

**United States Department of the Interior**  
**Statement before the State Water Resources Control Board**  
**Review of 1995 Delta Water Quality Control Plan**  
**Topic #8: San Joaquin River at Airport Way Bridge, Vernalis Flow**  
**Objectives: February – April 14 and May 16 - June**  
**March 21, 2005**

A decade ago, the State Water Resources Control Board (SWRCB) adopted the Delta Water Quality Control Plan (1995 WQCP), which included several flow standards to protect beneficial uses of river and Delta waters by the State's fishery resources. The San Joaquin River at Vernalis flow standard applies to the February – April 14 and May 16 – June period and is primarily intended to maintain sufficient net downstream flow in the lower San Joaquin River to benefit fishery resources. This flow standard benefits juvenile fall-run Chinook salmon, and federally listed adult steelhead during their downstream migration, and federally listed adult delta smelt during spawning, as well as the larval and the juvenile delta smelt.

During the past 10 years and particularly during the recent drier years, Department of the Interior (Interior) agencies have observed that achieving the Vernalis flow standard may require substantial releases of water from New Melones Reservoir on the Stanislaus River resulting in potential conflicts with other operational objectives and water quality parameters. Because of these conflicts, Interior has been unable to fully meet the Vernalis flow standard in some years. This has been documented by actual operations in the last several years and from long-term OCAP operation modeling studies and has been the basis for the Bureau of Reclamation (Reclamation) to reinitiate ESA Section 7 consultation with the Fish and Wildlife Service (Service).

Interior recognizes that in the future there may be increased competition between upstream operational objectives and Delta fishery objectives. Consideration must be given with regard to how best to balance competing beneficial uses while at the same time ensuring adequate flows to protect declining fishery resources. At the Periodic Review workshop for this topic, Reclamation will provide information related to concerns regarding the implementation studies conducted by the SWRCB and improved modeling tools for the San Joaquin River Basin. The Service will provide information related to the biological benefits and needs related to this standard.

**Recommendation**

Interior believes a Vernalis flow standard is an important protection for emigrating salmonids and federally listed delta smelt. However, compliance with the San Joaquin River at Vernalis flow standard may create both operational challenges and potential ESA conflicts. Interior therefore recommends that the Vernalis flow standard be evaluated and addressed in an open, cooperative, SWRCB-sponsored process among federal and state agencies and interested parties, to determine the appropriate Vernalis flow standard and the best means to achieve it. This process will likely include the