



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Central Region
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Fresno, California 93710
(559) 243-4005
www.wildlife.ca.gov

EDMUND G. BROWN JR., Governor
CHARLTON H. BONHAM, Director



April 22, 2014

Jeffrey Parks
Water Quality Certification program
Division of Water Rights
State Water Resources Control Board
Post Office Box 2000
Sacramento, California 95812-2000
Jeff.Parks@waterboards.ca.gov

**Subject: Request for Water Quality Certification Amendments
Spring Gap – Stanislaus Hydroelectric Project;
Federal Energy Regulatory Commission (FERC) Project No. 2130 and
Beardsley/Donnells Hydroelectric Project;
Federal Energy Regulatory Commission (FERC) Project No. 2005
Tuolumne County**

Dear Mr. Parks:

The California Department of Fish and Wildlife (Department) is writing in regards to the request by Pacific Gas and Electric Company (PG&E) and the Tri-Dam Project for a variance from providing recreational boating flows and supplemental spring flows in 2014 in the Middle Fork Stanislaus River (MFSR) as required by the water quality certifications issued for the Spring Gap – Stanislaus Hydroelectric Project and Beardsley/Donnells Hydroelectric Project, respectively. Each Project is required to provide recreation streamflows for boating and supplemental spring flows to assure that an adequate spring peak flow event occurs each year.

PG&E and the Tri-Dam Project do not anticipate that May and June 2014 inflows into the Sand Bar diversion dam will be sufficient to provide the approximately 2,500 acre-feet required to provide recreational flows during 2014. In general the Department does not object to or have alternate suggestions regarding the proposed omission of these two-day pulse flows, which are not intended to benefit fish, wildlife, or plant resources.

Regarding the supplemental flow requirement, the Department recognizes that critically dry conditions exist due to the current drought; however, during dry years with reduced snow pack and run-off, snow melt peaks in the hydrograph would have naturally occurred and the diminished flow levels would still provide ecological benefit to fish species inhabiting the MFSR. The Department recommends that rather than completely

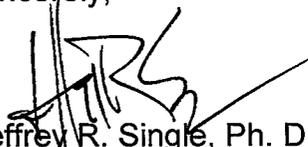
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bypassing supplemental flows during 2014, some level of flow that mimics the natural hydrograph should occur to enable upstream fish cues and movement, enable some level of sediment transport, and provide some level of riparian floodplain re-germination. Healthy ecosystems maintain these ecological functions at some level even during critically dry years. The Department therefore recommends and requests that some level of increased peak flows be provided, to allow for some level of ecological benefit that would not occur without the supplemental flows.

The Department would be glad to provide guidance regarding reduced supplemental flows, if desired. If you have any questions about this matter, please contact Linda Connolly, Senior Environmental Scientist Supervisor, at (559) 243-4014, extension 242, or at Linda.Connolly@wildlife.ca.gov.

Sincerely,



Jeffrey R. Single, Ph. D.
Regional Manager

cc: See Page Three

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