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

Conserving California’s Wildlife Since 1870
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,

[Signature]

Jeffrey R. Single, Ph. D.
Regional Manager

cc: See Page Three
cc:  Kimberly Bose, Secretary
     Federal Energy Regulatory Commission
     888 First Street NE
     Washington, D.C. 20426

     John Aedo
     San Francisco Regional Office
     Federal Energy Regulatory Commission
     100 First Street, Suite 2300
     San Francisco, California 94105-3084

     Richard Doble
     Pacific Gas and Electric Company
     Post Office Box 770000; Mail Code N13E
     San Francisco, California 94177

     Ron Berry
     Tri-Dam Project
     Post Office Box 1158
     Pinecrest, California 95364

     Beth Martinez
     Stanislaus National Forest
     19777 Greenly Road
     Sonora, California 95370

     Deborah Giglio
     United States Fish and Wildlife Service
     2800 Cottage Way, Room W-2605
     Sacramento, California 95825-1846

ec:  Jeff Wetzel
     State Water Resources Control Board
     Email: Jeff.Wetzel@waterboards.ca.gov