
State Water Resources Control Board

APR 20 2015

Mr. Ron Milligan
Bureau of Reclamation
2800 Cottage Way
Sacramento, CA 95825

Dear Mr. Milligan:

DRAFT PLAN FOR STANISLAUS RIVER OPERATIONS TO PROTECT FISH AND WILDLIFE

The purpose of this letter is to respond to U.S Bureau of Reclamation's (Reclamation) draft plan to reasonably protect fish and wildlife on the Stanislaus River.

Based on concerns with very low storage levels projected in New Melones Reservoir this year, on March 30, 2015, I sent you a request to develop a proposed plan for operations of New Melones Reservoir that provides reasonable protection of fish and wildlife on the Stanislaus River throughout this water year and going into next year. In that request, I indicated that an upcoming order would likely require such a plan. The April 6, 2015 Order I issued acting on a request pursuant to a Temporary Urgency Change Petition by the U.S. Bureau of Reclamation (Reclamation) and the Department of Water Resources to modify water right requirements of the Central Valley Project and State Water Project to meet San Joaquin River flow and other requirements included in State Water Resources Control Board (State Water Board) Decision 1641 (D-1641) includes the following condition:

1.b.iv. In consultation with the Department of Fish and Wildlife, National Marine Fisheries Service, the U.S. Fish and Wildlife Service (collectively fisheries agencies) and State Water Board staff, Reclamation shall prepare a plan to reasonably protect fish and wildlife on the Stanislaus River at the March 99 percent hydrologic exceedance level. The plan shall identify needed storage and flow levels for the protection of fish and wildlife throughout water year 2015 going into water year 2016 to ensure adequate temperature and water quality conditions for salmonid species inhabiting the Stanislaus River, including how those conditions will be achieved. The draft plan shall be submitted to the Executive Director and fisheries agencies for comment by April 15, 2015. A final plan shall be submitted to the Executive Director by April 25, 2015. Reclamation shall implement the approved plan and any changes directed by the Executive Director necessary to reasonably protect fish and wildlife.

On April 8, 2015, you submitted information developed in coordination with Oakdale and South San Joaquin Irrigation Districts (Districts) responding to this matter. State Water Board staff then met with you, representatives of the Districts, and the fisheries agencies and tentatively agreed to an approvable operations plan. That plan includes operations to meet an end of

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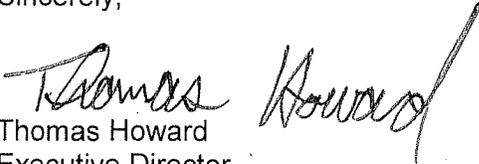
September New Melones storage of 147 thousand acre-feet (TAF) or higher. The Districts also committed to efforts to conserve additional supplies up to 20 TAF. The plan calls for managing releases between the upper and lower outlets of New Melones Reservoir to maximize the quality of cold water habitat downstream of Goodwin Dam to achieve a temperature of 65 degrees Fahrenheit through the end of the year. We agreed that real time operations will be coordinated with the State Water Board and representatives of the Stanislaus Operations Group, and that Reclamation would conduct monitoring and modeling and provide other necessary technical information requested by the real time operations group to inform current and future decision making.

Please prepare a final plan that incorporates the elements discussed above. Specifically, the final plan should:

1. Fully describe and summarize the proposed operations and other major components of the plan that will meet the target temperatures in the Stanislaus River and the associated degree of uncertainty with these operations and how that uncertainty will be managed. To the extent possible, temperatures should be managed to achieve a temperature of 65 degrees Fahrenheit at Knights Ferry to provide a stretch of suitable habitat below Goodwin Dam.
2. Include the full record of technical documentation that was used to inform the final plan, including all temperature modeling for the remainder of the calendar year for both scenarios that were evaluated. The Plan should include the degree of uncertainty considering that 1987 (a cool summer) meteorological information was used in the temperature modeling.
3. Correct the description on page 1 of the temperature evaluation submitted as part of the draft plan to accurately identify the difference between the two temperature model runs made for different end of September reservoir storage levels. The discussion states that "Comparison of the two sets indicated no apparent improvement in temperature conditions during October with higher carryover storage." However, in evaluating both AD Consultants' Table 4s and both Table 8s, there does appear to be a substantial difference in temperature between the lower storage and higher storage model runs during multiple months (including October), and this difference appears to be in the range that could be significant to salmon and steelhead.
4. Discuss Reclamation's ability to operate the New Melones low level outlet, and discuss the concerns with operating this structure on a real-time basis and how this will be managed.
5. Describe the regular consultation and decision-making process with the fisheries agencies and State Water Board to determine real time operations.
6. Provide a description of what modeling and monitoring will take place, in consultation with the fisheries agencies, to inform decisions on New Melones operations for fisheries purposes and to evaluate the effectiveness of those operations in order to inform future decision-making.
7. Include plans for preparing a report that evaluates and documents the effects of operations this year to inform future decisions. Specifically, that report should evaluate the effectiveness of blending operations between the upper and lower outlets, any concerns with operating the lower outlet, actual temperature conditions in the river downstream of Goodwin Dam, and observed fisheries conditions resulting from the operations.

The final plan including the above information should be submitted to me by April 27, 2015. If you would like to discuss this matter further, please contact Diane Riddle of my staff at (916) 341-5297 or diane.riddle@waterboards.ca.gov.

Sincerely,


Thomas Howard
Executive Director

