

June 24, 2015

Felicia Marcus  
Chair, State Water Resources Control Board  
1001 I Street  
Sacramento, CA 95814

Sent via email



RE: Request for the Board to Revise 2015 Drought Operations to Avoid Unreasonable Water Temperature Impacts to Salmonid Fisheries on the lower American River

Dear Chair Marcus and Members of the Board:

Current operational proposals by the CVP, SWP, and state/federal fishery agencies have set hard constraints for releases from Shasta Dam and Delta outflow. These constraints have resulted in planned releases from Folsom Dam that will result in lethal conditions for lower American River salmonids. We are writing to urge the Board to:

- Refine the computation of Delta outflow to account for expected voluntary reductions in Delta depletion; and
- Allow commensurate reduction of planned Folsom Dam releases to avoid significant mortality of steelhead and Fall-run Chinook salmon on the lower American River in 2015.

This letter is written on behalf of the Sacramento Water Forum, a diverse group of business leaders, water managers, local government leaders and environmental groups from the greater Sacramento Region. We appreciate the challenges that the State Water Board is facing in response to current unprecedented drought conditions. Further, we understand that extreme threats exist to Winter-run Chinook salmon and Delta Smelt; and that these federally endangered species hold a higher priority in fishery protection efforts. However, it is incumbent on us to make sure that you are also aware of the extreme ecological impacts that are imminent on the lower American River. Under the proposed operations plan, it is expected that 100% of the 2015 brood of federally threatened steelhead and the majority of the 2015 Fall-run Chinook salmon will perish this summer due to high water temperatures. These impacts could be avoided through a relatively modest change in operations of Folsom Dam.

Please be aware that these impacts are expected despite exceptional efforts being undertaken in the Sacramento region to adapt to current drought conditions. These efforts include demand management actions that have resulted 40% reduction of water use (May 2015) and creative and unprecedented temperature management actions on the lower American River and Folsom Dam. These include real-time temperature management, bypassing of hydroelectric generation, and emergency hardware changes (e.g. de-gangng shutters in the Folsom Temperature Control Device).

Under the draft operations plan for this season, releases at Folsom Dam would be relatively high during July and August (Up to 3610 cfs) to contribute to Delta salinity control and Delta outflow. This unusually high release pattern will deplete the Folsom cold-water pool and result in lower American River water temperatures above 73°F for an extended period – a lethal condition for juvenile Steelhead and spawning Fall-run Chinook salmon (Figure 1).

We request a modest reduction in Folsom releases of 200 to 400 cfs during July and August. Our temperature modeling analyses indicate that with this level of change and continued extraordinary local water demand reduction efforts, temperature impacts on fisheries in the lower American River can be mostly avoided (Figure 2). We understand that California's water system is stretched to the breaking point and that even this modest operational adjustment would appear to reduce Delta outflow below desired levels. However, we believe that Folsom release reduction can be offset by expected voluntary reduction in Delta depletion.

Delta depletion is estimated to be between 3800 and 4300 cfs (230 to 260 TAF) during July and August<sup>1</sup>. Our requested Folsom release reduction of 200 to 400 cfs represents 5% to 10% of total Delta depletion (Figure 3).

We respectfully request that the State Board work with Reclamation and DWR to refine the computation of Delta outflow to account for expected Delta water use reductions and redirect that saved water to Folsom Reservoir and the lower American River.

Thank you for your consideration.

Best regards,



Tom Gohring

Executive Director

Cc:

Daniel M. Ashe, Director, U.S. Fish & Wildlife Service

Roger Guinee, Assistant Field Supervisor, U.S. Fish & Wildlife Service

Ron Milligan, Central Valley Operations Manager, U.S. Bureau of Reclamation

David Murillo, Mid-Pacific Regional Director, U.S. Bureau of Reclamation

Charlton Bonham, Director, California Department of Fish & Wildlife

Maria Rea, Assistant Regional Administrator, National Marine Fisheries Service

Mark W. Cowin, Director, Department of Water Resources

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<sup>1</sup> Average Delta consumption (net channel depletion) is estimated for each month by DWR: Dayflow Model documentation (<http://www.water.ca.gov/dayflow/documentation/dayflowDoc.cfm#QGCD>)

Figure 1. Predicted lower American River water temperatures under proposed operations [DRAFT subject to change].

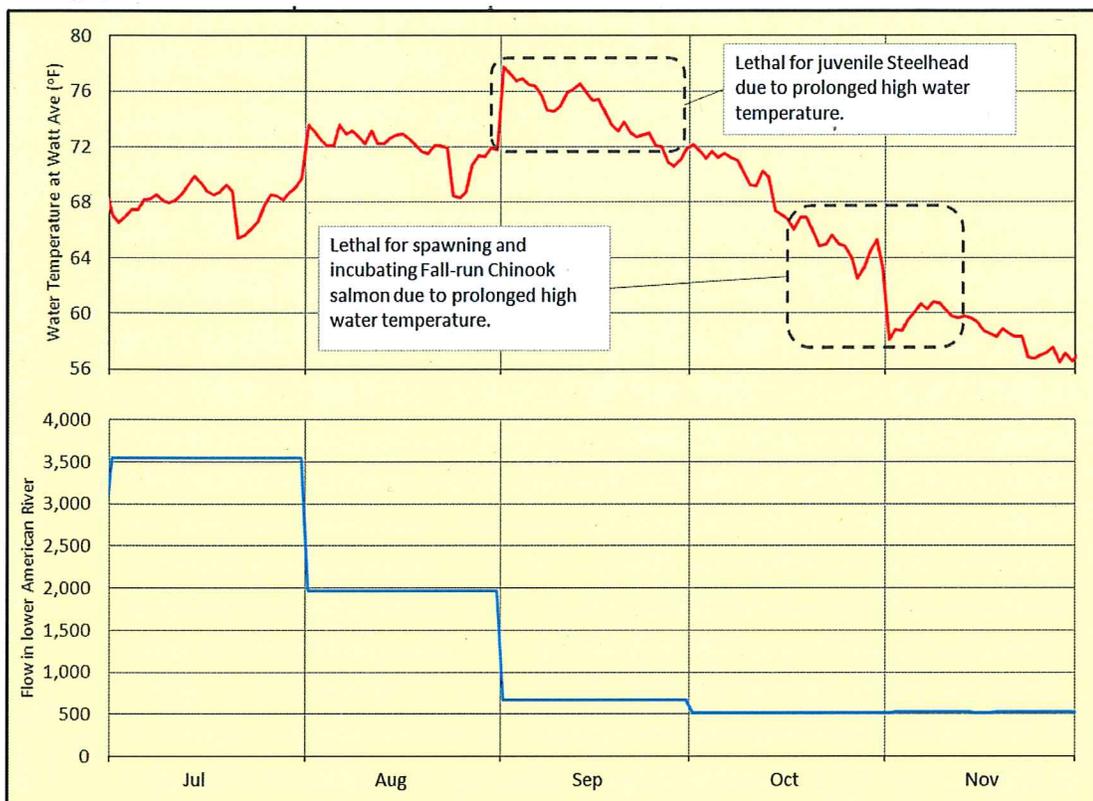


Figure 2. Predicted lower American River water temperatures with reduced July and August Folsom releases [DRAFT subject to change].

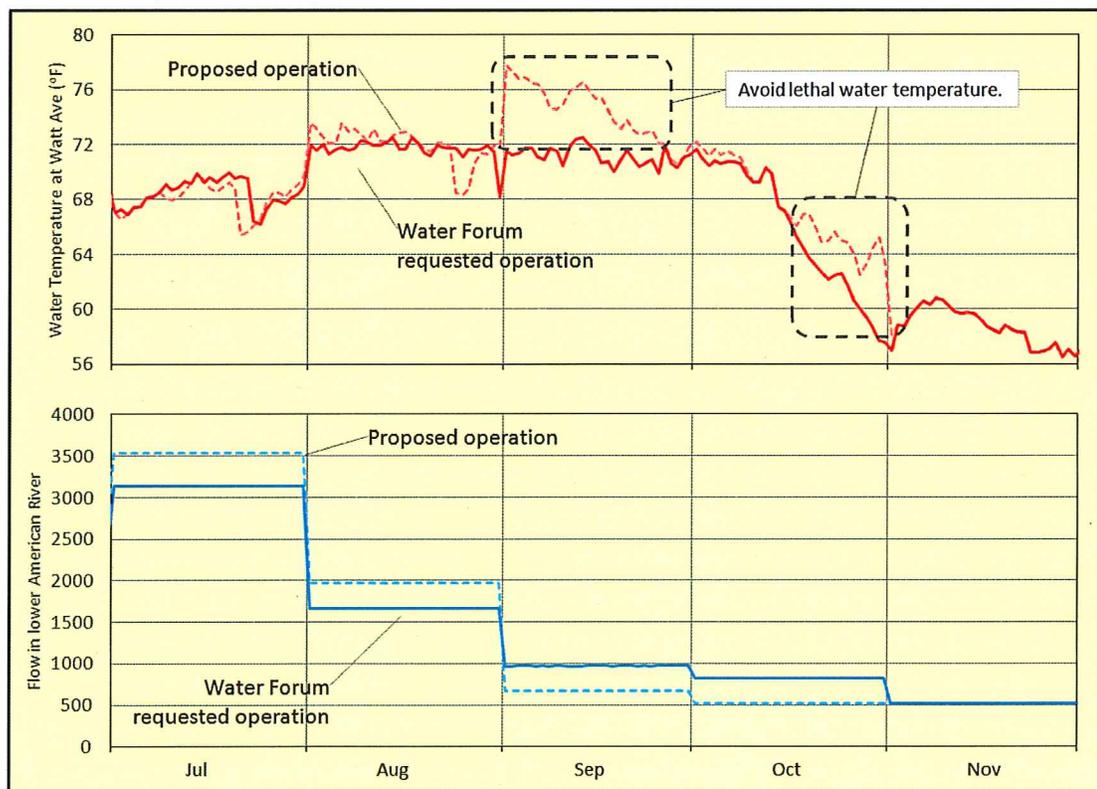
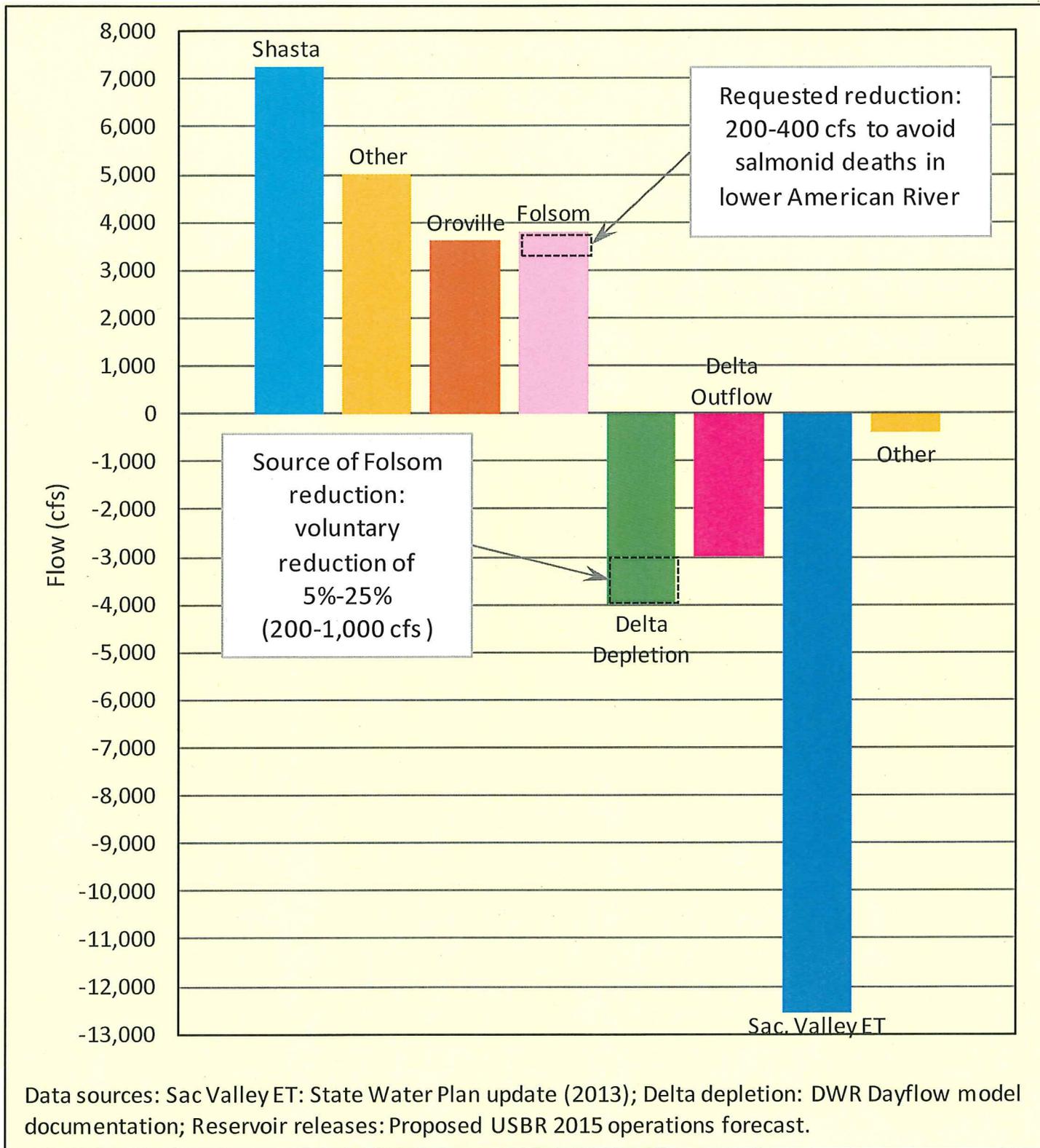


Figure 3. Major water balance elements in the Sacramento Valley and Delta [DRAFT subject to change].



Data sources: Sac Valley ET: State Water Plan update (2013); Delta depletion: DWR Dayflow model documentation; Reservoir releases: Proposed USBR 2015 operations forecast.