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**From:** Poole, Kate [<mailto:kpoole@nrdc.org>]  
**Sent:** Wednesday, April 22, 2015 4:51 PM  
**To:** Howard, Tom; Lauffer, Michael@Waterboards  
**Cc:** [dobegi@nrdc.org](mailto:dobegi@nrdc.org); Evoy, Barbara@Waterboards; Grober, Les@Waterboards; Trgovcich, Caren@Waterboards  
**Subject:** RE: Shasta/Keswick releases

Thanks Tom. I'm not sure if that means you have approved this provisional temperature management plan, but, if so, please consider my email NRDC's protest of that approval. If not, then the current level of releases from Keswick are premature, appear to violate the Board's previous orders, and are rapidly reducing your ability to require any changes that may be needed in this provisional proposal, especially those requiring conserving Shasta's cold-water pool, which was the stated justification for many of the Board's prior TUCP orders.

In addition, this provisional plan does not comply with item 6.b. in the Board's April 6, 2015, TUCP order, which requires that "[t]he plan shall provide reasonable protection for winter-run Chinook salmon at the March 2015 99 percent hydrological exceedance level." This plan does not model using the 99 percent hydrological exceedance level, but instead relies on the more optimistic 90 percent exceedance level, again overestimating the availability and ability to meet cold water, and further imperiling salmon.

Kate

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Think before printing.

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**From:** Howard, Tom [<mailto:Tom.Howard@waterboards.ca.gov>]  
**Sent:** Wednesday, April 22, 2015 4:38 PM  
**To:** Poole, Kate; Lauffer, Michael@Waterboards  
**Cc:** Obegi, Doug; Evoy, Barbara@Waterboards; Grober, Les@Waterboards; Trgovcich, Caren@Waterboards  
**Subject:** RE: Shasta/Keswick releases

Kate, I have been meeting with the fishery agencies, project operators and contractors regarding project operations. Based on those discussions, I and the fishery agencies agreed on a preliminary temperature control operation for Shasta. We posted this operational proposal on our website today. I call this a preliminary operation because as we get more information the temperature control task force will propose amendments to manage on real time basis. The link to that preliminary operation is attached.

As you can see average Keswick releases are 4500 cfs for April. During the first two thirds of April flows were maintained at 3250 cfs so we expect them to rise above 4500 for the last third. The farmers in the Sacramento basin have been holding off initial irrigation and many of them will continue to do so in order to meet the average monthly flow targets. A linchpin of the agreement is about 240,000-250,000 in transfers. The export transfers will be deferred until late September, October and early November, after the temperature control season. The inbasin transfers will occur in the summer.

I may amend the TUCO in the next few weeks to incorporate the monthly average flow targets as requirements.

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**From:** Poole, Kate [<mailto:kpoole@nrdc.org>]  
**Sent:** Wednesday, April 22, 2015 10:29 AM  
**To:** Howard, Tom; Lauffer, Michael@Waterboards  
**Cc:** [dobegi@nrdc.org](mailto:dobegi@nrdc.org)  
**Subject:** Shasta/Keswick releases  
**Importance:** High

Tom and Michael,

The Bureau of Reclamation has begun rapidly increasing releases from Keswick over the last week, intending to elevate to releases to 5500 cfs by tomorrow, even though these releases appear to conflict with their existing drought contingency plan, as well as put threatened, endangered, and imperiled salmon at serious risk. See <http://cdec.water.ca.gov/cgi-progs/queryRES?kes>. As you know, the drought contingency plan presented to the SWRCB in January, 2015, stated that Keswick releases would be maintained at the minimum of 3,250 cfs as long as practicable to conserve storage in Shasta, and likely until late May when releases could serve to help meet temperature management objectives:

## ii. Sacramento River

Flow releases at Keswick will be maintained at the minimum of 3,250 cfs this winter and spring as much as practicable to help conserve storage in Shasta Lake. Procedures consistent with the NMFS Biological Opinion will be applied through this period, and Reclamation will again work closely with the Sacramento River Settlement Contractors in scheduling their river diversions in a manner to help minimize the release of water prior to the start of the temperature management season. Likely starting in late May, flow releases will increase at Keswick to facilitate temperature management along the upper reach of the Sacramento River, and these increased flows will then be used to meet other Project purposes in the system.

[http://www.waterboards.ca.gov/waterrights/water\\_issues/programs/drought/docs/2015\\_drought\\_contingency\\_plan.pdf](http://www.waterboards.ca.gov/waterrights/water_issues/programs/drought/docs/2015_drought_contingency_plan.pdf) (page 17).

Further, the federal and state expert fish agencies have recently notified the Board that the temperature model relied on by the Bureau to estimate its ability to meet cold water habitat needs of salmon below Shasta in the fall is off by more than a degree:

“the fish agencies do not think Reclamation’s Sacramento River water quality temperature modeling accurately reflects increases in water temperature between Keswick Dam and CCR compared with the actual data. Figure 1 shows a consistent difference of about 1.3°F from May through September.”

[http://www.waterboards.ca.gov/waterrights/water\\_issues/programs/drought/docs/tucp/2015/nmfs\\_sacrtemp04\\_1515.pdf](http://www.waterboards.ca.gov/waterrights/water_issues/programs/drought/docs/tucp/2015/nmfs_sacrtemp04_1515.pdf) (page 1). This means that the framework proposed by the Bureau earlier this week, which predicts temperatures at or very near the upper 56 degree for most of the temperature control season, will NOT

adequately protect threatened and endangered salmon and steelhead below the dam, let alone prevent unreasonable impacts to these and unlisted runs of salmon.

In other words, the framework appears to be launching us into a repeat of last year's disastrous impacts on salmon below Shasta. The best way to prevent a repeat of this tragedy is to preserve water in Shasta now to ensure that the cold water pool is maximized and an adequate buffer maintained to respond to known inaccuracies in the temperature modeling.

To our knowledge, the Bureau has not yet presented its proposed framework for Shasta operations through the fall to the Board, and has not received approval for this change in operations. Can you please let us know if we are incorrect about that and how we can register our protest to this premature and apparently unlawful change of operations in a timely way?

Thanks,  
Kate

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