



A Public Education Effort of the South San Joaquin and Oakdale Irrigation Districts

February 3, 2011
Dan Bacher
Editor
Fish Sniffer Magazine

Re: *Agribusiness Trying to Pit Fishermen Against Each Other*

Dear Mr. Bacher:

We suggest you read the National Marine Fisheries Service's ("NMFS") May 29, 2009 technical memo on Modeling Tools and Associated Analyses Utilized in Developing the San Joaquin River Inflow to Export Ratio Action and the Minimum Stanislaus River Flows Action for the 2009 NMFS OCAP BO. In that tech memo you'll note statements made by the federal hydrologist admitting that with the addition of the flows required by the reasonable and prudent alternative ("RPA") contained in the NMFS's June 4, 2009 *Biological Opinion and Conference Opinion on the Long-Term Operations of the Central Valley Project and State Water Project* ("OCAP BO"), New Melones cannot meet its obligations in the long-term. In his memo, which was reviewed by Maria Rea of NMFS, hydrologist Craig Anderson states:

"Modeling for our analysis of the East Side Division show that relying on New Melones Reservoir to provide the flows at Vernalis cannot be sustained, and attempting to do so would likely have additional adverse effects on the CV steelhead." (pp. 3-4)

As you will see from the data provided, with the additional flows required by the RPA on the already over-burdened New Melones water supply, New Melones increasingly has less water to deliver for all purposes, including fish and wildlife, agriculture, and water quality. That's because all allocations, except temperature, are based upon the amount of the water supply in any given year. As continuously more water will be released from the reservoir to satisfy the additional RPA requirements than will be made up each year from inflow into New Melones, the reservoir will go empty. Indeed, under mindless application of these RPA guidelines, New Melones would have gone empty 13 times over an 80 year period, whereas it would not have gone empty with the same hydrology under the old operating plan.

Additionally, the OCAP BO RPA requires temperature goals to be met by releasing as much water as is needed to achieve the required temperature rather than by releasing a particular rate of flow. Thus, more water will need to be released from New Melones than is presently assumed under the OCAP BO RPA flow requirements. While the attached carryover storage graph has factored temperature into its model via use of a surrogate, the attached temperature graphs provide a more detailed analysis of the impacts this will have. In fact, as the OCAP BO RPA temperature goals are impossible to achieve under any release schedule and any attempt to satisfy them will drain New Melones.

Despite assurances by the USBR representatives that the USBR will not permit New Melones to be drained, they have yet to issue a plan of operations by which it will prevent this from happening. (See the attached letters in which the Districts have repeatedly requested USBR to provide an operations plan.) Absent an operations plan identifying which water will be used to keep New Melones operational, none of the interested parties have provided any reassurances that the potential impacts, to which the Districts are calling attention, will not in fact happen. As opposed to conducting studies based on assumptions that may or may not happen, the Districts have simply conducted studies in response to the concrete requirements that the USBR has agreed to implement.

Rather than assert that the results of these studies are merely a means by which the Districts can “pit different groups of fisherman against each other to further fragment opposition to unrestricted water use for big farms,” why not instead do a bit of your own research and get the facts straight. We suggest you begin by reading the May 13, 2010 letter from Maria Rea of NMFS to Jim Kellogg of the California Fish and Game Commission (a copy of which is attached) in which Ms. Rea “encourages the Commission to immediately review and amend striped bass sport fishing regulations in an attempt to reduce their predatory impact and thereby increase survival of native fish.” To blame the Districts for instigating warfare among the fishermen, when predation by non-native species such as striped bass has been acknowledged as a major factor warranting action, is illogical.

Furthermore, were you to look at the concrete facts, you would have discovered that the additional OCAP BO RPA flow requirements will drain New Melones, the additional OCAP BO RPA temperature goals are impossible to meet regardless of flow and the USBR has failed to provide an operating plan under which New Melones will not go empty. If you have something factual to repudiate anything that has been presented here, we’d love to hear it. Barring that, we look forward to more accurate reporting of the facts in your future articles.

Sincerely,

Jeff Shields,
General Manger
South San Joaquin Irrigation District

Steve Knell,
General Manager
Oakdale Irrigation District