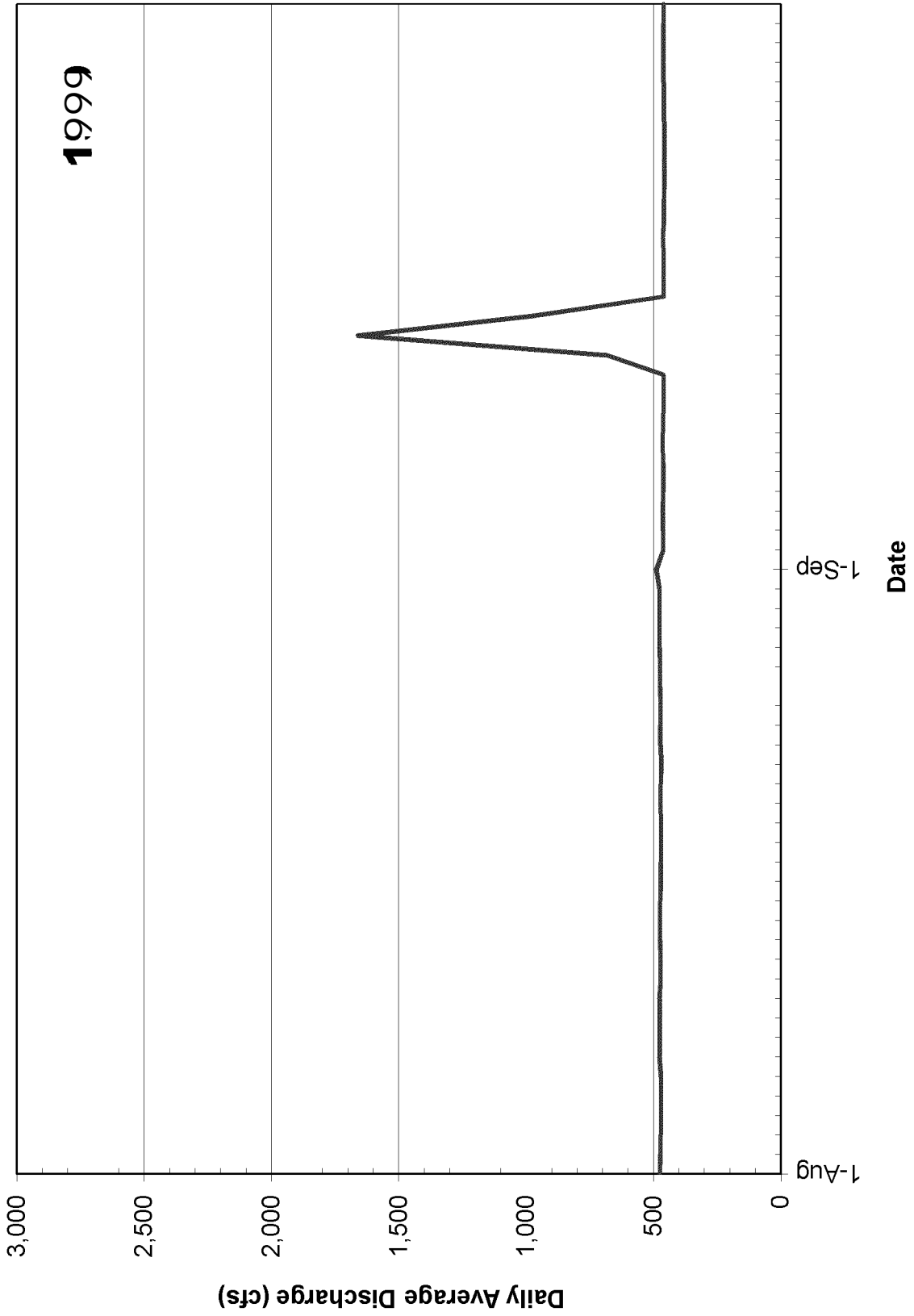


Figure 6. Daily average discharge (cfs) from Lewiston Dam, August 1, 1999 through September 30, 1999. USGS gage #11525500.

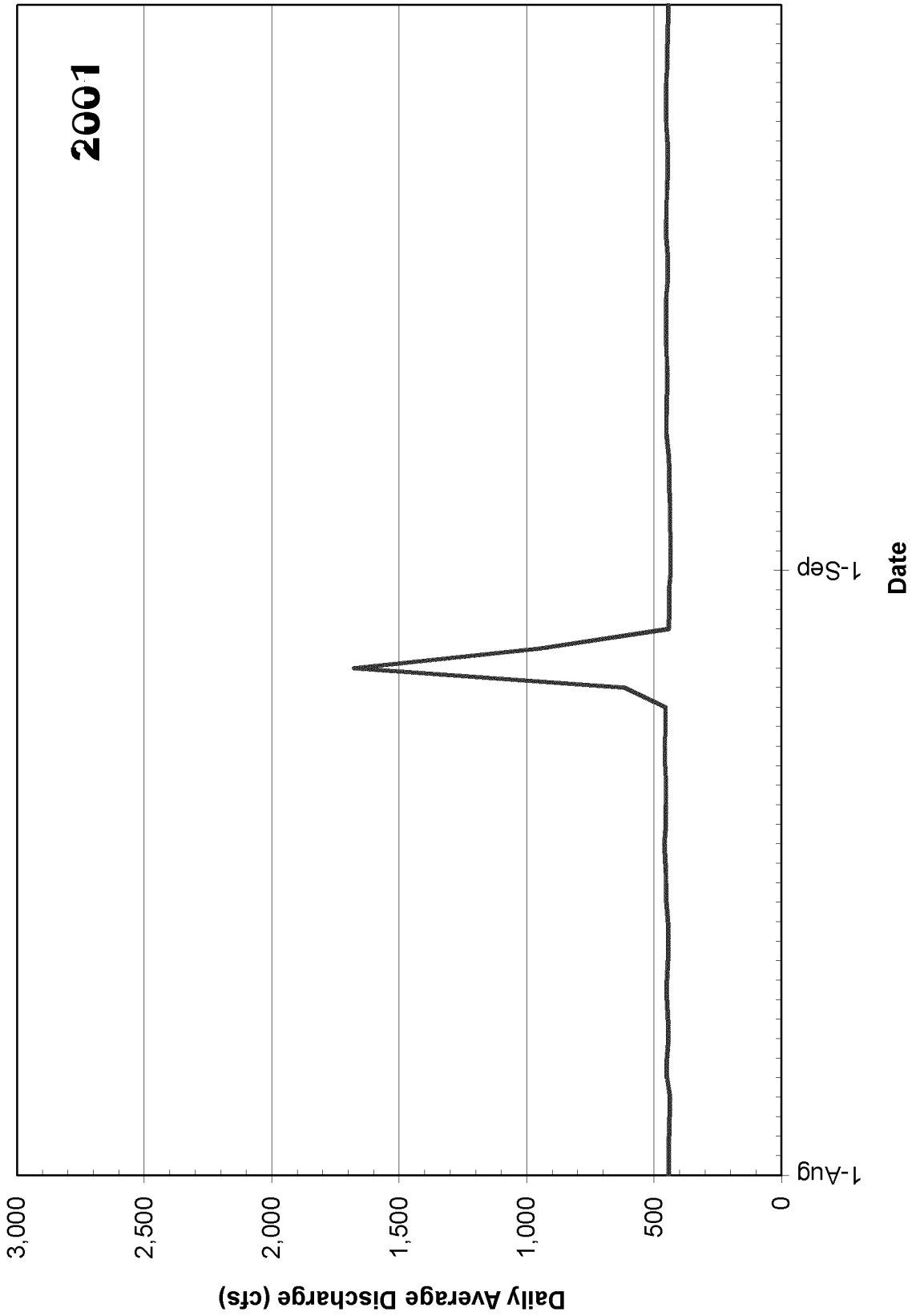


Figure 7. Daily average discharge (cfs) from Lewiston Dam, August 1, 2001 through September 30, 2001. USGS gage #11525500.

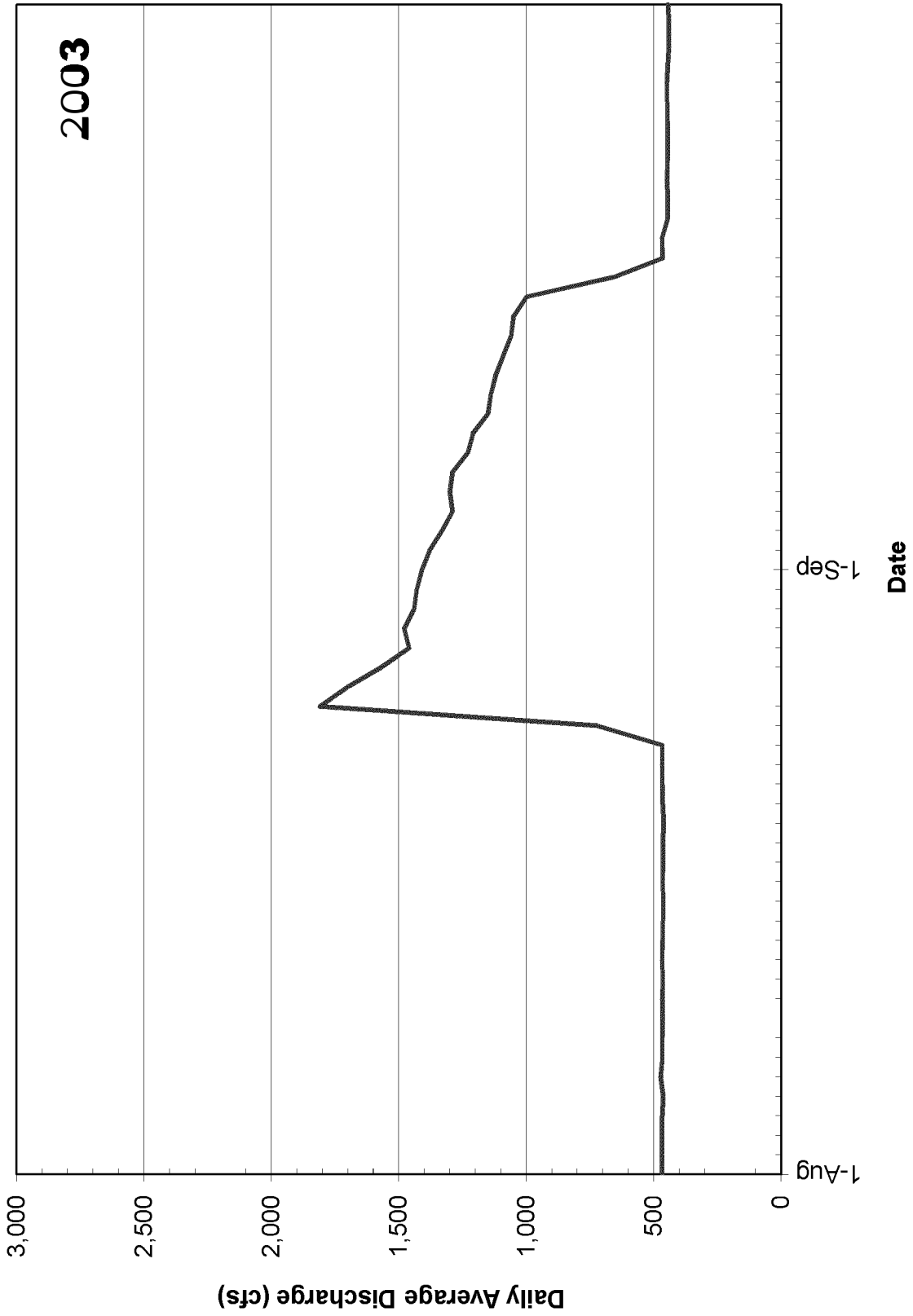


Figure 8. Daily average discharge (cfs) from Lewiston Dam, August 1, 2003 through September 30, 2003. USGS gage #11525500.

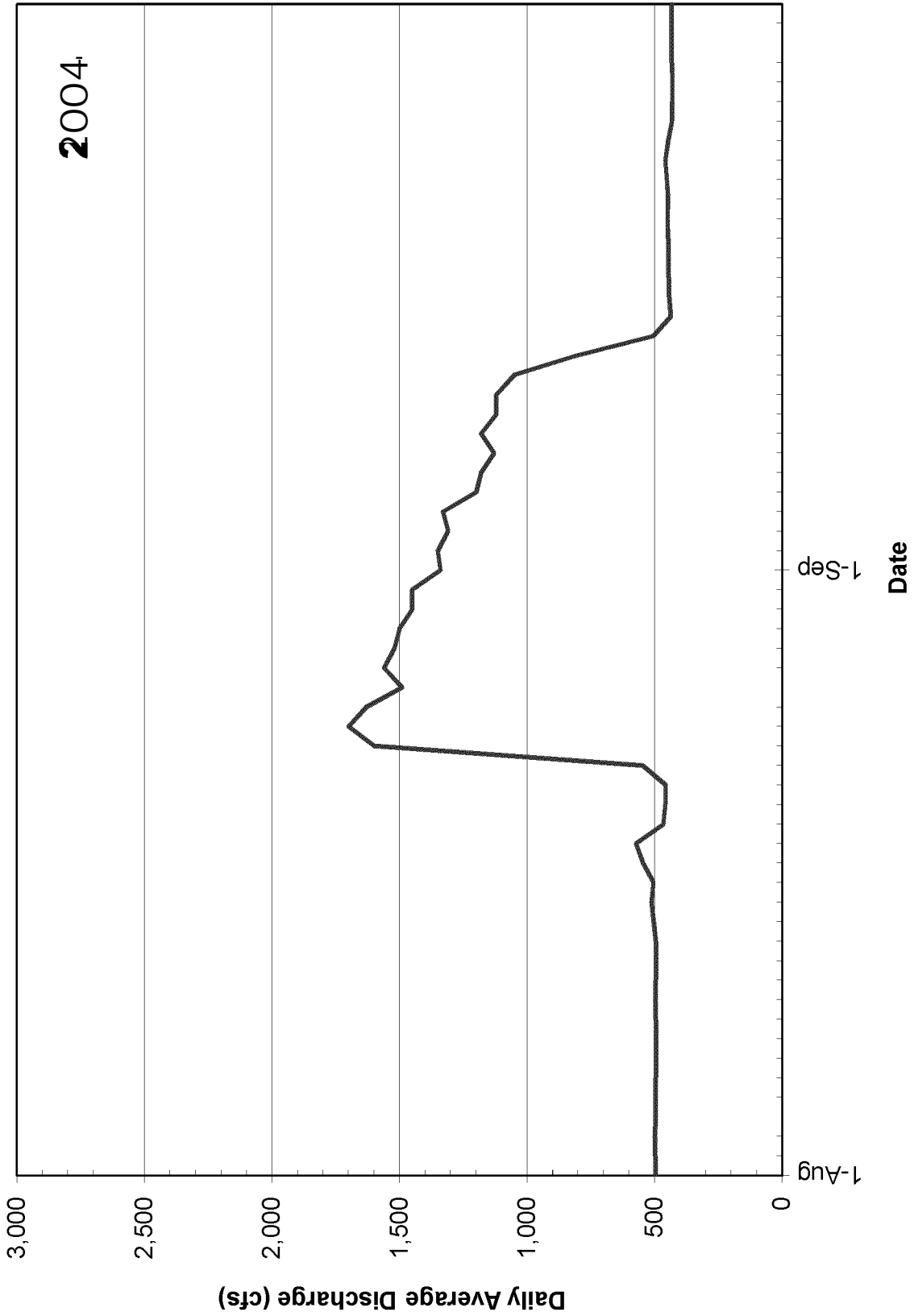


Figure 9. Daily average discharge (cfs) from Lewiston Dam, August 1, 2004 through September 30, 2004. USGS gage #11525500.

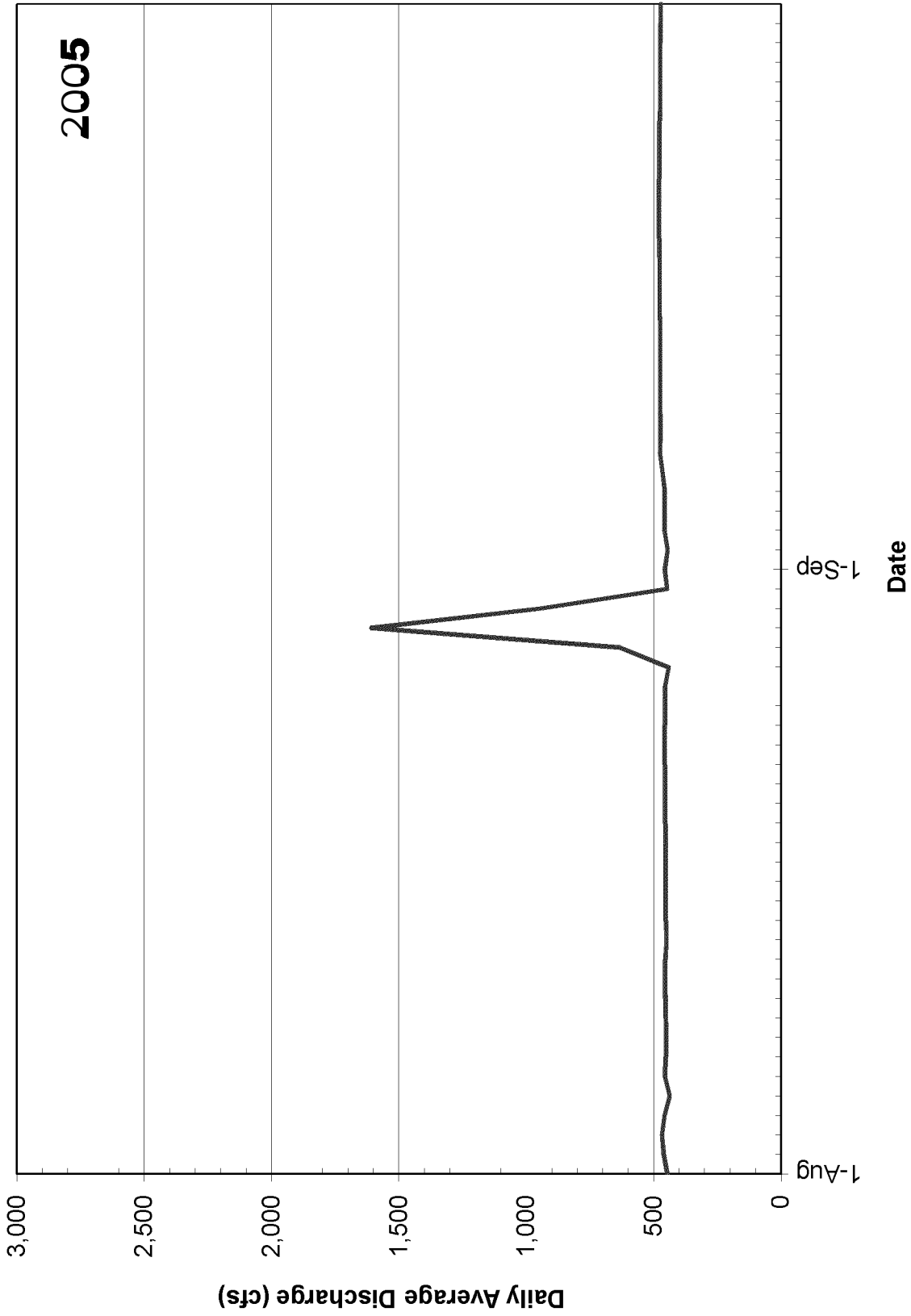


Figure 10. Daily average discharge (cfs) from Lewiston Dam, August 1, 2005 through September 30, 2005. USGS gage #11525500.

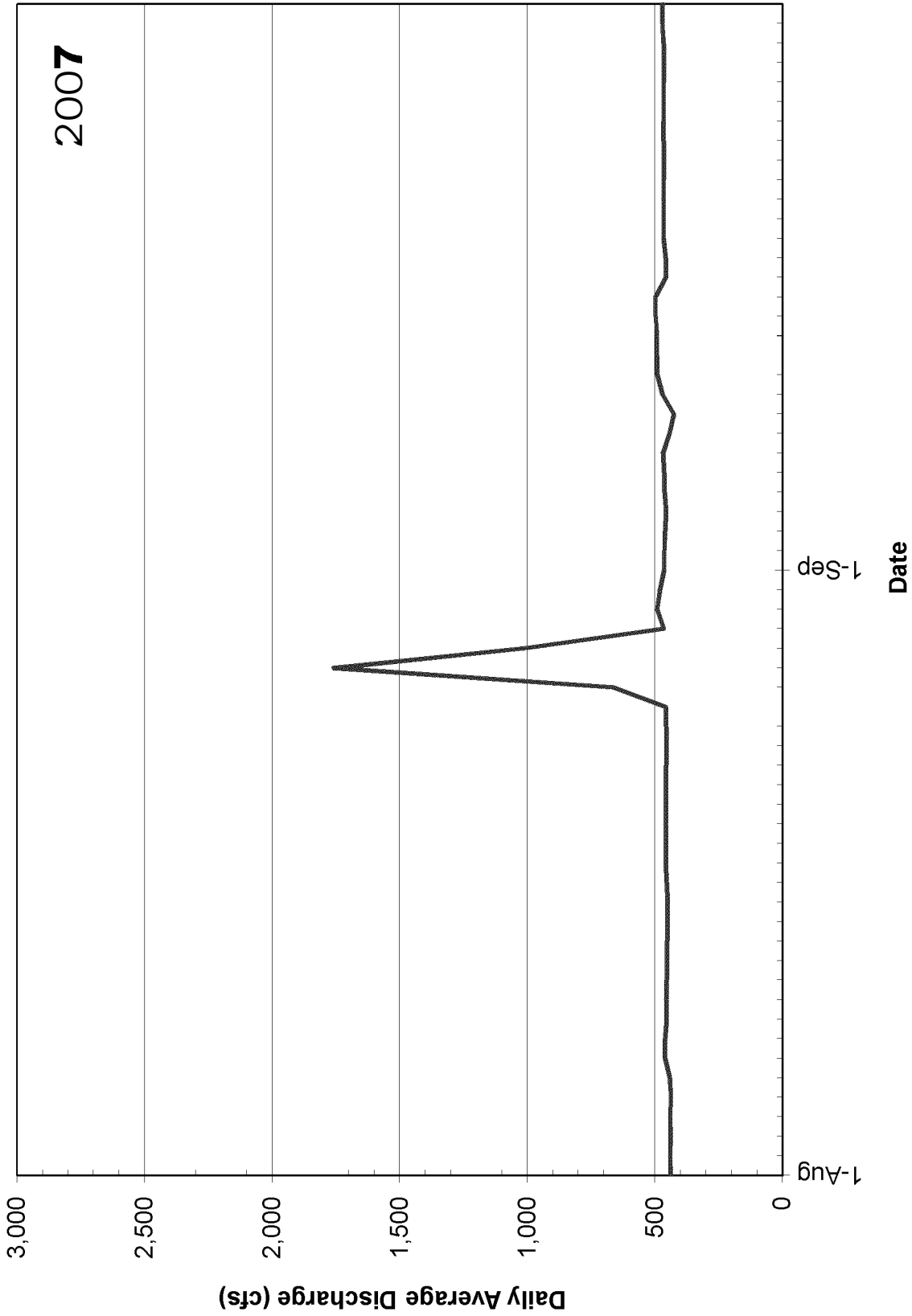


Figure 11. Daily average discharge (cfs) from Lewiston Dam, August 1, 2007 through September 30, 2007. USGS gage #11525500.

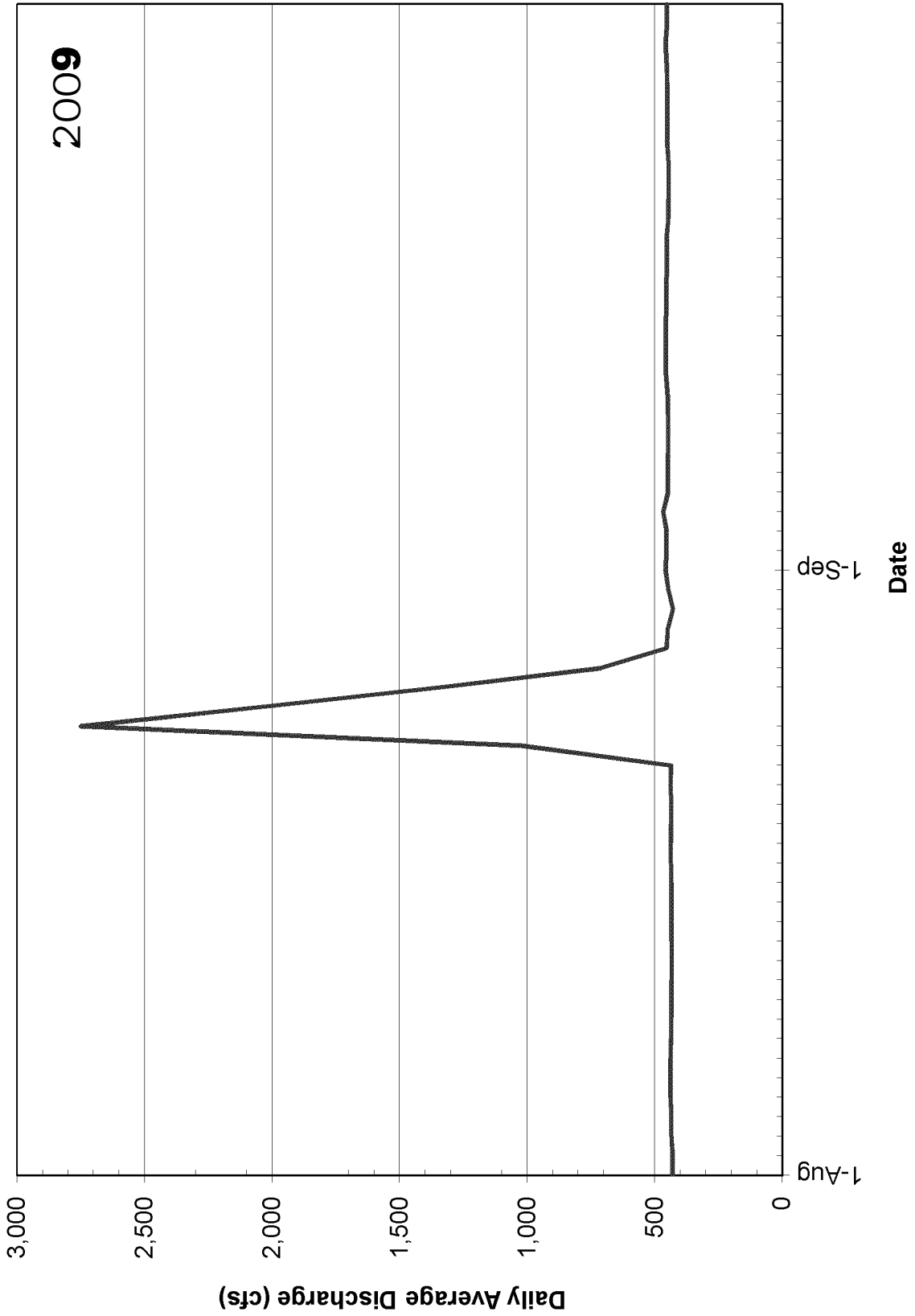


Figure 12. Daily average discharge (cfs) from Lewiston Dam, August 1, 2009 through September 30, 2009. USGS gage #11525500.

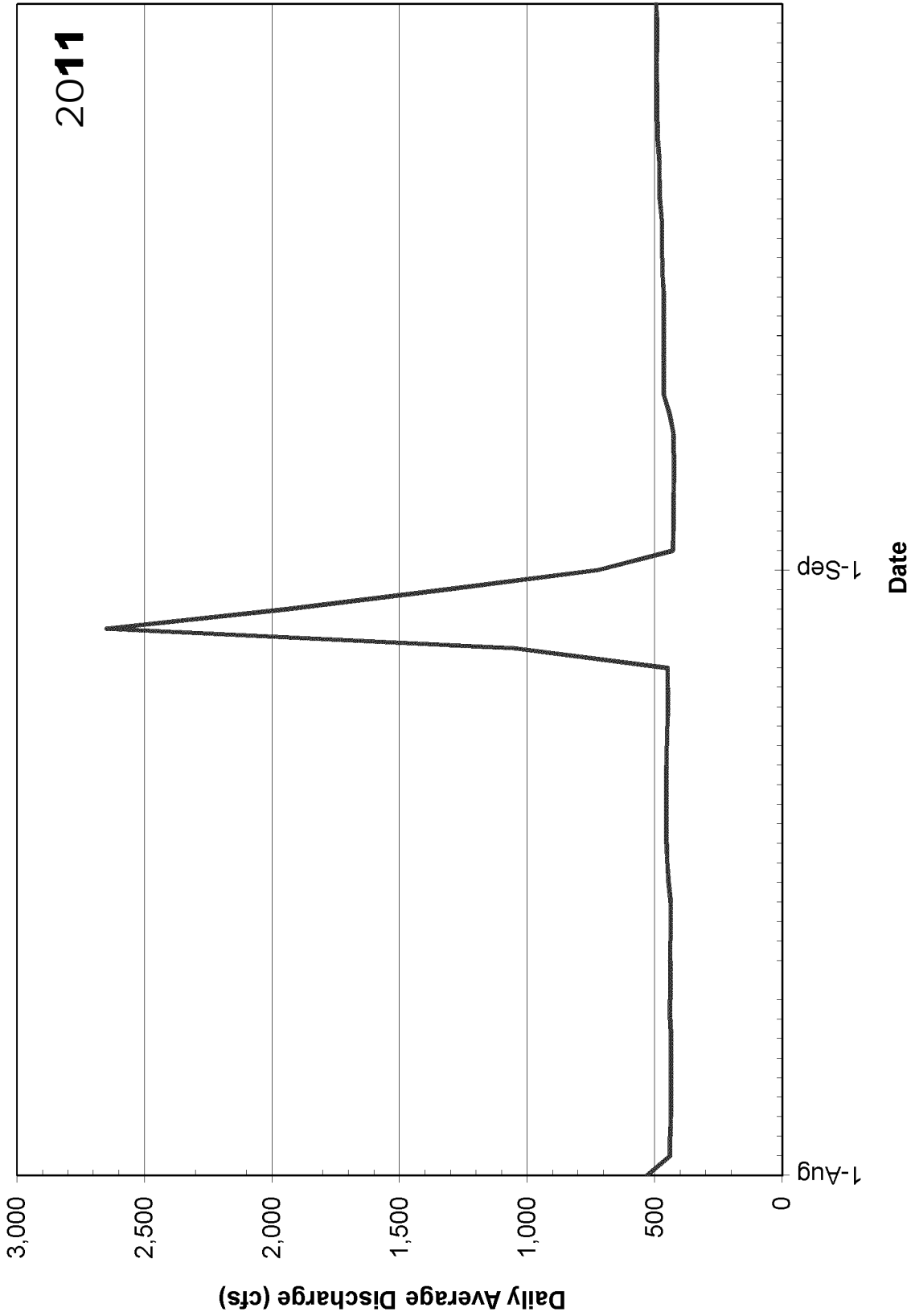


Figure 13. Daily average discharge (cfs) from Lewiston Dam, August 1, 2011 through September 30, 2011. USGS gage #11525500.

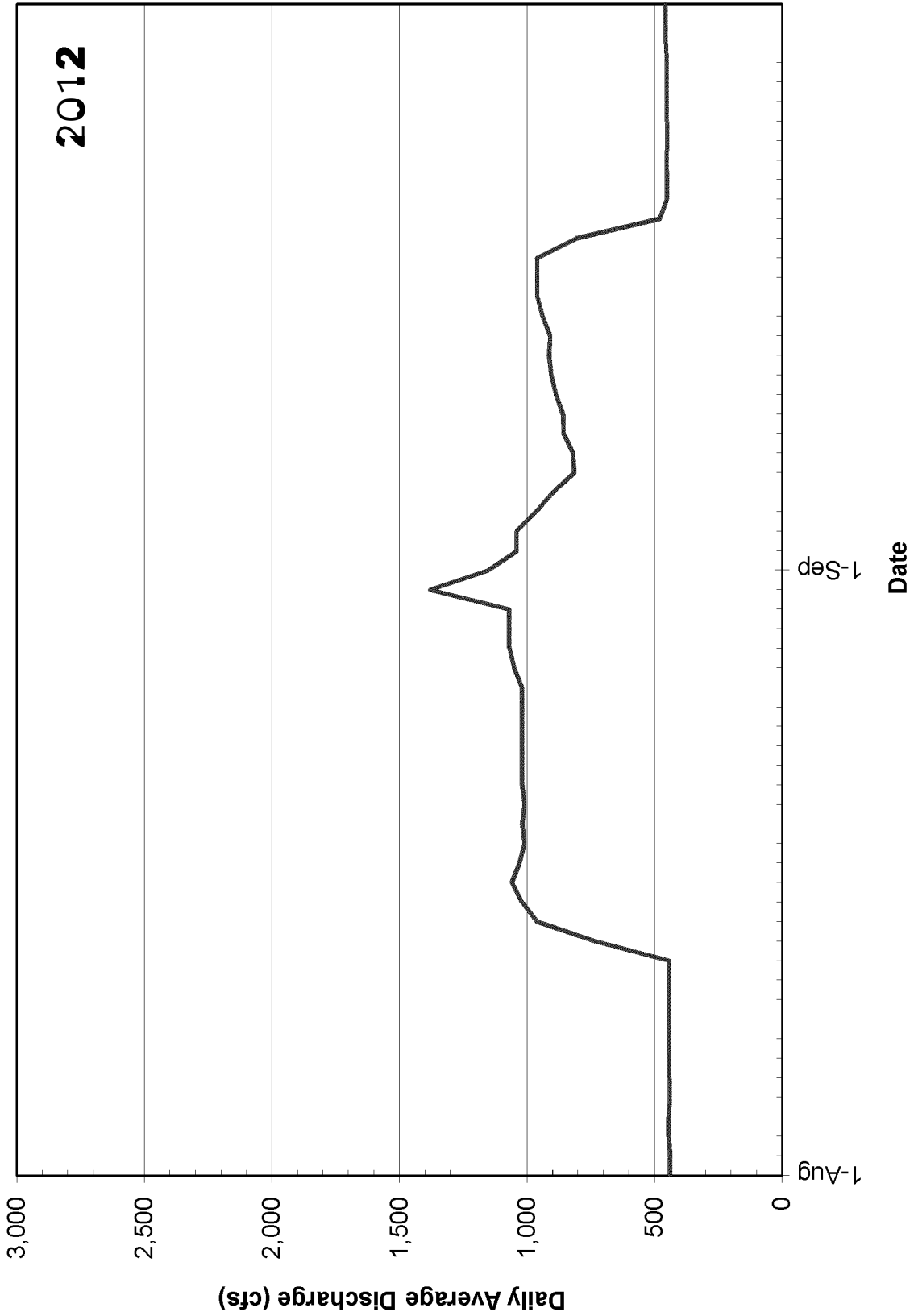


Figure 14. Daily average discharge (cfs) from Lewiston Dam, August 1, 2012 through September 30, 2012. USGS gage #11525500.

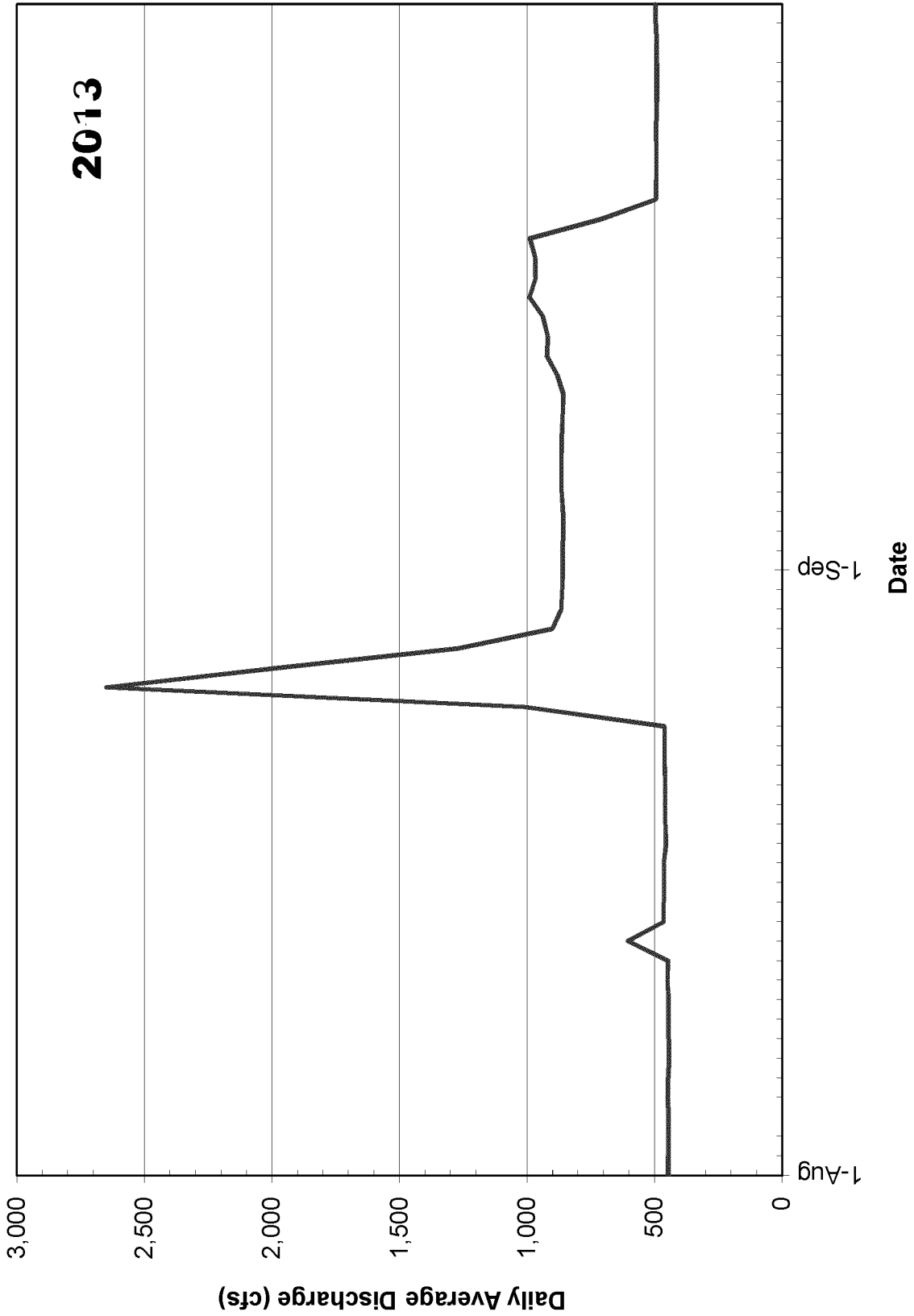


Figure 15. Daily average discharge (cfs) from Lewiston Dam, August 1, 2013 through September 30, 2013. USGS gage #11525500.