



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
Southwest Region
501 West Ocean Boulevard, Suite 4200
Long Beach, California 90802-4213

MAY 7 1999

F/SWO31:EJS

Mr. William H. Luce, Jr.
Bureau of Reclamation
South-Central California Area Office
2666 North Grove Industrial Drive, Suite 106
Fresno, California 93727-1551

Dear Mr. Luce:

The National Marine Fisheries Service (NMFS) received the U.S. Bureau of Reclamation's (BOR) biological assessment (BA) for the Cachuma Project on April 7, 1999. In a January 8, 1999, letter to the BOR, NMFS requested specific information relating to the Cachuma Project and its effects on steelhead. Based on our review, the BA does not contain all of the information that we previously requested. Our information needs are detailed below. NMFS will start the consultation time clock when this information is received.

Description of the action

- The BA is unclear regarding the frequency of mixing state water and Lake Cachuma water in Santa Ynez water releases. A simple statement indicating that data is not available to estimate the frequency would suffice, if this is indeed the case. (NMFS, January 8, 1999, page 3, *State Water Deliveries*).
- A construction schedule including measures to avoid adverse impacts to steelhead and specific design details are needed (90% drawings) for the proposals to modify Hilton Creek habitat. (NMFS, January 8, 1999, page 4, *Modification of Hilton Creek Habitat*).
- Maintenance of the Hilton Creek Water Supply Line needs to be detailed in the BA if steelhead will be affected. For example, valve repair might involve water shut off. (NMFS, January 8, 1999, page 5, *Maintenance*).

Description of listed species and critical habitat

- Critical habitat for the Southern California Evolutionarily Significant Unit of steelhead was proposed on Friday, February 5, 1999. This includes the Santa Ynez River and its tributaries below Bradbury Dam. This enhances NMFS's need to have specific information regarding steelhead habitat in these areas. In NMFS's January 8, 1999, letter NMFS asked for specific flow information regarding habitat mapping studies done in 1994 and 1995. The current BA does not provide this information, instead it presents new information from 1997 surveys. To facilitate NMFS's evaluation, NMFS requests a complete "table of comparison of releases at Bradbury Dam with downstream flow



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measurements for 1995 - 1999" (please also include 1994 if flow data was taken). NMFS only has this information for November - March for 1995 - 1999. NMFS will need January - December for each year.

NMFS requested that the percentage of shading provided by riparian vegetation and topography of the channel be provided for Hilton Creek. (NMFS, January 8, 1999, page 6, *Hilton Creek*). The information supplied by the BOR in the BA does not indicate the percentage of shading or if this data is available.

NMFS requested the flows at which various Santa Ynez River Technical Advisory Committee surveys were conducted on Hilton Creek (NMFS, January 8, 1999, page 6, *Hilton Creek*). The BA only provides this for the 1998 studies. Other documentation available to NMFS suggests that flow data were taken or flows were estimated. NMFS needs clarification of flows during each habitat survey effort on Hilton Creek.

NMFS requested a graph of temperature data showing the duration that temperatures exceeded 25 degrees Celsius in one day (NMFS, January 8, 1999, page 6, *Mainstem Water Temperature*). NMFS will need this data for all temperature probes in all years in the following reaches of the river identified in the BA: Highway 154, Refugio, Alisal, Avenue of the Flags, and Buellton to Lompoc.

NMFS requested the flows at which temperature models were run (NMFS, January 8, 1999, page 7, *Mainstem Water Temperature*). This information is not provided in the BA. NMFS needs clarification of the sentence on page 2-33: "Stressful water temperatures were predicted (and observed to occur) within 4.4 miles below the dam under all scenarios considered, regardless of flow release." Based on the information available to NMFS, NMFS understands this to mean the alternatives that were tested include Scfs release and the release schedules in for Alternatives 1 and 3A1-3A7 in the 1995 EIS/EIR for Cachuma Project Contract Renewal. Is this correct?

NMFS asked for specific information regarding mainstem dissolved oxygen surveys (NMFS, January 8, 1999, page 7, *Mainstem Dissolved Oxygen*). This information is not provided in the BA. It appears that this information may be contained within the 1998 SYRTAC document cited in the BA. NMFS requests this document.

NMFS asked for specific information regarding Hilton Creek temperature and dissolved oxygen data (NMFS, January 8, 1999, page 7, *Hilton Creek*). The BA does not contain this information. NMFS believes this information may be in the 1998 SYRTAC document noted above. NMFS would like to know specifically where in the water column monitoring was done.

Description of effects to listed species and/or critical habitat.

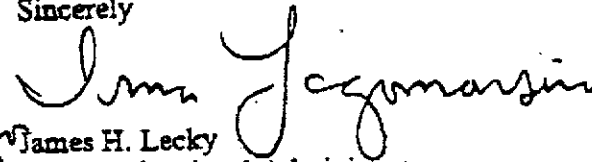
NMFS will need the following reports or studies and data used (electronic copies/spreadsheets are preferred) to produce them: the SYRTAC passage analysis and the SYRTAC habitat studies (referenced as SYRTAC 1999b and SYRTAC 1999a), the exceedence analysis for proposed, historic, and baseline conditions, and the data used to produce Figures 3-2, 3-3, Table 3-2, and Figure 3-4 if different from the data used for the

exceedence analysis. NMFS requested the data from the SYRTAC habitat study in our January 8, 1999 letter.

The BA does not specifically address the effects, if any, of maintenance activities for the Hilton Creek water supply line on steelhead and proposed steelhead critical habitat. As noted in our January 8, 1999 letter, maintenance of the pipeline could result in stranding, turbidity, sedimentation, and toxics, among others (NMFS, January 8, 1999, page 9, *Maintenance needs*).

The above information is critical for conducting consultation on the Cachuma Project. Please call the principle fishery biologist for this project, Mr. Eric Shott at 562-980-4026, or Craig Wingert, policy contact, at 562-980-4021 if you have any questions or need further information.

Sincerely


James H. Lecky
Assistant Regional Administrator
Protected Resources

cc: Dr. William Hogarth, NMFS
David Young, BOR