Tubb Canyon Desert Conservancy

To: Andy Malone, Samantha Adams, Lauren Salberg, West Yost
Borrego Watermaster Directors
Technical Advisory Committee Members
Environmental Working Group Members

Re: Utilization of UCI Responses to TAC/EWG/TC Review of UCI GDE Report

Date: March 31, 2026

In their memoranda of February 11, 2026, and March 12, 2026, the UCI research team has responded to every question, concern, critique, and category of critique that has been provided in writing by members of the TAC and EWG and by the Technical Consultant.

Implied, but not explicit, in the UCI responses is the identification of numerous errors contained in the critiques by the TAC, EWG, and TC. These errors include but are not limited to: 1) application of an inappropriately elevated standard of proof, 2) substituting hypothetical alternatives for empirically supported explanations, 3) inferring a critical water source without confirming its existence or capacity, 4) treating uncertainty as disproof of a conclusion, 5) misrepresenting the purpose and scope of an analytical method, 6) equating model uncertainty with invalid results, 7) attributing persistent vegetative patterns to short-term processes, 8) confusing contributing factors with primary drivers, 9) equating imperfect data with unreliable conclusions, 10) misunderstanding a basic biological process, and 11) confusing background climate trends with causal explanation.

These errors, and others, are described in more detail in the attached document titled "Errors in the Critiques of the UCI GDE Study." Although the subject is scientific, these errors of logic and subject matter competence are described in layman's terms and do not require a scientific background to be understood.

To date I have not seen evidence that the UCI responses have been read or considered. Given that the UCI responses address all formal questions and concerns produced by the TAC, EWG, and TC, it is incumbent upon the Technical Consultant to either incorporate each UCI response into his proposal going forward or explain why he has chosen not to do so.

Sincerely yours,

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