

State of California
Water Resources Control Board
Sacramento, California

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Registered Civil Engineer
C11291 from 1957-2017

Dear Sirs,

I will write from experience. I was City Engineer for Turlock, Supervising Engineer for State of Calif. DWR, worked for Turlock Irrigation District for 19 years from 1969 to 1988. I also worked on a consulting basis as City Engineer for Patterson, District Engineer for West Stanislaus Irrigation District, and District Engineer for West Side Irrigation District.

Most of my river experience is with the Tuolumne River.

I went to work for the Turlock Irrigation District in 1969 while preparation of the foundation for Don Pedro Dam was under way. After Don Pedro was completed in 1971

I was then responsible for the instrumentation and performance of the Don Pedro Dam and reported to the State Division of Safety of Dams and FERC, the results until 1988.

During this same period I observed the river flows each year and then observed the salmon runs 2 and 3 years later. There seemed to be no correlation directly between flows and salmon runs 2 or 3 years later. There seemed to be other things affecting the salmon runs on the river other than flow.

The salmon runs improved some when all fishing of salmon was halted for a time. This is understandable. During 1977 drought Don Pedro Dam was emptied down into dead storage. This could happen again under your proposed plan. Releasing 40% of the unimpared flow from Jan. to June could set it up for not putting enough water into Don Pedro Dam for the

farmers, domestic users or fish in the summer and fall. During 1977 TID & MID cooperated with Fish & Game providing pulse flows and improving salmon spawning areas.

I will make some observations and then some recommendations:

Salinity in the Delta has also been studied for years. Salinity has mostly been repulsed by flows from Shasta and Oroville Reservoirs into the Sacramento River. Salinity does encroach more during drought years. However the farmers and domestic users are better off with the two dams in place and making controlled releases than they would be if the water all ran down the river in the spring & the saltwater encroached in the summer and fall. I do not believe it is SWRCB responsibility to take additional water from 3 rivers with senior water rights to solve this problem.

Predation is a big problem. Environmental groups turn their backs and look the other way and ask for more and more water releases. Some groups asking for more than the 40% of unimpared flows from Feb. to June.

one study showed that 93% of the young salmon are devoured by large adult predators lurking in ponds and gravel pits in a 25 mile stretch between check points from Waterford to Grayson on the Tuolumne River. Less than 7% survived this attack. Lets work on predation. If the predators could be reduced from La Grange to Grayson or to the San Joaquin River. The salmon could grow in size ready for battle to the ocean. It boils down to predator or salmon - which are we trying to protect?

Releasing more water to the ocean infringes on senior water rights (prior to 1914) and encourages more pumping, which causes ground water levels to drop and results in shortages for farmland and domestic uses. Yes even land subsidence.

With the water running down the Tuolumne River there will be no way to recharge the groundwater as is being done now with irrigation from the river. The SWRCB is putting everyone in a two way bind with no way out.

I have already discussed salinity, predators and flows in the Tucumne. I would like to make a few recommendations:

1. SWRCB should be working with the existing dams and reservoirs, making the best use of their storage and release rather than running the unimpounded water releases down from Jan. to June. This would be better for farmers, domestic users and salmon. I believe this can be done without outlandish and inappropriately timed releases. I am sure the Irrigation Districts will work with you if you take this approach.
2. Limited salmon fishing season. They should do their part.
3. Feds should keep large harvest ships 200 miles from our shores where they are scooping salmon up by the thousands.
4. Work on spawning areas.
5. South State Design and build desalination plants now.
6. There are other things — — Just fill in the blanks.
Get accurate counts of salmon

Sincerely,
Richard Winkler