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California Sportfishing Protection Alliance – Tuolumne River Trust - Trout Unlimited – American Rivers – American Whitewater - Merced River Conservation Committee – Friends of the River - Golden West Women Flyfishers – Central Sierra Environmental Resource Center – Tuolumne River Conservancy

January 29, 2018

By electronic filing

Kimberly Bose, Secretary
Federal Energy Regulatory Commission
888 First Street NE
Washington, D.C. 20426

Re: Notice of Ready for Environmental Analysis
Don Pedro Hydroelectric Project, FERC Project No. 2299-082
La Grange Hydroelectric Project, FERC Project No. 14581-002

Dear Ms. Bose:

Attached for filing with the Federal Energy Regulatory Commission please find the response to the "Notice of Application Accepted for Filing, Soliciting Motions to Intervene and Protests, Ready for Environmental Analysis, and Soliciting Comments, Recommendations, Preliminary Terms and Conditions, and Preliminary Fishway Prescriptions" of California Sportfishing Protection Alliance, Tuolumne River Trust, Trout Unlimited, American Rivers, American Whitewater, Merced River Conservation Committee, Friends of the River, Golden West Women Flyfishers, Central Sierra Environmental Resource Center and Tuolumne River Conservancy (collectively "Conservation Groups") in the above-captioned proceedings.

Please contact me with any questions.

Respectfully submitted,

Chandra Ferrari

Chandra Ferrari
Senior Policy Advisor
Trout Unlimited

Enclosures

Cc: Service List, Project No. 2299-082
Service List, Project No. 14581-002

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UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

Modesto Irrigation District	)	
Turlock Irrigation District	)	
	)	
Don Pedro Hydroelectric Project	)	P-2299-082
La Grange Hydroelectric Project	)	P-14581-002
	)	

CONSERVATION GROUPS' COMMENTS AND RECOMMENDATIONS READY FOR ENVIRONMENTAL ANALYSIS

California Sportfishing Protection Alliance, Trout Unlimited, American Rivers, American Whitewater, Merced River Conservation Committee, Friends of the River, Golden West Women Flyfishers, Tuolumne River Trust, Tuolumne River Conservancy and Central Sierra Environmental Resource Center (hereinafter Conservation Groups) respectfully respond to the Notice of Ready for Environmental Analysis for the relicensing of FERC Project no. 2299, the Don Pedro Hydroelectric, and to the Notice of Ready for Environmental Analysis for the original relicensing for Project no. 14581, the La Grange Hydroelectric Project. Hereinafter, we refer to the Don Pedro Project as "the Project," and to the La Grange Project as "the La Grange Project." Both projects are operated by Modesto Irrigation District and Turlock Irrigation District (MID and TID respectively; collectively, Districts or Licensees).[1]

The Federal Energy Regulatory Commission (FERC or Commission) has stated its intent to prepare one Environmental Impact Statement (EIS) under the National Environmental Policy Act (NEPA) for the Don Pedro and La Grange licensing proceedings for the sake of efficiency and because the Districts own and operate the Projects in a highly coordinated manner to maximize water supply and power benefits at both Projects.[2] For similar reasons, including the fact that the Projects cumulatively affect the same resources in the Lower Tuolumne River, we provide one set of comments in response to both notices. Additionally, we provide a suite of recommendations for each Project under the Federal Power Act (FPA).

[1] The Commission issued the "Notice of Application Accepted for Filing, Soliciting Motions to Intervene and Protests, Ready for Environmental Analysis, and Soliciting Comments, Recommendations, Preliminary Terms and Conditions, and Preliminary Fishway Prescriptions" for the Don Pedro Hydroelectric Project (eLibrary no. 20171130-3002) on November 30, 2017. It issued the "Notice of Application Accepted for Filing, Soliciting Motions to Intervene and Protests, Ready for Environmental Analysis, and Soliciting Comments, Recommendations, Preliminary Terms and Conditions, and Preliminary Fishway Prescriptions" for the La Grange Hydroelectric Project (eLibrary no. 20171130-3003) on November 30, 2017.

[2] *See* Scoping Document 2 for the LaGrange Hydroelectric Project, eLibrary no. 20140905-3012.

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BACKGROUND

The Projects' facilities are located on the main stem of the Tuolumne River. The Project has a generating capacity of 203 megawatts (MW) and the La Grange Project generates 4.75 MW annually. The Conservation Groups have been active relicensing participants in the relicensing of the Project since before the formal commencement of the Integrated Licensing Process with several of the groups participating in dozens of face-to-face relicensing and/or settlement meetings. Additionally, the Conservation Groups have been active participants in the licensing of the La Grange Project and participated extensively in the pre-licensing proceeding to determine whether the La Grange Project was subject to the Commission's licensing jurisdiction. Key filings in the Don Pedro Project and La Grange Project dockets are noted below.

The Commission found that the La Grange Project was subject to its licensing jurisdiction under Part 1 of the FPA on December 19, 2012.[3]

The Licensees filed a Request for Rehearing and Motion for Stay Pending Judicial Review on January 18, 2013, arguing that the La Grange Project did not require licensing under the FPA.[4]

The Commission issued an Order on Rehearing, Clarifying Intervention Status and Denying Stay Pending Judicial Review on July 19, 2013.[5] As part of the Order, the Commission upheld its earlier finding that the La Grange Project was subject to its licensing jurisdiction and declined to determine that the La Grange Project required licensing as part of the Don Pedro Project.

The Licensees filed a Draft License Application for the Don Pedro Project on November 26, 2013.[6] They filed a Final License Application for the Don Pedro Project on April 28, 2014,[7] and then filed an Amended Final License Application for the Don Pedro Hydroelectric Project on October 11, 2017.[8]

The Licensees filed a Final License Application for the LaGrange Hydroelectric Project on October 11, 2017.

The Commission issued the "Notice of Application Accepted for Filing, Soliciting Motions to Intervene and Protests, Ready for Environmental Analysis, and Soliciting Comments, Recommendations, Preliminary Terms and Conditions, and Preliminary Fishway Prescriptions" for the Projects on November 30, 2017.[9]

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[3] *See* eLibrary no.20121221-5131; 141 FERC ¶ 62,211 (2012).
[4] *See* eLibrary no. 20121219-3106.
[5] *See* eLibrary no. 20130719-3031.
[6] *See* eLibrary no. 201311265015.
[7] *See* eLibrary no. 20140428-5069.
[8] *See* eLibrary no. 20171011-5064.
[9] The Commission issued the "Notice of Application Accepted for Filing, Soliciting Motions to Intervene and Protests, Ready for Environmental Analysis, and Soliciting Comments, Recommendations, Preliminary Terms and Conditions, and Preliminary Fishway Prescriptions" for the Don Pedro Hydroelectric Project (eLibrary no. 20171130-3002) on November 30, 2017. The Commission issued the "Notice of Application Accepted for Filing,

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SUMMARY OF KEY COMMENTS AND RECOMMENDATIONS

The Conservation Groups have worked collaboratively with the Licensees and the resource agencies throughout the licensing processes in an attempt to reach agreement on new license measures. The effort clarified many of the disputed issues, but unfortunately did not result in agreement. Most notably, the Licensees' proposal for protecting environmental resources in the lower Tuolumne River is insufficient to mitigate the effects of the Projects. Even though Conservation Groups did not reach agreement with the Licensees, the Conservation Groups' Flow Proposal and non-flow measures (i.e., floodplain recommendations and experimental weir) reflect an attempt to address the concerns articulated by the Licensee in those discussions. We believe they represent balanced measures that will address the Projects' impacts to ecological resources with minimal impact to Licensees' operations. These measures address key issues that have not been adequately addressed in the AFLA.

Conservation Groups recommend that the Districts and the Commission consider the following measures to ensure the legal sufficiency of the Commission's NEPA analysis (*see* 18 C.F.R. § 380.3) and to ensure that the new license is in the public interest and best suited to a comprehensive plan of development for the river consistent with Sections 10(a) and 15 of the FPA (*see* 16 U.S.C. §§ 803(a)(1) and 808).

1) Implementation of Conservation Groups' Flow Proposal as a comprehensive mechanism to address impacts to instream resources, strategically and flexibly manage reservoir storage levels and minimize effects to water deliveries.
2) Reservation of the National Marine Fisheries Services FPA § 18 authority to prescribe fish passage for spring-run Chinook salmon; re-evaluate in 2026.
3) Establishment of the Tuolumne River Technical Advisory Committee (TAC) as the primary forum to conduct post-licensing monitoring, research and consultation.
4) Creation of new floodplain habitat along the lower Tuolumne River.
5) Addition of gravel to fill in Special Run Pools in the lower Tuolumne River and to maintain spawning habitat.
6) Addition of large woody debris to provide salmonid habitat in the lower Tuolumne River.
7) Installation of a fish counting weir annually at RM 24, and installation of a temporary weir to capture piscivorous fish in Critically Dry and Super Critically Dry years.
8) Construction of a safe and efficient whitewater boating take-out facility and day-use facilities at Ward's Ferry Bridge.
9) Consideration of an alternative that analyzes changes to Project operations and condition of aquatic resources in response to Conservation Groups' Flow Proposal and non-flow measures.
10) Consideration of an alternative that analyzes changes to Project operations and condition of aquatic resources in response to limiting Delta exports.

Soliciting Motions to Intervene and Protests, Ready for Environmental Analysis, and Soliciting Comments, Recommendations, Preliminary Terms and Conditions, and Preliminary Fishway Prescriptions" for the La Grange Hydroelectric Project (eLibrary no. 20171130-3003) on November 30, 2017.

11) Consideration of the cumulative effects of the revised Bay-Delta Water Quality Control Plan, the San Joaquin River Restoration Program, and new Merced River operations on Tuolumne River fisheries and on the Tuolumne River's hydrological resources.

Summary Table A: Summary of Conservation Groups' Recommended Measures.

No.	Name	Notes	Page No.
I	Conservation Groups' Flow Recommendation	Includes water-year types, flows in lower Tuolumne River, irrigation deliveries, Groundwater Water Bank.	6
II	Reservation of FPA § 18 Authority to Require Fish Passage	NMFS reserve authority to issue a fish passage prescription; re-evaluate when NMFS is allowed to prescribe for spring-run salmon in 2026.	46
III	Establish a Restructured Technical Advisory Committee	Re-establish and reform the Tuolumne River TAC as a forum for consultation and coordination with resource agencies, Conservation Groups, and other interested parties on license conditions, monitoring, and annual river operations. Retain an independent consultant to facilitate the TAC.	51
IV	Increase Floodplain Rearing Habitat for Juvenile Salmonids	Lower floodplain surfaces to attain 100,000 acre-days of inundation in AN years, 65,000 ac-days of inundation in BN years, and 36,000 ac-days of inundation in D years OR create 810 acres of new 100% suitable floodplain rearing habitat, whichever is higher. Develop a Floodplain Rearing Habitat Restoration Plan.	55
V	Develop and Implement a Large Woody Debris Placement and Management Plan	Place 1600 pieces of LWD along the lower Tuolumne River from RM 52 to RM 0.	67
VI	Gravel Augmentation and Rehabilitation and Reduction of Habitat for Piscivorous Fish	Annually place 200,000 cu yds of sediment for 10 years to fill Special Run Pools and reduce piscivorous fish holding and spawning habitat. For the term of the license, annually place 2500 cu yds of cleaned spawning size gravel. Update the 2004 Coarse Sediment Management Plan.	71
VII	Annual Fish Counting Weir and Installation of a Temporary Weir to Capture and Remove Non-Salmonid Piscivorous Fish in Critically Dry and Super Critically Dry Water Years	Annually install a temporary fish counting weir at or near RM 24 as done since 2009. In CD and SCD years, install a temporary piscivorous fish removal weir between RM 25.9 and RM 25. Capture and remove striped bass to the San Francisco Bay. Relocate black bass to reservoirs where salmonids are not present.	74

VIII	Ward's Ferry Bridge Whitewater Take-out	Construct a whitewater boating takeout and day-use recreation facility at Ward's Ferry Bridge.	82

SUBSTANTIVE COMMENTS AND RECOMMENDATIONS

I. The Conservation Groups' Flow Recommendation: A Balanced Approach that Improves Instream Conditions, Minimizes Effects to Water Deliveries and Strategically Manages Reservoir Storage.

A. Conservation Groups' Flow Proposal: Summary

Conservation Groups recommend a flow condition for the lower Tuolumne River that is based on the following key elements:

- The primary flow compliance point is La Grange gage; secondary compliance point at a gage to-be-determined, no more than 1 mile downstream of the existing Geer Road infiltration gallery (RM 29.9).
- The year-round minimum baseflow requirement at the La Grange gage is 300 cfs.
- The minimum baseflow requirement at the gage downstream of Geer Road infiltration gallery is 200 cfs in July, August and September of each year, and 300 cfs in all other months.
- Licensees will use six water-year types based on 50% exceedance estimated unimpaired flow at La Grange
- Licensees will modify the water-year type within three days of the issuance of Department of Water Resources (DWR) Bulletin 120 in February, March, April, and May.
- Licensees will modify water-year types for specified dry-year and critically-dry-year sequences, as specified.
- Licensees will release 50% of unimpaired inflow to Don Pedro Reservoir to the lower Tuolumne River in specified months in specified water-year types.
- Licensees will release 50% of unimpaired inflow at La Grange February through June in Wet years.
- Licensees will release 50% of unimpaired inflow at La Grange February through May in Above Normal and Below Normal years; Licensees will apply a flow recession in these water years according to a set rampdown schedule, beginning on June 10 of each of these water years.
- Licensees will release 50% of unimpaired inflow at La Grange March through April in Dry years; Licensees will apply a flow recession in these water years according to a set rampdown schedule, beginning on May 10 each of these water years.
- Licensees will substitute a spring 35,000 AF Block of Water flow requirement in place of a percent-of-unimpaired flow requirement in Critically Dry years, and a

spring 12,500 AF Block of Water flow requirement in place of a percent-of-unimpaired flow requirement in Super Critically Dry years.

- Licensees will release a fall attraction pulse of 20,000 AF in Wet and Above Normal years, 15,000 AF in Below Normal and Dry years, 10,000 AF in Critically Dry years, and 7500 AF in Super Critically Dry years.
- Licensees will limit irrigation deliveries to a percent of baseline demand in each year, as specified.
- The City and County of San Francisco (CCSF) will pay for Licensees to construct and operate groundwater recharge facilities, capable of managed recharge of 90,000 AFY, which Licensees will operate as a "Groundwater Water Bank."[10]
- The Groundwater Water Bank will operate on a system of credits and debits similar in structure to the existing Water Bank arrangement between CCSF and Licensees for storage in Don Pedro Reservoir.
- The ability of CCSF to debit credits in the Groundwater Water Bank will be limited to dry year sequences and Critically Dry years.

The specific components of this measure are enumerated and described in detail in section (C) below.

B. Conservation Groups' Flow Proposal: Development

1. Update of the Bay-Delta Water Quality Control Plan

In developing a flow proposal for the lower Tuolumne River, the Conservation Groups attempted to work within the general framework that the State Water Resources Control Board (State Board) has established for its ongoing San Joaquin Flow and Salinity proceeding, otherwise known as Phase I of the Update of the Bay-Delta Water Quality Control Plan.[11] This framework centers flow requirements on release of a percent of the February-June unimpaired inflow to major San Joaquin tributary reservoirs, including Don Pedro Reservoir on the Tuolumne.

In its "Technical Report on the Scientific Basis for Alternative San Joaquin River Flow and Southern Delta Salinity Objectives" (February 2012, updated June, 2016; "Scientific Basis Report"), the State Board determined:

> [H]igher and more variable inflows during the February through June time frame are needed to support existing salmon and steelhead populations in the major SJR tributaries to the southern Delta at Vernalis. This will provide greater connectivity to the Delta and

[10] Conservation Groups understand that the Commission cannot require CCSF to pay for groundwater recharge facilities. However, as discussed *infra*, such payment is the most reasonable resolution to apportioning responsibility between CCSF and the Districts for increased Tuolumne River flows that simultaneously protects public trust resources. As also discussed *infra*, the Commission should analyze this feasible mitigation measure in its NEPA document and compare its combined environmental and economic impacts with other feasible measures.

[11] As discussed, *infra*, the State Board has reserved authority to regulate the "control, appropriation, use, or distribution of water used in irrigation or for municipal or other uses," under FPA section 27. It also has delegated authority under Clean Water Act (CWA) section 401, 33 U.S.C. § 1341, to certify that any discharge from a federally-licensed activity will comply with applicable state water quality standards.

> will more closely mimic the flow regime to which native migratory fish are adapted. Water needed to support sustainable salmonid populations at Vernalis should be provided on a generally proportional basis from the major SJR tributaries (Stanislaus, Tuolumne, and Merced Rivers).[12]
>
> . . . A more natural flow regime is anticipated to improve a number of ecosystem attributes such as (but not limited to): 1) native fish communities; 2) food web; 3) habitat; 4) geomorphic processes; 5) temperature; and 6) water quality.[13]

In this Scientific Basis Report, the State Board also cites to its previous finding in *Development of Flow Criteria for the Sacramento-San Joaquin Delta Ecosystem* (Delta Flow Criteria Report), that "approximately 60% of unimpaired flow during the February through June period would be protective of fish and wildlife beneficial uses in the SJR."[14]

The State Board released its first Substitute Environmental Document (SED) for Phase I on December 31, 2012. Numerous parties, including many of the Conservation Groups and the Licensees, submitted extensive comments. The State Board subsequently issued a recirculated SED on September 15, 2016.[15] Generally speaking, the 2016 SED recommended flow objectives for the Tuolumne River as well as the Merced and Stanislaus rivers that required release of 30-50% of the February-June unimpaired flow in each river, with a beginning value of 40%. Again, numerous parties commented on the SED, including many of the Conservation Groups and the Licensees. The State Board intends to issue a final SED and to adopt water quality objective (including Tuolumne River flow) in the spring of 2018.

The Conservation Groups note that both iterations of the SED required rigid adherence to the same percent-of-unimpaired flow requirements in all of the same months across all years. This uniform adherence limits the opportunity to realize the full benefits of February-June flows in wetter years because identical percentages would cause the Tuolumne system to run out of water in dry years. Conservation Groups decided to use the water-balance model developed by the Districts and CCSF for the relicensing to incrementally evaluate different percentages of unimpaired flow requirements for the lower Tuolumne River in all or just some of the February-June months. We also reviewed the model runs of the Base Case or existing condition performed by consultants to the Districts and CCSF. This analysis informed our flow recommendations.

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[12] State Water Resources Control Board, "*Technical Report on the Scientific Basis for Alternative San Joaquin River Flow and Southern Delta Salinity Objectives*" ("Scientific Basis Report," updated June, 2016). Appendix C of the Substitute Environmental Document for Phase I of the update of the Bay-Delta Water Quality Control Plan. p. 3-1. Available at: https://www.waterboards.ca.gov/waterrights/water_issues/programs/bay_delta/bay_delta_plan/water_quality_control_planning/2016_sed/docs/appx_c.pdf

[13] *Id*, p. 3-41.

[14] *Id*, p. 3-53. *Development of Flow Criteria for the Sacramento-San Joaquin Delta Ecosyste*m (**"**The Delta Flow Criteria Report") is available at: http://www.waterboards.ca.gov/waterrights/water_issues/programs/bay_delta/deltaflow/docs/final_rpt080310.pdf.

[15] Available at: https://www.waterboards.ca.gov/waterrights/water_issues/programs/bay_delta/bay_delta_plan/water_quality_control_planning/2016_sed/index.shtml

2. Modification of the Don Pedro Water Balance Model

The water balance model that the Districts provided to relicensing participants did not initially have the capability to allow Conservation Groups to do an iterative analysis of various different scenarios that apply a percent-of-unimpaired flow requirement. Notably, the model did not allow variable irrigation deliveries, the ability to easily change water year type, or the ability to easily model monthly flow requirements. Over the course of about two years, staff from the California Sportfishing Protection Alliance (CSPA) made several requests of District staff and their consultants to modify the model to allow such capability. After a series of non-affirmative answers, CSPA approached technical staff at the San Francisco Public Utilities Commission (SFPUC) about making such modifications.[16] In June, 2017, CSPA met with SFPUC staff, the modeling consultant to the Districts and CCSF, staff from MID and staff from the Bay Institute (TBI) to discuss desired modifications. In September, 2017, SFPUC delivered to CSPA and TBI a model with an added "dashboard" that allowed CSPA and others to model various scenarios. These scenarios included combinations of flows based in part on a percent of unimpaired flows in specified months, variable water-year types, and changes in irrigation deliveries. We view this as an important step in the collaborative process.

3. Broader Context of Conservation Groups' Flow Proposal

a. Hydrology and System Demands

With an average annual unimpaired flow of just under 2 million acre-feet (MAF), the Tuolumne River is the largest tributary to the San Joaquin River. The watershed is also storage rich: Don Pedro Reservoir stores about 2 MAF of water.[17] CCSF's Hetch Hetchy Reservoir stores 360,000 acre-feet (AF), Cherry Reservoir (Lake Lloyd) stores 273,000 AF, and Lake Eleanor stores 26,000 AF.[18]

There is also much demand on the watershed. Combined annual average diversion demand by the Districts is about 900,000 AF. CCSF exports on average about 250,000 AF to the Bay Area annually.[19]

Required flows in the lower Tuolumne River are meager: on average, 21% of the February-June unimpaired flow is released into the lower Tuolumne, and only 40% of the average annual flow is released.[20] The largest maximum required annual flow release in any given year is 300,923 AF, the smallest required annual flow release is 94,000 AF, and the required annual flow release on a 50% exceedance basis is 165,000 AF.[21]

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[16] The SFPUC is the water purveyor within the City and County of San Francisco. SFPUC wholesales water outside San Francisco to Bay Area water agencies through the Bay Area Water Supply and Conservation Agency (BAWSCA). SFPUC tends to represent BAWSCA on policy issues. CCSF represents SFPUC on legal issues through the City Attorney's office.
[17] Don Pedro relicensing Pre-Application Document, p. 3-3.
[18] *Id*., p. 4-10.
[19] *Id*., p. 4-8.
[20] Scientific Basis Report, Table 2.20.
[21] 1995 Settlement Agreement.

Looking at the required releases somewhat differently, actual February-June release from La Grange was equal to or less than 10% of the unimpaired February-June flow in 18 of the 45 water years from 1971 through 2015; equal to or less than 20% of the unimpaired February-June flow in 29 of the 45 water years from 1971 through 2015. In only 8 of the 45 water years from 1971 through 2015 did actual February-June flow at the La Grange gage equal or exceed 50% of the February-June unimpaired flow.[22]

b. Role and Interests of the City and County of San Francisco

On July 16, 2009, the Commission issued an "*Order on Rehearing, Amending License, Denying Late Intervention, Denying Petition, and Directing Appointment of a Presiding Judge for a Proceeding on Interim Conditions*."[23] During the subsequent informational Proceeding on Interim Conditions, resource agencies and Conservation Groups advocated that FERC require, until relicensing, a year-round flow release requirement of 275 cfs at the La Grange gage, with an added requirement to meet certain water temperatures. The Districts and CCSF opposed this proposed flow increase. At that time, the Districts and CCSF had not developed (or at least not made public) the water balance model that they later developed for relicensing. In addition, the HEC-5Q water temperature model that would later be available to the agencies had just been developed. Agencies and NGO's were thus in 2009 limited in the tools available to test various flow scenarios.

One of the main lines of argument that developed in 2009 against interim flow increases was that the increases would cause water shortages in the Bay Area during drought and thus rain draconian economic impacts on the economy of the San Francisco Bay Area. CCSF developed and expanded this line of argument in the 2012-2013 and 2016-2017 workshops, hearing, comments and public statements on the State Board's SED for Phase I of the update of the Bay-Delta Plan. The water supply of CCSF and its wholesaler the Bay Area Water Supply and Conservation Agency (BAWSCA) is not directly implicated in relicensing. However, CCSF has historically interpreted the Fourth Agreement between CCSF and the Districts to mean that CCSF is contractually responsible for 51% of any flow increases that the Commission may require in relicensing. Both the Districts and CCSF have consistently pointed out the potential economic impacts of this contractual arrangement.

As stated *infra*, the Fourth Agreement is a contractual agreement between the Licensees and CCSF. As such, it cannot be read to limit the authority of the Commission or the State Board to condition the licenses in order to assure compliance with the FPA and CWA, respectively. Acceptance of CCSF's predicted economic impacts as immutable fact would leave Conservation Groups, resource agencies and potentially the Commission and the State Board in the apparent position of either acceding to unreasonable anemic flows in the lower Tuolumne River or unreasonable advocacy of economic risk in the face of drought.

It is unclear whether the Districts and CCSF are constrained by law from proposing a way out of this Hobson's choice of their own making. What is clear is that each of the parties has in practice prioritized good faith in supporting the Fourth Agreement over consideration of a

[22] SFPUC document distributed at stakeholder meeting, February 10, 2017.
[23] ELibrary no. 20090716-3060.

solution outside the letter of the Fourth Agreement that would reduce potential economic impacts to the Bay Area of increased flow in the Tuolumne River. In response, Conservation Groups propose a reasonable and feasible solution to the potential water supply impacts of increased lower Tuolumne River flows on the City and County of San Francisco. Our proposed solution is similar to the existing Water Bank arrangement in Don Pedro Reservoir that maintains the seniority of the Districts' water rights but that in this instance does not rely on protecting water rights priority at the expense of public trust resources.

c. Flow Negotiations for the Lower Tuolumne River 2012-2017

Since 2012, there have been at least three separate venues established whose scope included the negotiation of flows for the lower Tuolumne River. The first was established at the initiative of the California Resources Agency in 2012 as a prospective venue to resolve flows in each of the major San Joaquin tributaries. The second was a negotiation established by some of the Don Pedro relicensing participants in 2014 to negotiate issues relating specific to the Tuolumne River. The third was a negotiation established by the California Resources Agency to negotiate flow in the San Joaquin tributaries, as part of a broader effort to negotiate "voluntary agreements" throughout the Sacramento and San Joaquin river watersheds and the Bay-Delta estuary as an alternative to having the State Water Board set flow objectives in the various phases of the update of the Bay-Delta Water Quality Control Plan.

All of these negotiations were subject to confidentiality, non-disclosure and/or non-attribution agreements. None of them has reached negotiated settlement. None of them has directly produced usable work product that Conservation Groups or others can draw from verbatim in analysis or in direct support of flow proposals for REA comments or recommendations.[24]

One of the consequences of the shift to confidential negotiations was that informal mutual explorations of potential flow scenarios, using a water balance model developed for relicensing, largely did not take place in the Don Pedro relicensing. This is the exception, not the rule in recent California relicensings. In both the Merced River Project relicensing and the Yuba River Development Project relicensing, there was considerable non-confidential discussion and analysis by relicensing participants of flow scenarios proposed by different entities.

In the relative absence of flow discussions in relicensing, public statements regarding impacts of increasing lower Tuolumne River flows have assumed a greater market share in the dialogue among relicensing participants. Much of this public advocacy has concerned the flows proposed in the State Water Board's Phase I of the update of the Bay-Delta Plan. The fuel for this dialogue is far more rhetorical than technical.

One glimpse of middle ground in the tone of ongoing dialogue has been a series of discussions between Conservation Groups and representatives of the San Francisco Public Utilities Commission (SFPUC). Following some relatively contentious disagreements and

[24] However, various technical staff from NGO's and agencies who were initially gathered to support the San Joaquin negotiation that began in 2012 started a collaborative group that developed the Scientific Evaluation Process Report, discussed *infra* and included as Attachment 3 to these comments.

discussions of documents in public meetings in 2016 and 2017, staff from SFPUC and from the Conservation Groups agreed that the dialogue would improve if it were grounded in a common set of technical tools that were not themselves in dispute. It was as a result of this dialogue that SFPUC staff agreed to modify the Don Pedro water balance model, as described in section (B)(2) above.

C. Conservation Groups' Flow Proposal for the Lower Tuolumne River

1. Water Year Types

Water year types shall be based on the DWR Bulletin 120 50% exceedance estimated annual unimpaired flow of the Tuolumne River at the La Grange gage, as shown in Table 1.

Table 1: Water Year Type Classification for the lower Tuolumne River

Water Year Type	Thousands of Acre Feet
Wet	Equal to or greater than 2725
Above Normal	Equal to or greater than 2000 and less than 2725
Below Normal	Equal to or greater than 1400 and less than 2000
Dry	Equal to or greater than 1075 and less than 1400
Critically Dry	Equal to or greater than 830 and less than 1075
Super Critically Dry	Less than 830 TAF

The water year type shall be modified when multiple dry and critically dry year water year types occur in sequence as follows:

- If a Dry year (according to inflow) is immediately preceded by any combination of two or more Critically Dry or Super Critically Dry years, it becomes a Critically Dry year.

- If a Critically Dry year (according to inflow) is immediately preceded by a Critically Dry year, it becomes a Super Critically Dry year.

Licensees shall update water year types within three days of the issuance of DWR Bulletin 120 or its successor in February, March, April and May of each year. The May water year type shall apply until the February update in the following water year.

Because DWR Bulletin 120 is typically not released until about the 10th of the month in February, March, April and May, the flow requirement for each of these months will extend into the following month. It is the intent of these recommendations that the percent-of-unimpaired flow requirements be one full month's duration in those months in which they are required. Example: if the April DWR Bulletin 120 is released on April 10 and indicates a Dry water year, and that water type is applied by Licensees on April 13, Licensees would be obligated to continue the required Dry year release for April through May 12.

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2. Streamflow Compliance Points and Compliance

The primary compliance point for flow measurement for the lower Tuolumne River shall be the La Grange gage (USGS 11289650).

Because Licensees propose to establish a new point of diversion at the to-be-completed infiltration gallery at RM 29.9 just downstream of Geer Road, licensees must install a new "Downstream" compliance gage capable of measuring streamflow downstream of the new diversion. To reasonably limit the influence of accretions and depletions between the new diversion and the Downstream gage, the Downstream gage should be no more than 1 mile downstream of the new diversion.

In the months of October through June, the flow requirement at La Grange shall also be the flow requirement at the Downstream gage. If the Districts divert water at the new diversion (infiltration gallery) in the October through June time period, they must release sufficient extra water past the upstream La Grange gage such that the diversion at the infiltration gallery does not drop the streamflow at the Downstream gage below the required flow value for the La Grange gage.

In the months of July through September, the minimum instream flow requirement at the La Grange gage shall be 300 cfs. In the months of July through September only, the Districts may divert water at the infiltration gallery such that the flow at the Downstream gage meets a minimum value of 200 cfs.

When the minimum streamflow requirement is a specific number, minimum streamflows shall mean the 3-day running average of average daily streamflows, with the 15-minute flows not less than 90 % of the specified flow requirement. In addition, 15-minute flows shall not be less than the applicable flow requirement for more than 48 consecutive hours.

When the minimum streamflow requirement is stated as a percent of unimpaired flow, Licensee shall release the percent of unimpaired as applicable with no three day running average being less than 40% of unimpaired, and no seven day running average being less than 50% of unimpaired.

3. February-June Flows

a. Wet years

1. Meet 50% of February-June unimpaired flow at the La Grange gage.
2. 300 cfs at the La Grange gage is a February-June default floor value if 50% of unimpaired drops below 300 cfs in February-June in a Wet year.
3. Allowed irrigation deliveries in a Wet year are 100% of demand, 90,000 AF of which shall be managed recharge deliveries to the Groundwater Water Bank, as described *infra*.

b. Above Normal (AN) years

1. Meet 50% of February-May unimpaired flow at the La Grange gage.
2. 300 cfs at the La Grange gage is a February-May default floor value if 50% of unimpaired drops below 300 cfs in February-May in an AN year.
3. Allowed irrigation deliveries in an AN year are 90% of demand, 90,000 AF of which shall be managed recharge deliveries to the Groundwater Water Bank if July 1 Don Pedro storage is greater than 1.6 MAD, as described *infra*.
4. Apply a managed flow recession in AN years according to a set rampdown schedule beginning on the final day of any water year on which minimum flows are determined by a percent of unimpaired flow (approximately June 13).
5. If recession flow drops to 300 cfs prior to the end of June, the minimum instream flow for the remainder of June is 300 cfs at the La Grange gage.

c. Below Normal (BN) years

1. Meet 50% of February-May unimpaired flow at the La Grange gage.
2. 300 cfs at the La Grange gage is a February-May default floor value if 50% of unimpaired drops below 300 cfs in a BN year.
3. Allowed irrigation deliveries in a BN year are 80% of demand.
4. Apply a managed flow recession in BN years according to a set rampdown schedule beginning on the final day of any water year on which minimum flows are determined by a percent of unimpaired flow (approximately June 13).
5. If recession flow drops to 300 cfs prior to the end of June, the minimum instream flow for the remainder of June is 300 cfs at the La Grange gage.

d. Dry years immediately preceded by a Wet, AN, BN, Dry, or single Critically Dry year

1. Minimum instream flow in February is 300 cfs at the La Grange gage.
2. Meet 50% of March-April unimpaired flow at the La Grange gage.
3. 300 cfs at the La Grange gage is a March-April default floor value if 50% of unimpaired drops below 300 cfs in March-April in a Dry year.
4. Allowed irrigation deliveries in a Dry year are 80% of demand.
5. Apply a managed flow recession in Dry years according to a set rampdown schedule beginning on the final day of any water year on which minimum flows are determined by a percent of unimpaired flow (approximately May 13).
6. If recession flow drops to 300 cfs during May or June, the minimum instream flow for the remainder of May and/or June is 300 cfs at the La Grange gage.

e. Dry years immediately preceded by two Critically Dry (CD) years

1. Dry years immediately preceded by two CD years will be considered to be CD years.

f. Critically Dry (CD) years

1. February-June required flow is 300 cfs at the La Grange gage.
2. Provide an additional 35,000 acre-feet of water for pulse flows in the March 15 through April 15 period, with release specifics to be determined by an implementation committee.[25]
3. Allowed irrigation deliveries in a Critically Dry year are 75% of demand.

g. Super Critically Dry (SCD) years (including CD years immediately preceded by a CD year)

1. February-June required flow is 300 cfs at the La Grange gage.
2. Provide an additional 12,500 acre-feet of water for pulse flows in the March 15 through April 15 period, with release specifics to be determined by an implementation committee.
3. Irrigation deliveries in a Super Critically Dry year are 70% of demand.

4. July-September flows

1. July-September required flow in all water year types is 300 cfs at the La Grange gage.
2. July-September required flow in all water year types is 200 cfs at a gage one mile or less downstream of the Geer Road infiltration gallery ("Downstream gage").

5. October-January minimum flows

1. October-January required flow in all water year types is 300 cfs at the La Grange gage.

6. October or November pulse flows for salmon attraction

1. Licensees will release fall pulse flows to attract salmon, with release specifics to be determined by an implementation committee.[26] Flow volumes of pulse flows in addition to October baseflow volume shall be 20,000 AF in Wet and AN years, 15,000 AF in BN and Dry years, 10,000 AF in CD years, and 7,500 in SCD years.

7. Recession Flows in AN, BN, and Dry Years

1. Recession flows apply only in AN, BN and Dry years.
2. Recession flows provide a multi-day rampdown to baseflow from the flow value on the final day of any water year ("Recession Initiation Flow Value") on which minimum flows are determined by a percent of unimpaired flow.
3. Recession rate is 180 cfs/day when the Recession Initiation Flow Value is greater than or equal to 1400 cfs, and shall remain at that rate until the daily flow value is equal to or less than 1400 cfs.

[25] *See* Conservations Groups' Recommendation, *infra*: Establish a Tuolumne River Technical Advisory Committee.
[26] The model run for this flow proposal assumes that this pulse takes place in the second half of October.

4. Recession rate for flows equal to or less than 1400 cfs is meant to require a drop in stage height of 9 cm/day for the first 6 days, and 3 cm/day thereafter, until baseflow is reached.
5. If the Recession Initiation Flow Value is equal to or less than 1400 cfs, or otherwise once the flow value becomes equal to or less than 1400 cfs in the course of the implementation of the 180 cfs/day recession, Licensees shall ramp down according to the values in Table 2 below. If the Recession Initiation Flow Value is less than or equal to 1254 cfs, then Licensees shall initiate the rampdown at the smallest value greater than the Recession Initiation Flow Value, and ramp down each day according to the descending values on the table.
6. If there are flood releases on the day that the recession is to be initiated, or Licensees must make flood releases in excess of the prescribed value for any given day in the flow recession sequence, Licensees shall reinitiate the flow recession once flood control requirements allow Licensees to resume the recession. In such case, Licensees shall resume the flow recession using the highest flow at which Licensees can maintain system control as the new Recession Initiation Flow Value.

Table 2: Recession Values Equal to or Less than 1400 cfs

Day	Flow	Day	Flow
1	1400	14	612
2	1254	15	584
3	1157	16	556
4	1068	17	527
5	979	18	499
6	890	19	499
7	801	20	471
8	771	21	443
9	742	22	414
10	720	23	386
11	697	24	358
12	669	25	330
13	640	26	301

8. Groundwater Water Bank: Water Bank Expansion and Accounting

1. The Conservation Groups' flow proposal generally assumes that the City and County of San Francisco will be responsible for its commitments to the Districts per the Fourth Agreement.
2. The Conservation Groups propose a suite of measures that keep the Water Bank from going negative and also helps to preserve CCSF's Total System Storage at a level where CCSF can limit the frequency of water rationing.
3. The primary physical feature of Conservation Groups' proposal regarding the Fourth Agreement responsibility of CCSF is the construction by the Districts, at CCSF's

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expense, of managed groundwater recharge facilities capable of recharging 90,000 AF a year in the MID and TID service areas.

4. Conservation Groups propose to use water recharged in these facilities as a Groundwater Water Bank (GWWB) that would serve as a supplement to the existing Water Bank in Don Pedro Reservoir.
5. The GWWB would be managed with the explicit purpose of CCSF planning for and managing dry year sequences, Critically Dry and Super Critically Dry water years.
6. Actual recharge using GWWB facilities would take place in Wet and in AN years in which July 1 Don Pedro storage is greater than 1.6 MAF. CCSF would receive GWWB credits in Wet years without debiting the (Don Pedro) Water Bank. CCSF would get 90 TAF of GWWB credit in AN recharge years and would debit the (Don Pedro) Water Bank 90 TAF on September 30 at the end of the AN recharge year. CCSF would be allowed to transfer credits from the GWWB to the (Don Pedro) Water Bank in the second year of BN/Dry year sequences, in CD years, and in SCD years, according to the amounts shown in Table 3 below:

Table 3: Groundwater Water Bank

Year type	**Recharge**	**Surface Deficit (Districts)**	**Credit to CCSF**		**Debit to CCSF**	
			To WB	**To GWWB**	**From WB**	**From GWWB**
Wet	90 TAF	0		90 TAF	*	
AN (if 7/1 DPS>1.6 MAF	90 TAF	90 TAF	0	90 TAF	90 TAF **	
AN (if 7/1 DPS<1.6 MAF	0	90 TAF	0	0	0	0
First BN or Dry	0	180 TAF	0	0	0	0
Second or more BN or Dry	0	180 TAF	90 TAF ***	0	0	90 TAF ***
CD (note: second CD yr is SCD by def.)	0	225 TAF	90 TAF ****	0	0	90 TAF ****
SCD	0	270 TAF	180 TAF *****	0	0	180 TAF*****

*Recharge water in Wet years is presumed to be from flood flows. CCSF receives the 90 TAF credit in the GWWB in Wet years for having built the recharge facilities.
** Water for recharge in AN years is debited from Water Bank and credited to GWWB. Debit from Water Bank occurs September 30 at the end of the water year.
*** In second (or more) consecutive BN/Dry year, CCSF will have the discretion to credit Water Bank with up to 90 TAF from the GWWB. This transfer of credits can take place any time from June 1 to July 1.

**** In a first CD year (CD year not immediately preceded by a CD year), CCSF will have the discretion to credit Water Bank with up to 90 TAF from the GWWB. This transfer of credits can take place any time from June 1 to July 1.
***** In an SCD year, CCSF will have the discretion to credit Water Bank with up to 180 TAF from the GWWB. This transfer of credits can take place any time from April 1 to July 1.

D. Modeling Notes

Conservation Groups modeled the flow proposal above as closely as reasonably possible using the Don Pedro water balance model as modified by CCSF/District consultant, with the added "dashboard" as described above. We present the results of this modeling as Attachments 1 and 2 to this document.[27]

1. Water-Year Types and their Application

a. In the Conservation Groups' flow proposal, Licensees would adjust the water-year types based on the 50% exceedance estimated unimpaired inflow to La Grange as given in the February, March, April, and May DWR Bulletins 120. However, the Don Pedro water balance model as currently configured (with modified "dashboard") does not allow adjustment of the water-year type on a monthly basis, although CSPA did request this modification in the interest of accuracy. As presented, the model uses perfect foresight to define the water-year type for any given year. In running the model for the Conservation Groups' flow proposal, we thus initially let the model define each year according to the final actual inflow. However, we modified some the water year-types according to rules we defined in the flow proposal, as described below.
b. In the Conservation Groups' flow proposal, February flow requirements would begin within three days of the issuance of the February DWR Bulletin 120 (flows from January would continue until about February 10). Each subsequent month, Licensees would evaluate the water-year type for the month based on DWR Bulletin 120, and make the change within three days. The final year type determination will be based on the May DWR Bulletin 120. Since the monthly increments in the model as currently configured begin on the 1st of each month, this model run assumes that the water-year type for each year initiates on February 1. Changing the model so that it made an adjustment on about February 10, March 10, April 10 and May 10 would be more accurate, but would have added a level of difficulty and complexity. This is a potential model refinement.
c. Recognizing that Dry and Critically Dry year sequences create greater limitations on water available for all uses than do single Dry or Critically Dry years, CSPA requested that the model allow manual adjustment of water-year types. This allowed response to the 1987-1992 drought sequence in particular. Conservation Groups created rules governing Dry and Critically Dry year sequences in our flow proposal, then manually adjusted water-year types in 1989, 1990, 1991 and 1992 to reflect those rules.

[27] Attachment 1 run is model output from a run that assigns Fourth Agreement responsibility to CCSF. Attachment 2 is a second model run that does not assign Fourth Agreement responsibility to CCSF. The two runs are presented to allow comparison of such values as Water Bank and CCSF Total System Storage. Other than the treatment of CCSF's responsibility, these runs are identical. See modeling notes, *infra*. These Excel files contain hundreds of thousands of data points and cannot be served by surface mail.

2. Caps on Required Flows

a. On the WY Type tab of the modified Don Pedro water balance model, there is an input that places a cap on the maximum flow that a percent-of-unimpaired flow requirement can require. CCSF/Districts' modeler set default value for this cap at 5000 cfs. The model will allow releases to exceed this cap only during flood releases. The graphic output shows that this cap does come into play with some frequency, particularly in Wet and AN water years. Conservation Groups modeled our flow proposal with this cap set at 5000 cfs. In part, this was to respect the limits of Districts' power generating capacity. In part, this was out of consideration of the desirability to avoid minor flooding events.
b. During subsequent analysis, it came to our attention that a 2004 report identified 5500 cfs as the threshold for bedload movement in the primary spawning reaches of the lower Tuolumne River.[28] There may be geomorphic desirability of managing flows to meet this threshold with some frequency. Therefore, it is possible that a slightly higher cap, such as 6000 cfs, may have significant instream benefits.
c. Increasing the cap to a value such as 6000 would likely cause a slight reduction in power generation compared to the present model run. It is unlikely that increasing the cap would affect the annual water balance in any given year, but it is likely that it would slightly reshape the winter-spring hydrograph in the lower Tuolumne River.

3. Averaging of Spring Pulse Flows in Critically Dry and Super Critically Dry Years

a. In Critically Dry and Super Critically Dry years, a block of water for pulse flows would be applied in the spring instead of a percent of unimpaired flow. In modeling these pulse flows, Conservation Groups averaged the flows over then entire month of April to account for these blocks of water. To meet the 35,000 AF spring annual block flow in CD years, this model run increases April daily flows from 300 cfs to 890 cfs. To meet the 12,500 AF spring annual block flow in SCD years, this model run increases April daily flows from 300 cfs to 510 cfs.
b. Insertion of a time series or of alternative time series would more accurately portray options for the shape of spring pulses.

4. Averaging of Fall Pulse Flows

a. In each year, Licensees are required to release fall pulse flows for salmon attraction. The volume of water dedicated to fall pulse flows varies by water year type. In modeling fall pulse flows, Conservation Groups added the volume of the block of water allocated for fall pulse flows to the required minimum instream flow in October, and averaged the resulting flow totals over then entire month of October to account for these blocks of water.
b. Insertion of a time series or of alternative time series would more accurately portray options for the shape of fall attraction pulses.

[28] McBain & Trush, *Coarse Sediment Management Plan For The Lower Tuolumne River*, Revised Final, July 2004 http://tuolumnerivertac.com/Documents/7-2004_Revised_CSMP_Report.pdf

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5. Application of the Spring Recession in AN, BN and Dry Years

a. Because this model run does not incorporate the delay in the issuance of DWR Bulletin 120 and assumes that flow changes in February-May initiate on the first of the month rather than about the 10th of the month, this model run assumes that the flow recession in AN and BN years initiates on June 1, and that the flow recession in Dry years initiates on May 1.
b. The intent is that the full recession be implemented, starting from the Recession Initiation Flow Value and continuing to baseflow, even if the duration of the recession bleeds into a second month.

6. Application of Diversion at Geer Road Infiltration Gallery

a. The Don Pedro water balance model as currently configured (with modified "dashboard") does not include a point of diversion at the Geer Road infiltration gallery.
b. Conservation Groups' flow proposal requires a July-September release of 300 cfs at La Grange but allows the diversion of 100 cfs of that release at the infiltration gallery.
c. In order to most accurately account for the water balance, Conservation Groups modeled the instream flow requirement for July-September as 200 cfs (at the La Grange gage).
d. Any (future) water temperature modeling or habitat modeling that is based on a flow of 200 cfs upstream of Geer Road will be inaccurate, because the required flow between the La Grange gage and Geer Road will actually be 300 cfs.

7. Application of Reduced Irrigation Deliveries

a. Modeling of Conservation Groups' flow proposal applies diversion limitations on the Districts on an annual basis by calendar year. Generally, the irrigation season begins in March and ends in October. Water availability for irrigation deliveries in October are much more dependent on antecedent conditions from the previous water year (water years end September 30) than on October precipitation.
b. Modeling of Conservation Groups' flow proposal does not distinguish between Municipal and Industrial deliveries and irrigation deliveries to Modesto Irrigation District, though one can imagine that MID's urban customers might be accorded preference over MID's agricultural customers. In terms of assigning shortages to the Districts, Conservation Groups left that up to the default settings in the Don Pedro water balance model.
c. An alternative method of limiting irrigation diversions would be to set storage targets for the end of September or the end of October. The model as it currently exists does not allow a requirement for a carryover storage target that would trigger changes in other operating rules. In any event, constraining diversions with carryover storage requirements tends to drive storage to the minimum allowed level. This does not promote smart planning. It is our observation that the District don't operate that way in the current condition.

8. Modeling the Water Bank and CCSF's Contribution to Increased Streamflow

a. The Don Pedro water balance model as currently configured has a Fourth Agreement toggle switch on the User Input tab that either assigns 51% of the responsibility for flow increases ("On") or zero percent of the responsibility ("Off") to CCSF. Conservation Groups ran our flow proposal both ways in order to compare, leaving all else identical save the Fourth Agreement toggle switch.
b. The Don Pedro water balance model contains a macro that seeks to keep the Water Bank from going negative. Conservation Groups ran this macro for our flow proposal with the Fourth Agreement toggle switch "On," but this drained reservoirs and crashed the model. Conservation Groups ran this macro for our flow proposal with the Fourth Agreement toggle switch "Off," and the model resolved the few instances in which the Water Bank went negative.
c. The Conservation Groups' modeled flow proposal with Fourth Agreement toggle "On" ("with San Francisco") thus leaves the Water Bank negative in some years during the 1987-1994 time period. The Conservation Groups' modeled flow proposal with Fourth Agreement toggle "Off" ("without San Francisco") uses the model to keep the Water Bank from going negative.
d. Conservation Groups recognize the importance of not letting the Water Bank go negative. The proposal for a Groundwater Water Bank to supplement the Water Bank is an effort to keep the Water Bank positive. Conservation Groups manually estimated the Groundwater Water Bank balance as it would likely be applied, and believe that its implementation as proposed would prevent a negative Water Bank.
e. The modeling of the irrigation diversions in Conservation Groups' modeled flow proposal assumes that 100% of irrigation deliveries would be made in Wet water years, but the proposal is that 90,000 AF of these deliveries would go to the Groundwater Water Bank for groundwater recharge rather than irrigation. The water balance for total irrigation deliveries in Wet years (including Don Pedro storage) is thus correct, but the amount available in irrigation tables is overstated by 90,000 AF. The balance in the Don Pedro Water Bank for Wet water years is correct.
f. The modeling of irrigation diversions in Conservation Groups' modeled flow proposal assumes that 90% of irrigation deliveries would be made in Above Normal water years. However, the proposal is also that 90,000 acre-feet of the remaining allocated water go to the Groundwater Water Bank for groundwater recharge rather than for irrigation in AN years when Don Pedro storage on July 1 is greater than 1.6 MAF. The amounts shown as available for irrigation in the irrigation tables for years in AN years and for end-of-September Don Pedro Water Bank balance 1973, 1974, 1975, 1984 and 1999 is thus overstated by 90,000 AF. Don Pedro Water Bank balance is correct for 1993, when Don Pedro storage on July 1 was less than 1.6 MAF.
g. In order to model the Groundwater Water Bank in the Don Pedro water balance model, it would be necessary to modify the Fourth Agreement toggle to allow its modification by a time series. Such modification is a potential future action. In the meantime, we reproduce below a table that shows how CCSF might potentially accumulate credits and debits in the Groundwater Water Bank (GWWB), and how those credits and debits would affect the Don Pedro Water Bank (DPWB).

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Table 4: Don Pedro Water Bank/Groundwater Water Bank Debit/Credit Scenario 1971-2012 (TAF)

Year	Credit to DPWB	Credit to GWWB	Debit from DPWB	Debit from GWWB
1971	0	0	0	0
1972	0	0	0	0
1973	0	90	90	0
1974	0	90	90	0
1975	0	90	90	0
1976	90	0	0	90
1977	90	0	0	90
1978	0	90	0	0
1979	0	0	0	0
1980	0	90	0	0
1981	0	0	0	0
1982	0	90	0	0
1983	0	90	0	0
1984	0	90	90	0
1985	0	0	0	0
1986	0	90	0	0
1987	0	0	0	0
1988	180	0	0	180
1989	0	0	0	0
1990	180	0	0	180
1991	90	0	0	90
1992	90	0	0	90
1993	0	0	0	0
1994	0	0	0	0
1995	0	90	0	0
1996	0	90	90	0
1997	0	90	0	0
1998	0	90	0	0
1999	0	90	90	0
2000	0	0	0	0
2001	0	0	0	0
2002	90	0	0	90
2003	90	0	0	90
2004	90	0	0	90
2005	0	90	0	0
2006	0	90	0	0
2007	0	0	0	0
2008	180	0	0	180
2009	0	0	0	0
2010	0	0	0	0
2011	0	90	0	0
2012	0	0	0	0
Total	1170	1530	540	1170

E. Rationale for Conservation Groups' Flow Recommendation

1. Hydrology and water supply management: Districts

In 2012, Modesto Irrigation District considered a "Comprehensive Water Resources Management Plan" that would potentially have involved the sale of water to CCSF. Revenues from the sale of water would have been used to make various water delivery infrastructure improvements. A public presentation in support of the potential program presented a "Generalized Average Water Balance" as 310 thousand acre-feet (TAF) of canal diversions, 16 TAF of inflow from Oakdale Irrigation District, 191 TAF irrigation demand, 35 TAF domestic deliveries, 60 TAF in "seepage losses," and 40 TAF in "operational discharges."[29] The same presentation suggested that MID could realize a "potential water savings" of between 25,000 and 40,000 AF per year for a cost of about $115 million.[30]

In the face of vehement opposition by MID constituents to selling MID water to CCSF, MID's directors rejected the prospective transfer of water. Shortly thereafter, the general manager of MID and MID's outside counsel, both proponents of the transfer program, were relieved of their duties.

Review of the statistics used in support of the 2012 prospective plan led Conservation Groups to review additional data regarding water use and efficiency by both MID and TID. Specifically, Conservation Groups reviewed the Turlock Irrigation District's *2015 Agricultural Water Management Plan*[31] and Modesto Irrigation District's *Agricultural Water Management Plan 2015 Update*[32] (AWMP's). We reproduce some of the statistics from each document in the tables below.

Table 5: "TID Distribution System Irrigation Season Water Balance" (2010-2014)[33]

(Volumes are in acre-feet)	2010	2011	2012	2013	2014	Average
Irrigation Releases	531,107	537,685	445,579	460,420	320,862	459,131
Operational spillage	81,968	87,229	46,211	46,865	19,207	56,296
Irrigation Season Seepage	39,210	39,340	36,890	36,890	31,000	36,333

[29] See slide 7 of http://www.mid.org/about/newsroom/projects/watertransfer/waterpresentation-120228.pdf
[30] *Id*., slide 10.
[31] Available at: http://www.tid.org/sites/default/files/documents/tidweb_content/TID%20AWMP%202015-FINAL_12_09_15_w-attachments.pdf
[32] Available at: http://www.water.ca.gov/wateruseefficiency/sb7/docs/2015/plans/Modesto%20ID%202015%20AWMP.pdf
[33] Table 4.8, TID *2015 Agricultural Water Management Plan*.

Table 6: "TID Irrigated Lands Irrigation Season Water Balance Results" (2010-2014)[34]

(Volumes are in acre-feet)	2010	2011	2012	2013	2014	Average 2010-2014
Deliveries	481,780	491,115	482,593	494,105	364,246	462,768
ET of Applied Water	291,230	278,797	326,004	364,811	358,919	323,952
"Deep Percolation" of Applied Water	201,650	219,446	177,879	170,903	105,416	175,059
Net recharge (AF per acre)	1.8	1.8	0.8	0.5	0.0	1.0

Table 7: MID "Surface Water Supplies"[35]

(Volumes are in acre-feet)	2010	2011	2012	2013	2014	Average 2010-2014
MID water diverted at La Grange	261,728	282,640	311,500	316,571	176,087	269,705

Table 8: MID "Overall Water Balance for 2012"[36]

(Volumes are in acre-feet)	
Surface water irrigation	278,800
Surface water M&I	32,700
ET of Applied Water	184,700
Deep percolation - Irrigation	108,500
Groundwater intentional recharge	0
Operational spills	49,700

[34] Table 4.9, TID *2015 Agricultural Water Management Plan*.
[35] From MID, *Agricultural Water Management Plan 2015 Update*, Table 32. Average calculated by Conservation Groups.
[36] *Id*., Table 48. MID did not provide data for all 5 years like TID did. Instead, it chose 2012 as a representative year. *Id*., p. 28.

These tables (and the complete tables from which they are excerpted) provide a snapshot of key features of the water supply management of MID and TID.

The most obvious feature of both systems is that agricultural water users apply large amounts of surface water in excess of what is needed to grow crops. Based on an earlier study by USGS, MID assumes a 63% efficiency factor.[37] In the normal and wet years 2010 and 2011, TID estimated "deep percolation" from applied surface water of 201,650 AF and 219,446 AF respectively. The numbers diminish in drier years. MID, for the representative year 2012 for which it presented statistics in its AWMP, estimated deep percolation from applied surface water of 108,500 AF.

TID explains the water management and recharge strategy in its AWMP:

> TID's conjunctive management program is designed to encourage irrigators to draw from surface water supplies during periods of normal and above normal reservoir storage. Surface water from the Tuolumne River, applied within the TID via flood irrigation, is the primary source of groundwater recharge within the Basin.
>
> TID's tiered volumetric pricing structure for surface water (described in Section 2.7) is designed to encourage growers to use available surface water supplies to provide appropriate in-lieu and direct groundwater recharge. Having two rate schedules, one for normal or wetter years and one for dry years, provides different pricing signals between normal and dry water year types. This pricing encourages the use of available surface water supplies in normal and wetter years.[38]

Stated differently, TID explicitly incentivizes over-watering of crops in normal and wet water years in order to recharge groundwater. Since MID has a very similar pricing structure, it is fair to say that MID also incentivizes over-watering crops in normal and wet water years, although MID's AWMP suggests that there is an ongoing transition in the MID service area away from flood irrigation to more efficient irrigation techniques.

From a strictly agricultural business perspective, the biggest problem is that in dry years, critically dry years, and dry year sequences, flood irrigators have a harder time making do with less water. Flood irrigation requires heavy application of water even in times when water is scarce. Surface water use is inefficient, and groundwater must be heavily pumped.

MID's AWMP says that the District conducts zero managed aquifer recharge.[39] We found no mention of managed recharge in TID's AWMP, and presume there is none there either,

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[37] *See* U.S. Geological Survey, *Hydrologic Model of the Modesto Region, California, 1960–2004*, 2015. Available at: https://pubs.usgs.gov/sir/2015/5045/pdf/sir2015-5045.pdf. *See also* MID, *2015 Agricultural Water Management Plan 2015 Update*, p. 38.
[38] TID *2015 Agricultural Water Management Plan*, p. 45.
[39] MID, *Agricultural Water Management Plan 2015 Update*. Table 48.

although TID's AWMP does mention "Partnership with the Eastside Water District for groundwater recharge projects."[40]

Both TID and MID have initiated a series of efficiency upgrades in the last decade, in part in response to the mandates of SB7X-7 (2009 state of California legislation). Most of these upgrades involve improving distribution systems. They do not address the structural over-application of water as a basic business strategy.

Over-application of water makes a certain sense if one is willing to starve the Tuolumne River of flow. In its crude way, it works. Flood irrigation is inexpensive. It requires relatively little special infrastructure. It keeps the groundwater in relative balance. However, it is unknown how much of the excess water that is applied is actually recoverable for use. As a business model for recharge, it is a relatively sloppy system built on keeping the ground wet.

Part of 2009 Senate Bill X7-7 requires municipal water suppliers to reduce water use 20% by the year 2020. Most municipal suppliers are on their way to achieving this goal. Given the Districts' business model for agricultural water use, Conservation Groups believe it is entirely reasonable to ask the Districts to cut back half of that, 10%, as a default starting point for systemwide water conservation.

2. Hydrology and Water Supply Management: San Francisco

Prior to approval of its Water System Improvement Program (WSIP) in 2008, the San Francisco Public Utilities Commission projected that water demand in its service territory would reach 285 million gallons per day (mgd) by 2018. The WSIP proposed diverting an additional 25 mgd from the Tuolumne River to meet future demand. While conservation organizations supported the seismic upgrades proposed in the WSIP, they were adamantly opposed to an increase in diversions.

To avoid a controversy that would likely slow down or derail the WSIP, the SFPUC approached the conservation organizations with a compromise. In exchange for NGO support of the WSIP, the SFPUC offered to cap water sales at 265 mgd until at least 2018 and to focus on water conservation, recycled water and groundwater to make up any potential supply deficit. CCSF would be responsible for 10 mgd in savings, and BAWSCA would be responsible for the other 10 mgd.

The conservation organizations agreed to this compromise, which became known as the Phased WSIP, and the WSIP was approved without challenge.

At that point, the SFPUC, its wholesale customers represented by BAWSCA, and the conservation organizations had a common goal, and worked together to reduce reliance on the Tuolumne. The water purveyors implemented a number of programs, including rebates for high-efficiency toilets, washing machines, irrigation equipment and graywater systems, a Lawn Be Gone program (rebates for converting turf to climate-appropriate landscaping), large landscape audits and water-wise gardening workshops, indoor and outdoor water efficiency ordinances,

[40] TID, *2015 Agricultural Water Management Plan*, p. 112.

leak detection programs, and more. Some water agencies supplied by BAWSCA have even begun to explore indirect potable reuse projects.

San Francisco enacted a Non-Potable Water Ordinance that requires new development projects of 250,000 square feet or more to install and operate onsite non-potable water collection and to use systems that utilize rainwater, stormwater, graywater, blackwater and foundation drainage for toilet flushing, irrigation and cooling. In 2017, the SFPUC launched a program to blend groundwater with water from the Regional Water System. When fully operational, groundwater will provide 4 mgd of potable water. The SFPUC also broke ground on its Westside Recycled Water Project, which will provide 2 mgd of recycled water for irrigation.

An innovative program included in the WSIP is the Regional Groundwater Storage and Recovery Project, which provides surface water to several water agencies in normal and wet years so that they don't need to pump groundwater. The groundwater basin can then recharge in order to provide 8 mgd of water during drought years.

As a result of these measures and growing public awareness, water demand in the SFPUC service territory decreased from just over 250 mgd in 2008 to 223 mgd in 2013. Then, in response to the drought, demand dropped to 195 mgd in 2015 and even further to 175 mgd in 2016. Following the end of the drought, demand increased only slightly to 180 mgd in 2017. In both 2016 and 2017, overall water use was lower than during the 1976/77 drought, despite considerable population growth.

Despite this commendable conservation effort, CCSF has maintained a posture in the Don Pedro relicensing, and in the proceeding at the State Water Board to update the Bay-Delta Plan, that flow increases in the lower Tuolumne River would be catastrophic to the Bay Area. This posture began during the 2009 FERC proceeding on Interim Conditions. In that proceeding, David Sunding of Berkeley Economic Consulting presented estimates of potential economic impacts of water rationing in the SFPUC service territory if instream flows in the Tuolumne River below La Grange Dam were increased. Since then, real world experience has shown that Dr. Sunding's projections were far from accurate.

Dr. Sunding stated in 2009:

> The impact of potential rationing levels on employment is severe. In the 51% rationing scenario, I estimate that the Bay Area would lose more than 188,000 jobs as industrial and commercial output is reduced to meet conservation requirements…Job losses in the other scenarios are 139,146 (41% Rationing), 6,562 (20% Rationing), and 3,922 (10% Rationing).
>
> Lost sales of firms in the SFPUC Regional Water System area are in excess of $49 billion annually in the event of 51% rationing…Sales losses in the other scenarios are $37 billion (41% Rationing), $3.1 billion (20% Rationing), and 1.8 billion (10% Rationing).[41]

[41] CCSF Exhibit 20 in 2009 Hearing on Interim Measures, Answering Testimony of David Sunding, pp. 9-10, eLibrary no 20990922-5093.

Between 2006 and 2016, water demand in the SFPUC service territory decreased by more than 30%, from 257 mgd to 175 mgd, with no negative economic impacts. Between 2010 and 2015, 190,000 jobs were added in San Francisco and San Mateo Counties (which receive almost all of their water from the SFPUC), and 265,000 jobs were added in Santa Clara and Alameda Counties (which receive a portion of their water from the SFPUC). The regional economy improved to its strongest position ever.

In 2014, Dr. Sunding, on behalf of the Brattle Group, explained his process for determining the socioeconomic impacts of water rationing in a report entitled *Socioeconomic Impacts of Water Shortages within the Hetch Hetchy Regional Water System Service Area*.[42] A coalition of environmental groups analyzed the study and identified a number of flaws. They found that the study: 1) erroneously based rationing on demand vs. supply; 2) comingled Bay Area water sources with Tuolumne supply as if Bay Area sources would be affected by an increase in flows in the Tuolumne; 3) treated instream flow as reduced water supply and failed to consider the role of carryover storage and replenishment; and 4) underestimated the potential for water conservation, especially with consideration to irrigation use.

Since 2008, the SFPUC has planned for an extreme rationing scenario based on an 8.5-year "Design Drought," which includes the 1987-92 drought of record, followed immediately by the driest 2-year period on record: 1976-1977. The SFPUC assumes that every year is either the beginning of, or middle of, this Design Drought, and thus factors in much higher levels of rationing than would have been required at any time in the past.

In neither this licensing nor the Bay-Delta Plan proceeding at the State Water Board has CCSF acknowledged its ongoing efforts to secure alternative water supplies during droughts. The SFPUC and BAWSCA have both been active partners in the Bay Area Regional Reliability Project, which seeks to use the regional resources of Bay Area water agencies to assure water supply reliability.[43] One of the most promising projects in this regional planning effort is use of the existing or an expanded Los Vaqueros Reservoir in eastern Contra Costa County to store drought water supply for Bay Area water agencies. CCSF could even add a point of diversion for its existing water rights at the intakes to Los Vaqueros (Contra Costa Water District's points of diversion in the south Delta). However, although Conservation Groups suggested that CCSF consider west-of-Delta storage as part of its drought planning in scoping for the Don Pedro relicensing, CCSF has been dismissive of the alternative.

3. Groundwater Water Bank Rationale and Description

Conservation Groups propose the application of less surface water to the ground in the Districts. The Tuolumne River cannot withstand an annual diversion demand of 1.2 MAF, which is 60% of its average annual flow and in some individual years is greater than the year's total unimpaired flow in the Tuolumne River watershed. The Districts need to reduce their water use. They can reasonably reduce their water use by applying less irrigation water whose functional purpose is to recharge groundwater.

[42] Dr. Sunding's 2014 Report is available at: https://www.tuolumne.org/wp-content/uploads/2016/10/CCSF-Draft-Socioeconomic-Study_3_13_2014.pdf

[43] *See* Bay Area Regional Reliability Project website at: http://www.bayareareliability.com/

Conservation Groups propose a more tightly managed system of groundwater replenishment through managed aquifer recharge to maintain groundwater in relative balance. We propose that CCSF pay for recharge facilities and in exchange receive credits against future upstream diversions: a Groundwater Water Bank account based on water recharged using facilities CCSF has paid for.

The Groundwater Water Bank maintains the basic parameters of the Fourth Agreement. It gives CCSF zero access to groundwater stored in MID and TID's service areas. In the spirit of dividing the benefits and responsibilities for the Groundwater Water Bank, CCSF's Don Pedro Water Bank would not be debited in Wet years for recharge water, but would be debited in AN years. We presume that these two water year types are those in which physical recharge would occur, with the exception of AN years when July 1 Don Pedro storage is less than 1.6 million AF.

Districts would divert water for groundwater recharge into the Groundwater Water Bank under the Districts' existing senior water rights. Even though the Districts would be required to apply less water to the ground, the diversion of water into the Water Bank would preserve the volumes of the Districts' senior water rights. We believe that over a series of years, in agricultural water management plans and reports, the Districts will be able to demonstrate beneficial use of the water recharged through the Groundwater Water Bank.

In devising a proposed strategy for sharing responsibility for increased flow in the lower Tuolumne River, Conservation Groups began from the fact that leaving the Fourth Agreement intact would have unacceptable impacts to public trust resources. "When the public trust doctrine clashes with the rule of priority, the rule of priority must yield." *El Dorado Irrigation Dist. v. State Water Resources Control Bd. (2006) 142 Cal.App.4th 966.* (*El Dorado).*

We recognize that CCSF has made extensive infrastructure improvements in the last decade to its water distribution system, with expenses running into billions of dollars. We also recognize the CCSF and to a somewhat lesser degree its BAWSCA wholesale customers have developed a strong culture of water conservation over the past decade, and really stepped up during the 2013-2015 drought. Nonetheless, it is reasonable to ask CCSF to invest in water supply infrastructure for the Districts if CCSF's customers get water supply reliability in return. While the availability of financial resources in the Bay Area would allow the Bay Area to subsidize irrigation infrastructure, it seems to us less reasonable to ask CCSF and BAWSCA customers to pay for improvements within the Districts that the Districts have not been willing to pay for and that don't have a clearly identifiable direct benefit to Bay Area water customers.

Greater conservation by CCSF and BAWSCA is always possible, and Conservation Groups will continue to encourage it. However, even though the SFPUC's drought planning horizon is excessively conservative, simple math limits CCSF's ability to contribute to increased flow in the lower Tuolumne River. One could even make a convincing argument that severely shorting water deliveries to the San Francisco Bay Area in a prolonged drought is not in the public interest. One could thus make a case that in severe droughts, CCSF should be allowed to let the Don Pedro Water Bank go negative, or that CCSF should be absolved of part of its

responsibility for Tuolumne River flow by some other instrument. However, Conservation Groups also recognize that there is a legal obligation to observe the rule of water rights priority: "Every effort . . . must be made to respect and enforce the rule of priority. A solution to a dispute over water rights 'must preserve water right priorities to the extent those priorities do not lead to unreasonable use.'" (*El Dorado*, *supra*, at 966).

In sum, Conservation Groups' Groundwater Water Bank is our best effort to both restore flow in the Tuolumne River and to minimize harm to water supply for both the Districts and CCSF, consistent with both the public trust and reasonable use doctrines and with the rules of water rights priority.

4. Rationale for Selection of Water-Year Types

Conservation Groups took into account multiple considerations in selecting rules for water-year types.

Broadly speaking, Conservation Groups had an interest in carefully distinguishing among water year types in order to match both flow requirements and water supply to system hydrology. The desire was to optimize the capacity of the system to achieve adequate instream flows without recklessly drawing down storage, while at the same time keeping reductions in water supply deliveries to a minimum. Because the Conservation Groups' proposed flow and water delivery rules differ significantly for different water-year types, it was important not to approximate water-year types or approach them in a perfunctory fashion.

The availability of the Don Pedro water balance model for use in iterating different water-year type designations provides the opportunity to test options against historical hydrology. Water-year types are one of the variables that one can test. Of course, this also has the limitation that the perfect foresight afforded by the model does not reflect how real-world operators would respond to borderline water year designations or how the Districts would respond in making irrigation allocations.

Conservation Groups had a particular interest in distinguishing between very wet years and years that were above average but that did not feature the extent of flood releases of the very wet years. This interest stemmed from the desire to continue high flows through June when reasonable and also from a recognition that the Wet designation allows increased irrigation deliveries. Conservation Groups had a similar interest in carefully distinguishing Below Normal and Dry years for the same reasons.

Conservation Groups consider Critically Dry years to be years of triage both for instream resources and for water supply. It is important to recognize when the system is in hydrological trouble, and to act decisively. It is important to have a water-year type designation that anticipates triage and that defines its level in advance, rather than punting flow requirements to *ad hoc* decision making. Conservation Groups disagree strongly with the flow levels released into the Tuolumne River in Critically Dry years in the past: they were years of ecosystem collapse, unchecked bleeding of the fisheries. But Conservation Groups also recognize that

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application of a percent of unimpaired flow in Critically Dry years breaks the system, which is no better for the fisheries than it is for water supply.

Conservation Groups recognize that dry year sequences are the periods of greatest stress on the system, both in terms of available water and in terms of planning. For this reason, Conservation Groups propose a Super Critically Dry year water-year type that would be triggered either by extremely low inflow or when there are two or more Critically Dry years in a row.

In both Critically Dry and Super Critically Dry years, Conservation Groups decided the best thing to do for the salmon and *O. mykiss* fisheries is to maintain relatively high baseflows as compared to historical flows and as compared to the Districts' Preferred Plan.[44] Small spring and fall pulse flows will provide some (but very limited) managed opportunities to stimulate migration. In these years, conditions are most ideal for warm water piscivorous fish such as black bass and striped bass. In these years when flow is limited by hydrology, conditions also allow for installation of a temporary weir to capture migrating bass. Conservation Groups propose such a measure below.

Districts propose using the San Joaquin 60-20-20 Index to set water-year types. This would have the advantage of potentially keeping the water-year types the same as those on the Merced and the Stanislaus (although Merced ID has proposed a different system in the relicensing of the Merced River Project). The 60-20-20 Index also looks at the previous year's Index. 60-20-20 uses 75% exceedance to set water-year types, somewhat conservatively.

There are several general downsides of the 60-20-20 Index. One is that it is based on hydrologic conditions in all three watersheds (Stanislaus, Tuolumne and Merced), rather than being specific to the Tuolumne. Conservation Groups think that the value of a watershed-specific water-year type outweighs the convenience of having the same water-year type designation in all three major San Joaquin tributaries in any given year. 60-20-20 also places great emphasis on April-July runoff (the "60" in 60-20-20). This distinction is not really needed in a storage-rich system with a relatively small flood reservation, and may skew water-year types to lower categories under future changing climate conditions.

Conservation Groups ran multiple scenarios with 60-20-20 and with the water-year type schedule Conservation Groups adopted. As noted above, the Don Pedro water balance model as currently configured does not allow for adjustment of water-year types in February-May. Therefore, Conservation Groups were not able to analyze the relative difference of using a 50% exceedance versus a 75% exceedance in setting water-year types. This analysis is worth conducting with a modified model. For the moment, Conservation Groups chose the estimated 50% exceedance value for annual flow at La Grange. We believe the annual value is the better value to use than the 60-20-20 emphasis on inflow from April-July.

In running the model with various flow scenarios, Conservation Groups found in particular that the 60-20-20 broke the distinction between Wet and AN years at too low a point.

[44] Conservation Groups' overall flow volumes in CD and SCD years are about double the volumes proposed in the Districts' Preferred Plan for downstream of the infiltration gallery.

For instance, 1993 was a Wet year under 60-20-20, but an AN year under the Conservation Groups' water-year types. The same is true for 1974 and 1975. For purposes of Conservation Groups' flow proposal at least, we think 60-20-20 is not as good a fit.

The actual values for the break points between water-year types were inserted by CCSF/Districts' consultant as placeholder values on the Don Pedro water balance model's dashboard. We retraced the steps and found that the break points worked well with our flow proposal. We viewed the categories somewhat differently than CCSF/Districts' consultant, however, eliminating a "Normal" year type and adding Super Critically Dry.

5. Biological Rationale for Prioritization of Percent-of-Unimpaired Flow Requirements by Month and for Snowmelt Recession Flows in Above Normal, Below Normal and Dry Water Years

In considering the relative benefit and losses of eliminating certain months from the default February through June percent-of-unimpaired requirement in Above Normal, Below Normal and Dry years, Conservation Groups principally considered: 1) the lifestages of salmon and *O. mykiss* that benefit from flow in each month; 2) the relative biological benefit that derives from the hydrology under the percent-of-unimpaired requirement in each month; and 3) and downstream conditions in each month.

In considering flows in Above Normal and Below Normal water years, Conservation Groups observed that most salmon outmigration from the Tuolumne River is completed by mid-June except in Wet water years that feature flood flows through June.[45] High June flows have benefits to pelagic fish species downstream in the Delta, and in Wet years high June flows may extend the in-river rearing period and increase outmigrant size. On the front end of the February-June time period, February generally has relatively little inflow compared to later months, including June; reducing flow in February would gain little in volume but would lose an entire month in variability. Eliminating the percent-of-unimpaired requirement in June also does more to balance the water towards water for storage and irrigation. With less in-river biological benefit in water years that are not Wet years, and relatively high water cost, Conservation Groups chose to first eliminate June as a month to require release of a percent-of-unimpaired inflow in Above Normal and Below Normal years. Conservation Groups also eliminated February and May from a percent-of-unimpaired requirement in Dry years.

Because DWR does not release its Bulletin 120 until about the 10th of the month in February through May, the actual dates for a percent-of-unimpaired requirement in AN and BN years would be approximately February 15-June 15, and in Dry years would be March 15-May 15.

In AN, BN and Dry years, Conservation Groups' flow proposal would to a limited degree extend the benefit of the percent-of-unimpaired flow requirement by immediately following such

[45] Compare for example the 2011 Tuolumne River Rotary Screw Trap Annual Report, pp. 25 *ff*, with the 2013 Report, pp. 17 *ff*, available at: http://tuolumnerivertac.com/Documents/2011%20Tuolumne%20RST%20Annual%20Report_final.pdf and http://tuolumnerivertac.com/Documents/2013%20Tuolumne%20RST%20Annual%20Report_FINAL%20COPY.pdf

flow requirements with a managed down-ramp that mimics the snowmelt recession. Recent river science has placed increased emphasis on the importance of mimicking the snowmelt recession in regulated rivers.[46] In valley floor river settings, a managed recession coming off high spring flows is particularly important for riparian recruitment.

Recent literature suggests that riparian vegetation is most likely to become established when the rate of recession at the end of the high-flow portion of the hydrograph is less than 3 cm/day.[47] However, others have suggested that down-ramping at the beginning of the recession can be more rapid and still allow successful riparian recruitment, particularly if that down-ramping is not at the end of the May-June seed dispersal period.[48]

Therefore, in recognition that required flows when the percent-of-unimpaired flow requirement ends are likely to be thousands of cfs, Conservation Groups selected 180 cfs as the required daily recession value until flows at La Grange drop to 1400 cfs. In addition, for the first six days after receding flows drop to 1400 cfs, the allowed drop in stage height is 9 cm/day. Thereafter, the allowed drop in stage height is 3 cm/day, until flows reach baseflow.

To calculate the flow values for the recession rate, Conservation Groups used the stage/discharge relationship at the Tuolumne River at Modesto gage, USGS 11290000 as published on the USGS website. It is possible that the flow values in the recession rate would benefit from further refinement.

6. Selection of 50% as the applied percentage of unimpaired flow requirement

The State Board's 2010 Delta Flow Criteria Report[49] established that 60% of February-June unimpaired flow is what fish need as in-river flow in each of the three major San Joaquin tributaries and as outflow from the San Joaquin River. The Delta Flow Criteria Report used fall-run Chinook as the target species for evaluation within the tributaries, including the Tuolumne. The Report evaluated the effects of flow on a variety of species including Delta smelt when considering fisheries downstream of Vernalis on the lower San Joaquin River.[50]

Conservation Groups selected the 50% of unimpaired value as a compromise based on analysis of the hydrology of the Tuolumne River and the competing uses. Conservation Groups do not recommend that the Commission or the State Water Board balance against this compromise as a sideboard. It is the Conservation Groups' recommendation for where the

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[46] *See e.g.*, Yarnell *et al*., *Ecology and Management of the Spring Snowmelt Recession*, 2010. Available at: https://watershed.ucdavis.edu/pdf/Yarnell_etal_BioScience2010.pdf

[47] *See e.g.*,South Yuba River Citizens League, *Cottonwood Seedling Recruitment on the Lower Yuba River Under Existing and Alternative Flow Regimes*, 2016. Available at: http://yubariver.org/wp-content/uploads/2017/08/LYR-cottonwood-recruitment-and-flows-SYRCL-2016.pdf

[48] Stillwater Sciences. *Restoring recruitment processes for riparian cottonwoods and willows: a field-calibrated predictive model for the lower San Joaquin Basin*, 2006. Available at: http://www.esf.edu/fnrm/stella/website_pubs/SWS_06_CVRrpt.pdf

[49] http://www.waterboards.ca.gov/waterrights/water_issues/programs/bay_delta/deltaflow/docs/final_rpt080310.pdf

[50] *See* analysis by the Bay Institute for a variety of species including bay shrimp, striped bass, starry flounder, and longfin smelt, as well as Delta smelt in TBI Exhibit 2 at http://www.waterboards.ca.gov/waterrights/water_issues/programs/bay_delta/deltaflow/bay_inst.shtml

jurisdictional regulators should end in their balancing. Stated differently, it is part of a recommendation for how the regulators could reasonably balance divergent uses, taking all uses into account.

50% of unimpaired, with fewer months than February-June applying in all water-year types except Wet years, is a substantial reduction from the recommendations in the Delta Flow Criteria Report. Using February-June unimpaired flow in the Tuolumne River as a metric, Conservation Groups analyzed the average February-June percent of unimpaired flow for each water-year type. The values are shown in Table 9 below.

Table 9: Percent of Unimpaired Flow By Month
Conservation Groups' Flow Proposal[51]

Average of % of Unimpaired	WY type					
Month	Wet	AN	BN	Dry	CD	SCD
1	102	91	38	20	60	97
2	108	97	64	28	33	74
3	95	87	70	50	21	28
4	79	64	53	50	32	24
5	50	46	48	16	7	11
6	47	28	32	22	17	29
7	39	17	29	59	62	83
8	73	55	76	100	229	227
9	112	140	136	119	145	476
10	457	299	816	295	249	1009
11	232	95	79	67	46	157
12	97	74	47	27	48	198

Table 9 also shows that actual flows in Wet years overwhelm the required flows in all months except May and June. There are lesser amounts of "flood releases" in Above Normal years, even under Conservation Groups' flow proposal. In most months in BN years, and in almost all months in Dry, CD and SCD water-year types, the actual flow is very close to the required flows. This is because the 2.6 million AF of storage in the system captures the vast majority of flow in the Tuolumne River watershed in all but Wet years.

On balance, Conservation Groups believe it is of greater value to meet the highest reasonably achievable percent-of-unimpaired flow requirements in as many months as possible, rather than reducing the percent-of-unimpaired requirement to a lower percent and, in effect, averaging the flow volume across additional months. In Wet years, 50% is achievable in all months (February-June) with no reduction in net diversions. In water years where the water balance did not allow 50% of unimpaired release in all months, Conservation Groups elected to meet it in a reduced number of months rather than spread the water cost over five months by reducing the percent of unimpaired. The principal benefits of increased February-June flow

[51] This table assumes water-year type based on perfect foresight of the year's ultimate final water-year type. See discussion of water-year type modeling, supra.

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ascribed to salmonids in the Delta Flow Criteria Report are variability, floodplain inundation above certain flow thresholds, water temperature improvements, outmigration success from the San Joaquin tributaries, and outmigration success from the lower San Joaquin River. The functional benefits seem to be greater above a threshold than by lowering the threshold.

7. Spring Blocks of Water in Critically Dry Years

In Critically Dry years, including multiple Dry/Critically Dry-year sequences (in which Conservation Groups propose to treat Dry years as Critically Dry years and Critically Dry years as Super Critically Dry years), taking a percent-of-unimpaired flow in the February-June time period causes the Tuolumne River water supply system to run very low on water. Generally, depending on the rules one applies, CCSF's Don Pedro Water Bank is the first to run out of water. Even where it doesn't, CCSF's total system storage is reduced well below 1 million AF, which would trigger rationing in the Bay Area. Conservation Groups modeled rules that would require 50% of unimpaired flow in March and April, 30% in May and 25% in June of sequential Critically Dry years, while allowing 75% of irrigation deliveries. This modeling exercise caused Don Pedro Reservoir to crash. Modeling irrigation deliveries at 50% of demand with the same flow requirements still pushed Don Pedro Reservoir very close to dead pool.

The Districts and other water purveyors in the San Joaquin River and elsewhere have argued that using a percent-of-unimpaired flow is infeasible in any year because of water shortage and depleted storage (with attendant water temperature impacts) in Critically Dry years and in dry-year sequences. Reasonable reduction of baseline diversions to restore balance to the Tuolumne River's beneficial uses, combined with a triage approach to flow requirements in Critically Dry years (including dry-year sequences), cuts through this tedious hyperbole.

Conservation Groups determined that maintaining the 300 cfs baseflow[52] in Critically Dry and Super Critically Dry years is the first best use of limited water. In Critically Dry years, Conservation Groups propose that a 35,000 AF spring block of water be available over and above the baseflow. In Super Critically Dry years, Conservation Groups propose that a 12,500 AF spring block of water be added to the 300 cfs baseflow. In both water year types, an implementation committee would determine the deployment of these blocks of water.[53] Under Critically Dry water-year conditions, water is not available to substantially enhance the rearing conditions of juvenile salmonids over most of the February - June period; we make no pretense that 35,000 AF or 12,500 AF will do that. The proposed spring block flow is purely and simply triage to at least facilitate successful outmigration of those salmonids that are able to survive flatline baseflow conditions; those baseflows provide adequate spawning conditions but create little juvenile rearing habitat.

8. Fall Pulse Flows to Attract Upstream-Migrating Adult Salmon

Conservation Groups propose requiring releases of fall pulse flows to attract salmon upstream. The volumes of water dedicated to fall pulse flows vary by water year type, ranging from 20,000 AF in Wet and AN years to 7,500 AF in Super Critically Dry years. As with the

[52] 200 cfs downstream of the Geer Road infiltration gallery in the months of July-September.
[53] See Conservation Groups' Recommendation, Technical Advisory Committee, *infra*.

spring pulse, an implementation committee would determine the deployment of these blocks of water.

Fall pulse flows to attract adult salmon are proven, water-efficient measures used in multiple watersheds. They bring salmon into rivers. The Districts' Preferred Plan astonishingly turns away from such pulses entirely.

While there are many examples of the effectiveness of fall salmon attraction flows, the program established by the Lower Mokelumne River Partnership has years of data based on refinement of fall pulse flow timing and volumes. The East Bay Municipal Utility District (EBMUD) publishes annual escapement reports that, among other things, discuss the upstream migration of Mokelumne River salmon.[54] Two representative graphs from the 2013-2014 and 2014-2015 reports are shown below.

Figure 1: Mokelumne River flow and migrating adult salmon counts at Woodbridge Irrigation Diversion Dam, August 2013-January 2014 and August 2014-January 2015. Source: EBMUD Escapement Reports.

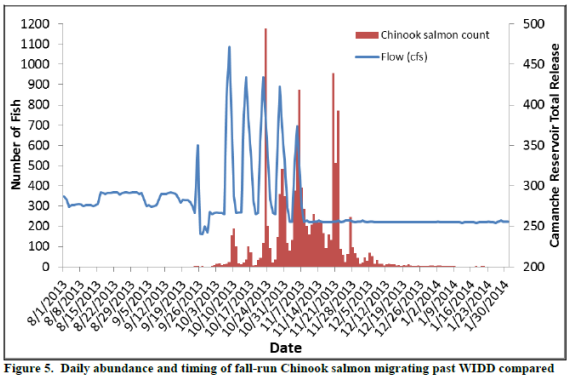


Figure 5. Daily abundance and timing of fall-run Chinook salmon migrating past WIDD compared to flow below Camanche Reservoir, August 1, 2013 - January 31, 2014. Flow data are preliminary and subject to change.

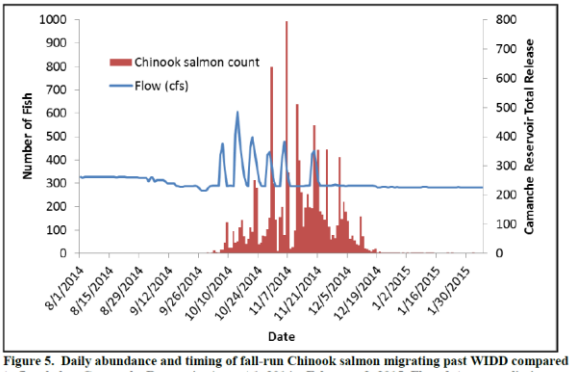


Figure 5. Daily abundance and timing of fall-run Chinook salmon migrating past WIDD compared to flow below Camanche Reservoir, August 1, 2014 – February 2, 2015. Flow data are preliminary and subject to change.

Note that there is a strong correlation between flow pulses and upstream migration. Salmon consistently move into the Mokelumne River on the declining limb of the pulse. This pattern has been consistent over at least the last five years.

Districts propose a volume of 5950 AF for "flushing flows" on October 5, 6, and 7 of Wet, AN, and BN years. This is likely too early to be the best use of water to bring salmon into the river, and would be better devoted to an attraction flow later in the fall. In addition, the volume is inadequate. Finally, it is important to have some pulses every year, even if limited in overall volume. The experience of the Stanislaus River in 2015 shows that even in very poor water years, pulses are effective at bringing fish into the river.

[54] EBMUD's annual fisheries reports are available at: http://www.ebmud.com/recreation/protecting-natural-habitat/fisheries-and-wildlife-division-reports/

9. Use of the Geer Road Infiltration Gallery

During negotiations that led to the 1995 Tuolumne Settlement, the Districts developed the idea of constructing an infiltration gallery just downstream of Geer Road at approximately RM 25.9. The concept was that the Districts would construct works to divert up to 100 cfs for municipal water supply use south of the Tuolumne River in parts of South Modesto, Ceres, Turlock and other nearby communities, all of which rely on groundwater for their municipal water supply. The plan was to construct facilities such that diverted water in excess of immediate municipal needs could be directed into the Ceres Main Canal for irrigation use. The prospective benefit to the Tuolumne River was that up to 100 cfs of the water released into the Tuolumne River at La Grange could be recaptured downstream. In theory, this would allow increased instream flow in over 26 miles of the lower Tuolumne River at little or no water cost.

During the reconfiguration of Special Run Pool 7 in the mid-2000's, the Districts installed the in-river portion of infiltration gallery infrastructure. However, because the use of these in-river works was contingent on construction of facilities by other parties, the Districts have not diverted a single gallon of water through the gallery. Now, Districts propose to bring the existing infiltration gallery on line. In addition, Districts propose to construct a second infiltration gallery just upstream of the existing gallery, which could allow the release at La Grange and the downstream recapture of up to an additional 125 cfs of water.[55]

Conservation Groups considered both the instream needs of the Tuolumne River between La Grange Dam at RM 52 and Geer Road at RM 25.9 and the instream needs of the Tuolumne River downstream of RM 25.9. We accept the diversion in the months of July-September of up to 100 cfs at Geer Road, provided the release at La Grange is 300 cfs. 300 cfs is sufficient to provide thermally suitable *O. mykiss* habitat from La Grange Dam downstream to RM 43, and to provide thermally suitable habitat downstream to about Roberts Ferry Bridge (RM 39.5) most of the time.[56] Conservation Groups consider a location between RM 43 and Roberts Ferry Bridge a reasonable benchmark for thermally suitable oversummering habitat for *O. mykiss*. 300 cfs between La Grange Dam and RM 25.9 also provides boatable flow at all times in the reach.

Downstream of RM 25.9, Conservation Groups consider 200 cfs rock bottom for acceptable flow from the river to the San Joaquin River. In the Lowest Boatable Flow Study (RR-3), the Districts determined 200 cfs to be the lowest boatable flow. Because Districts' proposed diversions at the infiltration galleries would keep flows downstream of RM 25.9 lower than 200 cfs between June 1 and October 15, the Districts' Preferred Plan proposes twelve recreational boating days downstream of RM 25.9 in this annual time period. Twelve days fall well short of

[55] *See* AFLA, Ex. E, Fig. 3.5-14.

[56] *Id*. at Ex. E, Fig 4.3-17. Thermally suitable habitat for *O. mykiss* means average daily water temperatures of 20° C. or less. 20°C average daily water temperature is not ideal, but it is acceptable. The Districts' efforts to demonstrate with their swim chamber study (W&AR 14) that Tuolumne River *O. mykiss* somehow have a higher thermal tolerance is unsupportable. Short-term thermal tolerance is not an indicator of long-term survivorship. As CSPA and TRT stated comments on the study: "Thermal conditions in the summer in most of the lower Tuolumne River are much more comparable to a marathon than a sprint." Districts simply responded that long term response was not part of the study design. Exactly! In addition, there is no evidence that there is a strain of *O. mykiss* specific to the lower Tuolumne River, let alone one that has somehow adapted to higher water temperatures.

the percentage of boatable flow days during the summer that occurred between 1997 and 2012. As described by the National Park Service:

> During the months of the typical boating season of May through October, flows were at or above 175 cfs 97 percent of the time in May and 56 percent of the time in July, August, and September. For the same period, the flow of 200 cfs is exceeded 88 percent of the time in April, 95 percent of the time in May, 56 percent of the time in June, July, August and September, 74% of the time in October, and 70% of the time in November.[57]

At flows less than 200 cfs, water quality issues develop, water becomes more stagnant, water hyacinth becomes more prevalent, and the river becomes a breeding ground for the piscivorous fish about which Districts express great concern. These effects carry downstream to the San Joaquin River. The AFLA identifies the reach of the Tuolumne River between RM 25.9 and about RM 11 as largely urban.[58] The visual quality of the river in this area thus has the greatest effect on the greatest number of people. At 75 cfs, the Districts' proposed flow in Dry and Critically Dry water years, the river is likely in many reaches to look more like a lake than a river. The City of Modesto deserves a living river.

Districts propose even lower flows until infiltration galleries are up and running.[59] The lower flows would apply if there are delays due to permitting or other external factors, and would apply permanently if FERC does not accept the galleries. Conservation Groups have been waiting 23 years for the promise of the infiltration galleries to translate into real water. 23 years is long enough. Conservation Groups' flow proposal assumes that Districts will release 300 cfs from La Grange in July-September. If for whatever reason Districts cannot capture 100 cfs at the Geer Road infiltration gallery, Districts must pass downstream the full flow that reaches the site of the gallery.

10. Compliance with Percent-of-Unimpaired Flow Requirement

Compliance with the percent-of-unimpaired flow requirement is set up to allow for operational feasibility without unnecessary averaging. Averaging tends to reduce the variability of flow that is a key benefit of tying flow releases to the unimpaired inflow. Conservation Groups have witnessed much complaining before the State Water Board that compliance would be difficult. Conservation Groups believe that the issue is much more that operators do not want to comply than that they can't comply.

A straightforward means of compliance would be to compute the average daily inflow to Don Pedro Reservoir, Hetch Hetchy Reservoir, Cherry Lake, and Lake Eleanor by measuring change in stage height of each reservoir against a rating curve and by measuring gaged outflow from each reservoir. The calculated release value for the lower Tuolumne River could be the net inflow to Don Pedro two days earlier plus the net inflow to Hetch Hetchy, Cherry and Eleanor reservoirs three days earlier. Some averaging over a week would allow true-up to account for the inherent inaccuracies of such a means of measurement. The Districts could post, and follow,

[57] AFLA, Ex. E, p. 3-287.
[58] *Id*. at Ex. E, p. 5-36.
[59] *See* AFLA, Ex. E, Table 5.6-2.

a calculator into which gages would electronically feed the necessary data. It would require working gages and perhaps gage redundancy. The goal is not perfection on any given day. The goal is reasonable measurable compliance over a season.

11. Water Hyacinth Abatement

Water hyacinth is a non-native plant that quickly establishes large, impenetrable, river-wide mats that block any boating passage during warm, low flow conditions. In the Tuolumne River, water hyacinth became a very significant problem during the low-flow years of 2014-2015.

Water velocity is a key factor in moving water hyacinth. Despite heavy and regular spraying by the Division of Boating and Waterways, water hyacinth was well-established in the Tuolumne. In the winter of 2015-16, the first winter with close to average precipitation after four years of drought, the Licensees were able to release modestly higher flows: four events in excess of 1250 cfs, three of which were in excess of 2250 cfs. These flows flushed the water hyacinth blockages, which previously were unaffected by Division of Boating and Waterways treatments, downstream and out of the river.

This underscores the benefits of higher flows for achieving desired environmental conditions. While the precise flow at which water hyacinth is mobilized and moved out of the system is unknown, flows similar to those achieved in April and May of 2016 were effective. The Conservation Groups' flow proposal will frequently achieve similar flow conditions that will more effectively control water hyacinth than the Licensees' proposed water hyacinth control program.

12. Gravel Cleaning and Gravel Mobilization

The Tuolumne River's flows and sediment inputs are out of equilibrium. Low-flow conditions favor the filling of interstitial spaces among spawning gravels. As noted in McBain and Trush, *Coarse Sediment Management Plan For The Lower Tuolumne River*, Revised Final, July 2004:

> Aggradation and degradation frequently have detrimental impacts on the river channel and ecosystem. For example, many regulated rivers receive elevated rates of fine sediment (silt and sand) to the channel, and combined with a reduced magnitude and frequency of floods, fine sediments accumulate in the channel bed, filling interstitial spaces among larger gravel and cobble particles. Increased substrate embeddedness renders the channel bed more resistant to mobilization, reduces invertebrate production, and reduces the quality of salmonid spawning gravels.[60]

The Licensees' proposed fix for this problem is experimental gravel cleaning. The Licensees provide little description of the project and no background to support the feasibility or efficacy of such an approach. The approach is likely to be highly disruptive to spawning gravels

[60] McBain and Trush, *Coarse Sediment Management Plan For The Lower Tuolumne River*, Revised Final, July 2004. Available at: http://tuolumnerivertac.com/Documents/7-2004_Revised_CSMP_Report.pdf

and the river bed, which may result in other unintended negative consequences. Additionally, the project will require consulting and permitting from Federal and State fish agencies, and there is a good potential that the agencies will not grant permits.

The 2004 McBain & Trush study of coarse sediment found 5500 cfs to be the threshold for bed mobility in the prime spawning reach of the Tuolumne River. The Conservation Groups' proposed flows would result in flows that frequently achieve or exceed 5500 cfs in the lower Tuolumne River, though if 5500 cfs is in fact the threshold for bedload mobilization, it may be necessary to increase the flow cap on the percent-of-unimpaired flow requirement, as discussed in the modeling notes, *supra*. Frequent flows in excess of the threshold for bedload mobilization should transport fine sediments out of the spawning gravels. This would more effectively accomplish the goals of the Districts' proposed gravel cleaning program.

The Licensees also propose periodic gravel mobilization flows of 6000-7000 cfs when sufficient water is available. While we do not oppose this measure *per se*, our concern is that the Districts will too infrequently determine that sufficient water is available.

F. Comments on the Flow Component of the "Districts' Preferred Plan"

1. Districts' and Conservation Groups' Approach to Flow in General and to Drought Planning Approach in Particular

Conservation Groups understand the importance of drought planning. Conservation Groups also understand the importance of constructing a flow schedule that allows reasonable water supply reliability during droughts. In crafting our flow proposal, Conservation Groups believe we have achieved that reliability, requiring no more than a 25% reduction in deliveries to the Districts in Critically Dry water years and no more than a 30% reduction in deliveries to the Districts in Super Critically Dry water years. We have proposed a contractual arrangement that keeps the CCSF Water Bank from going negative; this arrangement would require construction of groundwater recharge infrastructure at CCSF expense that will help assure the continuing availability of groundwater to the Districts to help mitigate water supply deficiencies during droughts. In exchange, CCSF will be able to transfer credits to the Don Pedro Water Bank from the new Groundwater Water Bank in Critically Dry, Dry and Below Normal water years.

Conservation Groups' proposal would achieve drought protection for both the Districts and CCSF, in part by requiring and funding more efficient groundwater recharge practices in the Districts, and in part by reasonably reducing District diversions during non-drought water years. Equally if not more important, Conservation Groups' flow proposal would achieve drought protection by changing the rules for providing instream flows during droughts. As discussed above, this allows greater required flows in non-drought years that are shaped according to the natural hydrograph, not according to flood releases and/or late spring pulses.

In Exhibit E of the AFLA, the Districts explain the underlying rationale of the flow component of the Districts' Preferred Plan:

> Planning for drought conditions is at the core of water supply system design and water supply impact analysis. Considering water supply impacts by comparing *"average"* annual water supply effects over the long-term has little meaning or value if reliable water supplies are not available during extended droughts. … Properly designed water supply projects have to be able to deliver reliable water supplies during drought and extended drought conditions. … Therefore, the effects of the Districts' Preferred Plan, as well as alternative scenarios provided by others, are examined by how they impact water supplies during drought conditions. In the 1971 through 2012 period, the longest drought occurred in the six-year period extending from 1987 through 1992.[61]

This is consistent with the drought planning policy of CCSF, which as described above assumes for planning purposes that each water year is going to be immediately followed by the 1987-1992 drought, which would then be immediately followed by the 1976-1977 drought.

The Districts' Preferred Plan does not propose to change the rules for instream flows during droughts. Using a framework that is consistent in philosophy with CCSF's drought planning, the Districts' Preferred Plan limits required flow releases for non-drought years to levels that would be safe during droughts.

In order to argue in favor of their Plan, the Districts spend a large section of Ex. E of the AFLA using charts and graphs to show that application of any percent of unimpaired flow in the winter-spring of drought years would cause severe water shortages during droughts. In applying non-drought rules to droughts, the Districts endeavor to make the non-drought rules appear unreasonable. It is reasonable to have rules for drought year flows. However, it is unreasonable to apply rules made for drought years to flows in non-drought years.

The Districts' Preferred Plan provides limited but still inadequate increases in required flow in Critically Dry, Dry and some Below Normal water years. The districts modest proposed flow increases in Above Normal and Wet years are in practice overwhelmed by flood flows.[62] Effectively, the Districts propose to make three kinds of water years: (very) Wet water years in which flood releases dominate the hydrograph for many months (as was the case historically in 1995, 1998, 2011, and 2017); Above Normal years in which some flood flows add enough to the hydrograph to allow some variability in the winter-spring hydrograph to make these years functionally below normal years; and functionally critically dry water years (which would effectively be all the rest of the years, the majority). In the functionally critically dry water years, the required February-June flow would be between 6% and 15% of the average February-June unimpaired runoff. A substantial portion of the proposed summer flow increases in Districts' Preferred Plan compared to Base Case would be rediverted at the existing and proposed additional infiltration galleries.

2. Districts' Preferred Plan Flow Objectives and their Application in Baseflows

Districts describe the biological objectives of their flows according to time of year as follows:

[61] AFLA, Ex. E, pp. 5-51 and 5-52.
[62] *See* Appendix E-1, Attachment G, tables 4-6, especially far right hand columns.

> The Districts are proposing to implement the flow regime summarized in Table 4.3.1 (above) and described in greater detail in Section 3.5.4 of this Exhibit E for the following aquatic resource objectives: (1) flows from June 1–June 30 to benefit *O. mykiss* fry rearing (2) flows from July 1–October 15 to benefit *O. mykiss* juvenile rearing, (3) flows from October 15–December 31 to provide habitat for fall-run Chinook spawning, (4) flows from January 1–February 28/29 to provide habitat for fall-run Chinook fry rearing, (5) flows from March 1 – April 15 to provide habitat for fall-run Chinook juvenile rearing, (6) fall-run Chinook outmigration baseflows from April 16–May 31, and (7) outmigration pulse flows from April 16–May 31.[63]
>
> The Districts also propose "flow hydrograph shaping," which they describe as follows:
>
> In spill years, the Districts would make reasonable efforts to shape the descending limb of the snowmelt runoff hydrograph to mimic natural conditions to promote seed dispersal and germination of cottonwoods and native willows. Increasing natural recruitment of snowmelt-dependent hardwoods would increase stands of trees that would eventually provide shade, which could over the long-term result in limited water temperature reduction, thereby contributing positively to cumulative effects on water quality in the lower Tuolumne River.[64]

In general, as explained in AFLA Section 3.5, the values chosen for baseflows in July through October 15 are largely governed by water temperature. We have no quarrel with the values between La Grange and RM 25.9. Downstream of the location of the existing infiltration gallery, diversions proposed by the Districts would cause flows that are unacceptably low.

The Districts chose flows from October 15-December 31 were chosen for physical habitat for fall-run Chinook salmon spawning. The value in Wet, AN and BN years is very close to Conservation Groups' recommended 300 cfs; lower values in Dry and CD years are unnecessarily inadequate.

The Districts appear to have gamed Weighted Usable Area in January-February by focusing on the Fry lifestage of Chinook salmon, whose preference for low velocities supports a general argument for lower flows. The result is a proposed flow of 225 cfs in these months. One could equally make the argument that if fall-run Chinook recover from the current generally depressed population level in the Tuolumne River, there will be a density-dependent need for increased physical habitat because low flows would not accommodate the number of fry that the Tuolumne is capable of producing. Conservation Groups' percent-of-unimpaired flow requirement would start in February in most water-year types; the resulting flow variability would both provide increased room for juvenile salmon and would also likely facilitate some downstream migration, diversifying life-history strategy by moving some fry toward the San Joaquin River and the Bay-Delta estuary.

[63] *Id*. at Ex. E, p. 4-103.
[64] *Id*.

The Districts label the March 1-April 15 time period as focusing on fall-run Chinook "juvenile rearing." This begs the question, where's the habitat? Districts' proposed flows for this time period would leave all the habitat in the thalweg of the river channel, except when flood flows pushed it out. The same is true for the baseflows in the April 15-May 31 time period.

Similar to the Districts' use of habitat modeling for salmon in January and February, Districts' proposed flows for June game Weighted Usable Area as a rationale for low releases. Districts choose the juvenile *O. mykiss* lifestage as the management focus because juvenile *O. mykiss* prefer lower velocities. This provides a rationale for low flows. Elsewhere, Districts elsewhere acknowledge the importance of mimicking the snowmelt recession in order to promote the recruitment of cottonwoods and other riparian vegetation. The snowmelt recession typically occurs in June. Districts do not directly address this potential conflict. Water temperatures also become elevated in June, but Districts elect to push the limits of water temperature in order to emphasize velocities as being of greater importance, thus providing a rationale to save water.

Overall, the greatest improvement in baseflows in the Districts' Preferred Plan is in Dry and CD years. These are the only year types in which one sees consistent percentage improvement in flow compared to Base Case.

3. Districts' Preferred Plan Pulse Flows

The ostensible sweetener in the Districts' Preferred Plan is a pulse flow in the April 15-May 31 time period.[65] However, it means little in the river: the average annual additional amount of actual February-June flow in the Tuolumne River that would result under the Districts' Preferred Plan compared to existing conditions would be 2%.[66]

In Wet and AN water years, the nominal water budget for spring pulse flows is 150 TAF. However, the Districts' modeling shows that the "resulting" increase from pulse flows in these water year types would be zero in almost every Wet, AN and BN year.[67] For Wet and AN years, this is because the pulse flow is not additive to the flood releases that will occur anyway. The pulses, instead, simply telescope into the flood releases. The only notable exception is the Wet year 1993, which had no flood releases because 1993 followed a prolonged drought. In the three BN years in the period of record, 1971 shows a slight increase, 2003 shows a slight decrease, and 2009 shows a greater increase. It is difficult to discern the reasons for the changes in these three water years, but it likely has to do with the nine different water year types under the 1995 Settlement Agreement flow schedule.

In Dry years and Critically Dry years, there would be benefits to the Districts Preferred Plan in comparison to Base Case. This is because the flows in these water-year types under the 1995 Settlement were extremely low. The addition of pulse flows in Dry years and CD years accounts for much of the improvement in those year types.

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[65] The limited and late time period for the Districts' spring pulse would favor the smolt lifestage of fall-run Chinook over the parr lifestage. This exclusive emphasis on a single lifestage reproduces a shortcoming of the defunct Vernalis Adaptive Management Program, which favored a late spring pulse in order to protect water supply, constricting pulse flow benefits to fish to a short window.

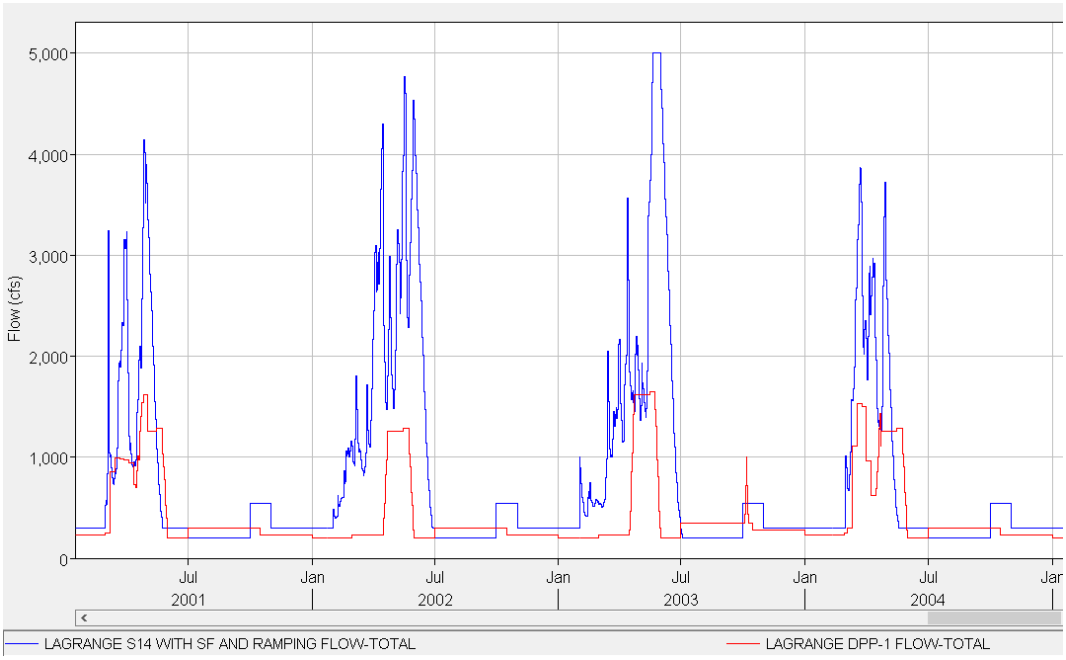
[66] AFLA Appendix E-1, Attachment G, Table 5.

[67] *Id*. at Appendix E-1, Attachment G, Table 4, far right column.

4. Comparison of Districts' Preferred Plan Flows and Conservation Groups' Proposed Flows in Below Normal and Dry Water Years

The most dramatic differences the Districts' and Conservation Groups' winter-spring flows in the lower Tuolumne River occur in Below Normal and Dry years. As an example, model output of the respective proposals' flows downstream of La Grange in 2001 (Dry), 2002 (BN), 2003 (BN) and 2004 (Dry) is pasted below.

Figure 2: Flows at La Grange Gage under Conservation Groups (blue line) and Districts' Preferred Plan flow proposals, 2001-2004 (model output)



In a nutshell, in the Conservation Groups' flows there is a hydrograph. Under the Districts' Preferred Plan, there is a flat line with a blip. Note this figure does not show that downstream of RM 25.9, Districts' flows would be lower by 225 cfs from June 1 through October 15 due to diversions at the Districts' infiltration gallery. Conservation Groups' flows downstream of RM 25.9 would be 100 cfs lower from July 1 through September 30.

Of the 42-year period of record used in the Don Pedro relicensing, twelve water years were CD or SCD water years and twelve water years were BN or Dry. District's Preferred Plan makes 24 of 42 years into effectively Critically Dry years, as described above. This is 57% of all years. Conservation Groups reduces the number of triage years in the period of record to 28.5%.

5. Comparison of Districts' Preferred Plan Flows and Conservation Groups' Proposed Flows in Critically Dry and Super Critically Dry Water Years

Under the Districts' Preferred Plan, flows at La Grange in Critically Dry years would be about 36,800 AFY less than those proposed by Conservation Groups; downstream of Geer Road

Districts' flows would be 70,000 less than those proposed by Conservation Groups. The Districts' flows at La Grange in Super Critically Dry years would be about 61,000 AFY less than those proposed by Conservation Groups; downstream of Geer Road, Districts' flows would be 100,000 AFY less than those proposed by Conservation Groups.

The difference in the volumes of flows under the Districts' Preferred Plan and Conservation Groups' flow proposal in CD and SCD water years has nothing to do with a percent-of-unimpaired flow requirement. In CD and SCD years, the Conservation Groups' flow proposal *does not require release of flow based on percent of unimpaired flow*. The flow difference upstream of RM 25.9 is almost entirely attributable to the difference in the baseflow requirements. The difference downstream of RM 25.9 is almost entirely attributable to the difference in baseflow requirement added to the Districts' proposed diversion of 23% of the flow at the infiltration gallery in CD years and 31% of the flow at the infiltration gallery in SCD years. The volumes of pulse flows in CD and SCD water years in the respective proposals are close.

The Districts' Preferred Plan keeps the Water Bank from going negative in the 1987 to 1992 drought by starving the Tuolumne River of flow in CD and especially in SCD water years. The Districts' proposed construction of a second infiltration gallery keeps annual flow to the Delta in CD years to 173 AF in CD years and 120 TAF in SCD years.[68] In SCD years, the required flow at RM 25.9 is at most 25 AFY greater than Base Case. Rather than starve the river, Conservation Groups propose to keep the Don Pedro Water Bank positive by adding the Groundwater Water Bank.[69]

6. Comparison of Districts' Preferred Plan Flows and Conservation Groups' Late Spring Recession Flows

As described above, Conservation Groups recommend a defined rate of flow recession following the last day in the spring when a percent-of-unimpaired flow requirement, or when Districts regain control after flood releases, which comes last.

Districts identify the desirability of a late spring flow recession. The AFLA titles the measure "Hydrograph Shaping." The AFLA's rationale states in part: "If spill conditions allow, streamflow recession rates would be managed during the cottonwood seed dispersal period to provide soil moisture conditions that allow seeds to take up water, germinate, and form roots."[70] However, their proposed measure is vague, unspecific, and unquantified, saying: "In spill years, the Districts would make reasonable efforts to shape the descending limb of the snowmelt runoff

[68] AFLA Appendix E-1, Attachment G, Table 4 shows required flows and resulting flows at La Grange as being identical in CD and SCD years. Table 6 shows resulting flows at RM 25.9 as notably higher than required flows. Without actual model output with a flow compliance location added at RM 25.9, it is difficult to understand the discrepancy at RM 25.9.

[69] In 1989, the Don Pedro Water Bank goes negative in the Conservation Groups' flow proposal because of the year-round 300 cfs baseflow. It goes more negative in 1990, 1991 and 1992, and slightly negative in 1994. These are the only years in the period of record that the Don Pedro Water Bank goes negative under Conservation Groups' flow proposal. Application of the Groundwater Water Bank allows elimination of this negative balance and some of the low positive balances in CCSF Total System Storage at other times in the period of record.

[70] AFLA, Ex. E, p. 4-68.

hydrograph to mimic natural conditions to promote seed dispersal and germination of cottonwoods and native willows."[71]

7. Comparison of Districts' and Conservation Groups' Timing of Change in Water-Year Type

Conservation Groups propose to adjust water-year types in February, March, April and May of each year. The water-year type would adjust with the release of DWR Bulletin 120 (or successor), based on forecast annual Tuolumne River flow at La Grange. Districts propose to change the water-year type only once per year, following the release of DWR Bulletin 120 in April. Districts' proposal does not make sense from either a water supply perspective or from an environmental perspective.

If the preceding water year was a relatively wet year, carrying the water-year type forward into April risks running water supply low if the present year is relatively dry. Conversely, if the preceding year was a relatively dry year, carrying the water-year type forward into April unnecessarily reduces instream flow if the current year is relatively wet.

Part of the rationale for the Districts' single change may be that Districts propose relatively small flow differences between water-year types in the February through early April time period. Conservation Groups believe it is important biologically for flow to respond to changing conditions in the crucial February through early April time period. Conservation Groups' flow proposal may significantly change instream flow requirements in these months.

G. Costs of Conservation Groups' Flow Proposal

Conservation Groups request that Commission staff analyze the costs of Conservation Groups' flow proposal in the Developmental Analysis section of the DEIS and clearly describe the basis for its analysis. Conservation Groups request that the DEIS consider different contingencies that would allow Districts' customers to mitigate the costs of having to maintain agricultural production with less surface water available for irrigation. Conservation Groups further request that the DEIS analyze Conservation Groups' proposed Groundwater Water Bank as a means to mitigate water supply impacts of Conservation Groups' flow proposal to CCSF.

II. The Conservation Groups' Recommendation: Reservation of FPA § 18 Authority to Require Fish Passage for Spring-Run Chinook Salmon and Possibly Steelhead to the Upper Tuolumne River after 2025.

A. Recommended Measure

The National Marine Fisheries Service (NMFS) shall reserve its authority under § 18 of the FPA to require fish passage for spring-run Chinook salmon and possibly Central Valley steelhead past La Grange and Don Pedro dams to the upper Tuolumne River after 2025.

[71] AFLA, Ex. E, p. 4-94. There is similar language on p. 5-39.

B. Rationale

1. Comprehensive Planning

The National Marine Fisheries Service (NMFS), the federal trustee for anadromous fisheries, has developed a comprehensive Final Central Valley Recovery Plan that defines actions for recovery of two federally listed species relevant to the Tuolumne River: the Distinct Population Segment (DPS) of Central Valley steelhead and the Evolutionarily Significant Unit (ESU) of spring-run Chinook salmon.[72] NMFS released the Recovery Plan in July, 2014 and filed it in the Don Pedro and La Grange dockets as a comprehensive plan in October, 2014. The actions recommended in the plan include:

- Protect and enhance the Central Valley steelhead Distinct Population Segment and its critical habitat in extant habitat, including the lower Tuolumne River downstream of La Grange Dam.
- Expand the extant population of the Central Valley steelhead into formerly occupied habitats by establishing new viable populations upstream of the current limit of anadromy and into the upper watershed of at least one of the three major San Joaquin River tributaries.
- Reintroduce Central Valley spring-run Chinook salmon into formerly occupied habitats by establishing new viable populations upstream of the current limit of anadromy and into the upper watershed of at least one of the three major San Joaquin River tributaries, after 2025.

2. Jurisdiction

Licensees opposed analysis of fish passage in the initial stages of the Don Pedro relicensing on the grounds that La Grange Dam, the terminal barrier to fish passage on the Tuolumne River, was not jurisdictional to FERC. Licensees argued that no study of fish passage was warranted because blockage of passage was not a Project effect, and thus there was no Project nexus for fish passage. Following formal study dispute by NMFS, FERC staff's Study Plan Determinations upheld the Districts' position.

Following a series of pleadings by NMFS, Conservation Groups, Districts and others, the Commission ordered the licensing of the La Grange Hydroelectric Project.[73] Following request for rehearing and litigation, the Districts initiated a licensing proceeding. The Commission issued a notice initiating the proceeding on May 23, 2014.[74]

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[72] National Marine Fisheries Services. 2014. *Final Recovery Plan for Sacramento River Winter-run Chinook Salmon, Central Valley Spring-run Chinook Salmon, and Central Valley Steelhead*. NMFS, West Coast Region, Sacramento, California. July 22, 2014. Entered into the records for the Don Pedro and La Grange licensings as a comprehensive plan, October 6, 2014, eLibrary no. 20141006-5095.

[73] 141 FERC ¶ 62,211, *Order Finding Licensing of Hydroelectric Project Required*, December 19, 2012.

[74] Notice of Filing of Pre-Application Document (PAD), Commencement of Pre-Filing Process, and Scoping; Request for Comments on the PAD And Scoping Document, and Identification of Issues and Associated Study Requests, May 23, 2014, eLibrary no. 20140523-3003.

In the La Grange licensing proceeding, the Districts proposed in their Revised Study Plan Proposal to perform a Fish Passage Alternatives Assessment. Subsequently, Districts performed a conceptual engineering analysis of fish passage past La Grange and Don Pedro dams.

In the Final License Application for the La Grange proceeding (FLA), the Districts argue that La Grange Dam itself is not jurisdictional to FERC even though the Commission determined that the La Grange Powerhouse falls under the Commission's jurisdiction.[75] Specifically, the Districts argue in the FLA that the blockage of fish passage by La Grange Dam pre-dates La Grange Powerhouse, and that La Grange Dam is used for purposes of water supply, not power generation. This argument fails, just as the Districts' arguments to try to separate functions of the Don Pedro Project also fail. *See* "Legal Basis for Conservation Groups' Recommendations," *infra*.

NMFS clearly has authority to issue a prescription for fish passage past La Grange Dam and Don Pedro Dam under § 18 of the FPA.

3. Preclusion of FPA § 18 Prescription for Spring-Run Chinook Salmon in the Tuolumne River until after 2025.

Under the terms of § 10011 of the San Joaquin River Restoration Settlement Act, NMFS is precluded from issuing an FPA § 18 fish passage prescription in the San Joaquin River watershed "until after the expiration of the term of the Settlement, December 31, 2025, or the expiration of the designation made pursuant to subsection (b), whichever ends first." Therefore, if NMFS were to make a § 18 prescription today in the instant La Grange and Don Pedro proceedings, NMFS would have to make that prescription on the basis that it is needed for steelhead and/or fall-run Chinook salmon.

4. Habitat and Source Stock in the Tuolumne River Upstream of Don Pedro Reservoir

Under the general umbrella of the La Grange licensing proceeding, Licensees conducted multiple studies of the habitat and relevant migration conditions in the Tuolumne River and major tributaries upstream of Don Pedro Reservoir**.** Licensees convened a series of workshops to present ongoing studies and study results and to discuss potential reintroduction of anadromous fish upstream of Don Pedro Reservoir. Licensees' scope of study exceeded studies directly required by the Commission. Notably, the Licensees undertook studies of the habitat in the Tuolumne River upstream of Don Pedro Reservoir as that habitat relates to the potential reintroduction of anadromous fish. Study results reported with the La Grange Final License Application (FLA) include evaluation of migration barriers and water temperature modeling and monitoring. Licensees also did field work to assemble assessment of holding pools, collected data on aquatic insects in the upper Tuolumne River, and collected data to support an instream flow study in the upper Tuolumne River; however, technical memos for this work are not part of the FLA.

[75] "The presence of the LGDD (not the Project) blocks the migration of anadromous fish. The diversion dam exists to support the primary purposes of water supply and M&I uses and would continue to operate as it does currently independent of hydroelectric generation." FLA, p. 3-110.

Since 2014, NMFS has also performed and commissioned several studies related to a potential reintroduction of anadromous fish to the Tuolumne River upstream of Don Pedro Reservoir. In 2017, NMFS produced a technical report on the genetics of *O. mykiss* found in the upper Tuolumne River and upper Merced River watersheds ("NMFS Genetics Report").[76] In 2018, NMFS also produced a technical report on the habitat capacity of the upper Tuolumne River and upper Merced River for steelhead and spring-run Chinook salmon ("NMFS Capacity Report").[77]

In aggregate, the information from these studies demonstrates:

1. "The Tuolumne system maintained tolerable temperatures for holding Chinook in all years, and under existing flow management had a mean capacity that met or nearly met viability criteria for spring run Chinook salmon (>2500 spawning adults)."[78]
2. "In all years assessed, the Merced system showed intolerable temperatures for holding Chinook from late June through early September, comprising most of the peak season for this life stage."[79]
3. There is suitable habitat for steelhead in both the upper Tuolumne River and upper Merced River.
4. There are genetically unique populations of *O. mykiss* in sections of both the upper Tuolumne watershed and the upper Merced watershed; these populations might serve as source stock to develop steelhead reintroduction programs to each upper watershed.

5. Engineering Issues for Reintroduction of Salmonids to the Upper Tuolumne River

In 2017, NMFS produced a technical report on conceptual engineering plans for fish passage facilities to support a program to reintroduce salmonids to the upper Tuolumne River ("NMFS Engineering Report").[80] This report generally concludes that a "collection, handling, transport and release" (trap and haul) method passing fish from the lower Tuolumne watershed to the upper watershed and vice versa would be the most feasible.[81]

The NMFS Engineering Report evaluates two options for collection of juvenile salmonids migrating downstream from the upper Tuolumne River into Don Pedro Reservoir: a "hybrid" head-of-reservoir collection facility located just downstream of Ward's Ferry Bridge[82] and a floating surface collector, perhaps to be located near Moccasin Point.[83] The Report

[76] *Conceptual Analysis of Oncorhynchus Mykiss in the Upper Tuolumne and Merced Rivers to Evaluate Ancestry and Adaptive Genetic Variation*, November, 2017, eLibrary no. 20171117-5127.
[77] *On the Capacity of upper Tuolumne and Merced Rivers for Reintroduction of Steelhead and Spring-run Chinook Salmon*, January, 2018, eLibrary no. 20180124-5038.
[78] NMFS Capacity Report, p.5.
[79] *Id*.
[80] *Conceptual Engineering Designs for Fish Passage at La Grange and Don Pedro Dams on the Tuolumne River*, October 2017, eLibrary no. 20171133-5347.
[81] NMFS Engineering Report, pp. 33-34.
[82] *Id*., p. 42 ff.
[83] *Id*., p. 71 ff.

provides somewhat detailed costs for the "hybrid" option, and much less detail for the floating surface collector option. However, at first blush, the floating surface collector option appears to be half the cost or less (between $50M and $64M) of the "hybrid" option ($152M).

As noted in the discussion of a whitewater take-out, *infra*, Conservation Groups have great concern over a facility that might affect whitewater boating in the Tuolumne River upstream of Don Pedro Reservoir. It appears, however, that a downstream fish capture facility well downstream of Ward's Ferry, which would not affect boating in the upper Tuolumne River, would be much less expensive than a facility near Ward's Ferry.

6. Conservation Groups' Analysis of Fish Passage Issues in the La Grange Licensing and the Don Pedro Relicensing

The habitat and reliability of cold water in the upper Tuolumne River presents a strong argument for reintroduction of spring-run Chinook salmon to the upper Tuolumne River. As mentioned *supra*, the Merced River is thermally unsuitable for spring-run Chinook. The Stanislaus River has multiple water and power developments that segment its upper watershed and divert water out of its river reaches. Reliable cold water in the Stanislaus River, at least in the lower elevations upstream of New Melones Reservoir, is uncertain.

There are a number of questions related to a potential reintroduction program to the upper Tuolumne River that are likely to find answers in the next seven years. Those years are likely to determine whether the San Joaquin River Restoration Program can provide a source of reliable broodstock, not only for the San Joaquin but for one of its tributaries, especially with the conservation hatchery that supports that San Joaquin Program. It is unknown today whether spring-run Chinook from the San Joaquin River Restoration Program will stray into the Tuolumne River, but with adequate flows in the Tuolumne River and sufficient abundance of spring-run in the San Joaquin, such straying seems likely.

A number of organizations and individuals have questioned the efficacy of trap and haul programs in general and their application in California in particular. The Bureau of Reclamation's ongoing pilot reintroduction program to reintroduce winter-run Chinook salmon upstream of Shasta Reservoir will likely tackle practical logistical issues of trap and haul ranging from permitting to on-the-ground operations. One or more pilot trap and haul programs elsewhere in the Central Valley may also be in planning or early implementation stages by 2025. As each program develops, cost estimates and program efficiencies are likely to evolve.

While at least some Conservation Groups would likely support a § 18 fish passage prescription for steelhead on the Tuolumne River today, an evaluation of the reintroduction of spring-run Chinook to the Tuolumne River in 2026, informed by experience over the next seven years, is more compelling.

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III. Conservation Groups' Recommendation: Establish a Restructured Technical Advisory Committee

A. Recommended Measure

Licensees shall re-establish and reconstitute a Tuolumne River Technical Advisory Committee (TAC).[84] The purpose of the new TAC shall be to review and approve resource management plans, restoration plans, and annual monitoring plans, as well as the implementation of these plans. The Tuolumne River TAC's voting members shall consist of the Turlock Irrigation District, Modesto Irrigation District, City and County of San Francisco, National Marine Fisheries Service, US Fish and Wildlife Service (USFWS), Bureau of Land Management (BLM), US Forest Service (USFS), California Department of Fish and Wildlife (CDFW), and two representatives from Conservation Groups, each representing a separate organization. Non-voting members shall include any organization or individual with an interest in fishery and recreation issues on the Tuolumne River.

Licensees shall retain an independent, professional consultant to facilitate and coordinate TAC meetings. The facilitator shall be approved by the members of the TAC. The facilitator shall propose formal procedures or communication protocols including processes for decision making, assuring appropriate conduct, managing dispute resolution, drafting agendas, and recording meeting notes. The facilitator shall present the procedures and communication protocols to the TAC for consideration and adoption. The TAC facilitator shall notify the TAC and other interested stakeholders of the location, time and agenda of each TAC meeting at least 30 days in advance of that meeting.

The Licensees shall convene the TAC each year for an annual consultation meeting. Licensees shall make best efforts to convene the annual consultation meeting on a date that allows maximum attendance, in general prior to April 15 of each year. The agenda shall include opportunities for discussion of all of Licensees' presentations.

The Licensees shall make available to the TAC, at least four weeks prior to the annual meeting, an operations and maintenance plan for the upcoming year.

The goals of the annual meeting are to share information; mutually agree upon planned monitoring, maintenance, and restoration project implementation activities; identify concerns of Resource Agencies or other TAC members about activities and their potential effects on sensitive resources; and reach consensus on any measures required to avoid or mitigate potential effects.

Consultation at the annual meeting shall include, but not be limited to:

[84] Other entities filing conditions or recommendations have chosen a different name. We continue the name of the entity that was created in the 1995 Settlement Agreement. See discussion in the rationale for this section. We attach no particular importance to the title of the entity we propose. We believe there is some benefit in continuity, despite concerns we and others have had for the way the present Tuolumne River TAC has functioned in the last decade.

- Discussion of the implementation of license conditions, including those instream flow measures that have specific timing and duration components that require annual adjustment.
- Discussion of the results of monitoring studies performed over the previous year.
- Review of any non-routine maintenance.
- Discussion of any recent past or foreseeable changes to Project facilities or features.
- Discussion of any necessary revisions or modifications to implementation plans approved as part of this license.
- Discussion of needed protection measures for species newly listed as threatened, endangered, or sensitive.
- Changes to existing management plans due to delisting of a species or to new knowledge about a protected species.
- Discussion of elements of current-year maintenance plans, e.g. road and trail maintenance.
- Discussion of any planned pesticide use.

For at least the first five years after license issuance, the Licensees shall convene the TAC at least quarterly; one of these quarterly meetings may be the annual meeting. The purpose of such quarterly meetings shall be to consult on license conditions that require consultation or adaptive management. These conditions include instream flow (including timing of pulse flows), water temperature management planning, spawning and floodplain habitat restoration, and reservoir stocking. To the extent that some resource measures may be highly technical and narrowly focused, the TAC will have the option to designate issue-specific working groups to address technical matters and report back to the larger TAC. After the first five years, Licensees may modify the frequency of TAC meetings to less than quarterly, but no less than annually. Before reducing the frequency of TAC meetings, Licensees shall consult with other TAC participants to seek consensus on the appropriate frequency of meetings.

Licensees shall keep meeting records of all TAC meetings, which shall include all recommendations made by Resources Agencies or Conservation Groups. Licensees shall file the meeting records, along with results from ongoing and Project-specific monitoring, progress made towards the License conditions, and associated meeting materials, and file them as an annual report with the Commission no later than June 30 of each year.

The Licensees shall continue to maintain the previous TAC website (http://tuolumnerivertac.com/) to post meeting materials and information, to post related documents and information, and as a communication tool for TAC business.

B. Rationale

Section 14 of the 1995 Settlement Agreement[85] established a Technical Advisory Committee with a two-tier governance structure. Tier #1 was open to any interested party or organization with an interest in lower Tuolumne River fishery issues. Tier #2 was the Management Committee consisting of representatives of the Licensees, CCSF, USFWS, and

[85] Available at: http://tuolumnerivertac.com/Documents/1995FSAfrom1996FEIR.pdf

California Department of Fish and Game (now DFW). Though the Commission adopted specific elements of the Settlement Agreement as part of the Don Pedro license, the Commission never formally recognized the TAC. Nonetheless, the Licensees coordinated and staffed the TAC per the terms of the 1995 Settlement Agreement.

The Tuolumne River TAC was initially a successful forum for Settlement Agreement participants to work towards implementing many of the projects and monitoring elements of the Settlement Agreement. Over time, it became a more contentious body, and it lost the faith of many of the participants. By 2005, participation by most parties of the Settlement Agreement other than the Licensees and CCSF had almost completely ceased.

In 2005, during the required 10-year review of the terms of the Settlement Agreement and associated license requirements, many of the parties filed comments and recommendations for reforming the TAC. The Conservation Groups' comments read as follows:

> We generally agree with the Districts that the TAC should continue to provide a forum for oversight of restoration projects, review of monitoring results, and discussion of fisheries-related issues. However, we believe that substantial changes should be made to its operation in order to make it a more effective element of the fish management program.
>
> To date the TAC essentially has been facilitated and organized by the Districts, and as a result has not consistently provided a fair and objective forum for discussion and decision. The lack of an objective, independent facilitator is compounded by the fact that there are no formal process or communication protocols for the TAC meetings. There are no procedures for taking or approving meeting minutes, developing or approving the agenda, resolving disputes, confidentiality, participants' conduct, etc.
>
> If the TAC is going to be continued through relicensing, and especially if it is going to play a role in reviewing the 2005 Report and reaching consensus on recommendations as to whether the Commission should require further monitoring studies and changes in project structures and operations to protect fishery resources in the Tuolumne River, then several reforms are necessary. We request that the Commission direct the Districts to establish protocols, in consultation with agencies and other interested stakeholders. We also request that the Commission support our recommendation that the Management Committee be convened in order to discuss reforms necessary to improve the effectiveness of the TAC. Other interested agency and non-governmental stakeholders should be allowed to participate in such a meeting. Possible reforms could include the Districts funding an outside, independent facilitator selected by the Management Committee, based on recommendations by the TAC, to facilitate meetings; the Districts' funding technical consultants selected by the Management Committee and directed by the TAC rather than exclusively by the Districts; developing process and communication protocols; formally adding NMFS and other interested stakeholders to the TAC membership; etc.

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> We also agree with the Districts' recommendation that reporting should continue through relicensing. However, we believe that there should be an opportunity for input from relevant agencies and interested stakeholders before reports are finalized and filed with the Commission. For example, the Districts did not provide a copy of the 2005 Report to the TAC in advance of filing. Thus, in order to improve the accuracy and objectivity of the reports, we request that the Commission require the Districts to distribute draft reports and provide for a 30-day minimum comment period prior to finalizing the reports and filing them with the Commission.[86]

Similarly, the California Department of Fish and Game (now DFW) and Friends of the Tuolumne, Inc. (now Tuolumne River Conservancy) referenced specific failings of the TAC as it had been operated and made similar recommendations to the Commission for reform.[87,88,89] For example, the Tuolumne River Conservancy noted shortcomings in the taking and keeping of meeting notes, deviations in the consensus structure in designing and implementing monitoring efforts, and other weaknesses in the decision-making process.

As configured in 1995, the TAC did not provide a voting role for non-governmental organizations with a conservation mission. In the new license, Conservation Groups recommend two voting positions self-selected from among the Conservation Groups. We believe that Conservation Groups have earned this recognition. Conservation Groups are extremely well-informed and bring important meeting and collaborative skills to the TAC. We are willing to compel decisions even when they are difficult. In addition, Conservation Groups' personnel are often more durable than agency representatives: at least half of the signatories of this letter have a decade or more of involvement with regulatory and on-the-ground activities on the Tuolumne River.

A notable shortcoming of the 1995 Settlement Agreement is that it did not include NMFS. Subsequent to the adoption of the Settlement Agreement, Central Valley steelhead were listed as a federally-listed Threatened species. In these licensing proceedings, NMFS will issue a Biological Opinion to protect Central Valley steelhead. NMFS may also issue a fish passage prescription as part of this relicensing proceeding or may reserve its authority to do so. Therefore, it is reasonable to anticipate that upper Tuolumne river fishery issues may take on new importance during the next license term. Thus, we recommend the addition of NMFS as a voting member of the TAC.

The Licensees, in their AFLA for the Don Pedro Project, have proposed to construct a whitewater take-out facility near Ward's Ferry Bridge. Conservation Groups support construction of such a facility, though we recommend modifications to the facility the Districts have proposed. Licensees also propose to construct new day-use facilities near the upper end of Don Pedro Reservoir. These facilities will fall under the jurisdiction of the United States Forest Service (USFS) and the Bureau of Land Management (BLM) or will affect areas jurisdictional to

[86] Comments of Conservation Groups on Ten Year Summary Report, eLibrary no. 20050725-5060, pp. 15-17
[87] Comments of DFW on Ten Year Summary Report, eLibrary no. 20050725-5055, pp. 1-2
[88] Comments of Friends of the Tuolumne on Ten Year Summary Report, eLibrary no. 20050725-5024, p. 4
[89] Recommendations for Terms and Conditions of Friends of the Tuolumne, Inc., eLibrary no. 20051122-5001, pp. 1-2

these agencies. Thus, we also recommend the addition of USFS and BLM as voting members of the TAC.

Finally, our recommendation notably would result in the Commission formally incorporating the TAC into the Project licenses, which would ensure a more defined formal role for the TAC that the Commission had previously declined to order.

C. Cost of Measure

Annual facilitation, staff time, record-keeping, website, and reporting: $100,000

IV. Conservation Groups' Comments and Recommendation: Increase Floodplain Rearing Habitat for Juvenile Salmonids

A. Recommended Measure

1. Licensees shall restore and create salmon fry and juvenile rearing habitat by lowering historical floodplain surfaces that currently inundate at flows greater than 5000 cfs. Licensees shall achieve specified quantities of floodplain creation by either:

   a) Designing and implementing the lowering of sufficient floodplain habitat such that, in combination with the flow requirements of the new license, the number of acre-days of inundation at flow levels greater than 1000 cfs, between February 1 and June 15 under the hydrology of the 1971-2012 period of record, would have been as follows:

      - In Above Normal years, a median of at least 100,000 acre-days;
      - In Below Normal years, a median of at least 65,000 acre-days;
      - In Dry years, a median of at least 36,000 acre-days.

   OR

   b) Creating 810 acres of 100% suitable floodplain habitat or equivalent based on habitat suitability. (As the floodplain habitat quality decreases, acreage shall increase *e.g.*, 2314 acres for 35% suitability, 4050 acres for 20% suitability, 8100 acres for 10% suitability, etc.). Of this acreage, 25% shall inundate at 1500 cfs or lower flow; 50% shall inundate at 3000 cfs or lower flow; 75% shall inundate at 4000 cfs or lower flow; and 100% shall inundate at 5000 cfs or lower flow.

   Licensees shall implement whichever of these two alternatives would have created the greater amount of suitable floodplain acreage in the Below Normal years under the hydrology of the 1971-2012 period of record.

   The flow schedule ultimately required by the Commission may reduce the amount of floodplain habitat creation that is required under the acre-days of inundation criterion. For example, if the Commission requires the Conservation Groups' flow proposal as a license condition, then flows alone would have attained a median of 25,237 acre-days of inundation

in Below Normal years over the 1971-2012 period of record, without any physical manipulation of habitat. The Licensees would then be required to lower floodplains to attain an additional median value of 40,362 acre-days of inundation per Below Normal year, above and beyond what flows are attaining alone.

Licensee shall select no fewer than six restoration locations distributed along the lower river to ensure that outmigrating and rearing juveniles have adequate access to floodplain habitat along the entire length of the river. Restoration designs shall emphasize floodplain terraces, benches, and swales with through-flow. Licensees shall incorporate silt importation into floodplain restoration designs to mitigate for loss of silt due to Project operations. Licensees shall plant floodplain surfaces with native riparian trees, shrubs, forbes, and grasses. Licensees shall complete restoration within 10 years of the new license term.

2. Licensees shall complete, within two years of the new license term, a Floodplain Rearing Habitat Restoration Plan (FRHRP). Licensees shall consult with the Tuolumne River Technical Advisory Committee to develop the plan. Licensees shall use the plan as the guiding document for designing and implementing the Floodplain Rearing Habitat Restoration Program. The specific objective of this Floodplain Rearing Habitat Restoration Program shall be to restore or create additional salmon fry and juvenile rearing habitat that, in conjunction with instream flows and other non-flow restoration measures (such as LWD addition and gravel augmentation), is sufficient to achieve the AFRP Doubling Goal for the Tuolumne River.

   The FRHRP shall identify the river reaches with the greatest need for rearing habitat, a target amount of rearing habitat for each reach, potential locations for new rearing habitat, a floodplain inundation analysis to identify elevations for flooding at flows of 1500 to 3000 cfs, and a revegetation plan. The FRHRP shall also evaluate land ownership and the potential for acquisition, permitting requirements and timelines, and other relevant details.

   As part of this planning effort, Licensees shall refine the Licensees' existing TUFLOW model. The refined model shall incorporate vegetative cover (in addition to depth and velocity) to analyze floodplain rearing habitat needs and opportunities and to quantify habitat quality at flows of 1500 to 3000 cfs. The refined model shall also reduce the cell size of the TUFLOW model (smaller than 30' x 30') to a size appropriate to quantifying habitat quality. Licensees shall, to the greatest extent possible, prioritize project sites that have the potential to produce the highest quality habitat. Project site selection shall prioritize floodplain areas with a higher river frontage to acreage ratio. Licensees shall develop project-specific plans in coordination with the Tuolumne River Technical Advisory Committee. Licensees may develop specific projects in conjunction with projects they develop as part of the Gravel Augmentation Program. Licensees may use floodplain restoration sites as sources gravel and may create new floodplains in concert with the filling of Special-Run Pools.

B. Rationale

There are a number of studies that document the interrelationship between outmigration success of juvenile salmonids and the amount and quality of rearing habitat on Central Valley

rivers. Historically, the Central Valley had extensive, seasonally inundated, shallow-water habitat that allowed for salmonid rearing.[90,91,92] This habitat is associated with increased growth and survival of juvenile salmonids.[93,94,95,96] Most of these shallow-water rearing habitats have been eliminated throughout the Central Valley, and the Tuolumne is no exception. Flow modifications from Project operations have dramatically reduced the magnitude, frequency, and duration of flows, thus reducing the total amount, duration, and frequency of inundated floodplain acreage.[97,98] Additionally, inundation under Project operation often occurs at times that are not optimal for outmigrant success.

Conservation Groups have developed a detailed set of draft biological goals and objectives for the Tuolumne River. These goals and objectives grew out of an initial report produced for the Stanislaus River by a collaborative of conservation groups, resource agencies, academics, consultants and water project personnel. This collaborative is known as the Scientific Evaluation Process (SEP). Participants in the SEP attributed continuing declines in salmon and steelhead stocks in the San Joaquin Basin, in part, to a lack of common vision of conservation success among resource agencies, conservation groups, and water purveyors. Many policies have focused on particular Central Valley salmonid stocks and have not defined outcomes for other stocks. The SEP participants ultimately determined that they should use science-based methods to establish desired outcomes (including goals, biological objectives, and environmental objectives) in each of the three major tributaries to the San Joaquin River and in the lower San Joaquin mainstem. These desired outcomes can serve as metrics to evaluate conservation proposals.

The SEP partnership developed a vision of restoration success that expresses and harmonizes relevant policies as science-based and achievable goals and objectives. This vision prioritizes the relative importance of various barriers (stressors) to the attainment of these desired conditions and provides a framework for developing, evaluating, and implementing strategies for

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[90] [TBI] The Bay Institute. 1998. *From the Sierra to the Sea: The Ecological History of the San Francisco Bay-Delta Watershed*. Novato, California. Available at http://www.bay.org/publications/from-the-sierra-to-the-sea-the-ecological-history-of-the- san-francisco-bay-delta-waters

[91] Moyle, P. B. 2002. *Inland fishes of California*. University of California Press.

[92] Williams, J.G., 2006. *Central Valley Salmon: A Perspective on Chinook and Steelhead in the Central Valley of California*. San Francisco Estuary and Watershed Science 4:416.

[93] Sommer, T.R., Nobriga, M.L., Harrell, W.C., Batham, W., Kimmerer, W.J., 2001. *Floodplain rearing of juvenile Chinook salmon: evidence of enhanced growth and survival*. Can. J. Fish. Aquat. Sci. 58:325–333. Available at: http://dx.doi.org/10.1139/f00-245

[94] Sommer, T.R., W.C. Harrell, A.M. Solger, B. Tom, and W. Kimmerer, 2004. *Effects of flow variation on channel and floodplain biota and habitats of the Sacramento River, California, U.S.A.* Aquatic Conservation: Marine and Freshwater Ecosystems. 14: 247-261. Available at: http://www.water.ca.gov/aes/docs/AquaticConservManuscript.pdf

[95] Sommer, T.R., W.C. Harrel, M.L. Nobriga. 2005. *Habitat use and stranding risk of juvenile Chinook salmon on seasonal floodplain*. North American Journal of Fisheries Management, 25: 1493-1504. Available at: http://citeseerx.ist.psu.edu/viewdoc/download?doi=10.1.1.591.7404&rep=rep1&type=pdf

[96] Jeffres, C.A., J.J. Opperman, P.B. Moyle. 2008. *Ephemeral floodplain habitats provide best growth conditions for Chinook salmon in a California river Environmental Biology of Fishes*, 83(4): 449-458

[97] McBain & Trush, 2000. Habitat Restoration Plan for the Lower Tuolumne River Corridor. Available at: http://tuolumnerivertac.com/Documents/tuolplan2.pdf

[98] AFLA Att. C, *Lower Tuolumne River Floodplain Hydraulic Assessment Study Report*, W&AR-21, p. 6-2

conservation and restoration. Established quantifiable goals and objectives are also a prerequisite to the application of science-based adaptive management.

The SEP vision provides a common scientific foundation that will be useful for all parties pursuing a comprehensive approach to restoring native species and habitats in the San Joaquin River basin and in establishing a framework for addressing relevant regulatory processes that include:

- The State Board's update of the Water Quality Control Plan, as called for under both the state Porter-Cologne Water Quality Control Act and the federal Clean Water Act, and
- Federal Energy Regulatory Commission relicensing proceedings.

The overarching purpose of the SEP is to restore conditions in the lower San Joaquin River and its tributaries that will support sustainable native fish populations and other living resources. The SEP is designed to:

- Articulate a clear, scientifically justified expression of policy guidance regarding the desired status of fall-run and spring-run Chinook salmon and *O. mykiss* (both resident [rainbow trout] and anadromous [steelhead] forms) in the San Joaquin River basin;
- Provide well-documented and transparent technical guidance on the conditions necessary to attain that vision; and
- Provide a foundation for evaluating the effectiveness of proposed actions to achieve the conditions necessary to realize the vision.

The SEP approach to conservation planning begins by describing a vision of conservation success that integrates and harmonizes a suite of policy goals and objectives, which are described in laws, policies, and plans. This vision is articulated as specific outcomes that are grounded in the best available science. Defining goals and objectives provides a transparent basis for evaluating implications of proposed actions and trade-offs among these actions, implementing actions efficiently within a specific timeframe, and managing actions towards attainment of desired conditions.

The initial SEP Report focused on the Stanislaus River. The Report is included as Attachment 3 to these comments and recommendations.[99] This Report provides the methodological context and approach that Conservation Groups used to develop the biological and environmental objectives for the Tuolumne River.

One of the foundational policy goals driving the specific biological goals and objectives for the Tuolumne River is Section 3406(b)(1) of the Central Valley Project Improvement Act (CVPIA). Section 3406(b)(1) directed the Secretary of the Interior to:

> [d]evelop within three years of enactment and implement a program which makes all reasonable efforts to ensure that, by the year 2002, natural production of anadromous fish

[99] *Scientific Evaluation Process (SEP) Report: Conservation Planning Foundation for Restoring Chinook Salmon (Oncorhynchus Tshawytscha) and O. mykiss in the Stanislaus River*, Anchor QEA, 2016

in Central Valley rivers and streams will be sustainable, on a long-term basis, at levels not less than twice the average levels attained during the period of 1967-1991.

This directive is commonly referred to as the Anadromous Fish Restoration Program (AFRP) Doubling Goal. The Conservation Groups' draft biological and environmental objectives for restoring salmon and steelhead in the Tuolumne River, whose development Conservation Groups based on the same approach as those applied by the SEP collaborative, are included as Attachment 4. With the AFRP Doubling Goal as its basis, the biological objective for total freshwater survival of fall-run Chinook in the San Joaquin system is 10%. To achieve this basin-wide objective, the Tuolumne's juvenile survival rate would need to be similar to that of the Stanislaus, 15-35% depending on water year type.

To further round out the original SEP Report, SEP participants have also completed a draft detailed assessment of stressors limiting Tuolumne (and Merced) River fall-run and spring-run Chinook salmon and Central Valley steelhead. Stressors are conditions (physical, biological, or ecological) within the system that limit or inhibit the attainment, existence, maintenance, or potential for desired conditions, as characterized by the Biological and Environmental Objectives. Identification of stressors:

- Highlights components of desired conditions that are not being achieved; and
- Identifies specific obstacles (i.e., stressor[s]) inhibiting desired conditions.

As a complement to the identification of stressors, ranking stressors accomplishes the following:

- Enables the development of specific actions to achieve desired conditions by resolving stressors; and
- Facilitates the prioritization and sequencing of those actions to maximize benefit by addressing the most significant stressors first.

In cases where other prioritization considerations (e.g., financial and political) prevent stressors from being addressed in order of importance, stressor ranking also helps to correctly set expectations about the extent of progress towards desired conditions that a given action will achieve, and/or the suite and scale of actions necessary to achieve or make progress towards desired conditions. The draft stressors analysis and prioritization for the Tuolumne and other San Joaquin tributaries is included as Attachment 5. As part of this analysis, the SEP participants observed that there is a lack of sufficient rearing habitat for juvenile salmon, and this lack of rearing habitat has a high expected sustained major population-level effect.

In support of the Central Valley Flood Protection Plan Conservation Strategy (CVFPPCS), existing and historical suitable rearing habitat was estimated using the Estimated Annual Habitat (EAH) approach[100] that uses measured hydrology and modeled hydraulic relationships between flow and inundation area to calculate areas of inundation with timing,

[100] Matella, M. M., and K. Jagt. 2013. *An Integrative Method for Quantifying Floodplain Habitat*. Journal of Water Resources Planning and Management.

duration, and frequency to support juvenile Chinook salmon. Suitable rearing habitat required to satisfy the AFRP Doubling Goal was calculated using the Emigrating Salmonid Habitat Estimation (ESHE) model, developed by Cramer Fish Sciences and Flow West. The ESHE model considers territory size required for emigrating juvenile salmonid cohorts of a target population size, using empirically derived migration rates, growth rates, and survival rates. In implementing these two approaches, consistent assumptions were adopted about the duration, timing, and frequency of flows and the physical suitability of inundated areas required to provide suitable rearing habitat for juvenile salmonids.[101]

The ESHE model is based on the theory that territory size limits the density and production of stream/river-dwelling salmonids.[102,103,104] Salmonids either defend or rely on food from an area of territory.[105] As juvenile salmonids increase in size, the area they defend also increases to meet their growing food and energy requirements.[106] As a result, the density of juvenile salmonids decreases as the average body size within a cohort increases.[107] The ESHE model applies a territory size curve (a function of fish size) to empirical data on fish outmigration distribution under different flow scenarios to estimate the spatially and temporally explicit habitat area needed to support a given number of juvenile fish. The model simulates stationary growth (rearing) and downstream movement (emigration) of individual daily groups (cohorts). The model tracks numbers of fish (abundance), average emigration speed, size, survival, and territory size. The ESHE model assumes that habitat is 100% suitable with sufficient food and cover for salmonids.

ESHE model parameters include:

- Initial abundance, i.e., the number of juveniles entering the model based on the target number of parent fish. The number of juveniles included in the ESHE model run whose results are discussed in the present document was calculated using the AFRP Doubling Goal.
- Initial timing and size, which is the number and average size of fish that exit the spawning grounds each day, informed by rotary screw trap tagging studies within the Central Valley.

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[101] [DWR] California Department of Water Resources. 2016. *Central Valley Flood Protection Plan Conservation Strategy*. Appendix H Central Valley Chinook Salmon Rearing Habitat Required to Satisfy the Anadromous Fish Restoration Program Goal.

[102] Chapman, D. W. 1966. *Food and Space as Regulators of Salmonid Populations*. American Naturalist 100:345–357.

[103] Allen, K. R. 1969. *Limitations on Production in Salmonid Populations in Streams*. in T. G. Northcote (Editor), Symposium on Salmon and Trout in Streams. University of British Columbia, Vancouver. 3-18.

[104] Grant, J. W. A., and D. L. Kramer. 1990. *Territory Size as a Predictor of the Upper Limit of Population Density of Juvenile Salmonids in Streams*. Canadian Journal of Fisheries and Aquatic Sciences 47:1724–1737.

[105] Cramer, S. P., and N. K. Ackerman. 2009. *Linking Stream Carrying Capacity for Salmonids to Habitat Features*. Pages 225–254 in E. E. Knudsen and J. H. Michael, Jr. (Editors), Pacific Salmon Environmental and Life History Models: Advancing Science for Sustainable Salmon in the Future. American Fisheries Society, Symposium 71, Bethesda, Maryland.

[106] Keeley, E. R., and P. A. Slaney. 1996. *Quantitative Measures of Rearing and Spawning Habitat Characteristics for Stream-Dwelling Salmonids: Implications for Habitat Restoration*. *Watershed Restoration Project Report 2*. British Columbia Ministry of Environment, Lands and Parks. Available at: http://www2.isu.edu/~keelerne/k_s96.pdf

[107] Grant and Kramer, 1990.

- Migration speed, which is the speed of the daily downstream movement of juvenile salmon.
- Survival, or the number of fish that avoid death each day, calculated from tagging studies in rivers tributary to the Sacramento-San Joaquin Delta.
- Growth, which represents the daily growth and resulting size of juveniles, calculated from lab studies.
- Territory size, which is the territory size requirement of juveniles based on their size, calculated based on field and lab studies.

The output of ESHE calculates the required suitable habitat needed to support juveniles and includes estimates of fish/reach. The ESHE model run completed for Appendix H of the Central Valley Flood Protection Plan Conservation Strategy (CVFPPCS) estimated that 810 acres of rearing habitat that is 100% suitable is needed in the lower Tuolumne River to support the AFRP salmonid population Doubling Goal.[108]

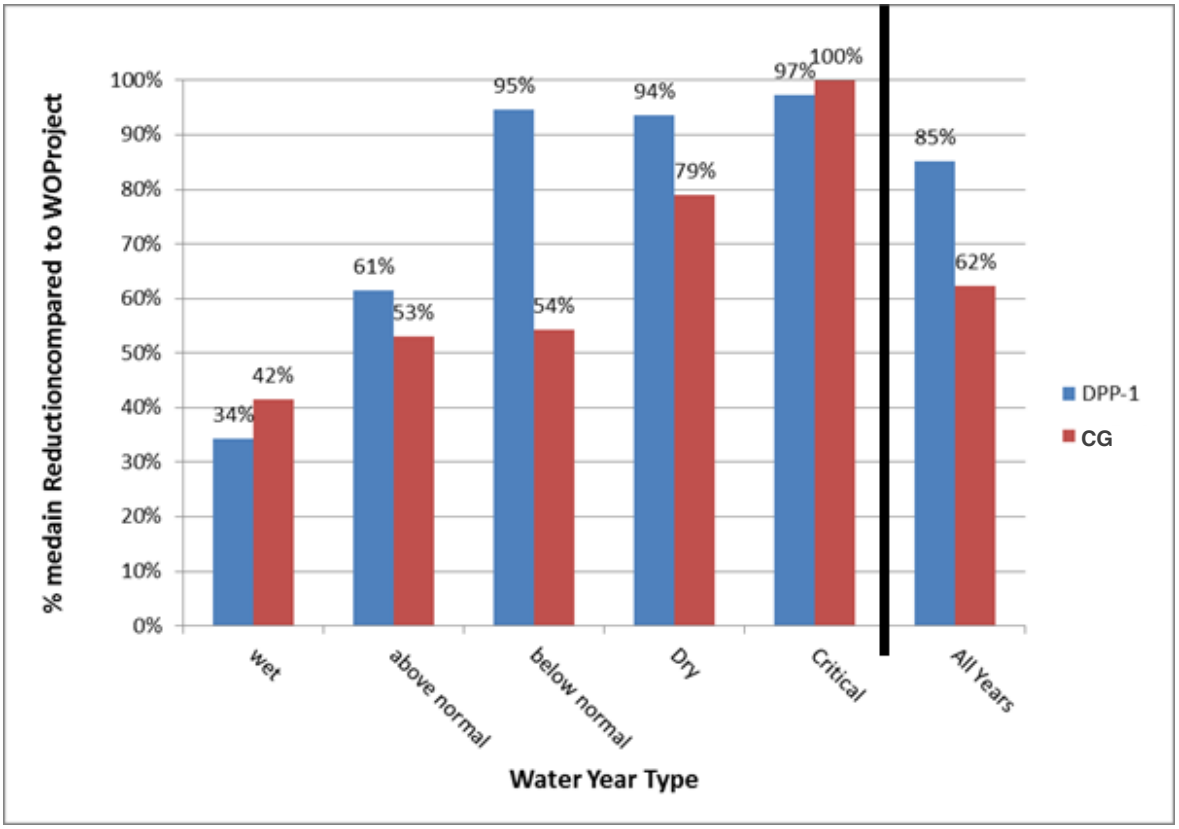
However, on-the-ground suitability studies on the San Joaquin River found that actual habitat suitability per acre was between 7% and 30%.[109] As a result of the fact that habitat is not 100% suitable, the number of acres of juvenile rearing habitat needed on the lower Tuolumne River to support the AFRP Doubling Goal is significantly larger than 810 acres. For example, at 35% suitability 2314 acres is needed, at 20% suitability 4050 acres is needed, and at 10% suitability 8,100 acres is needed.[110] Suitability as defined here is a threshold, not a weighting. In other words, an acre that meets the suitability criteria across all parameters specified in the environmental objectives is suitable. An acre that only meets some of the suitability criteria is not suitable. For example, 10% suitability means that out of 100 acres, 10 meet suitability criterial across all parameters. To be clear, it does not mean that of the 100 acres, each of the individual acres achieves the threshold across 10% of the parameters. If this were the case, then 0 acres of the 100 would be suitable.

Existing habitat availability on the lower Tuolumne River is far less than what is estimated as required to recover listed salmonid species populations. The CVFPPCS concluded that there is between 28-45 acres of suitable rearing habitat along the lower Tuolumne River.[111] The habitat deficit on the lower Tuolumne River is thus significant, and addressing this deficit requires a combination of flow improvements and channel modifications. The Licensees' own studies suggest that between 31-242 acres of usable habitat exist along the lower Tuolumne River for fry and juvenile Chinook salmon at flows of 1000-3000 cfs.[112] However, the Licensees' analysis has several flaws, which are explained in greater detail below, that both inflate the amount of habitat available identified in their report and create an incorrect conclusion that there is sufficient floodplain rearing habitat.

[108] Flow West and Cramer Fish Sciences, Unpublished Data.
[109] [SJRRP] San Joaquin River Restoration Program. 2012. *Minimum Floodplain Habitat Area for Spring and Fall-Run Chinook Salmon in the SJRRP*.
[110] SEP *Tuolumne Floodplain Rearing Environmental Objectives*
[111] DWR 2016. CVFPPS Appendix H.
[112] W&AR-21, Table 5.2-1, p. 5-3.

USFWS's analysis supports the conclusion that there is a significant deficit in floodplain rearing habitat. The USFWS's analysis quantified the amount of floodplain inundation under different flow scenarios in order to identify the impact of the Project on inundation (see Figure 3). When inundation from the Licensees' proposed flows is compared to without-project hydrology, median inundation is reduced by 85% for all water year types and as high as 97% for some water year types.[113] The USFWS also identified that 77,640 acre-days would need to be attained to mitigate the Project's inundation reductions resulting from lower flows and provide necessary components for high quality rearing habitat (Table 10). The specific flow schedule that is ultimately required by the Commission will affect the amount of floodplain habitat creation necessary to attain 65,599 acre-days of inundation in a median Below Normal year in the period of record. For example, if the Commission adopts the Licensees' flow measures, then the flows alone would attain only a median 3553 acre-days of inundation (Table 10) and thus require sufficient floodplain lowering to attain an additional 62.046 acre-days of inundation (Table 11). Alternatively, if the Commission adopts the Conservation Groups' flow measures, then flows alone would attain 25,237 acre-days of inundation (Table 10) and thus require sufficient floodplain lowering to attain an additional 40,362 acre-days of inundation in a Below Normal year (Table 11).

Figure 3. Percent decrease in floodplain inundation for DPP-1 flows and CG flows, by water year type, compared to what inundation would be under Without Project flows



[113] US Fish & Wildlife Service. 2017. *Use of Cumulative Acre-Days to Evaluate Changes in Floodplain Inundation on the Lower Tuolumne River Under Different Hydrological Regimes and Quantification of Mitigation Measures*. Rationale in support of USFWS 10(j) Conditions.

Table 10: Median inundation, expressed as cumulative acre-days, in areas that become inundated at flows greater than 1,000 cfs for three different hydrological regimes by schedule water year type. DPP-1 represents the Licensees flow proposal presented in the Amended Final License Application for the Don Pedro Project. CG represents the Conservation Groups' flow proposal.

	Median inundation expressed as cumulative acre-days		
	WO Proj	*DPP-1(flows only)*	*CG (flows only)*
All Years	77,640	7563	30,176
Wet	144,938	89,945	78,954
Above Normal	100,107	35,620	46,197
Below Normal	65,599	3553	25,237
Dry	36,258	2104	8465
Critically Dry	15,245	39	0

Table 11: Change in inundation of DPP-1 flows and Conservation Groups' Proposed flows in relation to Without Project flows. A negative value means that the flow resulted in a loss of inundation when compared to Without Project. This assumes that inundation begins at flows greater 1,000 cfs.

	Inundation change compared to Without Project, expressed as acre-days	
	DPP-1	*CG Proposal*
All Years	-70,077	-47,464
Wet	-54,993	-65,984
Above Normal	-64,487	-53,910
Below Normal	-62,046	-40,362
Dry	-34,154	-27,793
Critically Dry	-15,206	-15,245

Although the Licensees' Study Report for the *Lower Tuolumne River Floodplain Hydraulic Assessment* concluded that there is sufficient rearing habitat in the Tuolumne River for salmon and *O. mykiss* fry and juveniles, the study had several flaws that must be addressed to provide a more accurate analysis of the rearing habitat conditions on the river.

First, the Licensees' study has not given full consideration to the floodplain habitat needed to support the AFRP Doubling Goal. The Licensees' study quantified the amount of usable/suitable habitat for salmon fry and juveniles.[114] The Licensees also calculated the

[114] AFLA Att. C. *Lower Tuolumne River Floodplain Hydraulic Assessment* W&AR-21, p. 4-18.

corresponding carrying capacity for salmon fry for each flow using maximum fry densities per Grant and Kramer (1990) and the carrying capacity for juveniles using maximum densities per USFWS (1991)[115]. These results are summarized in Table 12.

Table 12. Usable Floodplain Habitat for Salmon Fry and Juveniles at Select Flows (TID & MID 2017)

	1,000 cfs Total Area of Usable Habitat (acres)	1,000 cfs Carrying Capacity	2,000 cfs Total Area of Usable Habitat (acres)	2,000 cfs Carrying Capacity	3,000 cfs Total Area of Usable Habitat (acres)	3,000 cfs Carrying Capacity	5,000 cfs Total Area of Usable Habitat (acres)	5,000 cfs Carrying Capacity
Chinook Salmon Fry	53.3	3.3M	134.8	8.5M	202.9	12.7M	293.3	18.4M
Chinook Salmon Juveniles	32.0	0.6M	129.5	2.6M	243.0	4.9M	434.8	8.8M

Though the carrying capacity estimates exceed the number of fry and juveniles produced in the Tuolumne in all years since 1995,[116] none of these years had the number of juveniles required to meet the AFRP Doubling Goal. To attain the AFRP doubling goal, the Tuolumne River must produce on average 25,759,250 juveniles annually,[117] which will require substantially more high quality floodplain rearing habitat than is inundated under current conditions.

Second, the Licensees' study assumes that in-channel and floodplain rearing habitat are of equal value for outmigrating salmon. As described above, an increasing number of studies demonstrate the importance of seasonally or ephemerally inundated floodplain and off-channel areas for salmonid rearing and growth.[118,119,120,121] Functioning riparian and floodplain ecosystems are important for producing healthy juvenile salmonids because they increase primary productivity[122] and food production[123] and create cover during high flow events. Areas

[115] [USFWS] US Fish & Wildlife Service. 1991. *Trinity River Flow Evaluation-Annual Report. U.S. Fish and Wildlife Service, Division of Ecological Services*. Sacramento, CA.
[116] *See* e-Library no. 20171011-5067, *Salmonid Population Information Integration and Synthesis Study Report*, W&AR-05, Table 5.2-3, pp. 5-24 – 5-25.
[117] DWR 2016. CVFPPS Appendix H. Table 5-2, p. 5-7.
[118] Sommer et. al. 2001.
[119] Jeffres et. al. 2008.
[120] Grosholz, E. & Gallo, E. 2006. The influence of flood cycle and fish predation on invertebrate production on a restored California floodplain. Hydrobiologia 568: 91.
[121] Merz, J.E., D.G. Delaney, J.D. Setka, and M.L. Workman. 2016. S*easonal rearing habitat in a large mediterranean-climate river: Management implications at the southern extent of pacific salmon (oncorhynchus spp.).* River Research and Applications, 32:1220-1231.
[122] Ahearn, D.S., J.H. Viers, J.F. Mount, and R.A. Dahlgren. 2006. *Priming the productivity pump: flood pulse driven trends in suspended algal biomass distribution across a restored floodplain*. Freshwater Biology. 51(8): 1417-1433.

whose inundation creates hydraulic interaction with riparian vegetation and floodplain-associated geomorphology provide abundant and high-quality salmonid rearing habitat. Such areas increase food availability and growth opportunities as well as overall salmonid productivity. In these inundated areas, the territory size of fish decreases, thus increasing the carrying capacity per unit area.[124] The important result is a greater number of emigrating juvenile salmonids that can successfully migrate to the ocean and later return as adults.

Finally, the Licensees' study estimated the total suitable floodplain habitat for salmonid juveniles and fry. The Licensees utilized TUFLOW Classic modeling package, which links one-dimensional channel habitat solutions with two-dimensional floodplain habitat solutions. Floodplain habitat suitability was based upon TUFLOW model predictions of depth and velocity as a function of discharge. However, this does not provide a complete picture of habitat quality, because vegetation is a critically important variable in determining habitat quality. The primary energetic driver of riparian ecosystem function is organic matter from riparian vegetation and riparian insects.[125,126,127,128,129] Terrestrial invertebrates from riparian forests fall into or interface with the river where they can be directly preyed upon by salmonids. This in-fall of insect biomass is considered a "terrestrial subsidy" to salmonid bioenergetics. In addition, plant detritus that falls into streams and rivers from terrestrial riparian vegetation provide food for benthic invertebrates, stimulating invertebrate food production. Terrestrial subsidies in the form of invertebrates and leaves are essential components of salmonid food supplies.[130,131,132,133] Both aquatic and terrestrial-derived invertebrates are partially or fully dependent upon the plant biomass provided by riparian vegetation. Energy in the form of plant detritus and invertebrate biomass from riparian vegetation has been found to support 50 to 80 percent of salmonid

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[123] Jeffres et. al. 2008.
[124] Grant and Kramer 1990.
[125] Allan, J.D. Wipfli, M.S., Caouette, J.P., Prussian, A. and Rodgers, J. 2003. Influence of streamside vegetation on inputs of terrestrial invertebrates to salmonid food webs. Canadian Journal of Fisheries and Aquatic Science, 60, 309-320.
[126] Cederholm, C.J., Johnson, D.H., Bilby, R.E., Dominguez, L.G., Garrett, A.M., Graeber, W.H., Greda, E.L., Kunze, M.D., Marcot, B.G., Palmisano, J.F., Plotnikoff, R.W., Pearcy, W.G., Simenstad, C.A., and Trotter, P.C. 2000. *Pacific salmon and wildlife-ecological contexts, relationships, and implications for management. Special Edition Technical Report*, Prepared for D.H. Johnson and T.A. O'Neil, Managing Directors, Wildlife-Habitat Relationships in Oregon and Washington. Washington Department of Fish and Wildlife, Olympia, Washington. Available at: https://wdfw.wa.gov/publications/00063/
[127] Cummins, K.W., Wilzbach, M.A., Gates, D. M., Perry, J.B., and Taliaferro, W. B. 1989. Shredders and riparian vegetation. BioScience 39:24–30.
[128] Pozo, J., Gonzalez, E., Diez, J. R., Molinero, J., and Elosegui, A. 1997. *Inputs of particulate organic matter to streams with different riparian vegetation*. Journal of the North American Benthological Society, 16: 602–611.
[129] Ward JV, Stanford JA. 1995. *Ecological connectivity in alluvial river ecosystems and its disruption by flow regulation*. Regulated Rivers 11: 105-119.
[130] Mason, C. F.; Macdonald, S. M. 1982: The input of terrestrial invertebrates from tree canopies to a stream. Freshwater Biology 12: 305-311.
[131] Nakano, S. and Murakami, M. 2001. Reciprocal subsidies: Dynamic interdependence between terrestrial and aquatic food webs. Proceedings of the National Academy of Sciences. 98: 166-170. doi: 10.1073/pnas.98.1.166
[132] Nakano, S., Fausch, K.D. and Kitano, S. 1999. Flexible niche partitioning via a foraging mode shift: a proposed mechanism for coexistence in stream-dwelling charrs. Journal of Animal Ecology, 68: 1079-1092. DOI: 10.1046/j.1365-2656.1999.00355.x
[133] Wipfli, M. S. 1997. Terrestrial invertebrates as salmonid prey and nitrogen sources in streams: contrasting old-growth and young-growth riparian forests in southeastern Alaska, USA. Canadian Journal of Fisheries and Aquatic Sciences 54 (6): 1259–1269

biomass in some systems.[134,135] In rivers with high canopy closure in the riparian overstory (i.e., 95% to 97%), bioavailability of terrestrial invertebrates is greatest in the summer, when benthic macroinvertebrate bioavailability generally tapers off.[136] Because of this difference in seasonal bioavailability, terrestrial invertebrates are the primary food source for rearing and over-summering salmonids. The TUFLOW analysis omitted vegetation as an important variable and thus does not present a complete picture of habitat quality that is available.

The Licensees did not propose the creation or restoration of any floodplain habitat. However, the Licensees' analysis is flwaed, and their conclusion that there is sufficient rearing habitat for salmon is unsupported. In fact, there is insufficient rearing habitat. The Don Pedro Project must mitigate for significant reductions in floodplain inundation due to Project operations. This is accomplished through a higher minimum flow schedule as proposed by the Conservation Groups in conjunction with the lowering/creation of floodplain terraces. The higher the minimum flows, the less floodplain habitat that will be required to mitigate for this Project effect. Conversely, lower minimum flows will require a greater amount of floodplain creation and restoration.

Based on the rationale above, the Licensees must attain the higher of the median values for acre-days BN water years in the period of record or 810 acres of 100% suitable floodplain habitat or equivalent. Licensees must describe the specific design and program for implementing this measure in a Floodplain Rearing Habitat Restoration Plan developed in coordination with the Tuolumne River Technical Advisory Committee.

C. Monitoring and Reporting

Licensees shall monitor the following parameters immediately following the completion of any individual project:

- Floodplain Inundation: Licensees shall monitor pre- and post-project floodplain inundation frequency, duration, depth, timing, velocity, and temperature.
- Fish Utilization: Licensees shall monitor the pre- and post-project utilization of the restored project sites by fish, particularly juvenile salmonids.
- Vegetation Survival: Licensees shall monitor survival of planted riparian species at newly constructed restoration sites.
- Licensees shall report the results of floodplain monitoring to the TAC at the annual meeting and in the annual report.

[134] Allan et. al. 2003.
[135] Kawaguchi, Y., Taniguchi, Y., & Nakano, S. (2003) Terrestrial invertebrate inputs determine the local abundance of stream fishes in a forested stream. Ecology, 84, 701-708.
[136] Nakano, S. and Murakami, M. 2001

D. Cost of measure

Costs are based on land acquisition and restoration projects in which Conservation Groups have been involved over the past 10 years.

Floodplain Rearing Habitat Restoration Plan:	$75,000
Site acquisition (assuming 2,600 acres) @ $5,000/ac:	$13,000,000
Restoration – Earthwork @ $5,000/ac:	$13,000,000
Restoration: Planting @ $4,000/ac:	$10,400,000
Pre- and Post-Project Monitoring $50,000/yr for 3 yrs:	$150,000
Total:	$36,625,000

V. Conservation Groups' Comments and Recommendation: Develop and Implement a Large Woody Debris Placement and Management Plan

A. Recommended Measure

Within six months of License Issuance, Licensees shall develop a Large Woody Debris Placement and Management Plan in consultation with the Tuolumne River Technical Advisory Committee. The Plan shall:

1. Describe potential collection locations of Large Woody Debris (LWD) in Don Pedro Reservoir or other locations in the Tuolumne River watershed.
2. Describe potential options for moving LWD from Don Pedro Reservoir to the Tuolumne River downstream of LaGrange Dam.
3. Identify suitable locations in the Tuolumne River downstream of La Grange Dam down to the confluence with the San Joaquin River where LWD can be placed within the active channel.
4. Require consultation with State and Federal agencies regarding effects of LWD on safety or maintenance of bridges.
5. Require consultation with qualified recreational boating groups to ensure safety with regard to placement of LWD in the context of channel design.
6. Evaluate the efficacy, costs, and permitting requirements of providing permanent anchorage to the placed LWD.
7. Include a long-term LWD management plan to re-install LWD annually to ensure no net loss of LWD.
8. Describe a regular LWD effectiveness monitoring and reporting process.
9. Describe necessary permits and a permitting timeline.

Licensees shall submit the Plan to the Agencies for comment and approval prior to submitting the final plan to the Commission for approval. Licensees shall implement the Plan once the Commission approves it.

For purposes of the LWD enhancement and management plan, "LWD" is defined as structurally sound logs, a minimum of 24 inches in diameter and 18 feet in length.

The LWD augmentation plan shall meet the following criteria:

1. Licensees shall place a total of 1600 pieces of LWD from La Grange Dam down to the confluence with the San Joaquin River.
2. Licensees shall place LWD at an appropriate distribution, density and configuration as recommended by a restoration ecologist and in consultation with the Agencies.
3. Licensees shall place LWD pieces within or adjacent to floodplain-lowering and planting sites where feasible.
4. Licensees shall secure or embed a minimum of 10% of LWD pieces (160 pieces) in the bank to provide at least partial inundation of these pieces at 300 cfs upstream of the Licensees' existing Infiltration Gallery and at 200 cfs in areas downstream of the Infiltration Gallery.
5. A minimum of 50% of LWD pieces that Licensees install shall have a crown or rootwad attached.
6. Licensees may include existing pieces of LWD that meet the size criteria as part of the total number of required pieces of LWD.

The Licensees shall place 50% of LWD pieces by Year 5 of the new license and the remaining LWD by Year 10 of the new license. The Licensees shall distribute the LWD equally among the following reaches:

- RM 51.7 to RM 40
- RM 40 to RM 21.5
- RM 21.5 to the confluence with the San Joaquin River

Licensees shall place LWD at an appropriate distribution, density, and configuration as approved by agencies in consultation. Licensees shall source the majority of LWD augmentation pieces from local collection at the Project reservoir. However, due to the episodic nature of LWD transport and unquantified rate of LWD delivery into Don Pedro reservoir, Licensees may need to use resources outside of the Project within the Tuolumne Watershed to source the LWD augmentation pieces. Licensees shall strive to match LWD from outside sources to the species composition native to the Tuolumne watershed. However, Licensees may also include local hardwoods used in agricultural production (*e.g.*, walnut trees) that are being retired from production.

Licensees shall place LWD such that it does not compromise the safety of recreational boaters, per American Whitewater design recommendations.[137]

The Licensees shall conduct a LWD census no later than three years after issuance of a new license to assist in making initial decisions regarding LWD placement. Licensees shall conduct a LWD census every 10 years thereafter. The purpose of the census shall be to

[137] American Whitewater, 2012. *Integrating Recreational Boating Considerations into Stream Channel Modification & Design Projects*. https://www.americanwhitewater.org/content/Document/fetch/documentid/1006/.raw

determine the effectiveness and function of the LWD already placed and to identify the need to replenish LWD.

The Licensees shall replenish LWD as needed downstream of La Grange Dam down to the confluence with the San Joaquin River within three years after completion of each LWD census. Licensees shall conduct the first LWD census in License Year 10 and shall conduct a census every 10 years thereafter until a new license is issued. The Licensees shall replenish the LWD such that 1,600 pieces that meet the minimum size criteria are in place. Following each census, Licensees shall also replace or re-attach any of the 160 LWD pieces secured in the bank that are no longer in place.

Within 60 days of completing the implementation of each placement of LWD, the Licensees shall conduct effectiveness monitoring for each LWD site and shall summarize the results of the monitoring in a report. Licensees shall provide the report to the Tuolumne River TAC within 120 days of completion of the monitoring.

B. Rationale and Consultation

Large Woody Debris provides habitat structure in streams and can influence sediment storage and channel morphology through its effects on flow, water velocity, and sediment transport. LWD provides cover and refugia zones for juvenile fish rearing and adult fish holding, serves as substrate for the growth of algae and invertebrates (which are important components of the aquatic food web), and affects patterns of sediment deposition and scouring. Loss of LWD can result in reduced complexity of aquatic habitat and reduced carrying capacity for Central Valley steelhead and fall-run Chinook salmon.

Project facilities trap and eliminate the entire upper watershed's supply of LWD to the lower Tuolumne River. The Project also significantly reduces the frequency and magnitude of high flows in the lower Tuolumne River, which directly limits wood transport and also reduces geomorphic processes that often provide local sources of wood to the channel through channel migration, bank erosion, and exhumation of wood buried in floodplains.

FERC staff's Study Plan Determination of July 25, 2012 approved with modifications the revised *O. Mykiss Habitat Survey Study Plan*.[138] In this Determination, the Director of FERC's Office of Energy Products (OEP) ordered the Licensees to estimate the average annual volume and frequency of LWD removed from Don Pedro Reservoir using quantitative and anecdotal historical data, including appropriate aerial photography analysis. The Director of OEP also required Licensees to conduct two annual quantitative surveys of LWD in Don Pedro Reservoir, timed to begin just after the cessation of seasonal high flows. FERC staff also ordered the development of a basic LWD budget that compares the average annual volume and frequency of LWD removed at Don Pedro Reservoir with the average annual volume and frequency of LWD stored in the lower Tuolumne River.

Licensees surveyed LWD in the lower Tuolumne River as part of the *O. Mykiss Habitat Survey Study* (W&AR 12). Licensees conducted the LWD survey in the lower Tuolumne River

[138] *See* Director's Study Plan Determination, July 25, 2012, e-Library no. 20120725-3008

between RM 52 and to RM 24. In addition, Licensees surveyed LWD in Don Pedro Reservoir as part of the study, in order to estimate LWD recruitment to the system.

As reported in the *O. Mykiss Habitat Survey Amended Study Report*,[139] the lower Tuolumne River has limited LWD. Licensees' survey found a total of 118 pieces of LWD in the 16,905 linear feet of habitat surveyed in 2012. Licensees extrapolated this number to the reach extending from RM 52 to RM 39, and thus estimated 453 pieces[140] or about 35 pieces per mile. The Report did not provide an analysis of the quality of the LWD in terms of its habitat value.

This amount of LWD per mile is an extremely low density of LWD pieces for a Central Valley river. In a 2012 survey of 19 Central Valley rivers that support Chinook salmon, the median number of pieces of large wood per mile was 130. A 2010 study of the Mokelumne River, a nearby highly regulated river that supports anadromous fish, found 112 large pieces of wood per mile.[141]

The lack of LWD is an important stressor or limiting factor for salmonid habitat. Adding LWD along with gravel, and providing a new instream flow schedule that mimics the natural hydrograph, would substantially improve lower Tuolumne River salmonid habitat over its currently degraded condition.

The Licensees state that the woody debris captured in the Don Pedro Reservoir is too small to act as favorable LWD-induced habitat in the lower Tuolumne River.[142] Rather than placing large wood in the lower Tuolumne River, Licensees propose to place boulder-size stones in select locations between RM 43 and RM 50 to increase river complexity. Boulders provide habitat that is much less complex than wood. A downed tree in a river, particularly if it has a rootwad or small branches, can provide cover for hundreds of juvenile salmon or *O. mykiss*. Boulders also do not provide organic substrate for benthic invertebrates. In addition, Licensees' proposed extent of boulder placement is extremely limited.

Conservation Groups recommend and request that the Commission condition the Don Pedro license to require development and implementation of a LWD plan to mitigate the loss of wood and to improve salmonid habitat in the Tuolumne River downstream of La Grange Dam.

C. Cost of Measure

Conservation Groups request that Commission staff evaluate costs of this measure in the EIS.

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[139] *See O. Mykiss Habitat Survey Amended Study Report*, W&AR-12, p. 6-2, submitted by Licensees as an attachment to the AFLA.
[140] *Id*.
[141] Senter, A.E. and G.B. Pasternack. 2010. Large wood aids spawning Chinook salmon (*Oncorhynchus tshawytscha*) in marginal habitat on a regulated river in California. River Res. Applic. 2010. Published online by John Wiley & Sons, Ltd. DOI: 10.1002/rra.1388.
[142] W&AR-12, p. 6-4

VI. Conservation Groups' Comments and Recommendation: Gravel Augmentation and Rehabilitation and Reduction of Habitat for Piscivorous Fish

A. Recommended Measure

1. Licensees shall place at least 200,000 cu yds/year of sediment annually for 10 years to mitigate for Project impacts, until Licensees have filled Special Run Pools (SRPs) in the river with a total of at least 1,950,824 cubic yards of sediment.

2. Licensees shall also conduct annual maintenance spawning gravel augmentation projects. The Licensees shall apply the bedload transport rating curve developed for the Coarse Sediment Management Plan[143] to any new flow schedule required by the Commission or the State Water Resources Control Board for the Don Pedro or La Grange Projects to calculate average annual bedload transport rates for sediment > 8 mm. The Licensees shall annually add this amount of gravel to the lower Tuolumne River to ensure no net loss of spawning habitat. At a minimum, the Licensees shall annually add 2500 cu yd/year of cleaned spawning size gravel.[144] The size of gravel added under this provision shall be identified in consultation with the Tuolumne River Technical Advisory Committee (TAC) as described below.

3. Licensees shall update the 2004 Coarse Sediment Management Plan[145] and implement the updated plan. Licensees shall develop project designs in consultation with the TAC within two years of license issuance. Licensees shall consult with the TAC on the annual implementation of gravel augmentation as an adaptive management program.

The updated Coarse Sediment Management Plan (CSMP) shall be used as the guiding document for designing and implementing the gravel augmentation plan. The specific objective of this gravel augmentation program shall be to:

a. Mitigate for the loss of gravel and sediment (both spawning-sized gravel and fine sediment) due to direct effects of Project operations.
b. Mitigate for the abundance of habitat for piscivorous fish that was created by Project effects.

The updated Coarse Sediment Management Plan shall:

a. Describe potential locations for gravel collection for the reaches of the Tuolumne River between La Grange Dam (RM 52.1) and Geer Road Bridge (RM 24.0), or, alternatively on other feasible locations.
b. Describe potential options for providing and placing gravel in the reach of the Tuolumne River between La Grange Dam (RM 52.1) to Geer Road Bridge (RM 26).

[143] McBain & Trush, 2004. *Coarse Sediment Management Plan for the Lower Tuolumne River Revised Final* (CSMP). Available at: http://tuolumnerivertac.com/Documents/7-2004_Revised_CSMP_Report.pdf
[144] *Id*, p. 75.
[145] *Id*.

c. Require and describe consultation with the TAC on annual gravel augmentation, including how the TAC will evaluate and respond to geomorphic and hydrologic variability.
d. Provide plans for annual gravel augmentation, taking into account geomorphic and hydrologic factors, access, and suitability of locations for gravel addition;
e. Provide an implementation timeline.
f. Report and evaluate any legal constraints on gravel placement, and any federal, state, or local permits that may be needed, and provide a permitting timeline.

Project designs shall focus on:

a. Enhancing Chinook salmon and *O. mykiss* spawning habitat.
b. Reducing holding and spawning habitat for piscivorous fish.
c. Maintaining or enhancing *O. mykiss* holding habitat above RM 42.
d. Creating floodplain habitat of medium to high quality for juvenile salmon rearing that meets criteria outlined in the Floodplain Rearing Habitat recommendation.

Licensees may implement the Coarse Sediment Management Plan in conjunction with floodplain restoration projects, as described in the Floodplain Restoration Recommendation. When Licensees complete the CSMP update, Licensees shall provide the plan to the TAC for a three month review. After the review period, Licensees shall assemble recommended edits, revisions and additions, prepare a final report, including an appendix documenting consultation, and file the plan with FERC.

4. Once gravel placement has commenced, Licensees shall annually monitor the quantity and quality of placed gravel, the locations and durations of placement, the short-term results of the placement of gravels, and the subsequent geomorphic distributions (movement, representative gravel quality, and bedload morphological change) and improvement (additions) of suitable anadromous salmonid spawning and rearing habitat by individual reach. Licensees shall document this monitoring in a draft annual report that they will provide to the TAC by March 1 of each year. After a two month review period by the TAC, Licensees shall assemble recommended edits, revisions and additions, prepare a final report, and submit the report to FERC. The final report will include an appendix documenting annual consultation with the TAC, including both general adaptive management consultation and consultation specific to the annual report.

B. <u>Rationale</u>

The Licensees' study report *Spawning Gravel in the Lower Tuolumne River* concluded that 373,966 tons/yr of total sediment and 37,397 tons/yr of coarse sediment is trapped by the Project reservoir.[146] Using a conversion factor of 1.6 tons/cu yd, this is equivalent to 233,728 cu yds/yr of total sediment and 23,373 cu yds/yr of coarse sediment. These amounts are roughly in agreement with the amounts identified in the 2004 CSMP: 18,800 cu yds/yr of coarse sediment trapped in the reservoir.[147]

[146]AFLA Att. C,, *Spawning Gravel in the Lower Tuolumne River Study Report*, W&AR-12, p. 6-2
[147] CSMP, p. 23.

During the early twentieth century, the Tuolumne River channel and floodplain were dredged for gold. The gold dredges excavated alluvial deposits in the channel and floodplain to the depth of bedrock and often realigned the river channel. After recovering the gold, the dredges deposited the remaining tailings back onto the floodplain, creating large, cobble-armored windrows that replaced the alluvial deposits and floodplain soils. By the end of the gold mining era, the majority of the floodplain adjacent to 14.5 miles of the river had been converted to dredger tailing deposits.[148] In the 1960's, much of the tailings were excavated to provide construction aggregate for Don Pedro Dam.[149] Much of this floodplain remains today as barren, unproductive surfaces, with exposed gravel/cobble and little or no soil layer and little or no native riparian vegetation.[150]

The Tuolumne River has also been extensively mined for aggregate. Large-scale aggregate mining began in the 1930s and continues today.[151] Historically, aggregate mines extracted sand and gravel directly from the active river channel, creating large in-channel pits. Contemporary mining operations excavate sand and gravel from floodplains and terraces adjacent to the river channel. These operations create large pits that are poorly separated from the river by narrow dikes that often fail during even moderate flows.[152]

Many of the remnant gravel pits, called Special Run Pools (SRPs), remain today because of the lack of sediment input due to Project operations. As shown in Table 1, the SRPs are of substantial size and, in conjunction with flow conditions, create substantial warm water habitat for piscivorous fish, most notably largemouth and smallmouth bass.

Table 13. Estimated Gravel Quantities to Fill SRP Habitat[153]

SRP Name	Volume (cubic yards)
La Grange Pool	17,284
Basso Pool	47,737
SRP 3	20,912
SRP 4	32,891
SRP 5	175,000
SRP 6	219,000
SRP 7	320,000
SRP 8	825,000
SRP 9	Filled in 2002 – 169,000
SRP 10	293,000
TOTAL	1,950,824 (not counting SRP 9)

[148] McBain & Trush, 2000. *Habitat Restoration Plan for the Lower Tuolumne River Corridor*, pp. 29-30, 40, 129, 167.
[149] *Id*.
[150] *Id*.
[151] *Id*.
[152] *Id*.
[153] CSMP, *Habitat Restoration Plan*, and Scott McBain, pers. comm.

Were it not for the total sediment capture and flow regulation by the Project reservoir, the river would transport enough sediment to fill the SRPs and recover geomorphic features within 10 years. Although availability of spawning gravel is not currently a limiting factor for recent escapement levels, it will become a factor as the population recovers. Don Pedro Reservoir's capture of gravel prevents its movement downstream, which has contributed to the net loss of gravel supply to the lower Tuolumne River and arrested the recovery of channel habitat types. Comparing 1999-2001 spawning habitat area to historical estimates indicates a loss (due to the Project) of 1.8 million sq ft (73%) of Chinook spawning habitat compared to historical conditions.[154]

Licensees proposed an initial augmentation of 55,600 cu yd of gravel at 6 sites (upper Basso Pool, lower Basso Pool, A6, A5, A3, and A2) (RM 51.7-RM 47.0). Licensees did not recommend any maintenance gravel additions after the initial augmentation has occurred.

Based on the rationale above, the quantity of gravel proposed by the Licensees does not mitigate for Project effects. The Project completely blocks and traps 233,728 cu yds/yr of total sediment and 23,373 cu yds/yr of coarse sediment. The disruption in sediment transport, in combination with the Project flow schedule, has prevented the recovery of channel geomorphology and supported the continuing persistence of abundant habitat for piscivorous fish. The Licensees' proposal is inadequate for mitigating Project impacts.

C. Cost of Measure

If gravel and rock is available on-site, estimated cost of sorting available gravel ranges from $11.00 to $15.00 per cu yd, with an additional cost for transportation and permitting $9/ per cu yd. Total cost of gravel rehabilitation: $20.00-$24.00 per cu yd. Cost estimates are based on restoration activities on the Merced River from 2009 to 2013 (Merced Fly Fishing Club and AFRP).

- Gravel Rehabilitation, Annual Cost: $4M to $4.8M for 10 years
- Gravel Maintenance, Following Rehabilitation: Annual Cost: $50,000 to $60,000
- Annual Cost for TAC Activities: $25,000
- Annual Cost for Gravel Monitoring and Reporting: $75,000

VII. Conservation Groups' Comments and Recommendation: Annual Fish Counting Weir and Installation of a Temporary Weir to Capture and Remove Non-Salmonid Piscivorous Fish in Critically Dry and Super Critically Dry Water Years

A. Recommended Measures

1. Each year, from September 15 through at least December 31, Licensees shall annually install a fish counting weir at or near RM 24, with the same basic configuration as the facility that Licensees have deployed since 2009.

[154] CSMP, p. 42 and Table 10, p. 44.

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2. Licensees shall install a temporary weir between River Mile 25.9 and River Mile 25 in Critically Dry and Super Critically Dry years, for the purpose of capturing and removing striped bass, largemouth bass and smallmouth bass and other non-salmonid piscivorous fish[155] that are migrating past the location of the temporary weir. Licensees shall commence installation of the temporary weir no later than April 15 of each CD or SCD year, at the conclusion of the spring pulse flow. Licensees shall staff the temporary weir with personnel who service the weir with sufficient frequency to allow release in good condition of any downstream or upstream migrating salmonids and to allow the capture in live condition of migrating striped bass. Licensees shall staff and maintain the temporary weir until September 1, at which time they shall remove the weir.
3. Licensees shall design the temporary weir in consultation with CDFW, USFWS and NMFS, who shall approved the design prior to construction.
4. Licensees may co-locate the annual counting weir and the temporary weir if they so choose.
5. Licensees shall not install permanent infrastructure related to the weir.
6. Licensees shall allow juvenile and adult salmonids to pass the removal weir as quickly as reasonably possible, upstream or downstream as the case may be.
7. Licensees shall relocate striped bass captured at the temporary weir to San Francisco Bay. Licensees shall relocate largemouth bass, smallmouth bass, and other warm-water piscivorous fish captured at the temporary weir to reservoirs where salmonids are not present and from which they cannot escape to the Tuolumne River or other salmonid-bearing waters.
8. Licensees shall complete all required permitting for weir installation and operation and for fish capture and relocation.
9. Licensees shall conduct two snorkel surveys between April 20 and June 30 in any year that the weir is installed. Licensees shall conduct these surveys three hundred feet upstream and downstream of the temporary weir. Licensees shall report the initial results to the TAC as soon as data is compiled. Licensees shall present a written report on the results of the snorkel surveys within 6 months of the removal of the weir.
10. Licensees shall monitor the numbers, species and size of fish captured at the weir. Licensees shall record timing of capture, mortality, and the condition of any salmonids and striped bass captured. Licensees shall present a written report on fish captured at the weir to the TAC within 6 months of the removal of the weir.

B. <u>Rationale</u>

Predation on salmonids by piscivorous fish is one of the factors that limits successful outmigration and survival of juvenile salmonids in the Tuolumne River. This factor becomes more pronounced in Critically Dry years when low flows constrict available rearing habitat and migration corridors for juvenile salmonids, potentially delaying outmigration and increasing encounters with piscivorous fish. Circumstances where seasonally inundated rearing habitat along the channel margins and on floodplains is limited are especially of concern for rearing and

[155] *O. mykiss* are known to eat salmon roe and fry. Conservation Groups do not propose to remove or otherwise harm *O. mykiss*, and do not refer to *O. mykiss* in this measure or section in discussing "piscivorous fish." While most of the other piscivorous fish in the Tuolumne River are bass, there are multiple other warm-water species in the lower Tuolumne River that eat juvenile salmonids.

outmigrating juvenile salmonids. Low flows also increase water temperatures sooner in the spring, increasing thermal stress on juvenile salmonids and creating habitat and energetic conditions more conducive to warm-water piscivorous fish such as bass.

Installing a facility that traps migrating piscivorous fish is an effective means of actually capturing these fish. While installation of a separation weir blocks that does not capture upstream migrants prevents them from passing upstream, it relies on secondary methods of capture that are unlikely to be effective. Any barrier that does not capture upstream migrating fish is also highly likely to concentrate them downstream of the barrier.

The limited sampling the Districts conducted in their 2012 Predation Study found that outmigration of juvenile salmon was more rapid and more successful at 2100 cfs than it was at 415 cfs or 280 cfs. 37 of 75 tagged salmon released at Hickman Bridge (RM 31.6) at a flow of 2100 cfs were detected at Grayson (RM 5.2). Of 75 tagged salmon released at Hickman Bridge at a flow of 280 cfs, only 1 was detected at Grayson. None of the tagged salmon released at Hickman Bridge at a flow of 410 cfs was detected at Grayson. [156]

An earlier study on the Tuolumne River also found that flow is the most effective defense for salmonids in avoiding piscivorous fish. The McBain & Trush 2007 *Special Run Pool 9 and 7/11 Reach: Post-Project Monitoring Synthesis Report* reported:

> During the years following the [1997] flood, largemouth bass abundance was controlled by spring and summer flow conditions that were unfavorable for reproduction. Largemouth bass require low water velocities and warm water temperatures to reproduce (Moyle 2002, Swingle and Smith 1950, Harlan and Speaker 1956, Mraz 1964, Clugston 1966, Allan and Romero 1975; all as cited in Stuber et al. 1982)…
>
> In 1998, water temperature was below the preferred spawning range until mid-June, and flow fluctuations through spring and summer could have caused sufficient disturbance to reduce egg viability or destroy the nests (Eipper 1975) (Figure 4-7). In fall 1998, adult abundance remained low and few juvenile bass were captured. In 1999, flow and water temperature were favorable for largemouth bass for the first time since the 1997 flood…
>
> High flow velocity was more important than depth in limiting largemouth bass habitat area at the channel sites.[157]

Under the Conservation Groups' flow proposal, flows in the February through June time period in most years will be relatively high, providing habitat conditions more suitable to salmonid outmigrants. A weir designed to capture migrating piscivorous fish during such higher flows is not only less necessary, it would also present logistical challenges both in installation

[156] Predation Study Report (W&AR-07), Table 5.4-2. (Version included as Part of Attachment C, file 82 of AFLA).
[157] McBain & Trush, *Special Run Pool 9 and 7/11 Reach: Post-Project Monitoring Synthesis Report*, 2007, pp. 130-132. Available at: http://tuolumnerivertac.com/Documents/Project%20Monitoring%20Synthesis%20Rpt1.pdf http://tuolumnerivertac.com/Documents/Project%20Monitoring%20Synthesis%20Rpt2.pdf (2 volumes).

and in staffing. For these reasons, Conservation Groups propose to limit installation of a temporary weir to CD and SCD water years.

A removable counting weir is an effective monitoring and management tool that the Districts have deployed effectively since 2009. We recommend that the new license require continuation of this practice.

C. Licensees' "Predator Control and Suppression Plan," Including Permanent Barrier Weir and Fish-Counting Facilities

The Licensees propose a plan attempting to reduce striped bass, largemouth bass and smallmouth bass that includes the following elements:

1. Installation of a permanent barrier weir at RM 25.5.
2. Construction and operation of a permanent fish counting facility as part of the permanent barrier weir.
3. Other forms removal and/or isolation methods of bass, including boat electrofishing, seining, fyke netting, and other collection methods
4. Advocacy for changes to current fishing regulations for the lower Tuolumne River (e.g., length of season, bag limit, catchable size, requested removal of black bass/striped bass caught, allowing a bounty program)
5. Establishment of a fund to carry out predator control activities and to disseminate information to the public on the adverse effects of non-native fish on fall-run Chinook in the Tuolumne River in an effort to encourage participation in the removal program and advocacy of changes to fishing regulations that facilitate such removal. Activities mentioned could include developing educational materials about the effects of predatory fish, community outreach, or kiosks.

D. Comments on Licensees' "Predator Control and Suppression Plan"

The "*Districts' Predator Control and Suppression Plan*," Appendix E-1, Attachment C of the AFLA, describes its overall goals and objectives as follows:

> The goal of the Plan is to reduce population-level impacts on juvenile Chinook salmon and *O. mykiss* production through a combination of predator exclusion, reduction, and removal or relocation efforts.
>
> To achieve this goal, this Plan proposes the following objectives:
>
> - Exclude striped bass from the reach upstream of RM 25.5.
> - Reduce and eventually eliminate smallmouth bass upstream of RM 25.5.
> - Reduce black bass populations downstream of RM 25.5 by 10 percent.[158]

[158] AFLA, Appendix E-1, Attachment C, p. 1-2.

The primary feature of the Districts' plan to reduce the impact of piscivorous fish on salmonids is the proposed construction of a permanent "barrier weir" at RM 25.5. The price tag for this proposed facility is very high: $12 million, plus O&M costs.

The "barrier weir" depicted in the AFLA[159] would more accurately be described as a dam. It may in fact be designed in part to provide additional head to facilitate diversion of water at the infiltration gallery just upstream. Like any dam, it will create a navigation hazard to recreational boaters, replacing the existing Dennett Dam downstream, whose removal by the Tuolumne River Trust has just been funded by the California Department of Fish and Wildlife. There are no launch facilities currently downstream of RM 25.5; the "weir" would segment the river, at least for motorized vessels, such as those used by CDFW for fish, carcass and redd surveys.

In addition to the obstacle for boaters, adding permanent structure in the river is likely to further constrain channel morphology, sediment and large wood mobility, and within-river movement of native species, including but not limited to salmonids.

As discussed *supra*, another major problem with such a facility would be the creation of a predation hot spot directly downstream of the facility. A comparable condition exists downstream of Woodbridge Irrigation Diversion Dam on the Mokelumne River, where a fish ladder allows upstream migration of salmonids but whose engineering prevents the upstream passage of striped bass, other bass, and most other fish species. Striped bass and other species concentrate downstream of Woodbridge in the spring, and are particularly effective at preventing successful outmigration of salmonids in Critically Dry years.

Licensees' own analysis acknowledges some of the potential problems that a permanent weir may present. In Attachment A of the proposed Predator Control Plan ("Review of the Predator Control Methods"), the Licensees note that a permanent weir could:

- Block/disrupt native migratory species such as O. mykiss and Pacific lampreys.
- Have an unknown impact on striped bass behavior, including factors such as spawning site selection.
- Be a barrier to recreational watercraft.
- Could promote poaching if fish were to "stack up" below the weir.
- Clog with debris.
- Introduce vandalism to the river.[160]

The Districts propose a weir design that would not allow use of the weir to capture bass and other target species as they migrate through the weir. Instead, the Districts propose a series of additional measures to capture and remove bass upstream and downstream of the weir. Each of the Districts' proposed methods of capture has problems.

[159] Ex. E, p. 3-178.
[160] Predation Control and Suppression Plan, AFLA Ex E., Appendix E1, Attachment C. *See* Attachment A to the Plan, p. A-11.

Districts plan to boat electrofish as the "primary method of predator removal." Districts acknowledge that electrofishing in deep water is ineffective.[161] Therefore, they plan to focus effort at times of year when bass are concentrated on nests and when juvenile bass are concentrated in edgewater habitat. However, largemouth and smallmouth bass spawn in the spring. Spring electrofishing will shock migrating salmonids.

The Tuolumne River contains massive deep Special Run Pools that are perfect bass habitat. Boat electrofishing, the "primary" means of removal, will be ineffective in these pools. Much more effective would be filling in these pools that were created when the river was mined for gravel. Settling parties identified this approach during 1995 settlement discussions. But the agreed-upon approach had too many contingencies and no certain funding source, and little infill was actually accomplished. Conservation Groups propose to require Licensees to fill in these pools. See Conservation Groups' gravel measure, *infra*. This is consistent with Conservation Groups' general approach of restoring the habitat rather than attacking the fish and other biota that thrive in degraded habitat.

Districts also propose to use fyke nets and beach seining to capture bass. Districts acknowledge that both techniques are best suited to shallow water and are generally ineffective in deep pools.

Districts propose to seek changes in fishing regulations, to promote fishing derbies, and to promote a bounty-reward system that would pay anglers for bass caught in the lower Tuolumne River. It is altogether unclear whether Districts can achieve changes in fishing regulations that would be needed to initiate these activities, including the proposed bounty program. This aspect of the Plan pushes responsibility to undefined parties with no accountability.

The Plan makes no attempt to describe how the Districts plan to achieve the objective of eliminating smallmouth bass upstream of RM 25.5. Districts' more modest objective to achieve 10% reduction of black bass downstream of RM 25.5 raises the fundamental question of whether Districts achieving this objective, even on an annual basis, would assist in achieving the overall goal, to "reduce population-level impacts on juvenile Chinook salmon and *O. mykiss* production."

In Tables 2.3-1 and 2.3-1 of the *Districts' Predator Control and Suppression Plan,* Districts display much of the conceptual basis for the effort downstream of RM 25.5. We reproduce these tables below.

[161] *Id*., p. A-2.

Table 2.3-1. Estimated abundance of key predators >150 mm FL in the lower Tuolumne River.

Species	Estimated 2012 River Wide Abundance[1] (SE)	Estimated 2012 Abundance in RST Reach[2] (SE)
Largemouth bass	4,185 (± 261)	3,013 (± 156)
Smallmouth bass	6,764 (± 260)	3,626 (± 111)
Striped bass	588 (± 57)	235 (± 21)

Source: TID/MID 2013.
[1] Based on shoreline length between RM 0 and 39.4.
[2] Between Grayson (RM 5.2) and Waterford (RM 29.8) RSTs.

Table 2.3-2. Target removal numbers per year of piscivorous-size predators of each species between the Waterford (RM 29.8) and Grayson (RM 5.2) RSTs for the first year of implementation of removal efforts and estimated range in reduction of daily salmon predation following removal.

Species	10% Removal Target	15% Removal Target	2012 Predation Rate (Salmon/Day)	Potential Reduction in Predation (Salmon/Day)	
				10% removal	15% removal
Largemouth bass	301	452	0.1	30	45
Smallmouth bass	363	544	0.11	40	60
Striped bass	24	35	1.1	26	39
Total reduction in predation (salmon/day)				96	144

As noted in our comments on the Initial Study Report, we dispute the statistical accuracy of the estimated numbers of bass in the Tuolumne River, whose basis appears to be limited to the results of the 2012 Predation Study (W&AR-07). Even more, we dispute the reliability of the estimated predation rate, which was extrapolated from a total of 45 juvenile salmon recovered from the stomachs of bass during the 2012 Predation Study.[162]

Even assuming the accuracy of the Districts' extremely shaky foundation, we question even more the notion that removal of a certain number of piscivorous fish per day will reduce overall consumption of salmon by bass. We particularly question the figures for the numeric potential reduction in consumption of salmon per day. These estimates assume that each bass is eating the same number of fish. They assume that no bass is limited in consumption by competition with other piscivorous fish. They assume that the number of bass will be the same every year. They assume that the total number of bass is not limited by bass-on-bass predation, and that this dynamic does not overwhelm the significance of a slight reduction in the overall numbers of bass.

The 10% and 15% targets for the reduction of bass downstream of RM 25.5 appear to be patterned on the efforts in the Columbia River to reduce the numbers of northern pikeminnow. However, after 25 years of a "sport-reward" bounty system that pays anglers for harvested pikeminnow, the number of pikeminnow caught in the Columbia River appears to be as large as ever. As stated in the California Fisheries Blog:

> The Columbia pikeminnow population dynamics likely are best described with a standard Ricker-Type Population Model, with reduced recruitment of young at high adult

[162] *See* Conservation Groups' Comments on Don Pedro Initial Study Report, eLibrary 20130311-5169, pp. 4-8.

> population levels because of competition and cannibalism. The introduction of a light harvest can actual increase recruitment of young by reducing competition and cannibalism, with the increased recruitment replacing the harvest, even providing a constant harvest or yield. This is how fishery quotas may be sustained year after year, such as in Alaska's Bristol Bay Sockeye salmon fishery.[163]

The 10% and 15% targets assume that eliminating some bass one year will not stimulate greater reproductive success juvenile survival the following year, creating an equal or greater number of bass as in the previous year. In particular, these targets assume that elimination of large migrating striped bass will not also increase the number of surviving largemouth and smallmouth (not eaten by striped bass). This assumption is unfounded.

E. Conservation Groups' Flow and Non-Flow Measures, in Combination with Installation of a Temporary Fish Capture Weir in Critically Dry and Super Critically Dry Years, Will Be More Effective than Districts' Plan in Reducing the Effects of Piscivorous Fish on Juvenile Salmonids.

In sum, improved flows are the most effective means of reducing the effects of piscivorous fish and juvenile salmonids. Increased flows both favor salmonids and disfavor bass. Non-flow measures such as increasing juvenile salmonid rearing habitat and floodplain food production, and filling in Special Run Pools where bass thrive, will also be effective. When Critically Dry and Super Critically Dry water years limit the ability of the system to produce flows favorable to successful migration of juvenile salmonids, a temporary weir that that captures migrating fish is a feasible option that is likely to be more effective than other methods of capturing bass and other target species.

Capture weirs and fish traps are widely used throughout the Pacific Northwest to capture and separate salmonids.[164] Though trapping of predatory fish in California on the proposed scale is largely untested,[165] it is known that Licensees' proposed capture methods are ineffective, rely on low flows that largely defeat the goal of the proposed program, and are based on a biological hypothesis of gradual population reduction that appears to be unfounded on the Columbia River.

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[163] http://calsport.org/fisheriesblog/?p=1271

[164] See multiple examples of weir and traps at: https://www.google.com/search?q=river+salmon+traps&client=safari&hl=en-us&prmd=sivn&tbm=isch&tbo=u&source=univ&fir=sN_Kll_UVDtwpM%253A%252CPwS12kIAnu9XMM%252C_%253BhopQnIeHJoh2GM%253A%252CnKwWOinq53pFBM%252C_%253BOChpHHl5WE5xAM%253A%252CGaXt1ONimAKOEM%252C_%253BYTUJyKGTi0ZDKM%253A%252CGaXt1ONimAKOEM%252C_%253B7rvV3u2SY_-0CM%253A%252CDknGlUl_Y53jPM%252C_%253BoA5YZ-jWPFEt7M%253A%252C9CJE8FcrLgfI_M%252C_%253B7rhbuK9Lex5gVM%253A%252CA_lqfMqkXoz8rM%252C_%253BeyDb-2HDEQzRFM%253A%252CA_lqfMqkXoz8rM%252C_%253Bgy3rYNFgnvAm3M%253A%252CQnkzhBGIGaZ40M%252C_%253BeiHLcx1Gs3oebM%253A%252CEb0WaXbhF4VnsM%252C_&usg=__nQ5CaFRPZxw5qXRNuIyMy-UUhsI%3D&sa=X&ved=0ahUKEwjQn7vyz4zYAhVQ3mMKHVPfBX8Q420Idw&biw=834&bih=1010#imgrc=v39w6zb7h3F_HM:

[165] A contemporary weir on the Shasta River offers a design option. *See* photo at https://www.wildlife.ca.gov/Portals/0/Images/Science_institute/Morgan%20Knechtle-Shasta%20River_400px.jpg?ver=2018-01-25-153753-330

F. Cost of Conservation Groups' Proposed Measure

The cost of a temporary weir will depend on its design. However, by its nature it will be far less expensive than the $12 million capital cost estimate for the Licensees' proposed permanent weir structure. A significant cost consideration is that if the temporary weir approach as monitored over multiple years proves ineffective or creates undesirable collateral effects, its temporary nature will allow Licensees and the TAC to pursue a license amendment to eliminate the requirement with little associated cost. An approach on this scale is much more cost-effective than construction of a permanent dam-like weir that, if it is ineffective or creates undesirable collateral effects, will also be very costly to remove.

VIII. Conservation Groups' Recommended Measure: Ward's Ferry Bridge Whitewater Boating Take-Out and Day-Use Facility

A. Recommended Measure

1. The Licensees shall design and construct a new whitewater boating take-out facility and a day-use facility, and associated recreational facilities, in the immediate vicinity of Ward's Ferry Bridge. These recreational facilities shall accommodate all users safely, including commercial outfitters, private individual boaters, and day users. Licensees shall develop the design for these facilities in coordination with the U.S. Bureau of Land Management, U.S. Forest Service, National Park Service, California State Water Resources Control Board and Tuolumne County, and in consultation with recreational stakeholders including American Whitewater, Tuolumne River Trust, Central Sierra Environmental Resource Center and Tuolumne River Outfitters.

2. The Licensees shall provide motorized vehicle access to the river at the new Ward's Ferry take-out that functions at all water levels and that safely and functionally accommodates six simultaneous river trip take-outs, *i.e.*, up to 36 rafts taking out simultaneously. The vehicle access design shall accommodate vehicle turn-around, passing, staging, and loading of equipment. The Licensees shall provide gates and signage for the motorized vehicle access to minimize user conflicts.

3. The Licensees shall provide pedestrian access to the river at or near Ward's Ferry Bridge that is functional at all water levels, that minimizes conflicts with motorized vehicles, and that is sufficient to meet current and future needs.

4. The Licensees shall provide maintenance, management and daily staffing for the Ward's Ferry take-out and associated facilities during the US Forest Service's (USFS) Tuolumne Wild and Scenic River permit season from May 1st to October 15th of each year. Staff shall provide security and ensure that the takeout is being utilized in a safe and orderly fashion.

5. The Licensees shall provide at least two ADA toilets in close proximity to the Ward's Ferry take-out that will be open to the public throughout the USFS Tuolumne Wild and Scenic River permit season from May 1st to October 15th.

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6. The Licensees shall develop and provide adequate and safe day parking areas for vehicles, trucks, trailers and busses at or in proximity to Ward's Ferry Bridge. These day parking areas shall accommodate 25 parking spots located off Ward's Ferry Road, and shall include parking on both sides of the river.

7. The Licensees shall provide a means for reliable public communication (cell service) at the Ward's Ferry take-out to ensure safety during emergencies.

8. The Licensees shall provide a safe passenger loading area in close proximity to Ward's Ferry Bridge for all river trip passengers.

9. The Licensees shall provide a Day Use area in close proximity to Ward's Ferry Bridge for non-whitewater boating related recreational users. The area shall include picnic tables and shall be located in an area that avoids conflicts with whitewater boaters.

10. The Licensees shall charge fair and reasonable use fees for the Ward's Ferry take-out for the duration of the license.

11. The Licensees shall maintain a fair and transparent process for determining any changes to use fees for the Ward's Ferry take-out and shall consult recreational stakeholders regarding any prospective fee changes.

12. The Licensees shall consult with all interested public stakeholders on any future fish passage designs that might affect recreational use from the downstream boundary of the Wild & Scenic corridor to the Ward's Ferry Bridge and/or recreational facilities at Ward's Ferry Bridge.

13. The Licensees shall manage large woody debris to maintain river navigability from the downstream boundary of the Wild & Scenic corridor to Ward's Ferry Bridge, and keep all access points in this reach clear and open.

B. Rationale

Conservation Groups have met on numerous occasions with the Licensees, BLM, the USFS, the National Park Service, Tuolumne County, and other interested parties to discuss recreational facilities at Ward's Ferry Bridge. In these discussions, Conservation Groups have emphasized the importance of safety for all user groups and the desired level of efficiency for a whitewater boating take-out.

Licensees propose to build a deck near Ward's Ferry Bridge that would be suitable to accommodate crane trucks and hauling vehicles to service the take-out of rafts that have run the Tuolumne River upstream. The Districts' proposal falls short of comprehensive improvements needed to provide safe and efficient recreational facilities for all user groups, which include not only commercial outfitters, but also private individual boaters and day users.

The Conservation Groups acknowledge that the Licensees' proposal would help to reduce the congestion found on Ward's Ferry Bridge during the peak of whitewater boating take-out. However, only commercial outfitters either own or operate crane trucks to remove equipment and boats from the river. Commercial outfitters do not provide services to private boaters. In addition, the outfitters utilize crane truck operations as an imperfect solution for the lack of vehicle access at the site today.

The Licensees have included the *Ward's Ferry Take-out 2016 Observations Technical Memorandum* as an attachment to the AFLA. The Districts prepared the methods, objectives and monitoring forms for this memorandum without any input from the U.S. Bureau of Land Management, other resource agencies, and recreational stakeholders participating in the relicensing process. The Conservation Groups specifically question the results of monitoring that characterize parties and vehicles as either commercial, private whitewater boaters, or non-whitewater boaters. The methodology for distinguishing commercial outfitters, private individual boaters, day users and their vehicles is undefined. Additionally, the memo does not include a comparison of observed numbers with the permits issued by the USFS Groveland Ranger District. Overall, 3948 commercial permits and 933 private whitewater permits were reported by the Groveland Ranger District for the 2016 season.[166]

Ward's Ferry Bridge is the take-out location for thousands of annual commercial and private individual boaters who enjoy paddling the upstream section of the Wild & Scenic Tuolumne River.[167] Many boaters come from around the country, and indeed around the world, to raft the Tuolumne River. Ward's Ferry Bridge also attracts day users who come to the Tuolumne River to flatwater paddle, swim, fish, or picnic.

The AFLA asserts in a number of places that the current boating take-out problems experienced at Ward's Ferry are not related to Don Pedro Project operations.[168] The Licensees also assert that "the essential problem with take-out at Ward's Ferry is the resulting congestion and extensive road blockage, with the additional congestion on the bridge caused by the exiting customers."[169] We strongly disagree with these assertions.

The essential problem with the existing take-out is that there is no actual take-out facility. Changing reservoir levels in combination with the very steep shoreline and extreme difference between low reservoir levels and high reservoir levels combine to make take-out under existing conditions dangerous and difficult. The Don Pedro Project is a complete unit of development whose operation affects recreational conditions and access at Ward's Ferry Bridge by causing reservoir level fluctuations that typically range from 30 to 80 vertical feet, between 750 ft. and 830 ft. msl.[170] Changes in water level at this location contribute to the erosion of the Tuolumne River shoreline and the erosion of pedestrian trails. Relatively high reservoir levels reduce usable shoreline. Low reservoir levels create the need for a steep uphill hike to reach the

[166] *1978-2016 Tuolumne Wild & Scenic River Use*, USDA Forest Service Stanislaus National Forest, Groveland Ranger District
[167] *Id*.
[168] AFLA Ex. E, pp. 2-16, 3-279, 3-292, 5-40.
[169] *Id*. at p. 5-68.
[170] *Id*. at Att. C, *Whitewater Boating Take-Out Improvement Feasibility Study Report* (RR-02), p. 5-1.

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Tuolumne County road. These conditions are compounded by congestion during peak whitewater take-out hours, widespread graffiti, and vehicle break-ins. (See *Ward's Ferry Recreation Site Don Pedro Recreation Area: Overview of Current Situation and Safety Concerns* by Bob Stanley, USFS River Ranger – Attachment 6).

The Don Pedro Project also affects how and where USFS-permitted commercial and non-commercial boaters take-out (exit) from the Wild & Scenic reach of the Tuolumne River after float trips that originate on the Stanislaus National Forest. Prior to the construction of the Don Pedro Project, boaters were able to take out at the now submerged town of Jacksonville, on a large gravel area accessible by vehicles with trailers. Since the Project was constructed, boaters have had to carry their rafts, equipment, and supplies up steep, rocky, and unstable slopes to Tuolumne County's Ward's Ferry Bridge, or have been compelled to try to row, paddle, or be towed over five miles of flat water to Moccasin Point Marina.

Presently, boating on the Tuolumne River relies on the release schedule from CCSF's upstream facilities. CCSF releases flow pulses for approximately a four-hour period each day during the summer (except one day per week when there is no release for maintenance purposes). All boaters must put on the river in that same limited time window. This means that the various groups of boaters all arrive at Ward's Ferry Bridge at about the same time in the mid- to late-afternoon. This creates significant congestion on the "trails" up to the bridge, on the road, and on the bridge itself. Typically, groups that arrive later must wait for as long as an hour, until prior groups have cleared out. Currently, the USFS permit system allows for 52 commercial boaters and 96 private boaters per day on one, two, or three day trips. There may be as many as six groups arriving from these trips at the bridge simultaneously. This is why there is a need to provide space for six groups to be able to take-out simultaneously.

Towing boats over flat water to the Moccasin Point Marina is dangerous. A wide variety of sharp objects are exposed when the river channel cuts its way through the sediments downstream of Ward's Ferry. As the reservoir elevation declines, narrow mini-canyons develop that release silt avalanches large enough to bury boats passing by in the narrow channels. When the river reaches high elevation, it spreads out thinly over the sediments, creating sand waves that in turn create quicksand. Even very light boats often run aground, creating a dangerous situation when boaters then get out of their boats to decrease draft and/or to push their boat.

All boating interest groups as well as the National Park Service, BLM and USFS have informed the licensee's consultant since the beginning of the Don Pedro relicensing that Moccasin Point Marina is not a viable alternative to improved take-out facilities at Ward's Ferry Bridge. Being towed to the marina is inconsistent with the experience of non-motorized whitewater boating through the primitive river canyon setting upstream. User fees at the marina and the cost of towing add expense to river trips, especially for non-commercial boaters. There is no designated space at the marina for unloading rafts and loading them on to a trailer. The process of loading/unloading rafts and equipment is more time-consuming than loading motorized boats, and any increase in non-motorized boat traffic at the marina would increase the congestion at a location that is already crowded. A designated non-motorized ramp area would need to be identified and improved.

Commercial and private whitewater boating provides a large economic benefit to the economy of Tuolumne County and the community of Groveland. Groveland's economy is heavily dependent on tourism. According to a 1995 study completed by the Highway 120 Association, the town of Groveland received an annual net economic benefit of nearly $5 million from rafting-generated tourism dollars ($8 million in 2017 dollars). Improved take-out facilities on the Tuolumne River are likely to increase the number of boaters on the river and provide further benefit to the local economy.

The number of people engaged in whitewater boating nationally has grown substantially in recent years. Licensees' Reservoir Recreation study references the tremendous growth in recreation at all of their other Project-related facilities. An estimated 142 million Americans went boating in 2016, 36% of U.S. households, according to the 2016 Recreational Boating Participation Study published in August 2017 by the National Marine Manufacturers Association. The facilities at Ward's Ferry need substantial improvements to support future as well as existing demand.

The Ward's Ferry Bridge is also a popular location for day recreation use. Many people use the bridge area for swimming, fishing, and simply getting outdoors during the summer. It is also one of the closest places for water-based recreation to the largest communities in Tuolumne County. As such, there are often many people congregating at the bridge and competing for space along the shoreline and on trails. The popularity of this location creates the potential for conflicts and unsafe conditions. As rafters carry or boom out their heavy rafts, day-users are often nearby and at times are underneath rafts that are being raised up to the bridge by boom trucks. This equipment has great potential to cause harm if boats or part of the equipment were to break loose and fall. For this reason, it is important to provide adequate facilities for day users.

It is possible that NMFS may issue a fish passage prescription to restore anadromous fish upstream of Don Pedro Reservoir. One of the options evaluated in NMFS's October, 2017 report entitled *Conceptual Engineering Plans for Fish Passage at La Grange and Don Pedro Dams on the Tuolumne River*[171] is a downstream capture facility for juvenile salmon and steelhead that could be located in the relative vicinity of Ward's Ferry Bridge. This report estimated that the cost of such a facility near Ward's Ferry Bridge would be almost double the cost of a capture facility close to Don Pedro Dam. Regardless of how likely top-of-reservoir infrastructure relating to fish passage may be, whitewater boaters would be very concerned about any potential for such facilities to interfere with whitewater boating on the river. Licensees should coordinate with the boating community to ensure that any future fish passage facilities work with boating and do not diminish the recreational values of the whitewater experience.

Woody debris is also a critical component of ensuring safe recreation conditions. The Licensees estimate that Don Pedro Reservoir captures on average 70,761 cubic feet/year of woody debris per year.[172] This estimate is likely low, because the survey period that led to this estimate was 2005-2012. Thus, surveys ended before significant events affected the upper watershed's production of large woody debris. These events include the 2013 Rim Fire, the five

[171] *See* eLibrary no. 20171113-5347.
[172] AFLA, Att. C, *O. mykiss Habitat Survey Amended Study Report*, W&AR-12, p. 6-2

year drought of 2012-2016, and the record-wet year of 2017. The abundance of trees killed by fire, drought, and beetles led to a massive volume of woody debris washing into the reservoir during the very wet winter of 2017. Local newspapers reported the logjam on Don Pedro Reservoir in 2017 to be 30-40 acres in size.[173,174]

Article 52 of the existing FERC license requires the implementation of the Districts' Log and Debris Removal Plan. Under the Plan, the Districts collect and remove woody debris at Don Pedro Dam and from other areas in the reservoir as needed so that this debris does not impede rafting and other recreational uses. Debris is collected in boom rafts, piled in un-vegetated areas below the high-water mark along the reservoir's edge, and burned during fall and winter. The Districts have proposed continuing this support for recreational uses of Don Pedro Reservoir through the implementation of a Woody Debris Management Plan. Conservation Groups are strongly supportive of continuing woody debris removal. However, Conservation Groups believe that licensees should re-evaluate the suitability of LWD collected in Don Pedro for placement in the lower Tuolumne River, and should place suitable LWD collected in Don Pedro Reservoir in the Tuolumne River downstream of La Grange Dam.

Article 53 of the existing FERC license requires the Licensees to provide restroom facilities at the Ward's Ferry Bridge. Conservation Groups are strongly supportive of a license requirement in the new license that would require that Licensees continue to maintain these restroom facilities.

There are several errors in the description of whitewater boating and the Licensees' proposed whitewater take-out in AFLA Exhibit E. First, the Licensees identify "known whitewater boating runs on the Tuolumne River upstream of the Project area."[175] In addition to the runs identified in Table 3.9-5, the North Fork of the Tuolumne is paddled by kayakers.[176] Also, the Clavey River is commonly paddled from the upper bridge (Stanislaus National Forest Road 1N04) to the Tuolumne River itself, not just downstream from the lower bridge, as cited in Table 3.9-5. Licensees state that a description of the proposed improvements at Ward's Ferry is included in Exhibit B.[177] Licensees also state that the Ward's Ferry take-out will be part of the Recreation Facility Development Program within the Recreation Resource Management Plan.[178] Though the Recreation Facility Development Program describes new recreational facilities at RM 25.5, it does not identify the Ward's Ferry take-out.[179] Finally, in Exhibit E the Licensees state an estimated cost to construct the facility they have proposed at Ward's Ferry at $6M, with annual O&M costs of $25,000/year. However, the cost for the Ward's Ferry facility listed under the Recreation Resource Management Plan in Exhibit D is $1.167M.[180,181]

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[173] The Modesto Bee, 5/16/16. "Rain, snowmelt have filled Tuolumne River with debris." Available at: http://www.modbee.com/news/article138973328.html.
[174] The Union Democrat, 4/20/17. "40 acres of floating logs choke part of Don Pedro Reservoir." Available at: http://www.uniondemocrat.com/localnews/5248255-153/40-acres-of-floating-logs-choke-part-of.
[175] AFLA Ex. E, p. 3-260.
[176] California Creeks, *North Fork Tuolumne near Sonora*. Available at: http://www.cacreeks.com/tuol-nf.htm
[177] AFLA Ex. E, p. 2-5.
[178] *Id*. at Ex. E, p. 3-292.
[179] AFLA Ex. E, Appendix E-7 *Recreation Resource Management Plan*, p. 3-1.
[180] *Id*. at Ex. E, p. 5-41.
[181] *Id*. at Ex. D, *Statement of Costs and Financing*, p. 5-41.

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Overall, our recommendations seek to mitigate existing unsafe and inefficient conditions and to provide a recreational area that can be safely used by commercial outfitters, private individual boaters and multiple day users. Improving the Ward's Ferry take-out is the most feasible, lowest cost option for providing a safe and adequate take-out. The Licensees' Updated Study Report states: "Whitewater take-out improvements at Ward's Ferry Bridge appear to be technically feasible."[182] We hope this thinking will carry forward to a complete improvement proposal that meets the needs of all boating and non-boating users.

IX. Conservation Groups' Summary of Responses to Districts' Preferred Plan and Additional Comments on Districts' Proposals

Summary Table B: Conservation Groups' (CGs) responses to Licensees' proposed measures

AFLA Measure	Name	Notes
RPM 1	Augment Current Gravel Quantities through a Course Sediment Management Program	The Licensees' proposal is inadequate. CGs propose a more extensive and robust gravel augmentation program that in combination with other CG restoration measures mitigates Project effects and achieves the AFRP Doubling Goal.
RPM 2	Provide Gravel Mobilization Flows of 6,000 to 7,000 cfs	CGs support providing gravel mobilization flows. CGs' flow proposal either provides flows that will more frequently and reliably mobilize gravel or can be modified with no water cost to do so.
RPM 3	Improve Instream Habitat Complexity	The Licensees' proposal is inadequate. CGs do not support the Licensees' proposal, which relies on installation of large boulders in only the upper ten miles of the lower river. CGs' proposal to install LWD, rather than boulders, along the entire length of the lower Tuolumne will better mitigate Project effects and more effectively improve habitat complexity.
RPM 4	Gravel Cleaning	CGs oppose the proposal. CGs' flow proposal will achieve gravel cleaning objectives more effectively and in a less damaging manner than the Licensees' proposal.

[182] *Id*. at Att. C, *Whitewater Boating Take-Out Improvement Feasibility Study Report (*RR-02*)*, p. 6-3.

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RPM 5	Contribute to CB&W's Efforts to Remove Water Hyacinth	CGs oppose this proposal. CGs' flow proposal will more effectively remove water hyacinth from the river without application of pesticides as proposed by the Licensees.
RPM 6	Construct a Fish Counting and Barrier Weir	CGs strongly oppose the installation of a permanent barrier weir. CGs support the installation of a temporary seasonal fish counting weir. CGs support the installation of a temporary weir to capture striped bass and black bass in CD and SCD years only.
RPM 7	Predator Control and Suppression	CGs oppose this proposal. CGs' flow proposal in combination with CG's gravel augmentation proposal, targeted at reducing predator habitat, will more effectively reduce predation in the river.
RPM 8	Superimposition Reduction Program	CGs do not support this proposal.
	Tuolumne River Fall-run Chinook Restoration Hatchery	CGs oppose this proposal. CGs support the abundant natural production that the Tuolumne River is capable of producing. An abundant Tuolumne population is the best means of improving fall-run genetics.
	Flow-Related Measures	CGs do not support the Licensees' flow proposal, which starves the Tuolumne River of flow in just under 60% of all years. CGs' flow proposal will more effectively contribute to achieving biological and environmental objectives while balancing water supply needs.
	Operation of Two Infiltration Galleries	CGs are neutral towards the operation of the existing infiltration gallery. CGs oppose the expense of a second, new infiltration gallery and the Licensees' proposed excessive diversions from it. Licensees must establish a flow compliance point within one mile downstream of the infiltration gallery.
	Whitewater Boating Take-Out Facility at Ward's Ferry Bridge	CGs support a larger, safer and more efficient take-out facility than the facility proposed by the Licensees.
	Enhancements to Recreational Boating in the Lower Tuolumne River	CGs support providing recreational boating flows in the lower Tuolumne River. CGs' flow proposal accommodates the recreational flow needs.
	La Grange Project: Foot path trail construction and maintenance	CGs support a foot path trail to the La Grange Reservoir.

A. Additional Responses to Districts' Proposals

1. Fall-Run Chinook Salmon Hatchery

The Licensees propose to build a fall-run Chinook salmon hatchery downstream of the Project's La Grange Diversion Dam on the Tuolumne River. The intended purpose of the $36 million hatchery is to establish genetic integrity of salmon in the Tuolumne River and to supplement population abundance. The Licensees propose that CDFW operate the hatchery for a period of 20 years and that Licensees fund projected annual O&M costs of about $200,000.

The proposal to construct a hatchery is dependent on implementation of 100% hatchery parental-based tagging (PBT) throughout the Central Valley. Licensees project that cost would be $350,000 annually. The Licensees assume that funds to implement 100% PBT outside the Tuolumne River would derive from state (Department of Water Resources) and federal (U.S. Bureau of Reclamation) sources associated with operation of the State Water Project and the Central Valley Project. The California Department of Fish and Wildlife has for many years expressed concerns that a requirement to mark all hatchery fish would end up being an unfunded mandate placed on the Department. Commercial anglers have expressed concerns that 100% marking of hatchery fish would be a gateway to a mark-selective salmon fishery, further limiting resource opportunities for a commercial salmon fleet already in precipitous decline. Regardless of what various parties may think of 100% marking of hatchery fish, there is substantial uncertainty that CDFW will implement it in the near future.

The Tuolumne River is the largest sub-watershed in the San Joaquin River system. In combination with appropriate physical habitat improvements, the lower Tuolumne River is capable of sustaining a viable population of naturally produced fall-run Chinook salmon. Currently, salmon populations in the Tuolumne River are limited by decades of flow deprivation and habitat degradation.

It is generally accepted that the entire Central Valley fall-run Chinook salmon population is intermingled after decades of hatchery operations and straying throughout the state. While this can improve, in the short term it is very unlikely to end. The best way to develop a distinct Tuolumne River fall-run salmon population is to make use of the river's hydrological and physical potential. With flow improvements and such non-flow improvements as floodplain expansion, gravel augmentation, and restoration of LWD, the Tuolumne River can support large numbers of salmon. The Conservation Groups recommend that the Licensees allocate the proposed $36 million capital cost for a hatchery, along with the O&M costs, to the restoration of spawning and rearing habitats in the Tuolumne River, in combination with implementation of the Conservation Groups' flow proposal.

2. Recreational Boating Flows in the Lower Tuolumne River

The Licensees propose a measure that will provided limited enhancements in recreational boating flows in the lower Tuolumne River that is focused primarily on providing more reliable boating from RM 52 to RM 25.9 only, while leaving the river below RM 25.9 with very

infrequent boatable flows in summer that depend on the water year type and the operation of the infiltration galleries. The Conservation Groups support a flow schedule that supports year-round recreational boating in the entire lower Tuolumne.

3. La Grange Project: Footpath Trail Construction and Maintenance

The Conservation Groups support the construction of a footpath trail to La Grange Reservoir. Conservation Groups strongly support allowing fishing at La Grange Reservoir and suggest that Licensees create a setting conducive to low impact activities such as birdwatching and nature viewing at La Grange Reservoir.

LEGAL BASIS FOR CONSERVATION GROUPS' RECOMMENDATIONS FOR ENVIRONMENTAL ANALYSIS AND PROPOSED LICENSE CONDITIONS

This section addresses the legal basis for Conservation Groups' comments and recommended alternatives for the Projects that the Commission should analyze in the EIS. The Commission is required under the FPA and NEPA to analyze reasonable alternatives to the proposed Project, assess the Project's direct and cumulative effects on the environment and develop and adopt appropriate protection, mitigation or enhancement measures to mitigate the adverse effects of the Project. This section also contains Conservation Groups' responses to Districts' arguments in the AFLA that seek to preemptively limit the Commission's and other jurisdictional agencies' authority to consider alternatives for purposes of the NEPA analysis, and to ultimately condition the license. The Conservation Groups' responses maintain that the Commission has both a substantive and procedural duty to undertake a thorough study of alternatives and potential mitigation measures based on a complete record. The Commission may not avoid its legal obligations to conduct this analysis simply because the dams serve purposes other than hydroelectric power generation, or because the Commission lacks authority to authorize the alternatives and/or mitigation measures.

I. The FPA requires that the Commission analyze the Conservation Groups' proposed alternatives.

The Commission has substantive obligations under FPA § 10(a)(1), 16 U.S.C. § 803(a), and § 15(a)(2), 16 U.S.C. § 808(a)(2), to undertake a thorough study of alternatives as the basis for its required finding that a new license is best adapted to a comprehensive plan of development and to serve the public interest. *See Scenic Hudson Pres. Conference v. Fed. Power Comm'n*, 354 F.2d 608, 612 (2d Cir. 1965); *Green Island Power Auth. v. F.E.R.C.*, 577 F.3d 148, 168 (2d Cir. 2009) ("*Green Island*").

Section 10(a) establishes a "broad public interest standard, requiring consideration of all factors affecting the public interest." *Green Island* 577 F.3d at 167 (quoting H.R.Rep. No. 99–507, at 12 (1986)). Section 10(a) also requires that "the project adopted . . . will be best adapted to a comprehensive plan for improving or developing a waterway." 16 U.S.C. § 803(a)(1).

Section 15(a)(2) requires "that FERC rigorously scrutinize[] any application for a new license for an existing hydroelectric project, so that it can determine that the existing project is 'best adapted to serve the public interest.'" *Green Island,* 577 F.3d at 167.

The Commission must demonstrate that its decision was based on "substantial evidence" and that it "considered all of the germane factors" by providing "a reasoned explanation." *Idaho Rivers United v. F.E.R.C.*, 189 F. App'x 629, 634 (9th Cir. 2006).

To meet these FPA requirements, the Commission must thoroughly analyze alternatives to demonstrate on the record: 1) that it considered all beneficial public uses of the waterway; 2) that a license granted is consistent with any comprehensive plan of development for the waterway; and 3) that a license granted is conditioned to best serve the public interest.

A. The Commission must consider all beneficial public uses of the waterway in determining which alternative is best adapted to a comprehensive plan of development.

A license may be granted only if it is "subject to conditions that the Commission finds best suited for power development and other public uses of the nation's waters." *Am. Rivers v. F.E.R.C.*, 201 F.3d 1186, 1191 (9th Cir. 1999). The FPA "requires the Commission to consider *all* beneficial public uses when it grants a license." *Confederated Tribes & Bands of Yakima Indian Nation v. F.E.R.C.*, 746 F.2d 466, 471 (9th Cir. 1984) ("*Confederated Tribes*") (emphasis added). Specifically, these beneficial public uses include "the adequate protection, mitigation, and enhancement of fish and wildlife (including related spawning grounds and habitat), and . . . irrigation, flood control, water supply, and recreational and other purposes . . ." 16 U.S.C. § 803(a)(1).

The Commission must demonstrate that it considered these beneficial uses *before* it issues a license. "Prior to issuance of a new license, FERC must study the effect of a project on the fishery resource and consider possible mitigative measures." *Confederated Tribes*, 746 F.2d at 471. Here, the FPA requires that the Commission analyze the Conservation Groups' alternatives which will benefit fish populations in the Tuolumne River, including improving their spawning grounds and habitat and meet the purpose and need of the Projects.

B. The Commission should consider alternatives that would better achieve the objectives of comprehensive plans for the waterway prepared by other Federal or State agencies.

As stated above, the Commission must ensure that the new license is best adapted to a comprehensive plan of the development for the beneficial uses of the Tuolumne River. In making this determination, the Commission must consider "[t]he extent to which the project is consistent with … comprehensive plan[s] for improving, developing or conserving a waterway or waterways affected by the project" developed by other State or Federal agencies. 16 U.S.C. § 803(a)(2). Pursuant to FPA section 10(a)(2), Conservation Groups have previously requested that the Commission consider several comprehensive plans in preparing its DEIS and making its

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required NEPA and FPA findings including the Forest Service Wild and Scenic Management Plan and the National Marine Fisheries Service Recovery Plan for Central Valley Steelhead.[183]

The State Board's Bay-Delta Plan qualifies as a comprehensive plan for the Tuolumne River pursuant to FPA section 10(a)(2) and the Conservation Groups will be submitting it to the Commission for approval upon its finalization (expected in summer 2018).[184] Order No. 481-A (April 27, 1988) notes that "the Commission will accord FPA section 10(a)(2)(A) comprehensive plan status to any Federal or state plan that:

(1) Is a comprehensive study of one or more of the beneficial uses of a waterway

(2) Specifies the standards, the data and the methodology used and

(3) Is filed with FERC"

Furthermore, Order No. 481-A specifies that "[a] comprehensive plan should contain the following:

1. A description of the waterway or waterways that are the subject of the plan, including pertinent maps detailing the geographic area of the plan;
2. A description of the significant resources of the waterway or waterways;
3. A description of the various existing and planned uses for these resources; and
4. A discussion of goals, objectives, and recommendations for improving, developing, or conserving the waterway or waterways in relation to these resources."

Order No. 481-A also specifies that "[t]he description of the significant resources in the area should contain, among other things:

1. Navigation;
2. Power development;
3. Energy conservation;
4. Fish and wildlife;

[183] *See* Conservation Groups Comments Regarding Pre-Application Document and Scoping Document 1, and Study Requests for the Don Pedro Project "Scoping Comments." e-Library 20111024-5102. The Scoping Comments recommend the consideration of the following comprehensive plans: 1)The Anadromous Fish Restoration Program (AFRP); 2) SWRCB 2010 Integrated Report and Final 303(d) list; 3) San Joaquin River National Wildlife Refuge Comprehensive Conservation Plan (2006); 4) State Parks Central Valley Vision; 5) NMFS Critical Habitat for CV steelhead; 6) NMFS Draft Recovery Plan for Steelhead; 7) San Joaquin River Management Plan (1995); 8) TRTAC Restoration Plan; 9) Forest Service Wild and Scenic Management Plan; and 10) California Department of Water Resources, California Water Plan Update 2009.

[184] It is reasonably foreseeable that the Bay-Delta Plan will be finalized before the Commission issues final orders for the Projects. *See* State Water Resources Control Board Executive Director's Report Item 6 (December 19, 2017) noting that "[s]taff anticipates that the final SED (including responses to public comments) and [Bay-Delta] Plan Amendment will be released for public review in the spring of 2018 and will be brought to the Board for consideration in mid-2018."

5. Recreational opportunities;
6. Irrigation;
7. Flood control;
8. Water supply; and
9. Other aspects of environmental quality."

Finally, Order No. 481-A specifies that "[t]he plan should contain an examination of how the different uses will promote the overall public interest."

The Bay-Delta Plan meets these criteria. The Bay-Delta Plan examines all the beneficial uses of the waterway (including the Tuolumne River). Additionally, it includes significant scientific information and data supporting the methodology used to develop revised water quality objectives and assess the potential benefits and impacts of implementation of the objectives. The Bay-Delta Plan contains an adequate description of the applicable waterways, identifies the significant resources that comprise the waterways, identifies the current and planned uses for the resources of the waterway, and contains a recommendation for how to best utilize the waterway in relation to the many beneficial uses that rely upon it. As specified in *Light*, "the function of the Water Board has steadily evolved from the narrow role of deciding priorities between competing appropriators to the charge of *comprehensive* planning and allocation of waters." *Light v. State Water Res. Control Bd.*, 226 Cal. App. 4th 1463, 1481 (2014) (emphasis added).

As part of the Bay-Delta Plan update process, the State Board released recommended flow objectives for the Tuolumne River (as well as the Merced and Stanislaus rivers) that require release of 30-50% of the February-June unimpaired flow in each river, with a beginning value of 40%.[185] To meet these flow objectives, the Licensees will be required to increase flow releases from Project facilities, including Don Pedro Dam, at certain times of the year. In the Bay-Delta Plan proceeding and several past water right proceedings, the State Board has identified Fish and Game Code section 5937 and the public trust doctrine as sources of authority to require the release of stored water for the benefit of fish and wildlife beneficial uses.[186]

The Conservation Groups' do not believe the AFLA supports a finding that the Districts' proposed flow regimes are consistent with the planned update of the State Board's Bay-Delta

[185] SWRCB, "Bay Delta Plan Update: Draft San Joaquin River Flow and Southern Delta Salinity Requirements Released for Public Comment," *available at* http://www.waterboards.ca.gov/waterrights/water_issues/programs/bay_delta/bay_delta_plan/water_quality_control_planning/2012_sed/docs/sjr_factsheet2012.pdf.

[186] *See*, e.g., Comments of State Water Resources Control Board Chair Felicia Marcus at the Public Hearing on the Draft San Joaquin River Flow and Southern Delta Salinity Requirements. Dec. 16, 2016 Tr., p. 216, ln. 3-11; Dec. 19, 2016 Tr., p. 152-153. *See also* Decision 1644 In the Matter of Fishery Resources and Water Right Issues of the Lower Yuba River. State Water Resources Control Board 2001. p. 31. ("Decision 1644"). These authorities are appropriately cited by the State Board. Fish and Game Code 5937 is a legislative expression concerning the public trust doctrine that should be taken into account when the State Board acts under its public trust authority. *California Trout* 207 Cal. App. 3d 585, 626, 631 (Cal. Ct. App. 1989). The State Board acts under its public trust authority when it approves revised water quality objectives and when it revises water right authorizations to ensure implementation of the revised water quality objectives. It is well within the State Board's authority under the public trust doctrine to require the release of stored water for the benefit of instream resources particularly in cases where the storage project in question presents a continuing harm to those resources. *See* Decision 1644 at 32.

Plan. By contrast, the Flow, Habitat and River Management Alternative proposed by the Conservation Groups was expressly developed to meet the objectives set out in the State Board's Bay-Delta plan. The Commission's DEIS should evaluate the flow proposals to determine which would be more consistent with the relevant objectives set out in the Bay-Delta Plan. To the extent, the Commission disagrees with the flows recommended in the Bay-Delta Plan, it still has an obligation to provide a "reasoned explanation" as to why the conditions of the license are consistent with the objectives of the Bay-Delta Plan. *Idaho Rivers* 189 F. App'x at 634.

C. The Commission must analyze the proposed alternatives to show that a license granted is conditioned to best serve the public interest.

Pursuant to FPA sections 10(a) and 15(a)(2), the Commission must find that the project as licensed will be best adapted to a comprehensive plan of development and serve the public interest.[187] This requires more than a finding that the project will serve the applicant's interests, or otherwise preserve the status quo. In *Municipal Elec. Ass'n of Mass. v. FPC*, 414 F.2d 1206, 1207 (D.C. Cir. 1969, the D.C. Circuit interpreted this requirement to mean that the project as licensed must represent the "highest and best use" of the waterway. In other words, the Commission must determine how *best* to balance the competing beneficial uses of the Tuolumne River.

While not binding, the Commission's balancing analysis should be informed by the State Board's analysis in the SED for the Bay-Delta Plan. The SED reflects the State's interest in protecting water supply and fish resources as co-equal goals. Given the scarcity of water available to protect these and other uses, the SED also highlights the prohibition on waste and unreasonable use of water. SED, p.1-5. The state can terminate or restrict a water use that is found to be wasteful or unreasonable. Cal. Const. art. X, § 2. The State Water Board has found that uses that harm public trust resources, like fish are unreasonable and courts have agreed.[188]

As part of its public interest finding, the Commission should consider whether the Districts' proposed flow operation constitutes the best balance of competing beneficial uses for the Don Pedro Project. It is in the public interest to strategically and flexibly manage reservoir storage levels to minimize effects on water deliveries and maximize water resources available for a variety of uses. Accordingly, the Commission should consider the Conservation Groups' alternatives which seek to optimize water resources and address impacts to instream flows consistent with the SED's rationale for the State Board's Bay-Delta Plan.

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[187] FPA Section 15(a)(2) requires "that FERC rigorously scrutinizes any application for a new license for an existing hydroelectric project, so that it can determine that the existing project is 'best adapted to serve the public interest.'" *Green Island*, 577 F.3d at 167.

[188] *See* Decision 1644 p. 95 concluding that "there is ample evidence showing that the continuing diversion of water from the Yuba River through existing facilities at the South Canal has reasonably avoidable adverse impacts on anadromous fish in the Yuba River. To continue the diversions at the South Canal without taking actions to reduce fish loss would be an unreasonable method of diversion with unnecessary harmful effects on public trust resources." *See also Environmental Defense Fund, Inc. v. East Bay Municipal Utility District* 26 Cal.3d 183 (1980) noting that a "particular water use or method of diversion may be determined to be unreasonable based on its impact on fish, wildlife, or other instream beneficial uses."

D. The Commission may not avoid its obligations under FPA to analyze the Conservation Groups' proposed alternatives in detail.

1. The Districts' Fourth Agreement with the City of San Francisco does not limit the ability of the Commission to analyze Conservation Groups' Proposed Alternatives.

As noted in section I(c) *supra* the Commission's public interest balancing analysis should be informed by the State Board's analysis in the SED for the Bay-Delta Plan. The SED contains the State Board's recommended flow requirements for the San Joaquin River and its tributaries (including the Tuolumne) and represent the State Board's findings that anything less would constitute unreasonable use of water in light of the potential harm to public trust resources, including fish and wildlife.

The State Board regulates water use within the state in order to prevent unreasonable or wasteful use. *See Light,* 226 Cal. App. 4th at 1472-73. In doing so, the Board "can weigh the use of water for certain public purposes, notably the protection of wildlife habitat, against the commercial use of water" by those holding rights of priority to the water. *Id*. Specifically, the Board's broad regulatory authority extends to setting legally enforceable standards as to which uses of water are reasonable and which are not. *See id*. at 1484-86 (confirming that the Board may decide, under its regulatory authority, that using sprinkled water to prevent crop frost damage is not reasonable unless it can be managed to avoid harm to salmon populations). In fact, such regulatory activity is necessary because "[w]hat constitutes an unreasonable use of water changes with circumstances, including the passage of time." *Id*. at 1488.

The Districts' contend that they cannot comply with the State Board's recommended flow requirements because it would jeopardize or interfere with the terms and/or performance of their Fourth Agreement with the City. This argument is without merit. A contract between the licensee and a third party does not limit the Commission's authority to issue licenses under FPA section 4(e) nor can it be read to limit the scope of the Commission's alternatives analysis under NEPA. To the extent the Fourth Agreement seeks to interpret the priority of the District and CCSF's water rights or otherwise affect the State's authority to regulate appropriate water rights, those issues are properly reserved to the state pursuant to FPA section 27. *California v. FERC*, 495 U.S. 490 (1990). Accordingly, the Commission should not take action or limit the scope of the EIS in any way that interferes with the State's exercise of its reserved authority.

While the right to use water is a legally protected interest, the right is usufructuary and thereby limited by nature. *Allegretti & Co. v. Cty. of Imperial* 138 Cal. App. 4th 1261, 1271 (2006) ("Overlying water rights are usufructuary only, and while conferring the legal right to use the water, they confer no right of private ownership in public waters."). Unreasonable use of water is not protected by any property or usage right. Cal. Const. art. X, § 2; *see also Light,* 226 Cal. App. 4th at 1479. The State Board decides what uses of water are reasonable, and California does not recognize any property right tied to unreasonable use, even if such use was once considered reasonable in the past. *See id*. at 1487 (quoting *United States v. State Water Res. Control Bd*., 182 Cal. App. 3d 82, 106 (1986) ("*Racanelli Decision*") ("[N]o water rights

are inviolable; all water rights are subject to governmental regulation."); *Tulare Irrigation Dist. v. Lindsay-Strathmore Irrigation Dist.*, 3 Cal. 2d 489, 567 (1935). This means that the Districts are required to comply with increased flow requirements and other conditions that the Board deems necessary to ensure continuously reasonable use.

Furthermore, not only are water uses—even long-established ones—subject to the dynamic reasonable use standard, but they are also subject to the public trust doctrine. *See El Dorado Irrigation Dist. v. State Water Res. Control Bd.*, 142 Cal. App. 4th 937, 966 (2006) (quoting *Nat'l Audubon Soc'y v. Superior Court*, 33 Cal. 3d 419, 445-46 (1983) (noting that the state's "affirmative duty to take the public trust into account" prevents "any party from acquiring a vested right to appropriate water in a manner harmful to the interests protected by the public trust"). Thus, "when the public trust doctrine clashes with the rule of priority, the rule of priority must yield." *Id.* The Districts must abide by California's strong policy of protecting the public trust, which includes ecological values. *See id.*

The State Board's proposed flow requirements in the Bay-Delta Plan should be seen as an updating of the rights to which the Districts are entitled under a constitutionally-mandated reasonableness analysis, rather than a disruption of said rights. Meanwhile, the Fourth Agreement, founded in part on the fact that the Districts' water rights have priority over the City's, is enforceable only to the extent that the rights in play therein are still recognized under the law. That the parties to the Agreement formed a contractual relationship does not absolve them of their duty to comply with the basic principles of California's water law. After all, their contract is based on rights that are always subject to change.[189]

2. The Takings Doctrine does not limit the ability of the Commission to analyze Conservation Groups' Proposed Alternatives.

The Districts claim that implementation of the State Board's revised water quality requirements will constitute a physical taking under the Fifth Amendment.[190] The Districts are mistaken: 80 years of case law underscores that such regulatory action by the State Board (e.g., minimum reservoir carryover storage targets and flow release requirements) does not constitute a compensable physical taking.

The Districts will not be deprived of a protected property interest because water rights in California are not absolute. As noted in sections I(c) and I(d)(i) *supra,* water rights are

[189] On page 10 of their March 17, 2017 letter to the Board, the Districts suggest that the "California Constitution prohibits legislative or judicial actions which significantly impair the obligations of an existing contract." The Districts draw this conclusion from a 1957 case involving alimony payments. *See Bradley v. Superior Court*, 48 Cal. 2d 509, 519 (1957). What the *Bradley* court meant was that a court cannot rule in such a way that the sole aim and effect would have been to modify a property settlement agreement between a divorced couple. This is hardly apposite to the present situation, where the contract involves management of an important public utility and natural resource, and—more importantly—was formed subject to continued regulation. Moreover, even if this were the type of situation that would implicate the contracts clause, the Board's findings do not run afoul of it because they are properly and necessarily directed toward protecting the public interest. *See Fourth La Costa Condominium Owners Ass'n v. Seith*, 159 Cal. App. 4th 563, 584 (2008) (holding that the contracts clause is not violated if (1) there is no substantial impairment of the contract at issue, or (2) there is a significant and legitimate public purpose behind the state regulation at issue and the regulation operates in a way appropriate to that public purpose).

[190] TID and MID Letter to the State Water Resources Control Board, dated March 17, 2017, at pp. 5-7.

usufructuary and limited by the reasonable use and public trust doctrines. *Racanelli Decision,* 182 Cal. App. 3d 103-05. Water rights are not exempt from reasonable regulation; on the contrary, they are frequently subject to regulation in the public interest. *See, e.g., People v. Murrison* 101 Cal. App. 4th 349, 360 (2002) ("Legislation with respect to water affects the public welfare and the right to legislate in regard to its use and conservation is referable to the police power of the state."); *People ex rel. State Water Res. Control Bd. v. Forni* 54 Cal. App. 3d 743, 753 (1976) ("[T]here is a well-recognized distinction between a 'taking' or 'damaging' for public use and the regulation of the use and enjoyment of a property right for the public benefit. The former falls within the realm of eminent domain, the latter within the sphere of the police power."). This means that no owner of California water can acquire a protected right to use water in an unreasonable manner or in a manner that harms the public trust.

In this case, the Districts have not acquired a protected right to divert, store or release water in a manner that the State Board judiciously deems unreasonable, or that may harm the public trust. In short, the Districts' takings claim is premised on a type of protected property right that does not exist under California law.

a. <u>No compensation is due to the Districts.</u>

Compensation is not due to the Districts because the implementation of the State Board's revised water quality requirements will not constitute an appropriation, or taking, of a protected property right. While correctly noting that a protected property right cannot be taken without just compensation, the Districts fail to first establish the legal existence of a compensable property interest. There is no compensable property right to the unreasonable use of water. *Forni*, 54 Cal. App. 3d at 751-53 (further noting that "the overriding constitutional consideration is to put the water resources of the state to a reasonable use…. In order to attain this objective, the riparian owners may properly be required to endure some inconvenience or to incur reasonable expenses"). By extension, this argument cannot credibly be used to limit the Commission's ability to consider other reasonable alternatives to the Districts' Proposed Alternative, such as the Conservation Groups' alternatives.

3. <u>Contrary to arguments in the AFLA, the Commission must analyze the proposed alternatives under the FPA even if it lacks authority to authorize them.</u>

The Commission must consider reasonable alternatives to the propose and existing flow regimes under the FPA. This extends to alternatives that are outside of the Commission's authority. The FPA imposes upon the Commission "a statutory duty to give full consideration to alternative plans even where it ha[s] no authority to command the alternative." *Green Island,* 577 F.3d at 167 (internal quotation marks and citations omitted); *see also Scenic Hudson*, 354 F.2d at 617 ("that the Commission has no authority to command the alternative does not mean that it cannot reject the (original) proposal") (internal citation omitted).

The AFLA erroneously argues that "[h]ydroelectric generation is a secondary purpose of the Don Pedro Project" and, citing the Commission's Scoping Document 2, that recommended alternatives to change the consumptive use of water "could not replace the Don Pedro

hydroelectric project" and therefore "are not reasonable alternatives for the NEPA analysis." AFLA Exhibit E, Environmental Report, at 3-1 (September 2017). Conservation Groups' disagree that the Commission lacks authority to modify the flow regimes. Regardless, the Commission may not avoid analyzing water flow alternatives under the FPA simply because it "ha[s] no authority to command the alternative." *Green Island*, 577 F.3d at 167. (An explanation of why this argument is also incorrect under NEPA is provided *infra*.)

Conservation Groups' alternatives include measures that may be beyond the Commission's authority. However, as discussed in NEPA Recommendations section I *infra*, they were developed to protect all beneficial uses of the Tuolumne River, striking a balance between instream beneficial uses (i.e., fish and wildlife and boating) and consumptive uses.

II. NEPA requires that the Commission analyze the Conservation Groups' proposed alternatives.

In addition to the substantive obligations to analyze alternatives under the FPA, the Commission is subject to parallel, procedural obligations under NEPA to analyze a reasonable range of alternatives. It is critical that the Commission's NEPA document contain a robust alternatives analysis-- the "heart" of NEPA -- to provide "a clear basis for choice among options by the decision-maker and the public."[191] The Commission's NEPA document is intended to support its final licensing decision as well as the decisions of other jurisdictional agencies, including FWS, NMFS and the State Board. While the State Board has traditionally prepared its own environmental document under the California Environmental Quality Act, its practice is to rely as appropriate on the Commission's NEPA document.[192] Accordingly, the DEIS should consider a range of operational alternatives that the State Board will likely to consider in making its CWA section 401 decision. This includes the Conservation Groups' alternatives, which are reasonable means to meet the objectives of the State Board's Bay-Delta Plan and the purpose and need of the Projects.

A. NEPA requires that the Commission analyze and provide a detailed statement on reasonable alternatives to the actions proposed in the AFLA.

NEPA § 102(2)(C), 42 U.S.C. § 4332(2)(C), requires the Commission to provide a "detailed statement" on the following:

[191] *See*, e.g., Simmons v. U.S. Army Corps, 120 F.3d 664 (7th Cir. 1997); Davis v. Mineta, 302 F.3d 1104, 1118 (10th Cir. 2002); *see also* 40 CFR 1502.14.

[192] *See* Initial Study and Mitigated Negative Declaration for the Poe Project *available at* https://www.waterboards.ca.gov/waterrights/water_issues/programs/water_quality_cert/docs/poe_ferc2107/poe_final_mnd_stamped.pdf noting that:
"CEQA Guidelines section 15221 states that when a project requires compliance with both CEQA and NEPA, state agencies should use the Environmental Impact Statement (EIS) or Finding of No Significant Impact (FONSI) rather than preparing an Environmental Impact Report or Negative Declaration if the EIS or FONSI complies with the provisions of CEQA. Consistent with this section, this IS refers to appropriate sections of the final EA to avoid repetition of information. This IS was prepared in compliance with CEQA and assesses the environmental effects of the Proposed Project. To the extent that the Proposed Project incorporates conditions to ensure that potential impacts have been mitigated to insignificance, the applicant agreed to incorporate the conditions into the Proposed Project. The IS includes information necessary to comply with CEQA not included in the final EA."

> **(i)** the environmental impact of the proposed action,
> **(ii)** any adverse environmental effects which cannot be avoided should the proposal be implemented,
> **(iii)** *alternatives to the proposed action*,
> **(iv)** the relationship between local short-term uses of man's environment and the maintenance and enhancement of long-term productivity, and
> **(v)** any irreversible and irretrievable commitments of resources which would be involved in the proposed action should it be implemented.

42 U.S.C. § 4332(2)(C) (emphasis added). To fulfill this NEPA requirement, the Commission must show that it took a "hard look" at the environmental impacts of its licensing decision. *Am. Rivers v. F.E.R.C.*, 201 F.3d 1186, 1195 (9th Cir. 1999).

NEPA § 102(2)(E), 42 U.S.C. § 4332(2)(E), also imposes an independent, broader obligation to analyze alternatives than the EIS requirement under § 102(2)(C). *Bob Marshall Alliance v. Hodel*, 852 F.2d 1223, 1229 (9th Cir. 1988). § 102(2)(E). Under the Council for Environmental Quality's (CEQ) rules, the presentation of alternatives

> is the heart of the environmental impact statement. Based on the information and analysis presented in the sections on the Affected Environment (§ 1502.15) and the Environmental Consequences (§ 1502.16), it should present the environmental impacts of the proposal and the alternatives *in comparative form, thus sharply defining the issues and providing a clear basis for choice among options by the decisionmaker and the public*. In this section agencies shall:
>
> ...
>
> (b) *Devote substantial treatment to each alternative considered in detail including the proposed action so that reviewers may evaluate their comparative merits*.

40 C.F.R. § 1502.14 (emphasis added).

Furthermore, "[a]n EIS must address the *cumulative impacts* of a project and consider adequate alternatives." *Muckleshoot Indian Tribe v. U.S. Forest Serv.*, 177 F.3d 800, 809 (9th Cir. 1999) (emphasis added). Negative impacts and mitigation measures must also be discussed. 40 C.F.R. § 1502.16.

Pursuant to NEPA, the Commission stated that it intends "to prepare an environmental impact statement (EIS) that describes and evaluates the probable effects, including an assessment of the site-specific and cumulative effects, if any, of the proposed action and alternatives." FERC, Office of Energy Projects, Scoping Document 2 for the Don Pedro Hydroelectric Project, at 6 (July 25, 2011).

B. The Conservation Groups' proposed alternatives are reasonably related to the purpose and need of the Don Pedro Project.

For purposes of NEPA, "[t]he scope of an alternatives analysis depends on the underlying purpose and need specified by the agency for the proposed action." *League of Wilderness Defs.-Blue Mountains Biodiversity Project v. U.S. Forest Serv.*, 689 F.3d 1060, 1069 (9th Cir. 2012) ("League of Wilderness") (internal quotation marks omitted). The Commission "need only evaluate alternatives that are reasonably related to the purposes of the project." *Id.* (internal citation and quotation marks omitted). However, the Commission may not define the purpose and need of the project so narrowly as to curtail a full assessment of reasonable alternatives. *See City of Carmel-By-The-Sea v. U.S. Dep't of Transp.*, 123 F.3d 1142, 1155 (9th Cir. 1997) ("The stated goal of a project necessarily dictates the range of 'reasonable' alternatives and an agency cannot define its objectives in unreasonably narrow terms"). Only a sufficiently broad statement allows the full analysis of an adequate range of alternatives to enable the EIS to provide "a clear basis for choice among options by the decisionmaker and the public." 40 C.F.R. § 1502.14.

The AFLA notes that for purposes of NEPA, "any alternatives to mitigate the Don Pedro Project's effects ('mitigation strategies') must be reasonably related to the purpose and need for the Proposed Action, *which in this case is whether, and under what terms, to authorize the continuation of hydropower generation*." AFLA Exhibit E, Environmental Report, at 3-80 (September 2017) (emphasis added).

The Commission must structure its purpose and need statement so as not to preclude the analysis of reasonable alternatives. The Commission is licensing project works that affect the flow of water in the Tuolumne River. Regardless of whether those project works serve multiple purposes, the Commission is obligated to consider alternative operations that would avoid or minimize the existing conflicts between beneficial uses of the waterway.

C. The Commission may not avoid its obligations under NEPA to analyze the Conservation Groups' proposed alternatives in detail.

The Commission must analyze proposed alternatives in detail under NEPA. However, the Commission improperly asserts multiple times in Scoping Document 2 that it need not analyze *any* alternatives "designed to alter or reduce consumptive use of water":

> alternatives that address the consumptive use of water in the Tuolumne River through construction of new structures or methods designed to alter or reduce consumptive use of water are . . . alternative mitigation strategies that could not replace the Don Pedro hydroelectric project. As such, these recommended alternatives do not satisfy the NEPA purpose and need for the proposed project and are not reasonable alternatives for the NEPA analysis.

FERC, Office of Energy Projects, Scoping Document 2 for the Don Pedro Hydroelectric Project, at 15–17 (July 25, 2011). The AFLA's Environmental Analysis repeats this statement. AFLA Exhibit E, Environmental Report, at 3-1 (September 2017). This statement is incorrect.

The EIS must consider a reasonable range of alternatives, including alternative flow scenarios that better protect fish and wildlife resources. This obligation applies regardless of whether the dam serves multiple purposes; regardless of whether the Commission has exclusive authority to authorize the alternatives; to satisfy the requirement that cumulative effects be taken into account; and to satisfy the requirement that environmental consequences and mitigation measures be considered.

1. The AFLA improperly separates the Don Pedro Project's hydroelectric power purpose from its other purposes in an attempt to evade comprehensive review of the Project's impacts under NEPA.

The AFLA notes that "the purpose and need for the Proposed Action . . . is whether, and under what terms, to authorize the continuation of hydropower generation." AFLA Exhibit E, Environmental Report, at 3-80 (September 2017). However, the AFLA also states that there are "primary" and "secondary" purposes for the Don Pedro Project. "Flood control and water supply for irrigation and M&I uses, are primary purposes of the Don Pedro Project." AFLA Exhibit E, Environmental Report, at 3-80 (September 2017). Additionally, it states that "water management is driven by the primary Don Pedro Project purposes; hydropower generation is a consequence of flows scheduled for release to satisfy the primary purposes of the Don Pedro Project." *Id*. The Report thus describes hydropower generation as "a secondary consideration with respect to flow scheduling." AFLA Exhibit E, Environmental Report, at 3-80 (September 2017). *See also id*. at 3-1, 4-2 ("Hydroelectric generation is a secondary purpose of the Don Pedro project").

FERC has jurisdiction to regulate "project works," such as the Don Pedro facilities, that are necessary for project operation, regardless of whether those works serve other purposes. The Commission's jurisdiction to issue licenses for hydroelectric projects under Part I of the FPA is set forth in Section 4(e), which authorizes the Commission, in pertinent part:

> To issue licenses . . . for the purpose of constructing, operating, and maintaining dams, water conduits, reservoirs, power houses, transmission lines, or other project works necessary or convenient for . . . the development, transmission, and utilization of power.

16 U.S.C. § 797(e). "Project works" are defined as "the physical structures of a project." 16 U.S.C. § 796(12). The FPA defines a "project" as:

> [a] complete unit of improvement or development [of hydropower], consisting of a power house, all *water conduits*, all dams and appurtenant works and structures . . . which are a part of said unit, and all storage, diverting or forebay reservoirs directly connected therewith, . . . all miscellaneous structures used and useful in connection with said unit or any part thereof, and all water-rights, rights-of-way, ditches, dams, reservoirs, lands, or interests in lands the use and occupancy of which are necessary or appropriate in the maintenance and operation of such unit

16 U.S.C. § 796(11) (emphasis added). In this case, the infrastructure that supports those other purposes, such as irrigation and flood control, is necessary for hydropower generation and

qualifies as "project works" that the Commission is authorized to regulate by means of granting a conditioned license for hydroelectric power generation.

It is irrelevant that hydroelectric power generation is not the sole purpose of operations. Regardless of the impetus for operational decisions, the effects that result from the operation of project works are by definition project effects, and are thus relevant for an analysis of environmental impacts. The disassociation of power and water supply functions is a fiction that cannot used to circumvent NEPA requirements. The project works were specifically designed to have multiple purposes, and they will continue to do so unless the Project is decommissioned. The impacts of the flow regime dictated by the integrated Project operations, and alternatives to those operations, should be analyzed.

2. <u>Conservation Groups' alternatives must be analyzed as the record shows that the Proposed Action will not protect fish and aquatic resources over the term of the new license.</u>

Protection of fish and other aquatic resources has been a relevant concern for purposes of licensing the Project since its original license was granted in 1964. Indeed, the Commission expressly refuted the 1964 applicants' argument that the license should not require water flow releases specifically for the protection of fish.

> In concluding that releases for fish should be required as a condition of the license, we do not seriously question the applicants' contention that even without such a condition the salmon runs would be preserved longer with New Don Pedro than with existing Don Pedro. On the basis of the record, we would expect that New Don Pedro could be operated without adverse effect on the salmon runs until after 1985, when San Francisco's upstream diversions reach 295 mgd; whereas without New Don Pedro it appears that the fish would be seriously affected, if not destroyed, after 1968, when San Francisco's diversions reach 210 mgd. This evidence, however, does not substantiate the applicants' contention that no fish water releases should be required in the New Don Pedro license. In our judgment such releases are required as hereinafter prescribed if the project is to be found to be best adapted to a comprehensive plan for development of the waterway, since only by making the releases a condition of the license can we be sure that the project will be operated so as to utilize the available water in the best interest of all parties and provide the best plan for comprehensive development for all public uses.
>
> *Re Turlock Irrig. Dist.,* 53 P.U.R.3d 18 (1964).

The evidence in the record indicates that the proposed flow schedule will not protect fish and other aquatic resources over the term of the new license. Regardless, the AFLA argues that "the Proposed Action would have no adverse effects on fish and aquatic resources in the reach between Don Pedro Reservoir and La Grange Diversion Dam." AFLA Exhibit E, Environmental Report, at § 3.5.3.3. (September 2017). It also argues that "[c]ontinuance of existing hydropower operations at Don Pedro Dam would have no adverse effect on flows, temperature, water quality, or any other environmental conditions in the lower Tuolumne River, because the lower river flow regime is dictated by the independent, non-interrelated primary

purposes of the Don Pedro Project . . . and flow releases to protect aquatic resources." *Id*. § 3.4.2.3.

The Commission's NEPA analysis should include consideration of alternatives such as those that "enhance fish and wildlife resources and reduce negative impacts attributable to a project since its construction" even if the presently existing project conditions are adopted as the project baseline. *Am*. *Rivers v*. *F*.*E*.*R*.*C*., 201 F.3d 1186, 1197–98 (9th Cir. 1999).

3. Conservation Groups' alternatives must be analyzed under NEPA regardless of whether the Commission has authority to authorize them.

The Commission has authority to authorize the proposed alternatives. As explained above, FERC has jurisdiction to regulate "project works," such as the Don Pedro facilities, that are necessary for project operation, regardless of whether those works serve other purposes. As also explained above, in 1964 the original license for the Project granted by the Commission was "issued to Turlock and Modesto upon the conditions for fish water releases recommended by staff." *Re Turlock Irrig*. *Dist*., 53 P.U.R.3d 18 (1964).

For purposes of NEPA, however, it is irrelevant whether the Commission has authority to authorize the proposed alternatives. NEPA regulations, 40 C.F.R. § 1502.14(c), require that agencies "include reasonable alternatives not within the jurisdiction of the lead agency." *Muckleshoot Indian Tribe v*. *U*.*S*. *Forest Serv*., 177 F.3d 800, 814 (9th Cir. 1999) (internal citation omitted). The AFLA argues that "[h]ydroelectric generation is a secondary purpose of the Don Pedro Project" and, citing the Commission's Scoping Document 2, that recommended alternatives to change the consumptive use of water "could not replace the Don Pedro hydroelectric project" and therefore "are not reasonable alternatives for the NEPA analysis." AFLA Exhibit E, Environmental Report, at 3-1 (September 2017). This is an incorrect legal conclusion.

Contrary to the AFLA's argument, the Commission may not avoid its obligations under NEPA for lack of authority to authorize a proposed alternative. In *Muckleshoot*, the Ninth Circuit held that the Forest Service could not avoid analyzing an alternative that would involve purchasing land with Federal Land and Water Conservation Fund funds, despite that the Forest Service lacked authority to appropriate the funds. *Id*. at 814. The Court stated that the Forest Service did have the ability to *request* the funds, and its failure to analyze this reasonable option rendered its NEPA alternatives analysis inadequate. *Id*. Here, even if the Commission lacked authority to require a different water flow regime—which it does not, as explained above—it may discuss or request a different regime from those entities that have authority to change the regime. Failure to analyze this reasonable alternative would render the Commission's NEPA analysis inadequate.

III. NEPA requires that the Commission's EIS address cumulative effects.

The EIS must address cumulative effects, which are defined as "[t]he impact on the environment which results from the incremental impact of the action when added to other past,

present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions." (40 C.F.R. § 1508.7.)

The Commission's policy is to "address and consider cumulative impact issues at original licensing and relicensing *to the fullest extent possible* consistent with the Commission's statutory responsibility to avoid undue delay in the relicensing process and to avoid undue delay in the amelioration of individual project impacts at relicensing." 18 C.F.R. § 2.23 (emphasis added).

The Commission must analyze the Conservation Groups' proposed alternatives to determine whether it would avoid or better mitigate project effects, including cumulative effects.

"An EIS must address the *cumulative impacts* of a project and consider adequate alternatives." *Muckleshoot Indian Tribe v. U.S. Forest Serv.*, 177 F.3d 800, 809 (9th Cir. 1999) (emphasis added). This requirement includes consideration of "the incremental impact of the action when added to other past, present and reasonably foreseeable future actions *regardless of what agency (Federal or non-Federal) or person undertakes such other actions*." *Id.* (quoting 40 C.F.R. § 1508.25(a)(2)) (emphasis added). The Commission may not circumvent its obligation to analyze the proposed alternative flow regimes by arguing that the primary impacts of the Don Pedro Project are attributable to other agencies. The proposed alternatives would have positive effects on the incremental, cumulative impacts of the Project regardless of what actions other agencies have taken or will take in the future. These proposed alternatives must be analyzed.

IV. NEPA requires the Commission to analyze the Conservation Groups' alternatives to inform its analysis of potential mitigation measures for the Project's adverse effects.

When the Commission is evaluating the environmental consequences of proposed and alternative Project operations, it should also analyze any reasonable measures that would mitigate those consequences. The Commission's EIS must "discuss the extent to which adverse effects can be avoided." *Robertson v. Methow Valley Citizens Council*, 490 U.S. 332, 352 (1989). This required step is a crucial aspect of the NEPA analysis. "Without such a discussion, neither the agency nor other interested groups and individuals can properly evaluate the severity of the adverse effects." *Id.* As explained above, the Commission may not be excused from analyzing mitigation measures just because it may not have authority to require them.

The Commission must analyze reasonable alternatives as part of its required analysis of mitigation measures to reduce negative environmental consequences. This requirement is codified in 40 C.F.R. § 1502.16(d), which states that the NEPA analysis "shall include discussions of: . . . [t]he environmental effects of alternatives including the proposed action." *See also Robertson v. Methow Valley Citizens Council*, 490 U.S. 332, 351 (1989) ("To be sure, one important ingredient of an EIS is the discussion of steps that can be taken to mitigate adverse environmental consequences.") The Conservation Groups' alternatives are reasonable measures that would mitigate the environmental impacts of the Project. Therefore, the Commission must analyze them to meet its obligations under 40 C.F.R. § 1502.16(d).

V. FERC's Issuance of a New License for the Don Pedro Project Would Trigger CWA Section 401's Requirement for a Water Quality Certification.

Under CWA section 401 states must provide a water quality certification for any activity that may result in a discharge into intrastate navigable waters before a federal license or permit may be issued for that activity.[193] A request for certification may be granted, denied, or waived by the relevant state agency. If granted, the certification must set forth what conditions and limitations on the effluent and project are necessary to ensure that the certified project complies with the provisions of the CWA and with any applicable state law requirements.[194] The limitations set forth in this certification become a condition on any federal license or permit for the project.[195] The application process for a federal permit or license which triggers § 401 cannot be completed without properly applying for § 401 certification from the relevant state or tribe.[196]

Section 401 is triggered when an applicant seeks "a Federal license or permit to conduct *any* activity including, but not limited to, the construction or operation of facilities, which *may* result in *any discharge* into the navigable waters" of the United States.[197] The discharge need not involve any addition of pollutants in order to trigger § 401. The Supreme Court held in *S.D. Warren Co. v. Maine Board of Environmental Protection et. al.* that, when discussing water, "'discharge' commonly means a 'flowing or issuing out,' and this ordinary sense has consistently been the meaning intended when this Court has used the term in prior water cases."[198] This interpretation of the term "discharge," the Court further noted, was consistent with its previous holding in *PUD No. 1 v. Washington Dep't of Ecology*,[199] as well as with the interpretations of the EPA and FERC, which "have each regularly read 'discharge' as having its plain meaning and thus covering releases from hydroelectric dams."[200] Because the Don Pedro Dam would create a "discharge" under the CWA, it is subject to the requirements of § 401 of the Act.

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[193] CWA § 401(a)(1); 33 U.S.C. 1341(a)(1)
[194] CWA § 401(d)
[195] *Id*.
[196] EPA Office of Wetlands, Oceans, and Watersheds, Clean Water Act Section 401 Water Quality Certification: A Water Quality Protection Tool For States and Tribes 15 (2010) (hereinafter "EPA Handbook") ("Section 401 indicates that an application for a federal permit or license that may result in a discharge to waters of the U.S. cannot be considered complete unless accompanied by a grant or waiver of §401 certification. 'No license or permit shall be granted until the certification . . . has been obtained or has been waived.' As a result, the applicant is responsible for requesting the necessary §401 certification from the state or tribe.") (citations omitted).
[197] CWA § 401(a)(1) (emphasis added).
[198] 547 U.S. 370, 376 (2006) (quoting Webster's New International Dictionary 742 (2d ed. 1954)).
[199] 511 U.S. 700 (1994).
[200] *S.D. Warren*, 547 U.S. at 377 (citing EPA, Water Quality Standards Handbook § 7.6.3, p. 7-10 (2d ed. 1994) ("EPA has identified five Federal permits and/or licenses that authorize activities that may result in a discharge to waters[, including] licenses required for hydroelectric projects issued under the Federal Power Act"); *FPL Energy Maine Hydro LLC*, 111 FERC P61,104 p. 61,505 (2005)(rejecting, in a recent adjudication, the argument that Congress "used the term 'discharge' as nothing more than a shorthand expression for 'discharge of a pollutant or pollutants'")).

Furthermore, a § 401 certification for this project is mandated by California statute. The California Code of Regulations contains in Title 23, § 3855(b)(1) the following language: "[a]n application for water quality certification shall be filed . . . whenever a potential discharge from a proposed activity . . . is involved or associated with . . . a hydroelectric facility, and the proposed activity requires a FERC license or amendment to a FERC license." The Districts fail to address the existence of this statutory requirement, much less explain how it could possibly not apply to the Don Pedro Project. Instead of attending to the statutory language, the Districts choose to discuss language from a letter the State Board sent to the EPA in March of 1994.[201] However, the 1994 letter is not controlling legal authority. In addition to being almost 25 years old, this outdated State Board opinion contradicts both the intervening Supreme Court opinion in *PUD No. 1* and current California law. The language from the State Board's 1994 letter is therefore completely irrelevant.

In summary, the language from the Supreme Court and California's statute is unambiguous. The State Board therefore has the authority to establish Section 401 certification requirements and limitations as it deems appropriate to protect the Tuolumne River's water quality.

A. The SED's Unimpaired Flow and Carryover Storage Requirements Can Be Applied to the Districts Because Section 401 Applies to Streamflow and Operations.

The thrust of the Districts' arguments about streamflow and operations is that the CWA does not consider impacts from changes in water flow to be associated with "water quality" as properly regulated by the CWA. This line of argument contradicts precedent, explicit EPA policy, and the relevant statutory language. As such, the Districts' assertion that the § 401 process should not apply to the Don Pedro Project because the water-related concerns relate to stream flow should be summarily rejected. The State Board should proceed with the § 401 certification process as is clearly authorized by law, and establish conditions and limitations for licensing and operation as it deems necessary to adequately maintain and protect the existing uses of the Tuolumne River.

1. A minimum stream flow requirement is a permissible condition of a Section 401 certification.

The argument the Districts make regarding the impermissibility of streamflow and operations requirements in a § 401 certification is essentially the same as an argument already explicitly rejected by the Supreme Court. "[W]hether the minimum stream flow requirement that the State imposed on the Elkhorn Project [was] a permissible condition of a § 401 certification under the Clean Water Act" was "[t]he principal dispute" in *PUD No. 1*.[202] The Court concluded unambiguously that the minimum stream flow requirement was a permissible condition of a § 401 certification. Petitioners in that case argued, as the Districts do, that the

[201] Letter from Greg Salyer, General Manager, Modesto Irrigation District, and Casey Hashimoto, General Manager, Turlock Irrigation District, to State Water Resources Control Board, at 11 (Mar. 17, 2017) (hereinafter "Letter to SWRCB").
[202] 511 U.S. at 711.

CWA is concerned only with water quality, not water quantity.[203] The Supreme Court responded that "[t]his is an artificial distinction," and went on to explain the intimate link between water quality and water quantity:

[T]here is recognition in the Clean Water Act itself that reduced stream flow . . . can constitute water pollution. First, the Act's definition of pollution as "the man-made or man induced alteration of the chemical, physical, biological, and radiological integrity of the water" encompasses the effects of reduced water quantity. This broad conception of pollution -- one which expressly evinces Congress' concern with the physical and biological integrity of water -- refutes petitioners' assertion that the Act draws a sharp distinction between the regulation of water "quantity" and water "quality." Moreover, § 304 of the Act expressly recognizes that water "pollution" may result from "changes in the movement, flow, or circulation of any navigable waters . . ., including changes caused by the construction of dams." This concern with the flowage effects of dams and other diversions is also embodied in the EPA regulations, which expressly require dams to be operated to attain designated uses.[204]

In light of this decision, the Districts' assertion that § 401(d) is limited in scope and cannot be applied to "matters of streamflow, water rights, and operations of dams and diversions" because these are "not related to water quality" is plainly erroneous.[205] This argument was comprehensively and explicitly rejected in the *PUD No. 1* decision.[206]

The petitioners in *PUD No. 1* also attempted to argue that "the minimum stream flow requirement imposed by the State was unrelated to [the] specific discharges, and that as a consequence, the State lacked the authority under § 401 to condition its certification on maintenance of stream flows sufficient to protect the Dosewallips fishery."[207] The Court rejected this argument too because it conflicts with the explicit language of the CWA. "The text refers to the compliance of the applicant, not the discharge. Section 401(d) thus allows the State to impose 'other limitations' on the project in general to assure compliance with various provisions of the Clean Water Act and with 'any other appropriate requirement of State law.'"[208]

This view is consistent with EPA's regulations implementing § 401. The regulations expressly interpret § 401 as requiring the State to find that "there is a reasonable assurance that the *activity* will be conducted in a manner which will not violate applicable water quality standards." EPA's conclusion that *activities* -- not merely discharges -- must comply with state water quality standards is a reasonable interpretation of § 401, and is entitled to deference.[209]

The Court found, in no uncertain terms, "that ensuring compliance with § 303 is a proper function of the § 401 certification. . . . As a consequence, state water quality standards

[203] *Id*. at 719.
[204] *Id*. (citations omitted).
[205] Letter to SWRCB, at 12.
[206] 511 U.S. at 723 ("In summary, we hold that the State may include minimum stream flow requirements in a certification issued pursuant to § 401 of the Clean Water Act . . . .")
[207] *Id*. at 719.
[208] *Id*.
[209] *Id*. at 712 (citations omitted) (emphasis in original).

adopted pursuant to § 303 are among the 'other limitations' with which a state may ensure compliance through the § 401 certification process."[210]

In light of the well-established law on § 401, it is incoherent to argue that establishing streamflow requirements as part of the § 401 certification is inappropriate. Such an argument also contradicts a variety of statements in the EPA's handbook on § 401. In the section labeled "401 Certification Considerations: Consistency With Other Appropriate Requirements of State and Tribal Law," the EPA expressly acknowledges the relevancy of "wildlife laws addressing *habitat characteristics* necessary for species identified in a waterbody's designated use."[211] The words "habitat characteristics" clearly contemplate more than toxins and pollutants. Indeed, when the handbook discusses the potential for adaptive management, it explicitly discusses the creation and modification of "a minimum flow" requirement "[i]n the context of hydropower licensing adaptive management."[212]

The Districts also attempt to argue that "FERC retains sole and exclusive jurisdiction to establish minimum streamflow and other conditions of the license in the absence of the 401 conditions," and thus that "[e]ven if adopted, the UIF and carryover storage requirements cannot unilaterally be applied against MID and TID because they are preempted by FERC's determination on appropriate streamflows."[213] Their defense of this argument hinges entirely on the language and holding from *California v. FERC*.[214] Like almost everything else the Districts cite, however, this case predates the *PUD No. 1* opinion. Thus, *PUD No. 1* is the controlling law, not *California v. FERC*. As explained in detail above, the holding in *PUD No. 1* clearly authorizes the SWRCB to incorporate streamflow requirements in their § 401 certification.

B. The Need to Apply for Section 401 Certification for the Don Pedro Dam is Unavoidable.

There are no exceptions that will permit the Districts to circumnavigate the need to obtain § 401 certification for Don Pedro Project. The Districts make two failed arguments concerning the lack of a need for § 401 certification for the Project. The first argument is that, because they may apply for a new license that reduces the discharge quantity, the need for a § 401 certification is nullified. The second argument is that, even if the new license resulted in equal or slightly higher discharge than currently flows through the dam, the § 401 certification may still not be necessary because "[n]ot all increases in flows from hydroelectric projects will trigger the need for Section 401 certification."[215] Neither of these arguments has merit.

To address the Districts' first argument, what they "may" do is irrelevant. A § 401 certification is required whenever there exists the *potential* for a discharge. Certainty or likelihood of a discharge is not required.[216]

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[210] *Id*.
[211] EPA Handbook, at 21.
[212] *Id*. at 27.
[213] Letter to SWRCB, at 14.
[214] 495 U.S. 490 (1990).
[215] Letter to SWRCB, at 15.
[216] EPA Handbook, at 4 ("It is important to note that §401 certification is triggered by the *potential* for a discharge; an actual discharge is not required") (emphasis in original).

The Districts' second argument contains numerous flaws. First, the assertion that not all increases in flow require a § 401 certification is true but irrelevant. Section 401 is implicated by the Don Pedro Project because it involves an "applicant for a Federal license or permit to conduct [an] activity . . . which may result in [a] discharge,"[217] not because it is predicted to cause an increase in flow. Additionally, as was discussed above, 23 C.C.R. § 3855(b)(1) mandates that an application for water quality certification be filed for any hydroelectric facility activity requiring a FERC license or an amendment to a FERC license.

Furthermore, the example the Districts offer in support of their second argument is off-point. In the example, the licensee merely sought permission to make a change in its discharge rate.[218] This licensee asked only for a *modification* to the conditions of its *existing* FERC license, and FERC, being the licensing authority, granted the modification to its own license. In contrast, the Don Pedro Dam involves a relicensing procedure; a new license must be issued permitting continued and modified operations. As discussed above, state and federal law clearly provide for § 401 certification as part of the process of obtaining this new license.

Additionally, the Districts' example scenario occurred in Alabama. In California, there is a statute explicitly mandating the filing of an application for water quality certification for projects such as this. The decision FERC made in Alabama inherently did not involve application of this statutory mandate. The legal framework within which the Alabama decision was made is not analogous to the legal framework under which decisions must be made regarding the Don Pedro Project.

Finally, it is unclear what relevance the Districts believe their confidence "that the nature of the discharge will not materially change" is supposed to have.[219] Even assuming their confidence is well placed, the static nature of the discharge does not shield them from the requirement for a § 401 certification as part of the relicensing process. Federal law and Supreme Court precedent authorize the SWRCB to undertake a § 401 certification process if there is even the potential for a discharge, which clearly exists here. Furthermore, state law mandates that the project go through said process. Beyond that, the Districts' *beliefs* about what the studies and environmental analysis *will* say about the nature of the discharge are neither dispositive nor relevant to an analysis of the applicability of § 401.

NEPA RECOMMENDATIONS

As noted in the section *supra*, the Commission has obligations under NEPA and FPA to assess the Project's direct and cumulative effects on the environment, develop and adopt appropriate protection, mitigation or enhancement measures to mitigate the adverse effects of the Project, and develop and analyze reasonable alternatives to the proposed Project.

[217] 33 U.S.C. § 1341(a)(1).
[218] Letter to SWRCB, at 15.
[219] Letter to SWRCB, at 15.

VI. Alternatives

The Commission should analyze the following alternatives in its NEPA document: 1) the Conservation Groups' Flow, Habitat and River Management Alternative; and 2) a Low Exports Alternative that may be required pursuant to Phase II of the Bay-Delta Plan update;

A. Conservation Groups' Tuolumne River Flow, Habitat and River Management Alternative

The EIS should evaluate the Conservation Groups' Flow, Habitat and River Management Proposal for the Tuolumne River. This alternative should include: 1) Conservation Groups' recommended flow measures, including the proposal for a groundwater water bank; 2) Conservation Groups recommended habitat improvement measures including proposals for additional floodplain habitat, large woody debris, and gravel augmentation; 3) Conservation Groups' recommended river management improvement measures including a proposal to install a segregation weir in Critically Dry years in the Lower Tuolumne River; 4) Conservation Groups' measures related to management actions upstream of Don Pedro Reservoir including access improvement at Ward's Ferry Bridge.

In developing a flow proposal for the lower Tuolumne River, the Conservation Groups attempted to work within the general framework that the State Water Resources Control Board (State Board) has established for its ongoing San Joaquin Flow and Salinity proceeding, otherwise known as Phase I of the Update of the Bay-Delta Water Quality Control Plan."[220] The State Board framework is built around the scientifically-supported principle that higher and more variable inflows during the February through June time frame are needed to support existing salmon and steelhead populations in the major San Joaquin River tributaries, including the Tuolumne.[221] Accordingly, the State Board recommended flow objectives for the Tuolumne River (as well as the Merced and Stanislaus rivers) require release of 30-50% of the February-June unimpaired flow in each river, with a beginning value of 40%.

The Conservation Groups agree with the principles underpinning the State Board's recommended flow objectives. However, the State Board's recommended flow objectives lack critical detail and rely instead on an amorphous adaptive management regime. Consequently, it has been difficult for stakeholders to thoroughly understand the benefits and impacts associated with the State Board's proposal. The Conservation Groups' flow proposal picks up where the State Board's proposal falls short: it better defines the flow regime, models it more accurately, and addresses Critically Dry years and dry-year sequences. To do so, the Conservation Groups used the water-balance model developed by the Districts and CCSF for the relicensing to incrementally evaluate different percentages of unimpaired flow requirements for the lower Tuolumne River in all or just some of the February–June months. The Conservation Groups'

[220] SWRCB, "Bay Delta Plan Update: Draft San Joaquin River Flow and Southern Delta Salinity Requirements Released for Public Comment," *available at* http://www.waterboards.ca.gov/waterrights/water_issues/programs/bay_delta/bay_delta_plan/water_quality_control_planning/2012_sed/docs/sjr_factsheet2012.pdf.

[221] *See* Technical Report on the Scientific Basis for Alternative San Joaquin River Flow and Southern Delta Salinity Objectives. State Water Resources Control Board. February 2012; updated June, 2016.

flow proposal, in concert with its recommended non-flow measures, will likely achieve the stated goals of the State Board proposal while addressing many of the concerns articulated by the Licensees.

Given that the State Board issued its draft revised water quality objectives and a recirculated SED for Phase 1 on September 15, 2016, it is reasonably foreseeable that the State Board will adopt new flow objectives that will affect the Tuolumne River during the term of the new license.[222] Indeed, since the State Board may use its Clean Water Act §401 Water Quality Certification authority as a legal basis for portions of the Bay-Delta Plan update, it is foreseeable that portions of the update may be directly incorporated into the Certification and thus the new FERC license for the Don Pedro Hydroelectric Project.[223] The Conservation Groups plan to submit their flow alternative to the State Board for consideration as an alternative to the State Board's recommended flow objectives.

As described *supra*, the Conservation Groups also analyzed the nature and amount of physical habitat improvements needed in the lower Tuolumne River. Conservation Groups performed these analyses both in the context of FERC licensing and in other collaborative settings. The Conservation Groups developed a series of biological and environmental goals and objectives to use as metrics for these analyses. The Conservation Groups used two sets of modeling tools to evaluate the interaction between instream flow and floodplain inundation, and developed a recommendation that requires varying amounts of needed floodplain improvements according to a quantification of habitat availability that will become available as a result of flow improvements. Recognizing that not all inundated floodplain is suitable habitat for salmonids, Conservation Groups specifically require suitable habitat in their recommendation for floodplain habitat improvements. Conservation Groups also recognize the specific degradation of the Tuolumne River's channel habitat caused by dredging and the resulting "special run pools" that provide poor habitat for salmonids and excellent habitat for piscivorous fish. Conservation Groups recommend solving the underlying habitat problem that promotes the abundance of piscivorous fish, combined with use of a weir in Critically Dry years to prevent migration of striped bass into the upper 26 miles of salmonid habitat in the lower Tuolumne River. Conservation Groups also developed a proposal to place and maintain large woody debris in the lower Tuolumne River.

The State Board's SED for the Water Quality Control Plan acknowledges the need for physical habitat improvements in the lower Tuolumne River, and other San Joaquin River tributaries and the mainstem lower San Joaquin. However, the State Board makes no specific recommendations on the nature or amount of habitat that may be required in conjunction with necessary flow improvements.

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[222] Available at: https://www.waterboards.ca.gov/waterrights/water_issues/programs/bay_delta/bay_delta_plan/water_quality_control_planning/2016_sed/index.shtml

[223] See Revised Notice of Preparation for "Update to the Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary: Water Quality Objectives for the Protection of Southern Delta Agricultural Beneficial Uses; San Joaquin River Flow Objectives for the Protection of Fish and Wildlife Beneficial Uses; and the Program of Implementation for Those Objectives, Attachment 2, p. 4. Available at http://www.swrcb.ca.gov/waterrights/water_issues/programs/bay_delta/bay_delta_plan/water_quality_control_planning/docs/notice_sjr_flow_southern_delta_scoping_mtg_with_attachments.pdf

Conservation Groups propose to protect, mitigate and enhance Project effect on riverine recreation. Conservation Groups' recommendations for recreation differ in emphasis and extent from those of the Licensees.

Accordingly, the Commission should evaluate Conservation Groups' alternative as a reasonable means to address forthcoming regulatory requirements while meeting the purpose and need of the Projects.

B. Limited Exports Alternative

The EIS should evaluate an alternative that evaluates Licensee's proposal and Conservation Groups' Flow, Habitat and River Management Alternative in combination with reduced exports at the SWP and CVP south Delta pumps. Phase II of the update of the Water Quality Control Plan will consider changes to export restrictions and requirements on the south Delta pumps of the State Water Project and the Central Valley Project.

The geographic scope of this analysis, at a minimum, should extend to the confluence of the San Joaquin and Sacramento Rivers, consistent with Commission direction on listed species in Scoping Document 2 for the Don Pedro Project:

> For water resources, aquatic resources, and socioeconomics we define the geographic scope as extending upstream on the Tuolumne River to Hetch Hetchy and extending downstream to San Francisco Bay**.**
>
> At this time, we have tentatively determined a cumulative geographic scope for anadromous fish and EFH that includes the Tuolumne River basin downstream to the confluence with the San Joaquin River, and through the Sacramento-San Joaquin Delta to San Francisco Bay.[224]

In the 2009 FERC Proceeding on Interim Conditions, consultants for Turlock and Modesto irrigation districts and for the City and County of San Francisco pointed strongly to the importance of coordination of San Joaquin tributary flows and of Delta export operations. For instance, biologist Noah Hume testified on behalf of the Districts:

> Perhaps the largest improvements in conditions affecting Chinook salmon could take place in the San Joaquin River and Delta. … Other than drastic reductions in exports from the state and federal pumping facilities, major flow factors affecting Chinook salmon downstream of the Don Pedro Project include management of San Joaquin River basin outflows during winter and spring from all three tributaries (Stanislaus, Tuolumne and Merced) and implementation of seasonal barriers in the Delta that shift migration routes and improve survival. … Absent major reductions in export levels, however, it is unlikely that predator habitat suitability and predation levels in the Delta will markedly improve.[225]

[224] Scoping Document 2 for the Don Pedro relicensing, July 25, 2011, eLibrary no. 20110725-3020, pp.33-34.
[225] Testimony of Noah Hume, eLibrary no. 20090914-5160, pp. 16-17.

The Vernalis Adaptive Management Program (VAMP), which was discontinued after 2010, combined a mid-April to mid-May pulse flow with export reductions during the period of the pulse flow. While many observers agreed that the approach was conceptually sound, positive results were limited; much of this limitation was attributed to the small magnitudes of the pulses. As the VAMP review panel put it:

> VAMP flows generally have been too restricted in range and have included more low flows than high flow. From an experimental or adaptive management perspective, it is impossible to learn much about effects of higher flows without having a chance to observe survival (and carry out acoustic tagging experiments) at such higher flows.[226]

In testimony before the State Water Board in February, 2010, Dr. Christina Swanson of the Bay Institute recommended specific export limitations during biologically critical spring periods. Dr. Swanson concluded:

> … [C]urrent Delta hydrodynamic conditions resulting from the combined effects of low San Joaquin River inflows and high export rates are almost always inadequate to provide conditions necessary to support or sustain San Joaquin Basin salmon population abundances or meet these objectives. We also concluded that only Delta hydrodynamic conditions with a VF:E [Vernalis Flow to Exports] ratios that were greater than 4.0 consistently corresponded to salmon abundance levels that approached the population abundance objectives for this species.[227]

Dr. Swanson recommended the following measures:

1. "Hydrodynamic conditions in the Delta should be managed to maintain OMR flows that are greater than -2000 cfs during the period from October-June in all years."[228]
2. "Hydrodynamic conditions in the Delta should be managed to maintain a March–June VF:E ratio that is greater than 4.0 in 40% of years, greater than 3.0 in 60% of years, greater than 2.0 in 80% of years and greater than 1.0 in 100% of years."[229]

In its summary comments to the State Board in the 2010 Delta Flow Criteria workshops, the USFWS stated:

> We believe the source of flows is very important to determine Delta outflows. … This includes contributions from the Sacramento and San Joaquin Rivers and their tributaries. As stated in previous Board workshops, managing the San Joaquin system for flows only

[226] *The Vernalis Adaptive Management Program (VAMP): Report Of The 2010 Review Panel*, p. 9. Available at: http://www.sjrg.org/technicalreport/2009/2010-VAMP-Peer-Review-Panel-Report.pdf
[227] Testimony of Christina Swanson Regarding Flow Criteria for the Delta Necessary to Protect Public Trust Resources: Delta Hydrodynamics, February 16, 2010, p. 11. Available at: http://www.waterboards.ca.gov/waterrights/water_issues/programs/bay_delta/deltaflow/docs/exhibits/bay_inst/tbi_exh4.pdf
[228] *Id*.
[229] *Id*., p. 12.

> at Vernalis has not been effective in improving fish populations on the San Joaquin and its tributaries.[230]

The USFWS continued: "To address the biological objective of increased survival of emigrating salmonid smolts, the AFRP identified the importance of maintaining positive QWEST flows (AFRP Working Paper, 1995)."[231] It elaborated further:

> It's important to note, that in 1992, the Board also acknowledged the importance of maintaining positive QWEST flows, in order to protect and stop the decline of the public trust resources in the Delta, and included a new standard (requirement) that "there shall be no reverse flow for all year types on a 14-day running average in the western Delta… between February 1 and June 30.

Commission staff should select from principles agreed on in the State Board's Decision 1630 in 1992, in the San Joaquin River Agreement that led to the implementation of VAMP, in the testimony of the Districts in 2009, and in the submittals of Bay Institute and the USFWS in the 2010 Delta Flow Criteria workshops. Commission staff should use these principles and other relevant information to develop a series of rules for SWP and CVP exports as the basis for a Limited Exports Alternative. The Limited Exports Alternative should be designed to allow the Commission to evaluate the Districts' and Conservation Groups' flow alternatives in conjunction with Delta export reductions that substantially improve opportunities for the survival of salmonids outmigrating from the Tuolumne River in particular and the San Joaquin River in general. With this geographic extent, the Limited Exports Alternative should also evaluate impacts to Delta species such as Delta smelt and longfin smelt. These pelagic species are dependent not only on export operations, but also on inflow from Delta tributaries such as the Tuolumne.

Since at least 2009, the Districts and CCSF have argued that flow increases in the Tuolumne River are relatively futile because the benefits in the river will be overwhelmed by conditions in the Delta downstream. A Limited Delta Exports alternative will break through this blame-the-other-guy paradigm and answer the question: what if downstream conditions were not a limiting factor?

VII. Comments Regarding Cumulative Effects of the Proposed Action

As noted in the "Legal Basis for Conservation Groups' Recommendations," *supra*, the Commission's NEPA document must address cumulative effects. The Commission's policy is to "address and consider cumulative impact issues at original licensing and relicensing *to the fullest extent possible* consistent with the Commission's statutory responsibility to avoid undue delay in

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[230] U.S. Department of the Interior, *Comments Regarding the California State W ater Resources Control Board's Notice of Public Informational Proceeding To Develop Delta Flow Criteria for the Delta Ecosystem Necessary to Protect Public Trust Resources*, February 12, 2010, p. 12, Available at: https://www.waterboards.ca.gov/waterrights/water_issues/programs/bay_delta/deltaflow/docs/exhibits/usdoi/doi_entire_exhibit.pdf

[231] *Id*., p. 8. Qwest means the aggregate daily average flow at Prisoners Point on the San Joaquin River upstream of Antioch.

the relicensing process and to avoid undue delay in the amelioration of individual project impacts at relicensing." 18 C.F.R. § 2.23 (emphasis added).

The new licenses, in conjunction with present water supply operations, will cumulatively affect fish and wildlife and recreation resources. The AFLA does not include sufficient information regarding other present and/or reasonably foreseeable future actions to facilitate the Commission's evaluation of the Project's cumulative effects. For instance, the AFLA does not anticipate actions to restore anadromous fish upstream of La Grange and Don Pedro dams during the term of the new license. It does not contain sufficient analysis regarding the update to the State Water Resources Control Board's Water Quality Control Plan, the San Joaquin River Restoration Program, or foreseeable changed operations at dams on the Merced River. However, information regarding these actions is publicly available. We request that the Commission utilize all available sources to inform its cumulative effects analysis in the DEIS consistent with the comments below.

A. Fish Passage

The DEIS should analyze the Projects' cumulative effects likely to result from reasonably foreseeable actions to reintroduce spring-run Chinook salmon and/or Central Valley steelhead past La Grange and Don Pedro dams to the upper Tuolumne River during the term of the new licenses. The analysis should include potential effects to biological resources, recreation use and access and the water supply of the City and County of San Francisco. NMFS has authority to issue a prescription for fish passage past La Grange Dam and Don Pedro Dam under § 18 of the FPA. However, under the terms of § 10011 of the San Joaquin River Restoration Settlement Act, NMFS is precluded from issuing an FPA § 18 fish passage prescription in the San Joaquin River watershed for spring-run Chinook until December 31, 2025.

The Commission should consider the totality of information suggesting that reintroduction of spring Chinook salmon and/or steelhead above La Grange and Don Pedro Dams is a strong possibility after 2025 and during the term of the new licenses. Such a prescription would be consistent with NMFS' comprehensive Final Central Valley Recovery Plan filed in the Don Pedro and La Grange dockets as a comprehensive plan in October, 2014.[232]

Additionally, as detailed in Conservation Groups' Fish Passage recommendation in Section II *supra,* significant studies have been commissioned by NMFS and others related to a potential reintroduction of anadromous fish to the Tuolumne River upstream of Don Pedro Reservoir.[233] Generally, these studies demonstrate that there is suitable habitat for steelhead and

[232] National Marine Fisheries Services. 2014. *Final Recovery Plan for Sacramento River Winter-run Chinook Salmon, Central Valley Spring-run Chinook Salmon, and Central Valley Steelhead*. NMFS, West Coast Region, Sacramento, California. July 22, 2014. Entered into the records for the Don Pedro and La Grange licensings as a comprehensive plan, October 6, 2014, eLibrary no. 20141006-5095.

[233] In 2017, NMFS produced a technical report on the genetics of *O. mykiss* found in the upper Tuolumne River and upper Merced River watersheds. *Conceptual Analysis of Oncorhynchus Mykiss in the Upper Tuolumne and Merced Rivers to Evaluate Ancestry and Adaptive Genetic Variation*, November, 2017, eLibrary no. 20171117-5127. In 2018, NMFS also produced a technical report on the habitat capacity of the upper Tuolumne River and upper Merced River for steelhead and spring-run Chinook salmon. *On the Capacity of upper Tuolumne and Merced Rivers for Reintroduction of Steelhead and Spring-run Chinook Salmon*, January, 2018, eLibrary no. 20180124-

genetically unique populations of steelhead in sections of the upper Tuolumne watershed. Over the next seven years, additional information-gathering and other fish passage efforts are expected to generate more information on fish passage feasibility including logistical, technical and biological issues that would inform any effort on the Tuolumne.[234]

B. San Joaquin River Restoration Settlement Act

The San Joaquin River Restoration Program (SJRRP) is on track to reintroduce Central Valley spring-run Chinook salmon to the San Joaquin River by 2025. The continued reintroduction of Central Valley spring-run Chinook salmon to the San Joaquin River above Merced River confluence in the 2018 to 2025 timeframe will likely cause this species to stray into the Tuolumne River.

The EIS should highlight and discuss the Project's cumulative effects on spring-run Chinook salmon and steelhead in the San Joaquin River that are likely to result from reasonably foreseeable San Joaquin River restoration actions, such as reoperation of Friant Dam. For instance, increased releases from Friant Dam in February and March will provide additional cold water to the San Joaquin River, including the reach downstream of the confluence with the Tuolumne River. This may improve success of rearing and outmigration of juvenile salmon and steelhead from the Tuolumne River. During April, increased releases will likely transition in water temperature, and depending on magnitude and ambient meteorology may have more mixed results, improving flow but having variable effect on water temperatures. In May and especially in June, increased releases from Friant may have reduced benefits or even adverse impacts to out-migrating Tuolumne River salmon and steelhead because of thermal increases. In addition, the Licensee and Commission should consider potential measures that would create benefits for Tuolumne River salmon and steelhead from increased Friant releases. Increased releases from Friant Dam may result in fall water temperatures in the San Joaquin River downstream of Tuolumne River confluence that inhibit upstream migration of Tuolumne River salmon; however, depending on temperature, this increased mainstem San Joaquin flow may encourage or enhance upstream fall-run salmon migration, particularly as temperatures cool.

Documents that could inform this analysis include the San Joaquin River Restoration Program Programmatic EIS/EIR prepared by the Bureau of Reclamation and California Department of Water Resources, the Salmon Conservation and Research Facility and Related Management Actions Project EIR prepared by California Department of Fish and Wildlife, and the Final 10(j) Rule establishing a Nonessential Experimental Population of Central Valley spring-run Chinook salmon prepared by NMFS.[235]

5038. In 2017, NMFS produced a technical report on conceptual engineering plans for fish passage facilities to support a program to reintroduce salmonids to the upper Tuolumne River. *Conceptual Engineering Designs for Fish Passage at La Grange and Don Pedro Dams on the Tuolumne River*, October 2017, eLibrary no. 20171133-5347

[234] For instance, the Bureau of Reclamation's ongoing pilot reintroduction program to reintroduce winter-run Chinook salmon upstream of Shasta Reservoir will likely tackle practical logistical issues of trap and haul ranging from permitting to on-the-ground operations. One or more pilot trap and haul programs elsewhere in the Central Valley may also be in planning or early implementation stages by 2025. As each program develops, cost estimates and program efficiencies are likely to evolve.

[235] Bureau of Reclamation, Department of Water Resources. July 2012. Final Program Environmental Impact Statement/Report for the San Joaquin River Restoration Program. Available at www.usbr.gov/mp/nepa/nepa_projdetails.cfm?Project_ID=2940;

C. Update of Bay-Delta Water Quality Control Plan

The State Board's Bay-Delta Plan qualifies as a comprehensive plan for the Tuolumne River pursuant to FPA section 10(a)(2) and the Commission must consider it in determining "[t]he extent to which the project is consistent with … comprehensive plan[s] for improving, developing or conserving a waterway or waterways affected by the project". 16 U.S.C. § 803(a)(2). *See* "Legal Basis for Conservation Groups' Recommendations," *supra*. It is reasonably foreseeable that the State Board will adopt new flow objectives as part of its Bay-Delta Plan update process that will affect the Tuolumne River during the term of the new license.[236] Therefore, it is also reasonably foreseeable that the State Board will take action, through its water rights or water quality certification authority, to ensure the implementation of objectives adopted in the Bay-Delta Plan. The cumulative effects analysis in the DEIS should consider how Project operations would be modified in response to implementation of the preferred alternative set forth in the State Board's final Substitute Environmental Document (SED) for the Bay-Delta Plan.

D. Water Management in the Merced River

The Merced and the Tuolumne Rivers each contain FERC-jurisdictional rim dams that essentially control all instream flows downstream of the storage reservoirs (the Don Pedro Project on the Tuolumne River is on a relicensing timeline approximately four years behind the Merced River Project). FERC's EIS's for both the Merced and Tuolumne licensings must consider the effects of each proposed action on the other, and how the combined actions can best address flow requirements in the lower San Joaquin River and the San Francisco Bay/Sacramento-San Joaquin Delta Estuary.

COMPREHENSIVE PLANNING

The Commission must ensure that the new license is best adapted to a comprehensive plan of the development for the beneficial uses of the Tuolumne River. The AFLA does not contain sufficient information to support a finding that the Districts' proposed alternative is consistent with relevant comprehensive plans including the planned update of the State Board's Bay-Delta Plan. In particular, the AFLA neglects to provide relevant information or analysis regarding actions to restore fish access above La Grange or Don Pedro Dam, the update to the Bay-Delta Plan, the San Joaquin River Restoration Program, and foreseeable changed operations at Merced River Dam. Conservation Groups' recommend that the Commission consider these actions in the DEIS as separate alternatives and/or as part of the cumulative

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California Department of Fish and Wildlife (CDFW). June 2014. Salmon Conservation and Research Facility and Related Management Actions Project Final EIR. Available at www.dfg.ca.gov/regions/4/sanjoaquinriver/#docs; National Marine Fisheries Service (NMFS). 2013. 50 CFR Part 223 (Final Rule). 10(j) Rule establishing a Nonessential Experimental Population of Central Valley spring-run Chinook salmon below Friant Dam in the San Joaquin River, Available at www.westcoast.fisheries.noaa.gov/publications/frn/2013/78fr79622.pdf.

[236] *See* SWRCB, "Bay Delta Plan Update: Draft San Joaquin River Flow and Southern Delta Salinity Requirements Released for Public Comment," *available at* http://www.waterboards.ca.gov/waterrights/water_issues/programs/bay_delta/bay_delta_plan/water_quality_control_planning/2012_sed/docs/sjr_factsheet2012.pdf.

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effects analysis, consistent with our comments above. Such analysis must be completed to provide a sufficient basis for a Commission finding that the new license is in the public interest and best suited to a comprehensive plan of development for the river. 16 U.S.C. § 803(a)(1).

CONCLUSION

Thank you for the opportunity to provide comments and recommendations in response to the Notice of Ready for Environmental Analysis for the relicensing of the Don Pedro Hydroelectric Project and the licensing of the LaGrange Hydroelectric Project.

Dated January 29, 2018

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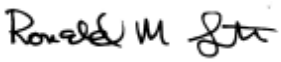
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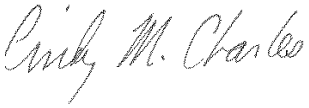
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BEFORE THE
UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

Turlock Irrigation District, Modesto Irrigation District	)	
Don Pedro Hydroelectric Project	)	P-229-082
La Grange Hydroelectric Project	)	P-14581-002

Certificate of Service

I hereby certify that the foregoing Comments and Recommendations on the Ready for Environmental Analysis of California Sportfishing Protection Alliance, Tuolumne River Trust, Trout Unlimited, American Rivers, American Whitewater, Merced River Conservation Committee, Friends of the River, Golden West Women Flyfishers, Central Sierra Environmental Resource Center and Tuolumne River Conservancy in the above-captioned proceeding has this day been filed online with the Federal Energy Regulatory Commission and served via email or surface mail upon each person designated on the Service List compiled by the Commission Secretary for this Project.

Dated at Salem, Oregon on the 29th day of January 2018.

Chandra Ferrari

Chandra Ferrari
Senior Policy Advisor
Trout Unlimited

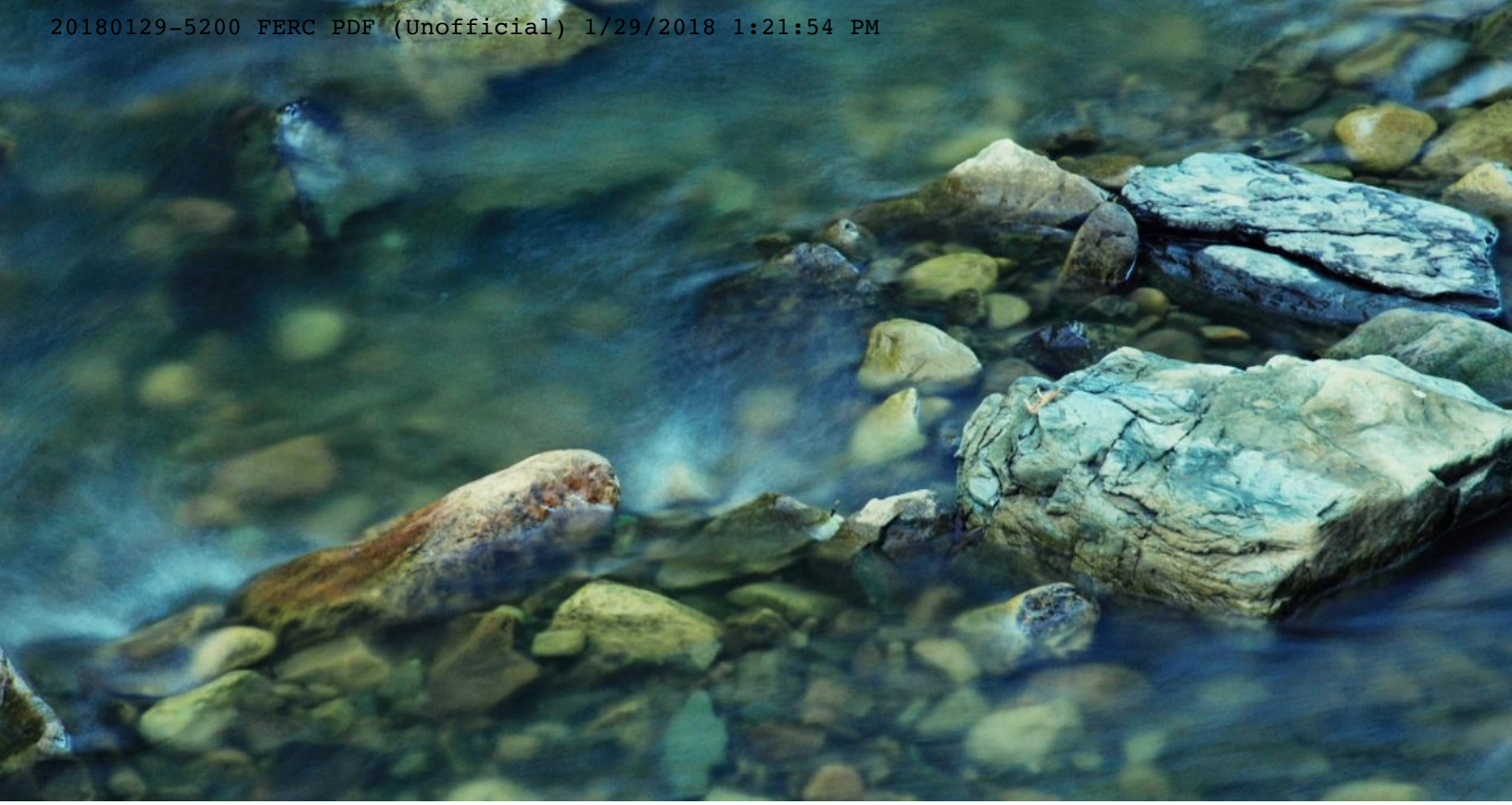
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ATTACHMENT 3

Scientific Evaluation Process (SEP) Report

Conservation Planning Foundation for Restoring Chinook Salmon (*Oncorhynchus Tshawytscha*) and *O. mykiss* in the Stanislaus River

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November 2016
SEP Group

ANCHOR QEA

Conservation Planning Foundation for Restoring Chinook Salmon (*Oncorhynchus Tshawytscha*) and *O. mykiss* in the Stanislaus River

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CONSERVATION PLANNING FOUNDATION FOR RESTORING CHINOOK SALMON (*ONCORHYNCHUS TSHAWYTSCHA*) AND *O. MYKISS* IN THE STANISLAUS RIVER

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APPENDICES

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Appendix C Environmental Objectives that Apply Across All Species and Life Stages
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ABBREVIATIONS

°C	degrees Celsius
°F	degrees Fahrenheit
7DADM	7-day average of daily maximum temperature
AFRP	Anadromous Fish Restoration Plan
BOD	biological oxygen demand
CDEC	California Data Exchange Center
CDFW	California Department of Fish and Wildlife
CFR	Code of Federal Regulations
CRR	cohort replacement rate
CVPIA	Central Valley Project Improvement Act
CVRWQCB	Central Valley Regional Water Quality Control Board
Delta	Sacramento-San Joaquin Delta
DO	dissolved oxygen
DRERIP	Delta Regional Ecosystem Restoration Implementation Plan
DWSC	Deep Water Ship Channel
ELS	early-life stages
ESA	Endangered Species Act
ESHE	Emigrating Salmonid Habitat Estimation
Estuary	San Francisco Bay/Sacramento-San Joaquin Delta Estuary
ESU	evolutionarily significant unit
F&G	California Fish and Game
FL	fork length
FR	Federal Register
ft	foot; feet
ft/s	feet per second
HSI	habitat suitability index
in	inch
IULT	Incipient Upper Lethal Temperatures
m	meter
m/s	meter per second
m^2	square meter

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maf	million acre feet
mg/L	milligram per liter
mm	millimeter
NMFS	National Marine Fisheries Service
OPP	Office of Pesticide Programs
pHOS	proportion of hatchery-origin spawners
PIT	passive integrated transponder
Porter-Cologne Act	Porter-Cologne Water Quality Control Act
RBDD	Red Bluff Diversion Dam
RM	river mile
RST	rotary screw trap
S.M.A.R.T.	Specific, Measureable, Achievable, Relevant to overarching goals, and Time-bound
SEP	Scientific Evaluation Process
SJTSP	San Joaquin Tributary Settlement Process
steelhead	California Central Valley Steelhead
SWRCB	State Water Resources Control Board
USDOI	U.S. Department of the Interior
USEPA	U.S. Environmental Protection Agency
USFWS	U.S. Fish and Wildlife Service
VSP	viable salmonid population
WDOE	Washington State Department of Ecology
WQC Plan	Bay-Delta Water Quality Control Plan
YOY	young-of-the-year

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TECHNICAL SUMMARY

FOREWORD

This document briefly summarizes the *Conservation Planning Foundation for Restoring Chinook Salmon (Oncorhynchus Tshawytscha) and O. mykiss in the Stanislaus River* (report) and highlights the key products and conclusions developed through the Scientific Evaluation Process (SEP). Please refer to the report for more detailed information on the methods, rational, and scientific justification for these products as well as to view the literature citations used to support the many scientific statements.

INTRODUCTION

Salmon and steelhead populations in the San Joaquin River basin were once some of the largest in California. Historically, the San Joaquin River and its tributaries supported both spring- and fall-runs of Chinook salmon and Central Valley steelhead. As recently as 1940, spring-run Chinook were the most abundant Chinook run in the San Joaquin system, ascending and occupying the higher elevation streams fed by snowmelt. Over the past century, extensive water storage development throughout the San Joaquin River watershed has resulted in a large proportion of flow being diverted from river channels, thus degrading spawning and rearing habitats and blocking access to historical spawning and rearing reaches. This habitat degradation due to damming, diversions, and levee construction has led to significant declines in Chinook salmon and steelhead populations (Figure TS-1). Spring-run Chinook salmon were considered extirpated from the San Joaquin River basin for decades; however, recently, spring migrating Chinook salmon have been observed in the Stanislaus and Tuolumne rivers.

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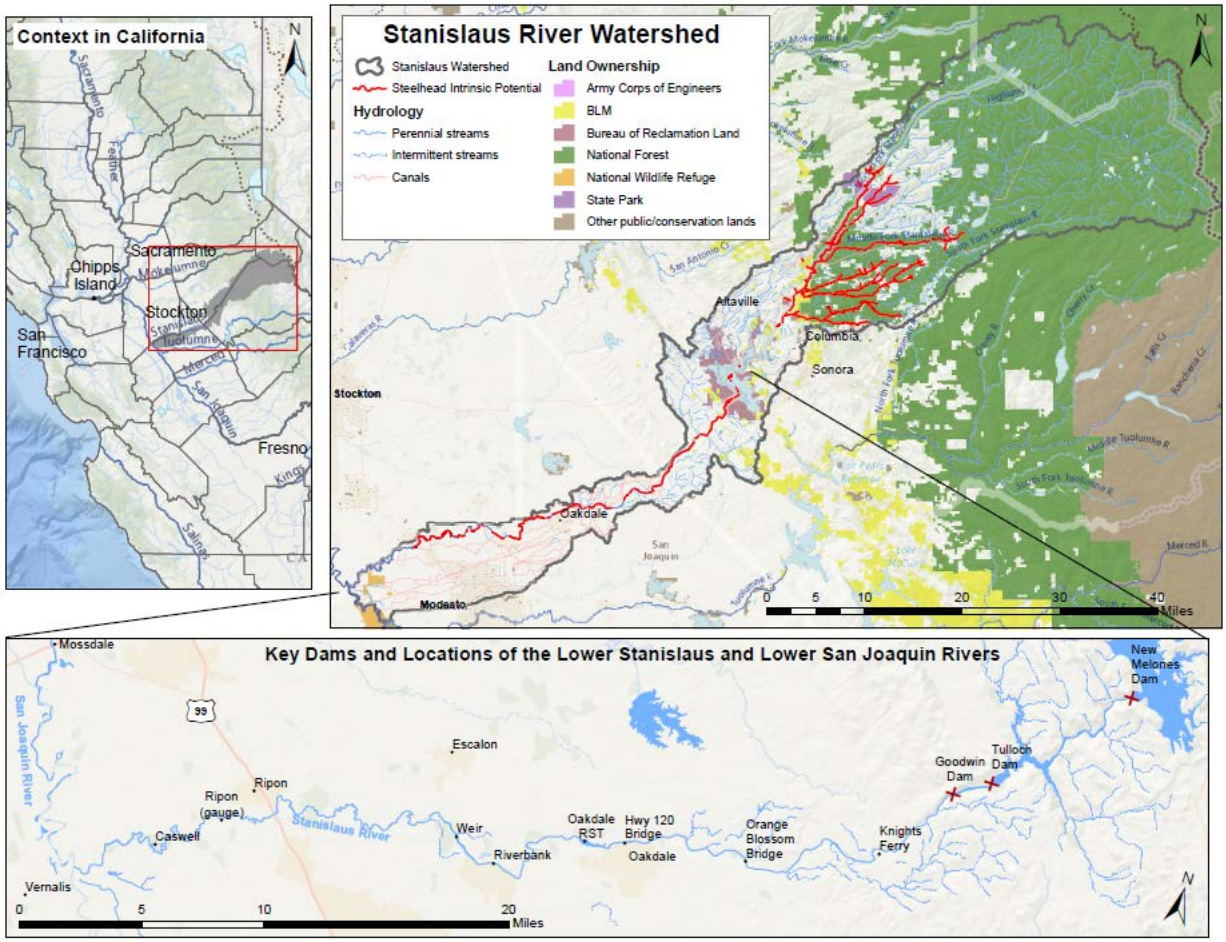


Figure TS-1
Key Dams and Features of the Lower Stanislaus River

Over the past few decades, efforts have been made to reverse and restore the declining health of riverine and estuarine habitats in the Central Valley and, in particular, their anadromous fish fauna. Since at least 1988, with the adoption of Sections 6901 and 6902 of California Fish and Game Code (and arguably back to 1915 with Fish and Game Code Section 5937), numerous policies, laws, and regulations have called for the restoration of anadromous fish populations.

However, the San Joaquin River and its tributaries continue to suffer from declining fish populations, stream health, and overall watershed condition. This is partially attributable to the lack of common vision of conservation success among resource agencies, conservation

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groups, and water districts. Many policies focus on particular Central Valley salmonid stocks and do not define desired outcomes for other stocks. For example, Central Valley spring-run Chinook salmon and Central Valley steelhead distinct population segments were listed under the Federal Endangered Species Act (ESA) in 1999 and 1998, respectively. The National Marine Fisheries Service determined that listing of fall-run Chinook salmon under the ESA was not warranted, though the species was listed as of special concern in 2004. The doubling of anadromous salmonid populations is required under the State Water Resources Control Board (SWRCB) Bay-Delta Water Quality Control Plan (WQC Plan), the California Fish and Game Code Sections 6900-6924 (by year 2000), and the Central Valley Project Improvement Act (CVPIA; by the year 2002). However, specific restoration targets for the San Joaquin watershed and its tributaries developed under the Anadromous Fish Restoration Plan (AFRP) in 2001 were only for fall-run Chinook salmon and not spring-run or steelhead.

The lack of restoration success in the San Joaquin River and its major tributaries (the Stanislaus, Tuolumne, and Merced rivers) is widely recognized (e.g., proposed update of the WQC Plan, CVPIA progress toward doubling of anadromous fish, National Marine Fisheries Service (NMFS) Recovery Plan for salmon and steelhead). As a result, a large group of stakeholders convened the San Joaquin Tributary Settlement Process (SJTSP) in an effort to explore resolutions to long-standing ecosystem and water management issues. Participants in this process originally discussed a set of actions for the overall system, but, due to the size and complexities of the overall San Joaquin River basin and a lack of shared understanding of the key barriers to restoration success, the stakeholders soon realized that science-based methods should be used to establish desired outcomes (including goals, biological objectives, and environmental objectives) in each of three major tributaries to the San Joaquin River and the lower San Joaquin mainstem. Conservation proposals would then be evaluated in the context of those desired outcomes. The SJTSP stakeholders decided to focus first on the Stanislaus River.

Scientists with appropriate expertise from the California Department of Fish and Wildlife (CDFW), U.S. Fish and Wildlife Service (USFWS), U.S. Bureau of Reclamation, NMFS, American Rivers, The Bay Institute, Trout Unlimited, and The Nature Conservancy participated in collaborative partnership called the SEP. The SEP focused on defining a vision of restoration success for three of the Stanislaus River's native fish populations: fall-

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run Chinook salmon, spring-run Chinook salmon, and *Oncorhynchus mykiss* (both resident and migratory forms).

The SEP partnership developed a vision of restoration success that expresses and harmonizes the policies listed above into science-based and achievable goals and objectives, and prioritizes barriers (stressors) to these goals and objectives that limit attainment of these desired conditions. This vision of success provides the framework for developing, evaluating, and implementing appropriate strategies for conservation and restoration. Without such a framework, science-based adaptive management cannot be applied to solve complex ecosystem and water management issues in this system. Development of the SEP vision also resulted in a common scientific foundation that will be useful for all parties pursuing a comprehensive approach to restoring native species and habitats in the San Joaquin River basin and in establishing a framework for addressing relevant regulatory processes that include the following:

- The SWRCB's update of the WQC Plan, as called for under both the state Porter-Cologne Water Quality Control Act and the federal Clean Water Act, and
- Federal Energy Regulatory Commission relicensing proceedings.

PURPOSE

The overarching purpose of the SEP effort is to restore conditions in the lower San Joaquin River and its tributaries that will support sustainable native fish populations and other living resources as follows:

- Articulating a clear, scientifically justified expression of policy guidance regarding the desired status of fall-run and spring-run Chinook salmon and *O. mykiss* (both resident (rainbow trout) and anadromous [steelhead] forms) in the Stanislaus River and larger San Joaquin River basin;
- Providing well-documented and transparent technical guidance on the conditions necessary to attain that vision; and
- Providing a foundation for evaluating the effectiveness of proposed actions to achieve the conditions necessary to realize the vision.

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APPROACH AND SCOPE

The SEP approach to conservation planning begins by describing a vision of conservation success that integrates and harmonizes a suite of policy goals and objectives, which are described in laws, policies, and plans. This vision is articulated as specific outcomes that are grounded in the best available science. Too often, conservation planning begins with identifying and describing a suite of actions without first defining the problem that the actions are meant to solve. Taking these first important steps of defining goals and objectives provides a transparent basis for evaluating implications of and trade-offs among proposed actions, implementing actions efficiently and within a specific timeframe, and managing actions towards attainment of desired conditions.

The report translates policy guidance regarding desired ecological conditions in the rivers of California's Central Valley into its local expression on the Stanislaus River watershed; the products described in the report reflect biological conditions on the Stanislaus River that are consistent with and supportive of river management and restoration policies for the Central Valley as a whole. Desired outcomes for river restoration and fisheries management were informed by and interpreted through a set of filters that allowed the SEP Group to provide a tangible set of desired biological restoration outcomes. These desired outcomes were used to define quantitative metrics that the group determined to be representative of a restored river ecosystem. As a result, the SEP Group's products do not simply serve one law (e.g., ESA), nor do they merely state CVPIA goals for doubling of anadromous fish populations. Rather, the vision describes conditions on the Stanislaus River that support outcomes that are in line with the range of relevant public policy regarding management of Central Valley fish populations and water quality.

Policy Scope – The first of these filters, the "policy scope," is described as the various laws, regulations, and policy targets that are relevant to ecological management and restoration of Central Valley salmonid populations and water quality. These policies often state desired outcomes in terms that require more complete and specific articulation in order to develop a tangible set of outcomes for the Stanislaus River. For example, while none of these policies describes the need to restore and maintain intra-population life history diversity among salmon, it is well established in the scientific literature that such diversity is essential to

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achieving any of the desired conditions that are specified in existing policy (e.g., fish in good condition or doubling of anadromous fish populations).

Biological Scope – The biological scope for the report incorporates all salmonids native to the Stanislaus River watershed, including fall-run Chinook salmon, spring-run Chinook salmon, and *O. mykiss*. Restoration of viable and fishable salmonid populations is a goal of California and national public policy, and many components of the policy scope identify desired outcomes for at least one salmon population or salmon populations in general. However, as described above, the policy scope description of desired conditions for salmonid populations is fragmented. Considering each of the native salmonid populations, both alone and collectively, allowed the SEP Group to develop a unified vision for restoration of the Stanislaus River and synthesize policy imperatives that might otherwise lead to conflicting or counter-productive outcomes. Also, the wealth of available research and monitoring data on these species enabled identification of tangible goals and measureable objectives for salmonid restoration.

For each focal salmonid population, restoration and maintenance of self-sustaining, fishable populations requires attaining adequate levels of several population viability parameters, including abundance, productivity (population growth rates), life history and genetic diversity, and spatial distribution. Collectively these are known as viable salmon population criteria (VSP criteria). Although the VSP criteria point to separate outcomes that are independently measureable, they are interdependent (e.g., acceptable levels of life history and genetic diversity require suitable productivity and abundance in the long term). Different temporal and spatial scales are relevant for each VSP criteria; as a result, the emphasis on particular VSP criteria changes as one considers different geographic scopes and time frames.

When thinking about restoration of the Stanislaus River system, there are some shortcomings to focusing on salmonids. For example, salmon are among the hardiest and most successful fish species in the watersheds they occupy; thus, ecosystem conditions that support restoration of these species may not be protective enough for other sensitive fish and aquatic species (many of which are also covered by elements of the policy scope).

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Nevertheless, the SEP Group expects that restoring watersheds for salmonids will provide ancillary benefit to other native species and desirable ecosystem processes.

Geographic Scope – Goals and objectives for these VSP criteria were defined to the extent that these could be addressed in whole or in large part through actions taken within the Stanislaus River watershed. Many elements of the policy scope describe desired outcomes for salmonids of the Central Valley (or California) as a whole. For migratory species like salmon, such outcomes can only be attained if they are supported by environmental conditions across the geographies these fish traverse during their life cycles. For example, adverse conditions in any one habitat could affect the attainment of desired outcomes for abundance identified in elements of the policy scope. The SEP's products articulate these larger policy targets in terms that can be managed by actions on the local scale. Accordingly, the SEP Group focused the planning effort on the San Joaquin watershed and the Stanislaus River, in particular, and described a specific set of conditions that are largely controlled locally and can be modified by local actions.

For the Stanislaus River-specific scope of this effort, the SEP Group described desired outcomes of the VSP criteria that could be controlled by in-river conditions. For example, abundance targets for anadromous populations (fall- and spring-run Chinook salmon and *O. mykiss*) were not specifically defined at the river-specific scale because abundance is not completely controlled by conditions in the Stanislaus River or any one habitat that salmonids occupy during their life cycle. Also, for each focal salmon species, restoring a population on the Stanislaus River would improve Central Valley salmonid viability simply by adding to or strengthening the larger Central Valley spawning population. As a result, no specific objectives for increasing spatial extent outside of the Stanislaus River were included. Rather, the report describes in detail the desired outcomes for the remaining VSP criteria such as productivity (stage-to-stage survival rates in fresh water), juvenile life history diversity (size at and timing of migration), and genetic interactions with other runs and hatchery fish in the Stanislaus River.

This SEP focus on improvements needed in the Stanislaus River and lower San Joaquin River segregates responsibility for achieving overall policy objectives into manageable units. As a result, responsibility for restoration success (attainment of locally relevant goals and specific

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objectives) can be allocated to parties that can take conservation action on the Stanislaus River. The responsibilities of stakeholders specific to the Stanislaus River environment are independent of the success or failure of restoration/management efforts in the Sacramento-San Joaquin Delta, San Francisco Bay, or the Pacific Ocean. This approach disentangles the improvements needed on the Stanislaus River from those needed elsewhere and thus facilitates local action.

The SEP Group did not develop or evaluate conservation actions that could be taken on the Stanislaus River to improve conditions for native salmonid populations. Rather, the group focused on foundational elements needed to understand the nature and magnitude of challenges to restoring target populations; these elements are also essential to managing restoration activities in an adaptive management context. By developing goals and objectives (biological and environmental) and by ranking and prioritizing the barriers that prevent attainment of those goals and objectives (stressors), the SEP Group sought to provide the design criteria for subsequent conservation planning and the benchmarks against which to prioritize, implement, and adjust conservation actions adaptively.

LOGIC CHAIN

The report follows a structured approach to developing a framework for prioritizing conservation actions that are predicted to achieve measureable outcomes from the VSP criteria. Some restoration programs fail to evaluate the effects of actions on their fundamental objective, in part because they fail to express that objective in specific and measureable terms. To prevent this, the SEP Group initiated a logic chain approach to clearly articulate the linkages between desired outcomes and the specific conditions that are hypothesized to lead to such outcomes. Articulating explicit, quantitative biological objectives provides a framework for the following:

- Evaluating potential conservation measures;
- Measuring the success of conservation measures after implementation; and
- Adjusting the conservation strategy through time to attain desired outcomes based on information gained from implementation and monitoring.

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In other words, this approach generates the basic building blocks for any subsequent adaptive management strategies.

The SEP Group addressed the following general questions to establish a logic chain for the development of Stanislaus-specific Biological and Environmental Objectives for Chinook salmon and *O. mykiss* and for identifying, ranking, and prioritizing stressors that prevent attainment of goals and objectives (Figure TS-2):

- What is the problem?
  Define a **Problem Statement**, a concise declaration of the ecological issues that require attention.
- What outcome(s) will solve the problem?
  Determine **Central Valley Goals** that present a vision for species-specific restoration actions across the Central Valley landscape. State desired outcomes that will solve the issue(s) identified in the problem statement.
- What does solving the problem and attaining the goal look like?
  Develop **Central Valley Objectives** that provide a clear standard for measuring progress toward desired outcomes in the larger context of the Central Valley.
- What can efforts in the Stanislaus River contribute to the attainment of Central Valley Objectives?
  Describe **Watershed-specific Goals** that specify the watershed contribution to Central Valley Goals and Objectives. Watershed-specific Goals can be attained within a particular watershed or geographic unit, regardless of actions taken outside the watershed.
- What is the suite of biological outcomes that characterize success?
  Define the specific biological outcomes that characterize success in the geographic area and for the species of interest. **Biological Objectives** are the metrics towards which all conservation actions and adjustments to those actions are directed and will be evaluated.
- What is the suite of physical and ecosystem conditions that characterize success?
  Develop **Environmental Objectives** that define the physical, chemical, and biological conditions that are hypothesized to be necessary to achieve the Biological Objectives. Environmental Objectives quantify the conditions that best available science indicates will lead to attainment of Biological Objectives.

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- What are the barriers to achieving Environmental and Biological Objectives? Define the **Stressors** that will need to be alleviated in order to attain the Environmental and Biological Objectives. Prioritize stressors according to the magnitude and certainty of their effect on Environmental and Biological Objectives.

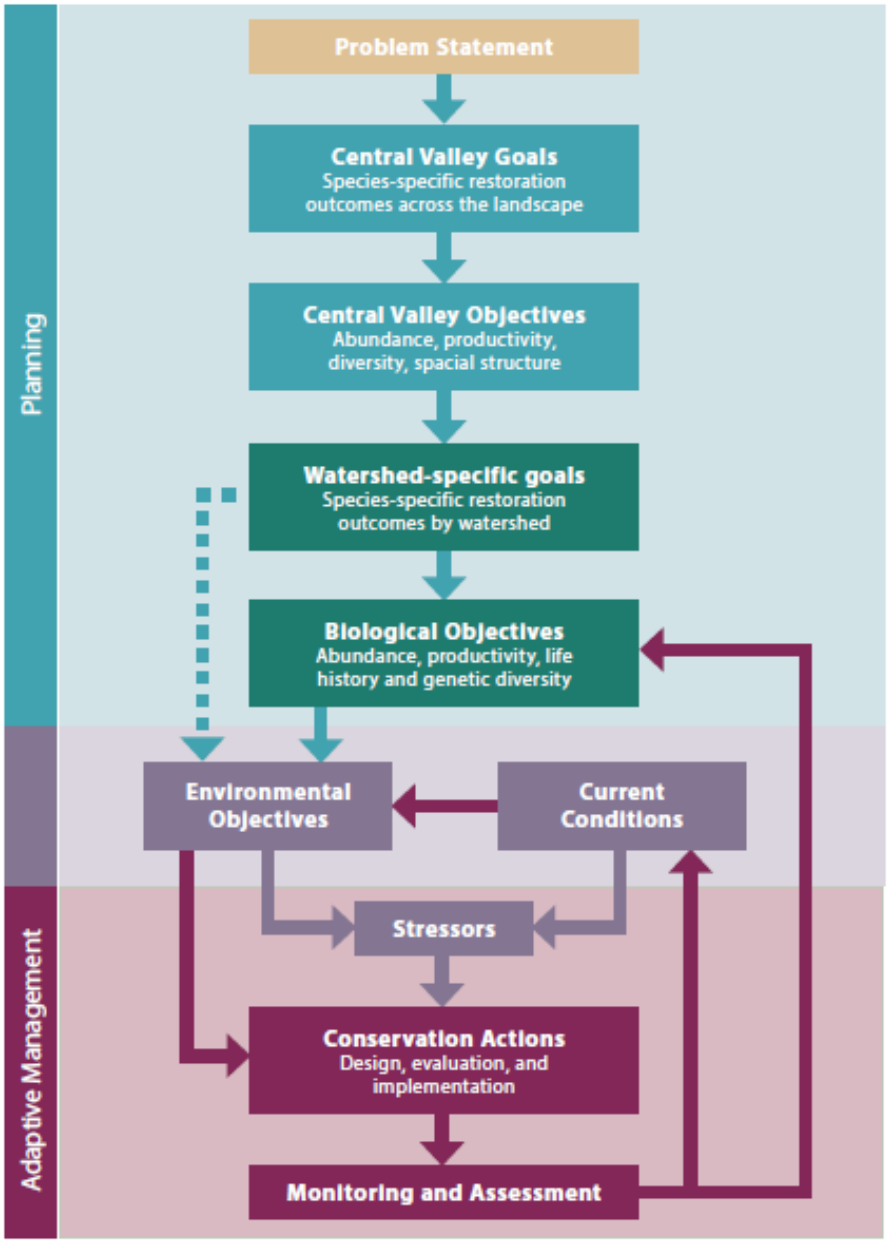


Figure TS-2
Scientific Evaluation Process Logic Chain

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The report does not identify or prescribe conservation actions, but rather highlights Environmental Objectives and key stressors that are priorities for management. The SEP Group did not assume any specific method or approach for alleviating stressors and achieving Environmental Objectives. Rather, the group assumed that prioritizing stressors without specifying conservation actions would allow for greater creativity and flexibility in the design of potential actions and solutions to achieve Environmental Objectives and ultimately lead to restoration of salmon and steelhead in the Stanislaus River. Potential conservation actions may include flow prescriptions, habitat restoration, temperature management, fish passage, and others. For example, the section on Environmental Objectives (Section 7) specifies environmental conditions that are necessary to achieve life stage specific outcomes for each species. These conditions include such metrics as the spatial extent of spawning and rearing habitat, optimal water velocity ranges for high quality habitat, and flow variability needed to provide cues for adult and juvenile migration. Attaining these conditions may be addressed through a set of flow prescriptions; however, it is possible that these objectives could also be met through habitat restoration, fish passage, or some combination of actions.

Overall, the SEP approach provides the basis for learning-based management using adaptive decision-making. The SEP products set the stage for generating and evaluating specific proposals for conservation actions and require that such proposals estimate outcomes in terms of Environmental and Biological Objectives. Such impact analyses, combined with analyses of costs to implement the strategy, allow for well-informed, transparent evaluations of trade-offs among proposed approaches.

STRUCTURED AND COLLABORATIVE APPROACH TO DECISION MAKING

Good decisions are defined by the process in which they were generated and by the degree to which they can integrate new information to help minimize uncertainty and improve outcomes. The process of developing the SEP's objectives and stressor evaluations represents a significant advance in the application of science to improve understanding of restoration needs and challenges in the Stanislaus River and throughout the San Joaquin River basin.

The SEP Group produced a consistent and clear description of desired conditions that are embedded in different policies and a strong foundation for adaptive management to attain

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those outcomes. In addition, collaboration among the participants in the SEP resulted in the alignment of conceptual models of participants with regard to attainable outcomes, system processes, and barriers to achievement of desired conditions. When the SEP began, participating organizations and agencies often had very different definitions of restoration success for the Stanislaus River, and, in most cases, those desired outcomes were not clearly articulated. Similarly, many of the participating scientists entered the SEP with their own internal (but unarticulated) conceptual models of the key problems and limits that prevented attainment of desired biological outcomes. The goals, objectives, and stressor rankings that emerged from this process represent a new scientific consensus around a vision of what the Stanislaus River can be expected to attain with regard to salmonid restoration. The SEP also contextualized how this vision fits into the requirements of existing policy for the Central Valley as a whole and created a science-based, explicit, and agreed-upon conceptual model regarding the numerous barriers to attainment of the vision of success.

The SEP Group recognizes that adaptive management is a critical component of many resource management processes because decisions are always made with some degree of uncertainty. The SEP framework was designed to support an adaptive management framework that could improve decisions and outcomes over time. Managing adaptively requires navigating towards a vision of success that is specifically articulated and widely understood. Thus, the products contained in the report are essential to the practice of adaptive resource management in the Stanislaus River watershed. Indeed, they represent the first step in the adaptive management cycle. For example, the goals and objectives developed by the SEP—and the consensus that these outcomes represent the conditions required under a variety of policies—allow managers to evaluate and implement potential restoration solutions at the appropriate scale. The SEP's analysis of stressors provides a plan of action driven by scientific evidence on the importance of the stress and the appropriate sequence for actions. In other words, the stressor evaluation is expressed in terms of the need and opportunities for adaptive management.

What became clear from developing the vision of success articulated in the report is that there are no silver bullets for restoring populations of fall-run Chinook salmon, spring-run Chinook salmon, or *O. mykiss* on the Stanislaus River. The stressor evaluation presented in Section 8, which is based on comparisons of current conditions to the desired environmental

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conditions for salmonids as described by the best available science, reveals that a comprehensive conservation strategy is needed. This strategy must include a wide variety of actions to address multiple barriers to success that occur throughout the freshwater life cycle of target salmonid populations. The SEP Group's products provide the essential framework for designing an effective and efficient conservation strategy that can produce desired outcomes on the Stanislaus River (Watershed-specific Goals) and ensure that this watershed can contribute to the attainment of larger laws and policies regarding salmonid restoration throughout the Central Valley (i.e., Central Valley Goals and Objectives). These products will support the prioritization of restoration activities by allowing restoration planners to make good decisions, based on the best available science, and avoid misallocation of limited resources to actions or monitoring that are not part of the critical path to successful restoration outcomes.

A noteworthy realization among participants in the SEP was that restoring viable salmonid populations is indeed possible, but the relationship between restoration effort and abundance is not likely to be linear, at least in the short term. There are numerous environmental thresholds that must be overcome before any biological response will occur. However, if the conditions necessary to support anadromous salmonids are provided, these populations are capable of rapid growth.

In many ways, progress towards restoration has been stifled by policy goals that define success purely in terms of adult salmonid abundance. Because adult abundance results are difficult or impossible to guarantee as a result of modifications to any one environment occupied by anadromous salmon, defining desired outcomes in abundance terms can lead to paralysis because questions such as "where should restoration actions occur?" and "who should be responsible for implementing those actions?" remain unanswered. By focusing desired policy outcomes through the lens of a specific geography and the range of viability parameters that define population viability, the SEP produced attainable definitions of local conditions that can support viable, healthy salmonid populations and an assessment of how local conditions currently impair such populations. As a result of this focus and specificity, the SEP products can facilitate local action and progress.

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GOALS AND OBJECTIVES

Central Valley

Central Valley Goals are desired outcomes for Central Valley rivers and their salmonid populations as expressed in the numerous laws and policies that form the policy scope of this effort—they provide guidance and context for all other elements of the logic chain developed herein. Where necessary, the desired outcomes of policies were further defined and articulated by the SEP Group as VSP criteria. For example, many policies call for maintenance or restoration of salmonid populations that are "viable" or "in good condition"; these terms imply a need to achieve acceptable levels in all VSP criteria parameters. Central Valley Goals for each salmonid population considered in the report include the following:

- Increase population size (abundance);
- Increase population growth rates and ability to recover from years of poor recruitment (productivity);
- Increase the number of self-sustaining populations across the landscape (spatial extent);
- Limit genetic influence from hatchery-produced fish and interbreeding of genetically distinct runs (genetic diversity); and
- Support a portfolio of life history types that are typical of each focal population (life history diversity).

In some cases, goals for restoration of rivers and salmonid populations in the Central Valley have been defined more specifically in the report with quantitative objectives. To the extent that they are specific, measureable, achievable, relevant, and time-bound (S.M.A.R.T.), Central Valley Objectives (Table TS-1) serve essential functions in adaptive management as they define goals in a manner that allows planners to scale restoration efforts to an appropriate level, and they facilitate the measurement of progress toward desired outcomes. Therefore, Central Valley Objectives allow effective and transparent evaluation of conservation actions (pre-implementation) and progress, success, and the need to change implementation of conservation actions (post-implementation).

Table TS-1

Central Valley Objectives Relevant to the SEP Scope

Relevant Goal	Target Population(s)	Policies	Objective
Abundance	Fall-run Chinook; Spring-run Chinook; Steelhead	CVPIA/AFRP, Fish and Game Code §6902, 2006 WQC Plan	Double natural production of anadromous fish as compared to their 1967 – 1991 average within 10 years. Specifically: • 750,000 fall-run Chinook salmon per year from the Central Valley as a whole and 22,000 from the Stanislaus River • 68,000 spring-run Chinook salmon per year from Central Valley Rivers as a whole[1] • 13,000 steelhead per year from Central Valley rivers as a whole
Abundance	Spring-run Chinook; Steelhead	ESA, Central Valley Salmonid Recovery Plan	Delisting of both species requires restoration of at least two in the Southern Sierra Diversity Group populations that are at low risk of extinction, which is defined, in part, as a census population size of > 2,500 (833 individuals, on average, for each of the three year classes in a one generation) or an effective population size > 500[2]
Productivity	Fall-run Chinook; Spring-run Chinook; Steelhead	CVPIA/AFRP, Fish and Game Code §6902, 2006 WQC Plan	Population growth rate sufficient to double populations within 10 years
Productivity	Spring-run Chinook; Steelhead	ESA, Central Valley Salmonid Recovery Plan	Restoration of viable populations at "low" risk of extinction is defined, in part, by failure to detect productivity declines among populations that meet other recovery criteria
Spatial Extent	Spring-run Chinook; Steelhead	ESA, Central Valley Salmonid Recovery Plan	Restore at least two viable of spring-run Chinook salmon and anadromous *O. mykiss* populations at low risk of extinction and multiple populations at no greater than moderate risk of extinction in the Southern Sierra Diversity Group
Genetic Diversity	Spring-run Chinook; Steelhead	ESA, Central Valley Salmonid Recovery Plan	Genetic introgression from different ESUs and/or hatchery populations must be no greater than "low" as defined in detail in Figure 4.1 of NMFS (2014).

Relevant Goal	Target Population(s)	Policies	Objective
Genetic Diversity	Fall-run Chinook salmon	HRSG 2012	Detailed in Figure 1 of Lindley et al. (2007).

Notes:
1 Production targets for spring-run Chinook salmon and steelhead were not developed by the AFRP for the Stanislaus River. However, natural production from the Stanislaus River would count towards Central Valley-wide Objectives
2 Note that this objective, while specific and measureable, is not time-bound.
ESU = evolutionarily significant unit

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Stanislaus River

Central Valley Goals and Objectives for salmonids are the aggregate of biological performance in all the waterbodies critical to Central Valley salmonids. Watershed-specific goals are the expression of local outcomes necessary to support attainment of Central Valley Goals and Objectives. Thus, while goals for the Stanislaus River are not detailed in the policies that define desired outcomes for the Central Valley at-large, it is important to translate these Central Valley-wide outcomes into necessary component outcomes for each relevant waterbody in the Central Valley.

In the context of adaptive management, Watershed-specific Goals serve to provide context and direction for local management efforts. Because Watershed-specific Goals are themselves expressions of existing policy they will change only when and if the overarching policy (Central Valley Goals and Objectives) change. Watershed-specific Goals for the Stanislaus River include the following:

- Increase population size (abundance);
- Increase population growth rates and ability to recover from years of poor recruitment (productivity). For Chinook salmon, population growth rates were targeted to increase in three stages, to support:
  - Rebuilding: a population growth rate that supports increasing populations in a relatively short time,
  - Resilience: achieve a population growth rate that allows the population to rebound in a single generation, after years with poor returns, and
  - Sustainability: achieve freshwater survival rates that are characteristic of salmon in human-modified rivers on the West Coast of North America.
- Maintain genetic integrity of stocks by minimizing hatchery influence and/or introgression with other runs (genetic diversity); and
- Support the fullest expression of life history diversity (as seen within other Central Valley populations and in other rivers that support this phenotype).

There is no Watershed-specific Goal that parallels the Central Valley Goals and Objectives regarding spatial extent (i.e., increase the number of self-sustaining populations across the landscape). This is because restoration of Stanislaus River populations of the focal species

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(i.e., attaining the other Watershed-specific Goals for each population) will represent the local contribution to the Central Valley Goals and Objectives.

BIOLOGICAL OBJECTIVES

Biological Objectives define Watershed-specific Goals in S.M.A.R.T. terms that define success. These tangible outcomes allow planners and managers to scale solutions appropriately, evaluate proposed actions against a clear baseline, and measure progress in a transparent fashion. Adaptive management requires such clear definitions of success and guidelines for implementing and adjusting actions through time.

The SEP Group made every effort to translate Watershed-specific Goals into Biological Objectives that were S.M.A.R.T. Metrics related to each Biological Objective are either measured currently or measureable using existing technology (see Table TS-2). The Biological Objectives described in the report are believed to be achievable based on performance in other watersheds in the Central Valley or across the focal species' ranges. The determination that an objective was "achievable" did not involve an evaluation of economic or political costs of the action—such an evaluation would be speculative, at best, and premature because a variety of solutions may be proposed to address any barrier to achieving objectives. Also, evaluations of political and economic feasibility were beyond the scope of the SEP efforts. It should be noted that, in many cases, Biological Objectives specified by the SEP Group are already attained in the Stanislaus River in many years; in these cases, the Biological Objectives serve as guidance that will help decision-makers and managers to evaluate and avoid potential negative outcomes of future actions or trends. Biological Objectives may be modified if one of the following is true:

- Relevant Watershed-specific Goals change; this would require changes in the larger policies that these goals represent;
- The specific outcomes are achievable, but not within the specified time-bound; this would require a change in the time-bound associated with the objective; and
- Substantial evidence develops that the objectives are not physically or biologically achievable in the Stanislaus River context; this would require a re-articulation of the Watershed-specific Goal that was both achievable and represented a meaningful

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contribution of the Stanislaus River to the relevant desired outcomes for the Central Valley at-large.

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Table TS-2

Current and Potential Monitoring that Could be Used to Measure Progress Towards SEP Biological Objectives

Biological Objective Type	Species	Life Stage	Specific Objective	Relevant Current Monitoring (Monitoring Agency)	Relevant Monitoring Needed
Productivity	All	Egg	Egg-emergence to Oakdale RST Survival	Adult escapement at counting weir (USFWS weir – Tri-Dam funds); life history investigations (e.g., escapement and carcass surveys; CDFW); Oakdale RST catch (Tri-Dam – currently not shared)	
Productivity	All	Egg	Viability	None	Requires incubation chamber (in hatchery or on site) measured by surrogates (e.g., egg trays) and/or as projected by monitoring of temperature, flow, sediment deposition, and scour
Productivity	All	Egg	Incubation success	None	Spawning surveys, redd mapping (superimposition), redd capping
Life History Diversity	Chinook salmon fall-run (FR) and spring-run (SR)	Adult migration	Migration timing	Adult Escapement at counting weir (USFWS weir – Tri-Dam funds); Life history investigations (e.g., escapement and carcass surveys; CDFW)	
Productivity	Chinook salmon FR-SR	Adult migration and spawning	Abundance	Adult Escapement at counting weir (USFWS weir – Tri-Dam funds); Life history investigations (e.g., escapement and carcass surveys; CDFW)	
Productivity	Chinook salmon FR-SR	Adult migration and holding	Survival	Adult Escapement at counting weir (USFWS weir – Tri-Dam funds); Life history investigations (e.g., escapement and carcass surveys; CDFW)	Include surveys for SR
Life History Diversity	Chinook salmon FR-SR	Adult migration and spawning	Spawning timing	Adult Escapement at counting weir (USFWS weir – Tri-Dam funds); Life history investigations (e.g., escapement and carcass surveys; CDFW)	Include surveys for SR
Productivity	Chinook salmon FR-SR	Adult migration and spawning	Prespawn mortality	Adult Escapement at counting weir (USFWS weir – Tri-Dam funds); Life history investigations (e.g., escapement and carcass surveys; CDFW)	Include surveys for SR
Productivity	Chinook salmon FR-SR	Juvenile emigration	in river (egg to delta) survival	Adult Escapement at counting weir (USFWS weir – Tri-Dam funds); Life history investigations (e.g., escapement and carcass surveys; CDFW); Caswell RST catch (USFWS); Mossdale trawl (CDFW)	Include surveys for SR; Add or modify surveys at Mossdale to more accurately/frequently survey migrating salmonids, and smaller fish in particular; Ototlith microchemistry to distinguish juveniles from different natal streams in the lower San Joaquin
Genetic	Chinook salmon FR-SR	Adult migration and spawning	Percentage of hatchery origin spawners	Adult Escapement at counting weir (USFWS weir – Tri-Dam funds); Life history investigations (e.g., escapement and carcass surveys; CDFW)	Include surveys for SR
Genetic	Chinook salmon FR-SR	Juvenile emigration	Percent introgression (SR-FR)	None	Genetic testing of outmigrating juveniles
Life History Diversity	Chinook salmon FR-SR	Juvenile emigration	Size, timing, and proportion of migrants; number of yearlings	Caswell RST catch (USFWS)	Include surveys for SR; Add or modify surveys at Mossdale to more accurately/frequently survey migrating salmonids, and smaller fish in particular; Otolith microchemistry to distinguish juveniles from different natal streams in the lower San Joaquin

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Biological Objective Type	Species	Life Stage	Specific Objective	Relevant Current Monitoring (Monitoring Agency)	Relevant Monitoring Needed
Productivity	*O. mykiss* (steelhead)	Juvenile emigration	Smolt survival down the river and size and proportion of smolt migrants	None	Inclined-screen traps and video cameras, Didson cameras (imaging sonar system), or mark-resight estimates based on PIT tagging (some data from RST)
Productivity	*O. mykiss* (steelhead)	Juvenile emigration	Number of smolts (> 150 mm) per female spawner and total number of smolts per female spawner	Adult escapement at counting weir (USFWS weir – Tri-Dam funds); Life history investigations (e.g., escapement and carcass surveys; CDFW); Caswell RST catch (USFWS)	Inclined-screen traps and video cameras, Didson cameras (imaging sonar system), or mark-resight estimates based on PIT tagging (some data from RST)
Productivity	*O. mykiss* (steelhead)	Juvenile rearing	Parr density	Snorkel surveys (USBR)	Electrofishing or other appropriate sampling
Productivity	*O. mykiss* (resident)	Juvenile rearing	Number of smolts (> 150 mm) per female spawner and total number of smolts per female spawner	Adult escapement at counting weir (USFWS weir – Tri-Dam funds); Life history investigations (e.g., escapement and carcass surveys; CDFW); Caswell RST catch (USFWS)	Inclined-screen traps and video cameras, Didson cameras (ARIS), or mark-resight estimates based on PIT tagging (some data from RST)
Productivity	*O. mykiss* (resident)	Juvenile rearing	Parr growth rates	None	Growth rates could either be measured by capturing, PIT tagging, and recaptured juvenile *O. mykiss* in the river or estimated by back calculating lengths at age from scales
Life History diversity	*O. mykiss*	Adults	Percentage of anadromous and resident adults	None	Resident: adult snorkel surveys or masks and recapture; Anadromous: weir counts, snorkel surveys, or redd surveys, otolith microchemistry
Life History diversity	*O. mykiss* (steelhead)	Juvenile rearing	Proportion of anadromous mothers	None	Otolith microchemistry
Life History diversity	*O. mykiss* (resident)	Adults	Minimum abundance of resident adults	None	Resident: adult snorkel surveys, mark and recapture, or electrofishing
Life History diversity	*O. mykiss* (steelhead)	Juvenile emigration	Detection of emigrating smolts	Caswell RST catch (USFWS); Oakdale RST catch (Tri-Dam – not currently shared); Mossdale trawl (CDFW)	Modifications to Mossdale trawl (CDFW) to detect juvenile-size ranges

Notes:
ARIS = Didson imaging sonar system
mm = millimeter
PIT = passive integrated transponder
RST = rotary screw trap
USBR = U.S. Bureau of Reclamation

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Clearly, political and economic considerations will come into play in the process of determining the best pathway to achieve Biological Objectives. However, political or economic considerations (while important) are not considered valid reasons for modifying Biological Objectives; current evaluations of political or economic feasibility are unlikely to account for potentially innovative solutions to problems that arise as a result of changes in either restoration technology or the socioeconomic backdrop of the Stanislaus River watershed. The Biological Objectives are based in the best available scientific information on the outcomes that a functioning Stanislaus River ecosystem can and should support, given the directives provided by the policy scope. In cases where political or economic considerations are barriers to current attainment of Biological Objectives, it is preferable to make as much progress as possible towards full attainment and simply acknowledge that the Biological Objective in question has not been attained yet.

A variety of Biological Objectives were identified for each focal species. These objectives relate to Watershed-specific Goals for productivity, life history diversity, and genetic diversity of all focal species, and abundance of resident *O. mykiss*. Because abundance Biological Objectives were not developed for anadromous populations, Central Valley Objectives for abundance of the anadromous populations were used to guide Environmental Objectives related to habitat area (e.g., spawning habitat and juvenile rearing habitat). This reflects the understanding that, although conditions on the Stanislaus River are not solely responsible for anadromous fish cohort size, the habitat space available in the river system ultimately defines system-carrying capacity and that carrying capacity must be adequate to support Central Valley Objectives for abundance. Habitat space is the Stanislaus River's "contribution" to the Central Valley Objectives for abundance as defined in the policy scope.

Biological Objectives are reviewed briefly below.

The **productivity** VSP attribute is composed of fecundity and stage-specific survival rates. The SEP Group's Biological Objectives for focal anadromous populations focus on the production of juveniles per adult spawner. Annual estimates of juvenile population size are currently measured at various locations in the Stanislaus and lower San Joaquin rivers; comparing these estimates to adult escapement estimates (which are measured at a counting

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weir and by redd and carcass surveys) reveals the overall annual productivity of the Stanislaus River for that population.

Biological Objectives for productivity of Stanislaus River salmonids are described in Tables TS-3 to TS-5. For Chinook salmon, productivity objectives tracked the three-staged Watershed-specific Goals for productivity: rebuilding, resilience, and sustainability. Attaining these objectives means that adult-to-juvenile outmigrant survival will increase over a 24-year period. Although adult-to-juvenile outmigrant survival rates are mathematically independent of the number of adult spawners in a given year, the rates apply whether there are 100 spawners or 1,000 spawners; as the population of adults and juveniles reaches the system carrying capacity, actual juvenile survival rates may drop below the objective due to density-dependent mortality. As a result, the Biological Objectives for productivity are only to be measured in years when population abundance is substantially below carrying capacity—such conditions are expected to occur naturally, from time-to-time, regardless of the success of Stanislaus River restoration (e.g., due to poor ocean conditions).

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Table TS-3

Chinook Salmon Productivity Objectives

Objective		Productivity[1]											
Life History Stage		**Juvenile "rebuilding"**			**Juvenile "resiliency"**			**Juvenile "sustainability"**			**Adult and Egg**		
Description	**Briefly**	Juvenile survival rate consistent with population growth rate of 2x over three generations (Cohort Replacement Rate =1.26)			Juvenile survival rate consistent with population resilience (Cohort Replacement Rate = 2.5)			Juvenile survival rate in freshwater typical of Chinook salmon populations across the Pacific coast (10%)			Survival/reproductive success of adult migrants and indicators of egg incubation success		
	Achieved by When?	Year 10			Year 15			Year 24			Year 9	Year 9	Varies (Year 9, 15, 24; see below)	Varies (Year 9, 15, 24; see below)
	Measure What?	Survival from/to	Survival from/to	Survival total	Survival from/to	Survival from/to	Survival total	Survival from/to	Survival from/to	Survival total	Survival from/to	Egg viability/ deposition	Egg/redd viability	Egg-emergence survival of surrogates
	Measured Where?	Spawning to Caswell [2]	Caswell to Vernalis [2]	Freshwater [3]	Spawning to Caswell [2]	Caswell to Vernalis [2]	Freshwater [3]	Spawning to Caswell [2]	Caswell to Vernalis [2]	Freshwater [4]	Caswell to spawning grounds at onset of spawning [5]	Spawning grounds	Spawning grounds	Spawning grounds
Fall-run	**Wet**	15.0%			18.0%			35.0%			≥ 90%	a) In hatchery hatching success = 95%; b) < 10% of female carcasses retain ≥ 10% of eggs	a) Environmental conditions consistent with in-hatchery incubation success: ≥ 80% (year 9); ≥ 85% (year 15); ≥ 90% (year 24) b) ≥ 90% redds remain intact through incubation period	Egg to fry survival (at Oakdale RST): ≥ 25% (year 9); ≥ 30% (year 15); ≥ 35% (year 24)
	Median Year	10.8%	69.8%	2.12%	14.3%	74.4%	4.20%	24.8%	80.7%	10.0%				
	Dry	5.0%			9.0%			15.0%						
Spring-run	**Wet**	15.0%			18.0%			35.0%			Same as above	Same as above	Same as above	Same as above
	Median Year	10.8%	69.8%	2.12%	14.3%	74.4%	4.20%	24.8%	80.7%	10.0%				
	Dry	5.0%			9.0%			15.0%						

Notes:

1 Juvenile productivity and life history objectives refer only to those Chinook that migrate before temperatures in the mainstem San Joaquin reach 25 degrees Celsius (°C) (77 degrees Fahrenheit [°F]).

2 Survival objectives from Spawning to Caswell are premised on attainment of Caswell to Vernalis survival rate. If median Caswell to Vernalis survival rate is unattainable or exceeded, the Spawning to Caswell survival rate objective will be adjusted accordingly.

3 For reference purposes. Includes through-Delta survival. Conditions on the San Joaquin and its tributaries affect Delta survival; however, responsibility of San Joaquin tributaries for through-Delta survival outcomes is yet to be determined. Improvement in freshwater survival rates assume river survival rates and Delta survival rates will improve proportionately from current levels.

4 For reference purposes. Assumes through-Delta survival of 50%. In this case, the improvement in river and Delta environments is no longer proportionate, as adherence to the proportionate improvement standard would require median survival of >50% in the Delta. There was no consensus that survival rates of > 50% in the Delta could be achieved.

5 Currently, adult survival objectives are only developed for spring-run Chinook after they have migrated past Caswell. This reflects desired outcomes in the ability of spring-run to successfully "hold" in the river through the summer. Adult survival objectives may be developed (and potentially for fall-run and steelhead) in the mainstem San Joaquin; however, those objectives would be part of basin-wide planning and may require adult migration monitoring in the lower San Joaquin.

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Table TS-4

Resident *O. mykiss* Productivity Objectives

Objective		Productivity	
Life History Stage		Juvenile Density	Juvenile Growth Rate
Description	**Briefly**	Densities of *O. mykiss* that support desired frequency of anadromy in the population	Average individual growth rates that support desired frequency of anadromy in the population
	Achieved by When?	Year 15	Year 15
	Measure What?	Population density (parr/river km^2)	Average growth rate (mm/day)
	Measured Where?	Upstream of Oakdale, in reaches identified as having high quality *O. mykiss* holding habitat	Upstream of Oakdale, in reaches identified as having high quality *O. mykiss* holding habitat
Resident *O. mykiss*		The minimum density of age-0 *O. mykiss* during the summer equals $1/m^2$ on average	Minimum average growth of both age-0 and age-1 *O. mykiss*, averaged over an entire season, equals 0.60 mm/day

Note:
km^2 = square kilometer
m^2 = square meter
mm = millimeter

Table TS-5

Steelhead Productivity Objectives

Objective		Productivity								
Life History Stage		Juvenile Smolt Size		Juvenile Smolt Production		Juvenile Smolt Survival			Adult
Description	Briefly	Proportion of smolts (Stages 4 and 5 in Table 16 of report) observed should be of a size able to survive the ocean phase and return as anadromous adult		Naturally produced smolts (Stages 4 and 5 in Table 16 of report) per female spawner increase to levels consistent with other healthy steelhead populations…		Smolt survival – smolt (Stages 4 and 5 in Table 16 of report) survival rate consistent with population resilience			Egg survival consistent with…
	Achieved by When?	Year 15		Year 15		Year 15			Year 15
	Measure What?	Fork Length (FL)		Number of smolts per female spawner		Survival through lower Stanislaus River			Egg survival
	Measured Where?	To be determined (Caswell area)		Caswell (or other location prior to confluence with mainstem)		Lower end of gravel bedded reach		Delta entry	
Steelhead		At least 90% of the smolts (Stages 4 and 5) observed should be 150 mm (5.9 inches) FL or greater in length		Naturally produced smolts (Stages 4 and 5) emigrating from the river each year shall increase to at least 165 per female spawner		> 90%			> 35%
		FL	150 mm (5.9 inches)	3-year running average					
		Percentage	90%						
		Year type	All years	Minimum	165				

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Biological Objectives for productivity were calculated by comparing current estimated survival rates throughout the salmonid life cycle and asking what survival rates would be needed in freshwater environments in order to achieve the Watershed-specific Goals for population productivity. Ocean mortality estimates were considered to be constant into the future; many of the policies guiding river and salmon restoration in the Central Valley (the policy scope) do not authorize or anticipate further limitation of the ocean salmon fishery. In addition, changes to ocean survival rate would not affect the final stage of improvement in productivity ("sustainability") as the relevant survival objective applies only to the juvenile survival rate of salmon in freshwater environments.

Preliminary analyses of data collected by state and federal agencies revealed that the Watershed-specific Goals for juvenile productivity of Stanislaus River salmon will be difficult or impossible to achieve without improving survival in both the riverine and tidal (Delta) portion of the salmon's freshwater environment. For example, "the sustainability" goal is characterized by survival rates that are typical of other Chinook salmon populations throughout the species' range; however, current survival rates in both the Delta and river environments are well below survival rates that characterize typical productivity of the entire freshwater environment (Table TS-6). Thus, even if there were no mortality in the Delta environment (survival = 100%), survival in the river environment alone is well below that observed in freshwater for most other Chinook salmon populations.

Table TS-6

Survival Rates in Freshwater Environments Necessary to Support Watershed-specific Goal of Rebuilding the Stanislaus River Fall-run Chinook Salmon Population

Reach	Current	River Mile (RM)	Target Survival	Target Survival per RM
Eggs to Vernalis	1.01%	57.0	7.55%	95.57%
Vernalis to Chipps Island	3.75%	54.5	28.06%	97.69%
Chipps Island to Adult[1]	2.83%	-	2.83%[2]	-
Adult to Spawner[1]	60.24%	-	60.24%	-
Recruits per Spawner[3]			**1.26**	

Notes:
1 Assumes no change from current estimated survival rates after juvenile salmon pass Chipps Island (the western edge of the Delta)
2 NMFS 2009

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3 Recruits per spawner is calculated as product of survival rates (e.g., Eggs to Vernalis × Vernalis to Chipps Island × Chipps Island to Adult × Adult to Spawner) × estimated population sex ratio (60% female spawners) × estimated average fecundity (5,813 eggs per spawner).
– Target survivals assume an equal increase over current survival in Delta and riverine habitats. See report for calculation of survival in different riverine stretches.

Improvements in freshwater survival were applied to river and Delta environments proportionately to the current estimates of survival in these two environments. Riverine survival rates necessary to support the three Watershed-specific Goals for productivity were then further divided into two river segments: one for the Stanislaus River between the spawning grounds and a juvenile salmon monitoring station at Caswell State Park and another for the river reach between Caswell State Park and where the San Joaquin enters the Delta. Because survival is currently estimated to be higher in the Delta than in the river, final estimates of survival rates necessary in the Delta were higher than the survival rates specified by the Biological Objectives for the riverine environment. The SEP Group determined that proportionate improvement in survival in the Delta vs. riverine environment (i.e., increased survival rates as fish grow and age in freshwater) was consistent with natural patterns. However, such proportionate improvement in survival rates eventually led to estimated Delta survival rates that were unrealistically high for juvenile salmon from the Stanislaus River with regard to the final Watershed-specific Goal (sustainability or "typical" Chinook salmon survival rates). Many juvenile salmon emerging from the Stanislaus River are expected to complete freshwater rearing in the Delta (as opposed to salmon migrating from watersheds further upstream that will rear mainly in the river environment), and this extended residence in the Delta will likely cap potential survival improvements in the Delta. The final survival target for Stanislaus River juveniles in the Delta was capped at 50% median annual survival through the Delta. Juvenile survival required in the riverine environment was adjusted to produce overall freshwater survival called for under the final productivity-related Watershed-specific Goal.

Adult-to-juvenile outmigrant productivity in the riverine environment is the product of spawning success of adults that return to the river, egg incubation success, and juvenile survival through the river system. These rates are controlled by conditions in the river

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system almost exclusively,[1] and, as a result, Biological Objectives for productivity of Stanislaus River salmonids may be attained through modifications of environmental conditions in the Stanislaus River and lower San Joaquin River. In addition to objectives for adult-to-juvenile survival rate, targets were established for adult survival, redd success, egg survival, and adult-fry production. These targets can be used to guide relative conservation efforts focused on improving conditions for each life stage and, by monitoring these component rates, managers can determine where problems are occurring in the event that the overall adult-to-juvenile productivity objectives are not attained.

Biological Objectives for **life history diversity** of Stanislaus River salmonids are described in Tables TS-7 through TS-10. Life history diversity among juvenile salmonids (commonly measured by the timing of and body size at migration) is increasingly recognized as vital to population growth rates (i.e., productivity) and stability of the population through time. Because the timing and quality of conditions in the San Francisco Bay Estuary and marine environments are highly variable, a diverse portfolio of juvenile sizes migrating at different times increases the chances that some fraction of each annual cohort will be able to capitalize on suitable conditions in pelagic environments.

Table TS-7
Fall-run Chinook Salmon Timing of Migration Objectives

Size Class	Caswell RST		Mossdale[1] Trawl	
	Start Week	End Week	Start Week	End Week
Fry (smaller than 55 mm [2.2 in])	Last of January	Second of April	N/A[2]	N/A[2]
Parr (larger than 55 mm [2.2 in], smaller than 75 mm [3 in])	First of February	Last of May	Second of February	First of June
Smolt (larger than 75 mm [3 in])	Third of February	First of June	February	June

[1] One nuance is that, for each individual female, maximum fecundity is determined by conditions experienced prior to river entry (e.g., in the marine environment); this potential fecundity may then be reduced by poor conditions encountered during the adult migration through freshwater.

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Notes:
1 Tributary contribution can be assigned (e.g., by otolith analyses).
2 Mossdale Trawl does not reliably detect fish smaller than 55 mm (2.2 inches).

Table TS-8

Fall-run Chinook Salmon Size at Migratory Objectives

Size Class	Wetter Years	Drier Years
Fry (smaller than 55 mm [2.2 in])	20% minimum	20% minimum
Parr (larger than 55 mm [2.2 in], smaller than 75 mm [3 in])	20% minimum	30% minimum
Smolt[1] (larger than 75 mm [3 in])	10% minimum	20% minimum

Notes:
1 Includes only juveniles that migrate before daily mean temperatures greater than 25°C (77°F) at Mossdale – Initial estimates of size class distribution are based on Sturrock et al. (2015)

Table TS-9

Chinook Salmon Biological Objectives – Life History Diversity Objectives

Objective		Life History Diversity (Migration Timing) [1]				Life History Diversity (Age-class Distribution Minima) [1]	
Description	Briefly	Support range of juvenile migration dates to maintain life history diversity				Support range of sizes at juvenile migration dates to maintain life history diversity	
	Achieved by When?	Year 10	Year 10	Year 10	Year 10	Year 12	Year 12
	Measure What?	Detection every week no later than…	Detection every week through at least…	Detection every week no later than…	Detection every week through at least…	Minimum % juvenile migrants annually (wetter years)	Minimum % juvenile migrants annually (drier years)
	Measured Where?	Caswell RST	Caswell RST	Mossdale Trawl	Mossdale Trawl	Caswell RST	Caswell RST
Fall-run	Fry	Last week of January	2nd week of April	N/A	N/A	20%	20%
	Parr	1st week of February	Last week of May	2nd week of February	1st week of June	20%	30%
	Smolt	3rd week of February	1st week of June	Last week of February	2nd week of June	10%	20%
Spring-run	Fry	1st week of January	2nd week of April	TBD	TBD	20%	20%
	Parr					20%	30%
	Smolt					10%	20%
	Yearling [2]	Detection in ≥ 50% weeks October to January	Detection in ≥ 50% weeks February to April	TBD	TBD	≥ 1.5 yearlings per 1,000 female spawners	

Notes:

1 Juvenile productivity and life history objectives refer only to those fish that migrate before temperatures in the mainstem San Joaquin reach 25°C (77°F).

2 The yearling life history strategy is associated with spring-running adults (fall-run adults may produce yearlings as well, but it is considered to be extremely rare). Production of some yearlings is expected whenever spring-run Chinook reproduce successfully; however, detection of yearlings is only required when sufficient numbers of spring-run salmon reproduce.
N/A = not applicable
TBD = to be determined

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Table TS-10
Spring-run Chinook Salmon Timing of Migration Objectives at Caswell Rotary Screw Trap

Size/Life History Type	Frequency	Start	Fall-run Start	End (Both Runs)
Yearling (to be measured two calendar years following parent cohort return [escapement])	a) Detection in at least 50% of weeks between the second week of October to January, and b) 50% of weeks February to April (The division between time periods is intentional and meant to ensure that some yearlings migrate in each of the time periods)	October	No Applicable Objective	April
YOY (Fry, Parr, and Smolt)[1]	Every week	First week of January	Last week of January	First week of June

Note:
1 See Table TS-8 for definitions of fry, parr, and smolt size classes.
YOY = young-of-the-year

For Chinook salmon, life history diversity objectives took two forms: minimum standards for both the temporal distribution of migration and for the distribution of fish among three body size categories. Targets were not intended to be overly prescriptive in either of these categories, as life history diversity parameters should vary from year to year in response to environmental conditions. Rather, the life history diversity objectives were designed to identify minimum levels of diversity, below which the SEP Group would be concerned that the overall population was overly homogenous. It is worth noting that the existing fall-run Chinook salmon population on the Stanislaus River already meets many of the life history diversity Biological Objectives in many years (e.g., timing of juvenile migration), and other objectives, such as body size distribution, should be easily met following establishment of adequate rearing conditions on the Stanislaus River.

Life history diversity objectives for the Stanislaus River *O. mykiss* population were complicated by the extremely variable nature of *O. mykiss* life histories. Because factors like the proportion of anadromy (production of steelhead) are so dynamic within and among *O. mykiss* populations, there are few objective baselines against which to establish expectations for a healthy *O. mykiss* population. However, to support the attainment of

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Central Valley Objectives, life history diversity objectives were developed to ensure the expression of both resident and anadromous *O. mykiss* in the Stanislaus River (Table TS-11). Essentially, the Stanislaus River is expected to provide the environmental conditions to support the production of steelhead by supporting the appropriate *O. mykiss* growth rates, smolt survival, etc.

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Table TS-11

***O. mykiss* Life History Diversity Objectives**

Objective		Life History Diversity (Anadromy)				
Life History Stage		Juvenile			Adult	
Description	**Briefly**	Smolts produced per female spawner indicative of healthy spawner	Supports anadromy via a sufficient proportion of juveniles with anadromous *O. mykiss* mothers	Supports a range of outmigration dates for life history diversity	Support viable levels of both life history types	Support viable levels of both life history types
	Achieved by When?	Year 15	Year 15	Year 15	Year 15	Year 15
	Measure What?	Smolts/ female spawner	Proportion of age-0 juveniles with anadromous maternal origin in otolith	Smolt (Stages 4 and 5; at least 150 mm [5.9 in] FL) Detection	Proportion of adult *O. mykiss*	Resident adult abundance
	Measured Where?	Spawning reach	Age-0 *O. mykiss* collected in rearing areas	Caswell RST		Reach just downstream of Goodwin Dam
O. mykiss		This shall be tracked on a brood year basis				Age 1+ fish superpopulation > 1,492 to 7,873
		Annual hydrology > 50% exceedance: > 300	> 45%	Minimum of 4 months of the year	> 25% resident – Summer	3 to 9 age 1+ fish per 100 m^2 (1,076 ft^2)
		Annual hydrology ≤ 50% exceedance: > 150			> 20% anadromous – immigrating adults	

Note:
ft^2 = square feet

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Genetic diversity objectives were intended to limit interbreeding between naturally spawned and hatchery-spawned individuals and among the different runs of Chinook salmon. Both phenomena are detrimental to the development of viable runs that are specifically adapted to local ecological conditions. Furthermore, both of these threats to genetic diversity are high priority management problems in the Central Valley. The prevalence of hatchery-origin fish returning to spawn in Central Valley rivers is a significant problem in managing wild stocks, and interbreeding among genetically distinct fall and spring-run Chinook salmon poses numerous threats to both populations.

Genetic diversity objectives are listed in Table TS-12.

Table TS-12
Genetic Objectives

Objective		Genetic	
Life History Stage		Adult	Egg/Juvenile
Description	Briefly	Maintain wild run genetic integrity	
	Achieved by When?	Year 9	Whenever spring-running fish are present
	Measure What?	Percentage hatchery origin spawners	Introgression
	Measured Where?	Spawning grounds	Spawning grounds
Fall-run	Wet	pHOS < 20% of spawners	< 2% hatchery influence
	Median Year		
	Dry		
Spring-run	Wet	N/A	< 2% inter-run mating
	Median Year		
	Dry		

Note:
pHOS = proportion of hatchery-origin spawners

Abundance objectives were developed for the resident *O. mykiss* only because, like for Chinook, the abundance of the anadromous form is not controlled solely by conditions in the freshwater environment (see Environmental Objectives below). Maintaining a viable population of resident *O. mykiss* is believed to be necessary in order to support: 1) increased frequency of the anadromous phenotype; 2) resilience of *O. mykiss* populations to prolonged

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natural occurrence of conditions that render anadromy a poor strategy; and 3) local recreational fisheries. The abundance objective for *O. mykiss* is in the term of parr density (i.e., one age-0 *O. mykiss* per square meter during the summer in specified reaches). Parr density, in conjunction with *O. mykiss* productivity objectives and associated Environmental Objectives, are believed to represent conditions in the Stanislaus River that will promote and protect the life history diversity of both resident and anadromous *O. mykiss.* The density and growth objectives for *O. mykiss* are described in Table TS-4.

ENVIRONMENTAL OBJECTIVES

Environmental Objectives represent the design criteria for the restored river. They are, in some sense, hypotheses about what is required to attain the Biological Objectives. Using the desired outcomes described above, as well as published literature and available models, the SEP Group defined a suite of environmental conditions that would support attainment of the Watershed-specific Goals and Biological Objectives. Where possible, these were expressed in ranges that the literature indicated would represent "Detrimental," "Sub-Optimal," and "Optimal" conditions for salmonids. Detrimental conditions for any one variable are those that will result in failure of the affected cohort to attain the Biological Objectives that are specific to that life stage. Conversely, attainment of Optima environmental conditions across the suite of Environmental Objectives is consistent with attainment of the Biological Objectives; in other words, all of the Biological Objectives are well within the known capacities of Chinook salmon and *O. mykiss* populations when environmental conditions are in the optimal range. Optimal conditions will not always occur for any one variable; the severity, duration, frequency, and number of other conditions that are sub-optimal will determine whether a given population attains its Biological Objectives. As a general rule, the more conditions that are sub-optimal and the longer or more frequently they are sub-optimal, the less likely it is that Biological Objectives will be attained.

Environmental Objectives were established for each life stage of each focal population. Variables addressed included temperature, dissolved oxygen (DO), contaminant concentrations, physical habitat space (e.g., gravel for spawning, shallow habitat for rearing), and others. To the extent possible, Environmental Objectives are not expressed as volumes of flow required to produce these optimal conditions, although flow volumes can be

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determined that will meet a particular suite of Environmental Objectives (e.g., depth and velocity of water to maintain desired temperatures or DO levels in spawning gravel).

The Environmental Objectives represent the hypothetical environmental conditions (based on best available science) that are necessary to attain the Biological Objectives in the Stanislaus River. It is possible that Biological Objectives can be attained even though the full suites of Environmental Objectives are not being met. This is grounded on the uncertainty around our scientific knowledge, natural variability, physical and biological interfaces, etc. As restoration proceeds on the Stanislaus River and the range of environmental conditions that approach their respective Environmental Objectives increases, the likelihood of attaining the Biological Objectives increases as well. When Biological Objectives are attained, the Environmental Objectives may be reassessed in an adaptive management context. Similarly, Environmental Objectives will need to be reassessed in the unlikely event that optimal conditions are attained for all Environmental Objectives but the Biological Objectives are not attained.

STRESSORS

Stressors (also known as limiting factors) are conditions (physical, biological, or ecological) within the system that limit or inhibit the attainment, existence, maintenance, or potential for desired conditions as characterized by the Biological and Environmental Objectives. Because different objectives are already being achieved to different degrees under existing conditions, identification of stressors is critical in order to:

- Highlight components of desired conditions that are not being achieved; and
- Identify the specific obstacles (i.e., stressor[s]) inhibiting desired conditions.

As a complement to the identification of stressors, ranking stressors:

- Enables the development of specific actions to achieve desired conditions by resolving stressors; and
- Facilitates the prioritization and sequencing of those actions to maximize benefit by addressing the most significant stressors first.

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In this way, when combined with the Biological and Environmental Objectives, the stressor analysis provides the basis for the following:

- Prioritizing conservation measures, including habitat enhancement actions and research, for maximum biological benefit;
- Understanding the full range and extent of conservation measures necessary to support population recovery; and
- Setting expectations related to the extent of conservation measures required to see progress towards the Biological Objectives for a given life history stage by virtue of the extent of the stress to that life history stage that has been resolved.

Stressor Identification, Ranking, and Prioritization

The process for identifying and ranking stressors includes the following four key steps:

1. **Identification of the range of stressors affecting each life history stage**. Potential stressors were identified based on a combination of expert opinion elicitation and review of published literature as well as other available data related to current and projected future conditions. Stressors identified were framed in terms of parameters specified in environmental objectives to characterize desired conditions (e.g., temperature and DO) and factors that are not specifically addressed in the objectives but which affect the potential for the Biological or Environmental Objectives to be achieved (e.g., predation).
2. **Assignment of stressors, for each life history stage, as relevant to: 1) current population and conditions; 2) target population and conditions; or 3) both.**
   - In the first case, the stressor affects the species or ecosystem under current conditions and/or at the current species population levels.
   - In the second case, the stressor, although not currently impacting populations or ecosystem conditions, is predicted to become impactful once populations approach recovery; when ecosystem conditions progress towards desired conditions; or as a function of some other trend, transition, or tipping point occurring in the future.
   - In the third case, a stressor is currently having an impact on the species, and it is also expected that the magnitude or nature (e.g., scale and predictability) of that impact will change as populations increase, progress towards environmental objectives is made, or some other future condition occurs.

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3. **Scoring of stressors by life history stage for current conditions and target of future conditions, as applicable.** Based on existing information, stressors were assigned a score of 1 to 4 points (1 being lowest and 4 being highest) in two categories—magnitude and certainty—using a scoring approach adapted from the Delta Regional Ecosystem Restoration Implementation Plan (DRERIP). Magnitude scores were based on the scale and severity of the impact to populations from the stress. Certainty scores were based on the understanding of a stressor's related impact as a function of the available information base as well as the predictability of that impact. In combination, magnitude and certainty scores generate an overall score, guide stressor ranking, and provide indication about the appropriate stressor response.
4. **Stressor ranking and prioritization across life history stages.** Once scored, stressors for individual life history stages were combined for each of the three species (fall-run Chinook salmon, spring-run Chinook salmon, and *O. mykiss*). Stressors were then sorted and ranked based on their magnitude and certainty scores and assigned a stressor response type. In addition to the severity of the stress, a high magnitude score indicates the potential need for a major action, depending on certainty. A low magnitude score, depending on certainty, suggests either a need for monitoring to ensure the magnitude does not increase or research to confirm the low magnitude score and potentially inform adaptive management. In order to facilitate the application of the stressor analysis to development and sequencing of conservation measures to alleviate stressors, the stressors were grouped and prioritized according to stressor responses in the following broad categories: Actions, Research, and Monitoring.

Stressor priorities are presented summarized across life history stages for fall-run Chinook salmon, spring-run Chinook salmon, and *O. mykiss*. All stressors identified in the analyses for the different species/life history stages are considered significant and in need of being addressed in order for Environmental and Biological Objectives to be achieved. However, the analysis specifically identifies stressors with both a high magnitude and certainty as the highest priority for response in the form of conservation action(s) that will resolve the stressors and support attainment of the Environmental Objectives. The analysis further defines lower priority actions as those with a lower magnitude, but also with a high degree of certainty. Stressors with a high magnitude, but a lower degree of certainty, are considered

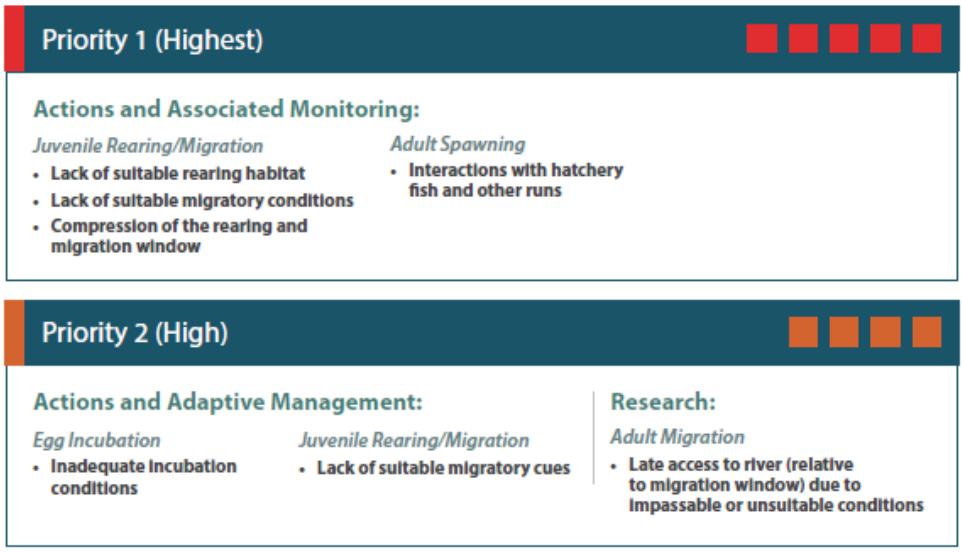
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the highest priority for research, with other research priorities falling in below based on their relative magnitude scores. Low magnitude stressors are prioritized under baseline monitoring needs, where higher certainty indicates a priority for trend monitoring to ensure that the magnitude does not increase.

The report includes an analysis and summary of both coarse scale stressors (e.g., lack of suitable rearing habitat) and single variable fine scale stressors (e.g., lack of suitable rearing habitat as a function of temperature) for each of the species over both the near- and long-term. The results are summarized in a total of four matrices—1) coarse and 2) fine scale priorities for both 3) near-term and 4) long-term populations—and are presented for each of the three focal species (near term Figures TS-3 through TS-5; long term in Appendix E).

Results of Stressor Analysis

The following matrices summarize a portion of the stressor prioritization results for each of the three target species. For the purposes of this technical summary, only the highest and high priority coarse scale stressors for each of the three target species are included in order to provide a sense of the most biologically pressing needs for action or research in the near term.



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Figure TS-3

Fall Run Chinook Salmon – Stressor Response Prioritization (Near Term, Coarse Scale)

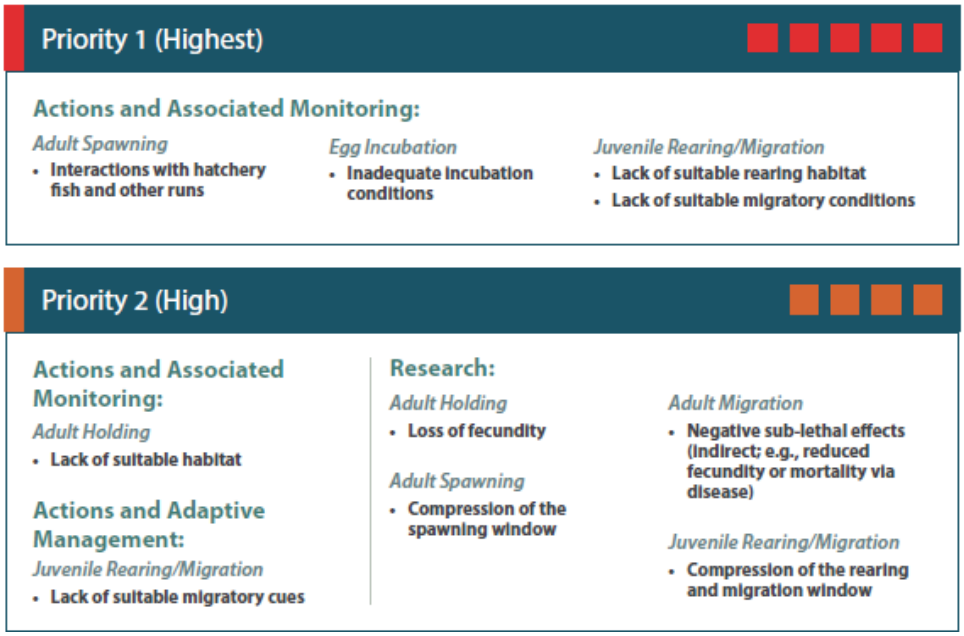


Figure TS-4

Spring Run Chinook Salmon – Stressor Response Prioritization (Near Term, Coarse Scale)

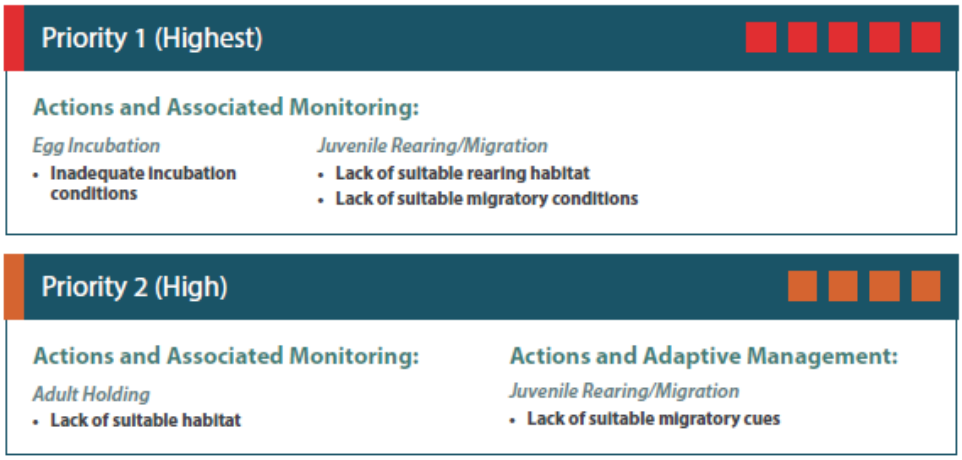


Figure TS-5

Steelhead – Stressor Response Prioritization (Near Term, Coarse Scale)

Stressors, as explained above, are the obstacles to achieving the desired conditions (i.e., Environmental Objectives) necessary for the species to attain the target population conditions (i.e., Biological Objectives). For this reason, for any given life history stage,

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progress towards the Biological Objectives can only be expected once the high priority stressors have been addressed and Environmental Objectives largely achieved. The efficacy of conservation measures designed to reduce stressors should therefore be measured based on the extent that those measures advance or achieve Environmental Objectives or Biological Objectives.

Once Environmental Objectives have been significantly advanced, or achieved via the resolution of priority stressors, Biological Objectives become metrics to measure species response to the actions and conditions quantified in the Environmental Objectives. In addition, Biological Objectives can serve as triggers for adaptive management actions in cases where Biological Objectives are not being achieved despite Environmental Objectives having been met and stressors resolved.

Although Environmental Objectives and stressors do not have a one-to-one relationship with Biological Objectives, there are several core relationships among them that can serve to guide expectations around biological response to the attainment of Environmental Objectives, including the following:

- **Habitat Quality → Survival**
  Given the carrying capacity associated with a given spatial area of habitat, fish condition and survival is largely linked with habitat quality as defined by Environmental Objectives and stressors for a given life stage.
- **Habitat Spatial Extent → Abundance**
  Given habitat quality and suitability (as quantified by the Environmental Objectives) and associated survival rates, increased spatial extent of suitable habitat increases carrying capacity for that life history stage.
- **Habitat Temporal Extent → Diversity and Resilience**
  Given sufficient habitat quality and spatial extent, the temporal extent and availability of habitat increases the potential for a given life history stage to express diversity.

Even when the primary stressors for a given life history stage have been addressed, certain Biological Objectives (e.g., population growth and abundance) require success across multiple or all life history stages. It therefore becomes necessary for the high priority stressors to be

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addressed, and Environmental Objectives achieved for all life history stages, in order to see meaningful progress towards the full suite of Biological Objectives.

In general, native species in the Stanislaus River are impacted by changes to river flow (e.g., reduced mean annual flow and an altered hydrograph), habitat alteration (e.g., dams and legacy mining), and biological modification (e.g., non-native species and hatchery-origin fish). In addition, changes to river flow and habitat alteration can influence biological modifications. Thus, the vast majority of stressors can be addressed through water management, habitat, or a combination of the two. For example, one of the highest priority stressors for juvenile fall-run Chinook salmon is the lack of rearing habitat. To alleviate this stressor, conservation actions would have to include a combination of habitat restoration and flow regimes to adequately inundate the restored habitat for an appropriate duration to support juvenile growth. Flow and habitat are both critical elements of river function and emergent themes necessary for river restoration. Although the SEP Group has not outlined specific actions necessary to alleviate stressors and meet Environmental and Biological Objectives, it is clear that modifications to both current habitat and current flow regimes will be necessary to achieve the objectives for the Stanislaus River.

ADDRESSING UNCERTAINTY

Each component of the SEP framework is essential to adaptively managing a comprehensive salmonid restoration strategy. Biological Objectives represent the minimum conditions necessary to achieve Watershed-specific Goals for the Stanislaus River and its contribution to Central Valley Goals and Objectives for anadromous fish restoration. Management activities must be oriented toward attainment of the Biological Objectives and modified over time, as necessary, to achieve those objectives. This means that, prior to selection and implementation of conservation actions, proposed actions must be evaluated based on their ability to support the Biological Objectives and, following implementation, monitoring will be needed to assess whether the actions' expected benefits materialize. Because it is difficult to measure the direct effect of individual actions on the Biological Objectives, the Environmental Objectives provide the physical design criteria against which conservation actions (individually and collectively) can be evaluated. Environmental Objectives represent hypotheses of the environmental conditions needed to achieve the Biological Objectives.

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Stressors, and their relative magnitude and certainty scores, represent hypotheses regarding the existing and expected future barriers to attainment of Environmental and/or Biological Objectives. Finally, conservation actions will represent hypotheses about the best way to ameliorate Stressors and to attain Environmental and Biological Objectives.

An adaptive management framework is necessary to:

- Evaluate conservation measures for the hypothesized relationships between proposed actions, Environmental Objectives, and biological outcomes;
- Predict trade-offs between alternative sets of proposed conservation measures and to select the conservation measures with the best predicted outcomes;
- Monitor the response of environmental and biological metrics to implemented conservation measures and predicted outcomes; and
- Update hypotheses, stressor evaluations, and Environmental Objectives over time in response to monitoring and new information.

NEXT STEPS FOR THE STANISLAUS RIVER

The next steps in developing a comprehensive conservation strategy for salmonids in the Stanislaus River will be the design of a suite of specific conservation actions (a comprehensive conservation strategy), including the monitoring elements needed to evaluate the performance of actions individually and collectively. Such actions can and should be evaluated based on their ability to alleviate the priority Stressors, and to attain the Environmental and Biological Objectives identified here. Stakeholders, resource managers, and decision-makers can employ the SEP group's goals, objectives, and stressor evaluations to assess the specific contributions of different Conservation Actions (alone and together) to the Biological and Environmental Objectives. Following implementation of Conservation Actions, information developed through monitoring can be synthesized to allow measurement of an action's effects, in terms of the environmental conditions (Stressors and Environmental Objectives) it was intended to modify. This adaptive management approach enables efficient adjustment of Conservation Actions and the conservation strategy, as needed. If monitoring indicates that Conservation Actions are not performing as intended, then changes to the actions, or additional actions, will be implemented to ensure that Environmental Objectives and Biological Objectives are reached.

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The SEP's logic chain framework (Figure TS-2) also facilitates design of efficient and powerful monitoring plans. Implementation of the conservation actions will require various levels of monitoring, including site-specific monitoring to document compliance and performance of specific measures as well as system-wide monitoring to evaluate overall effectiveness. Monitoring activities will need to produce data that are relevant to assessing progress at all levels of the logic chain structure; monitoring results should inform managers whether progress is being made towards the following:

1. Intended performance of individual conservation actions
2. Stressor reduction/elimination
3. Environmental Objectives
4. Biological Objectives

The SEP's goals, objectives, and stressors also encourage targeted and efficient monitoring of individual conservation actions. When conservation actions are developed, their projected effect on relevant stressors and, in particular, their expected contribution towards attainment of Environmental Objectives must be described. Clearly, monitoring needed to assess performance of conservation actions can only be determined after the conservation strategy is described in detail. However, the monitoring needed to evaluate progress towards larger desired outcomes (items 2 through 4 in the list above) has been defined by the performance metrics presented in this report. In certain cases, the stressors addressed by a conservation action may transcend the effect of any particular physical/chemical environmental condition; actions that are designed to reduce predation pressure fall into this category. In such cases, monitoring plans that accompany the proposed action should be specific with regard to the way in which the action is expected to reduce the stress, so that the effect of the action can be tracked by relevant monitoring.

The SEP Group is prepared to evaluate conservation plan proposals for the Stanislaus River to determine how likely they are to produce the Environmental and Biological Objectives. Such an evaluation will be limited to SEP group members that did not participate in development of proposed conservations strategies. Evaluations will be conducted using a systematic and transparent process to document likely effects, uncertainties, and potential

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unintended negative consequences of actions. To be evaluated, a conservation strategy will need to:

- Be comprehensive (i.e., address desired outcomes throughout the riverine life history of the focal populations)
- Be specific in terms of the scale and timing of actions
- Document its projected effect on Stressors and the attainment of objectives

BEYOND THE STANISLAUS RIVER

In addition to assisting with the evaluation of conservation plans that emerge for the Stanislaus River, the SEP Group intends to develop goals and objectives for the Tuolumne, Merced, and lower San Joaquin rivers. In addition, the SEP Group will evaluate the stressors in each of those environments and how they affect relevant life history stages of the focal populations. This process will culminate in the integration of a basin-wide vision.

Integration of goals and objectives for different waterbodies may require adjustment for the sake of consistency. Additionally, some desired outcomes can only be articulated in the context of goals and objectives for all three San Joaquin River tributaries. For instance, management of adult salmonid straying is a basin-wide issue that will require improved conditions on each of the tributaries and hatchery management objectives. Similarly, identification of effects on one life stage that are driven by changes in the previous life stage (e.g., bigger, healthier juvenile outmigrants contribute to better survival through Delta and less stressful adult migration through Delta/lower river leads to higher spawning success/fecundity upstream) will require a basin-wide approach.

Having created the template with the Stanislaus River process, the application of the SEP approach to other waterways in the San Joaquin Basin can happen much more quickly, provided there is adequate facilitation and technical support. The beauty of the SEP approach is that work towards desired conditions on the Stanislaus River can begin immediately. For example, while Delta restoration is essential to attaining desired conditions for the Central Valley's salmonid populations, there is no need to delay the process of attaining Stanislaus-specific Biological Objectives while required outcomes for the Delta are

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further defined. The SEP's Watershed-specific Goals and Biological Objectives are local in scope and achievable. The time to begin moving towards this vision is now.

REFERENCES

Lindley et al. 2007

NMFS (National Marine Fisheries Service), 2009. Biological Opinion and Conference Opinion on the Long-term Operations of the Central Valley Project and State Water Project. Southwest Region. June 4, 2009.

NMFS, 2014. *Public Final Recovery Plan for the Evolutionary Significant Units of Sacramento River Winter-run Chinook Salmon and Central Valley Spring-run Chinook Salmon and the Distinct Population Segment of Central Valley Steelhead*. Sacramento Protected Resources Division. July 2014.

Sturrock, A.M., J.D. Wikert, T. Heyne, C. Mesick, A. Hubbard, T. Hinkelman, P.K. Weber, G. Whitman, J.J. Glessner, and R.C. Johnson, 2015. Reconstructing the migratory behavior and long-term survivorship of juvenile Chinook salmon under contrasting hydrologic regimes. *PLoS ONE* 10(5):e0122380.

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1 INTRODUCTION

Over the past few decades, efforts have been made to reverse and restore the declining health of riverine and estuarine habitats in the Central Valley and, in particular, their anadromous fish fauna. Yet, these habitats and key populations continue to be at risk of further degradation and decline. This is partially attributable to the lack of a common vision of conservation success among resource agencies, conservation groups, and water districts. A vision of conservation success must include appropriate targets of success and prioritized actions based on their ability to attain overarching goals and objectives. In addition, a vision of conservation success provides the framework for developing, evaluating, and implementing appropriate strategies for conservation and restoration. Without such a framework, science-based adaptive management cannot be applied to solve complex ecosystem and water management issues.

The lack of conservation success is recognized in multiple regulatory processes associated with the lower reaches of the San Joaquin River and its major tributaries, the Stanislaus, Tuolumne, and Merced rivers. Because these regulatory processes may affect change in fisheries and the operations of various water and resource management agencies, a large group of stakeholders interested in resolving long-standing ecosystem and water management issues convened to work on a process to negotiate a settlement for these various regulatory processes. This settlement negotiation process, called the San Joaquin Tributary Settlement Process (SJTSP), originally discussed a set of goals for the San Joaquin River system, but the stakeholders soon realized that science-based methods should be used to establish desired outcomes (including goals, biological objectives, and environmental objectives) for the river and to evaluate conservation proposals in the context of those desired outcomes. The SJTSP stakeholders decided to focus first on one major San Joaquin River tributary—the Stanislaus River—due to the size and complexities of the overall San Joaquin River basin.

Scientists with appropriate expertise were identified by the various parties to participate in an effort to identify a new pathway for improving the status of Chinook salmon (*Oncorhynchus tshawytscha*) and Central Valley rainbow trout and steelhead (*O. mykiss*) populations in the San Joaquin River basin. The collaboration involved experts from the

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California Department of Fish and Wildlife (CDFW), U.S. Fish and Wildlife Service (USFWS), U.S. Bureau of Reclamation, National Marine Fisheries Service (NMFS), American Rivers, The Bay Institute, Trout Unlimited, and The Nature Conservancy. The process was open to all stakeholders. This collaborative group pursued a Scientific Evaluation Process (SEP) and identified itself as the SEP Group.

The SEP Group focused on defining desired outcomes for three fish populations: spring- and fall-runs of Chinook salmon and *O. mykiss* (both resident and migratory forms). This focus was motivated by the following:

- The understanding that restoring conditions that support these populations would provide significant benefits to other ecosystem attributes and functions in the lower Stanislaus River watershed; and
- The availability of data on salmonids relative to other aquatic biological resources in the Stanislaus River.

The SEP Group developed goals and specific objectives for the salmonid populations of the Stanislaus River that incorporated and harmonized numerous federal and state policies, programs, and plans, including the Anadromous Fish Restoration Program (USFWS 2001), Bay-Delta Water Quality Control Plan (WQC Plan), Endangered Species Act (ESA) recovery plans, and relevant CDFW code sections. The programs and plans that the SEP Group considered as part of this framework are discussed in detail in Section 2.3.1.

The SEP is intended to help provide a common scientific foundation of fact for all parties engaged in developing a comprehensive approach to solving San Joaquin River basin aquatic resource management issues as well as parties engaged in relevant regulatory processes, including specifically:

- The State Water Resources Control Board (SWRCB) update of the WQC Plan, as called for under the state Porter-Cologne Water Quality Control Act (Porter-Cologne Act) and the federal Clean Water Act; and
- Federal Energy Regulatory Commission relicensing proceedings.

The purpose of the SEP is three-fold, as follows:

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1. Develop a clear, scientifically justified vision for the desired status of fall-run and spring-run Chinook salmon and resident (rainbow trout) and migratory (steelhead) forms of *O. mykiss* in the Stanislaus River and larger San Joaquin River basin;
2. Provide well documented and transparent technical guidance on the conditions necessary to attain that vision; and
3. Provide a foundation for evaluating the effectiveness of proposed actions to achieve the conditions necessary to realize the vision.

This report explicitly addresses the first two purposes, and its development supports the third purpose as it relates to the Stanislaus River. The vision and technical guidance developed here will inform similar products for other major San Joaquin River tributaries (the Tuolumne and Merced rivers) and for the mainstem San Joaquin River downstream of its confluence with the Merced to the Sacramento-San Joaquin Delta (Delta). The SEP Group envisions that the strategies proposed to achieve the conditions necessary to restore salmonid populations to the Stanislaus River and throughout the San Joaquin River basin would be developed through discussions and multi-party negotiations among resource agencies, conservation groups, and water districts. Proposed strategies (suites of Conservation Actions) would then be reviewed using a systematic process (e.g., the methodology described for the Delta Regional Ecosystem Restoration Implementation Program that was developed by state and federal agencies). The overarching purpose of these efforts and strategies is to restore the San Joaquin River and its tributaries to support sustainable native fish populations and other living resources.

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2 SCOPE, CONTEXT, AND CONSIDERATIONS

2.1 Historical Context

San Joaquin River basin salmonid populations were once some of the largest in California's Central Valley (CDFG 1990). Historically, the San Joaquin River and its tributaries supported spring- and fall-runs of Chinook salmon and steelhead (Yoshiyama et al. 2001; Moyle 2002). As recently as the 1940s, spring-run Chinook salmon were the dominant salmon run in the San Joaquin River basin (Fry 1961).

From the 1940s to the 1980s, extensive water storage development occurred throughout the San Joaquin River watershed, resulting in a large proportion of flow being diverted from river channels. In addition, spawning and rearing habitats were degraded, and access to historical spawning and rearing reaches was blocked by dams. This habitat degradation and loss caused by construction and operation of dams, along with habitat degradation caused by gravel mining, channelization, and other human actions, has led to significant declines in spring- and fall-run Chinook salmon and steelhead populations. For decades, spring-run Chinook salmon were considered to be extirpated from the San Joaquin River basin (Fisher 1994); however, more recently, "spring-running" Chinook salmon have been observed in the Stanislaus and Tuolumne rivers (Franks 2012).

2.2 Considerations for Biological and Environmental Objectives

The SEP Group expressed its vision for the desired status of Stanislaus River salmonid populations in the form of "Biological Objectives" (Section 6). They developed "Environmental Objectives" (Section 7) to provide technical guidance on the conditions necessary to attain the Biological Objectives. Objectives were developed using the following considerations:

1. Objectives are "Specific, Measureable, Achievable, Relevant to overarching goals, and Time-bound" (S.M.A.R.T.).
2. Biological and Environmental Objectives for the Stanislaus River are specific to conditions that can be controlled or greatly influenced by actions in the Stanislaus River. In cases where setting Stanislaus River-specific objectives require making assumptions regarding outcomes in other parts of the salmonid life cycle,

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those assumptions are stated.

- For example, productivity (juvenile survival) objectives for the Stanislaus River assume and reflect anticipated improvements in survival through the Delta because it is not possible to restore adequate salmonid productivity unless conditions improve throughout the freshwater environments used by these fish.

3. Biological and Environmental Objectives provide a framework for evaluating proposed actions. Actions necessary to achieve these objectives are not proposed or evaluated in this document.
4. Biological and Environmental Objectives for the Stanislaus River are intended to serve Central Valley Goals and Objectives.

    - For example, Central Valley Goals and Objectives that set expectations for abundance of salmonids produced by or returning to the Stanislaus River have already been identified (e.g., the Anadromous Fish Restoration Plan [AFRP] identifies a target of natural production of 22,000 harvestable size fall-run Chinook salmon; USFWS 2001) or were derived with reference to policy guidance and outcomes on similar systems in the Central Valley. These expectations were used to inform development of Biological and Environmental Objectives for the Stanislaus River. However, the SEP Group did not identify adult abundance objectives for the Stanislaus River because the group recognized that abundance is related to conditions throughout the salmonid life cycle and cannot be tied solely to conditions in the Stanislaus River.

5. Levels of four viability parameters—abundance, productivity, diversity, and spatial structure—determine if salmonid populations are viable, healthy, and in good condition and to what level of risk they are exposed (McElhany et al. 2000). These parameters influence each other directly and indirectly. For any population, failure to achieve threshold levels for any one of these parameters represents a threat. Therefore, the SEP Group specifically addresses these four parameters for each population through life stage-specific Biological Objectives.
6. While the specific Biological and Environmental Objectives reported here have been developed for the Stanislaus River, they are intended to be applied in concert with analogous targets specific to all rivers in the San Joaquin River basin. Thus, creating ecological conditions in the Stanislaus River necessary to support Biological

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Objectives for the target salmonid populations is only one component of a broader strategy for supporting vibrant and diverse populations of Chinook salmon and *O. mykiss* throughout the San Joaquin River basin.

7. In addition to tributary-specific objectives, San Joaquin River basin-wide objectives will need to be established in some cases.
   - For example, the production of juvenile salmonids from all San Joaquin River tributaries will affect the quantity and quality of rearing and migration habitats needed in the lower San Joaquin River to support the combined outmigration. Additional objectives, to which the Stanislaus will need to contribute but which depend on the relative contributions of other San Joaquin tributaries, will be developed after the SEP Group develops biological goals and objectives for the Tuolumne and Merced rivers.
8. The objectives discussed in this report focus on salmonid species; however, their cumulative effect is intended to benefit numerous native species and habitat types throughout the Stanislaus River watershed, the San Joaquin River corridor, and into the Delta. Because salmonids are a relatively resilient and hardy species, attainment of objectives designed to restore these populations may not represent the level of restoration of the Stanislaus River, lower San Joaquin River, or Delta required by other species or downstream ecosystems.
9. All objectives identified here are believed to be measureable using existing technology, and existing monitoring is adequate to monitor attainment of some objectives. However, additional monitoring may be necessary to evaluate the attainment of some of the S.M.A.R.T. objectives identified in this report.
10. Successfully restoring the sustainability and resiliency of anadromous fish populations in the San Joaquin River basin may require restoring access to habitats in watersheds above dams. All major rivers in the San Joaquin River basin are identified by NMFS (2014) as candidates for building fish passage for access to upstream habitats. The SEP Group makes no assumptions that specific measures would occur in the future. Rather, the conservation measures to be developed through future discussions and negotiations are expected to respond to and serve the Biological and Environmental Objectives identified in this report and will be evaluated as to how well they support attainment of the objectives.

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2.3 Scope

The SEP Group developed Biological and Environmental Objectives for the Stanislaus River in the context of policy, geographical, and biological considerations.

2.3.1 Policy Considerations

Numerous laws, programs, and plans at the state and federal level call for restoring healthy anadromous salmonid populations in the Central Valley and the San Joaquin River. The SEP Group's Biological and Environmental Objectives for restoring salmonids of the Stanislaus River incorporated and attempted to convey technical guidance within a framework that is consistent with and harmonizes the requirements of these laws, plans, and programs (listed below).

Many policies, laws, and regulations call for the restoration of anadromous fish populations in the Central Valley and the San Joaquin River's watershed, but these policies do not necessarily apply consistently to different populations as illustrated in the examples below:

- Central Valley spring-run Chinook salmon and steelhead are listed under ESA, but fall-run Chinook salmon are not listed.
- Doubling of Chinook salmon runs is required under the WQC Plan, California Fish and Game (F&G) Code, and Central Valley Project Improvement Act (CVPIA) and doubling of steelhead is required under the F&G Code and CVPIA. However, specific restoration targets for the San Joaquin watershed and its tributaries were developed under the AFRP only for fall-run Chinook salmon, not spring-run or steelhead.

The Biological and Environmental Objectives developed by the SEP Group for the Stanislaus River were designed to support outcomes consistent with, and goals derived from, application of the laws, policies, and programs described below.

California Fish and Game Code Sections 2760-2765

The purpose of the Keene-Nielsen Fisheries Restoration Act of 1985 is to prevent further declines in fish and wildlife; restore fish and wildlife to historical levels where possible; and

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enhance fish resources through the protection of, and an increase in, the naturally spawning salmon and steelhead resources of the state.

California Fish and Game Code Section 5937

This section of the F&G Code is intended to balance the needs of California's native fish and the construction and operations of dams by requiring dam operators to release enough water to maintain fish populations below the dam "in good condition" (Börk et al. 2012). This section of the F&G code was enacted in 1915 and has rarely been implemented. However, one notable instance where the code was used was a decision by the Court of Appeals on suit brought by California Trout concerning Mono Lake tributaries (California Trout, Inc. v. State Water Resources Control Board 1989 ["CalTrout I"]).

California Fish and Game Code Sections 6900-6924

The Salmon, Steelhead Trout, and Anadromous Fisheries Program Act declares that it is the policy of the State to significantly increase the natural production of salmon and steelhead by the year 2000, and it directs the CDFW to develop a plan that strives to double the current natural production of salmon and steelhead resources. This is the same narrative (i.e., a doubling goal) as in the CVPIA.

Central Valley Project Improvement Act

In 1992, the CVPIA (Public Law 102-575) revised the goals of the federal Central Valley Project; Title 34 makes protection, restoration, and enhancement of fish and wildlife a goal of the Central Valley Project on par with its water delivery goal. Specifically, Section 3406(b)(1) of Title 34 requires that the secretary of the U.S. Department of the Interior (USDOI) develop and implement a program that makes all reasonable efforts to ensure that, by the year 2002, natural production[2] (i.e., the abundance of fish available for harvest in the ocean fishery excluding fish originating from hatcheries) of anadromous fish in Central Valley rivers and streams will be sustainable on a long-term basis at levels not less than twice the average levels attained during the 1967 through 1991 period. On

[2] Production refers to the abundance of fish available to the ocean fishery and should not be confused with escapement, which refers to the number of adult fish that return to freshwater habitats to spawn.

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January 9, 2001, the USFWS released the Final Restoration Plan for the Anadromous Fish Restoration Program to comply with this narrative requirement, which is referred to as the "doubling goal." The AFRP calculates an annual natural production target of almost 1 million Chinook salmon (including 750,000 fall-run, 68,000 spring-run, 110,000 winter-run, and 68,000 late-fall-run Chinook salmon). Production targets consistent with attainment of the overall "doubling goal" are established for most Central Valley rivers, including the Stanislaus; however, there are gaps in the river-specific targets of the AFRP. For example, the AFRP established a target of 13,000 naturally produced steelhead at the Red Bluff Diversion Dam (RBDD), but no steelhead targets have been established for the remainder of the Central Valley watershed, which would be much larger than the current (partial) target. Similarly, the AFRP does not establish targets for restoration of spring-run Chinook salmon in San Joaquin tributaries, even though the San Joaquin basin was once their stronghold in the Central Valley.

Federal Endangered Species Act Determinations and Plans

In 1998, NMFS listed the distinct population segment of steelhead in the Central Valley as threatened under ESA (63 Federal Register [FR] 13347); steelhead are present in the Stanislaus River. In 1999, the NMFS listed the Central Valley spring-run Chinook salmon evolutionarily significant unit (ESU) as threatened under ESA (64 FR 50394). Spring-run were believed to have been extirpated from the San Joaquin basin. The final NMFS recovery plan for endangered salmon of the Central Valley calls for reestablishment of at least two viable spring-run populations to the San Joaquin basin as a critical step in delisting this species (NMFS 2014). Recent status reviews conducted by NMFS resulted in no changes being made to the status of spring-run Chinook salmon or steelhead under ESA (NMFS 2011a, 2011b). In 1999, NMFS considered information about the Central Valley fall-run and late fall-run Chinook salmon ESU and determined that listing was not warranted. However, NMFS considered the fall-run and late fall-run Chinook salmon ESU to be a candidate species for listing in the future, so they are managed as a species of concern (NMFS 2009a).

San Joaquin River Restoration Program

After the completion of Friant Dam by the federal government in the 1940s, nearly 95% of the river's flow below the dam was diverted. As a result, 60 miles of the river ran dry, the second largest salmon population in the state was lost, and local fish and wildlife populations

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declined. Decreased water flows and water quality degradation impacted downstream farms and communities. Since 2009, the U.S. Bureau of Reclamation, USFWS, NMFS, CDFW, and the California Department of Water Resources have been working together to implement the San Joaquin River Restoration Program (resulting from a 2006 legal settlement between environmental groups, the Friant Water Users Authority and the federal government, and subsequent federal legislation) to restore spring-and fall-run Chinook salmon to the mainstem San Joaquin River downstream of Friant Dam. In the long term, this program intends to restore annual runs of up to 30,000 spring-run Chinook salmon and 10,000 fall-run Chinook salmon.

State Water Resources Control Board's 2006 Water Quality Control Plan

The WQC Plan contains the current requirements under federal Clean Water Act Section 303(c)(33 U.S.C., § 1313(c)) and Section 13240 of the state Porter-Cologne Act to protect the beneficial uses of the waters of the San Francisco Bay/Sacramento-San Joaquin Delta Estuary (Estuary). Specifically, it identifies beneficial uses of water in the Estuary, including its watershed, water quality objectives to protect those beneficial uses, and a program of implementation for achieving the water quality objectives. In the 2006 WQC Plan, the narrative objective for salmon protection states "Water quality conditions shall be maintained, together with other measures in the watershed, sufficient to achieve a doubling of natural production of Chinook salmon from the average production of 1967 to 1991, consistent with the provisions of state and federal law" (SWRCB 2006). The SWRCB is currently engaged in updating the WQC Plan and is proposing new flow standards on the lower San Joaquin River and its three eastside tributaries for the protection of fish and wildlife beneficial uses.

The Salmon, Steelhead Trout, and Anadromous Fisheries Program Act of 1988

The California Advisory Committee on Salmon and Steelhead Trout was created in 1983 to develop a strategy for the conservation and restoration of salmon and steelhead resources in California. The Salmon, Steelhead Trout, and Anadromous Fisheries Program Act of 1988 was signed by the governor of California to implement the advisory committee's recommendations, which included doubling the natural production of Central Valley salmon and steelhead.

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2.3.2 Geographical Considerations

The SEP Group focused on the Stanislaus River as a first step toward developing a transparent framework for identifying desired outcomes for salmonids in the San Joaquin River basin and the environmental conditions needed to support those outcomes (Figure 1). This focus was justified by the following:

- Current habitat conditions and potential for restoration of the Stanislaus River;
- The relatively large amount of information available on the Stanislaus River compared to others in the San Joaquin River basin; and
- The high level of interest by the SWRCB and other stakeholders in the WQC Plan process:
  - They are expected to issue new flow standards for the Stanislaus River and the two other main tributaries (the Merced and Tuolumne rivers) to the lower San Joaquin River.

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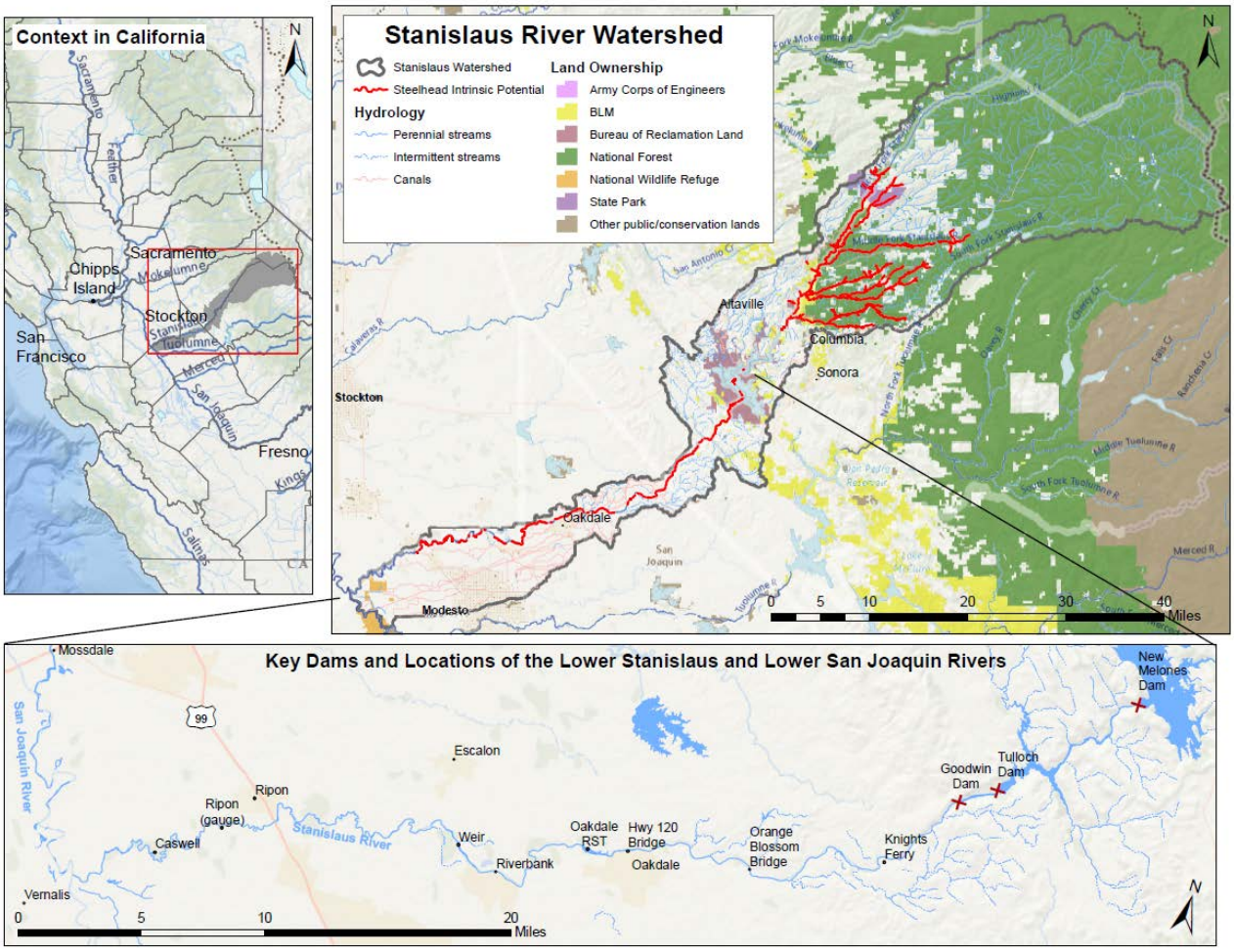


Figure 1
Key Dams and Features of the Lower Stanislaus River

Focusing on the Stanislaus River meant articulating desired outcomes for its salmonid populations and defining the suite of environmental conditions on the river that are necessary to attain those outcomes. Plan Goals and Biological and Environmental Objectives are specific to outcomes that can be attained by actions on the Stanislaus River; they represent conditions on and outcomes from the Stanislaus River that are consistent with laws, policies, and programs related to restoration of salmonids throughout the Central Valley. Additionally, the SEP Group recognized that the Stanislaus River must contribute to conditions in the lower San Joaquin River and southern Delta, but, in many cases, it is not possible to completely define that contribution without performing a similar evaluation of goals and objectives for the other rivers in the San Joaquin River basin. The SEP Group's

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intent is that the template developed for the Stanislaus River will be used to develop similar sets of Biological and Environmental Objectives for the Tuolumne and Merced rivers and the lower mainstem San Joaquin River (the area of the watershed downstream of the confluence of the San Joaquin and Merced rivers and upstream of the Delta).

The spatial scope of this initial effort to develop Biological and Environmental Objectives for the Stanislaus River includes the Stanislaus River from Goodwin Dam to its confluence with the San Joaquin River (Figure 1). While the Biological and Environmental Objectives are specific to reaches within the Stanislaus River, the SEP Group recognizes that establishing Biological Objectives for Chinook salmon and *O. mykiss* in the Stanislaus River and identifying the ecological conditions required to support them does not end at the Stanislaus River. Suitable habitat conditions in the lower San Joaquin River are necessary for the successful restoration of Chinook salmon and *O. mykiss* populations in the Stanislaus River. The SEP Group estimates that current survival of fall-run Chinook salmon through the Stanislaus River to the San Joaquin's entry into the Delta is extremely low (less than 1%; Section 6.2.1 and Appendix A).

Biological Objectives for the Estuary and Pacific Ocean were not addressed because these ecosystems respond to ecological drivers and human actions that are beyond the geographic scope identified for the SEP Group's consideration. However, in some cases (e.g., juvenile survival targets), assumptions regarding future conditions in the Estuary and Pacific Ocean were necessary in order to estimate the Stanislaus River's contribution to attaining larger, Central Valley-wide Goals. When assumptions about future conditions beyond the Stanislaus River were necessary in order to establish targets for the Stanislaus River, the assumptions and the rationale behind them were described in detail.

2.3.3 Biological Considerations

The overarching intent of the SEP is to restore native salmonids and associated habitat and ecosystem processes in the Stanislaus River and throughout the San Joaquin River basin. Salmonids are the focus of many policies regarding environmental and water management in the Central Valley, and they are among the best-monitored and studied organisms in this area. Achievement of all Biological Objectives for a given population is intended to result in

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a population that is viable, healthy, and sustainable. Achievement of all Environmental Objectives is hypothesized to achieve the Biological Objectives for salmonids and support other native river-dependent species. The Biological Objectives developed by the SEP Group focused on the following species/runs:

- Fall-run Chinook salmon,
- Spring-run Chinook salmon, and
- *O. mykiss*.

Attaining the Biological and Environmental Objectives for these salmonids may not be adequate to restore all of the important ecological and physical functions of the Stanislaus River. In addition, establishing conditions necessary to attain Biological Objectives for salmonids in the San Joaquin River basin's tributaries may not result in conditions necessary for achieving sustainable benefits in the Delta and Estuary. Thus, protecting and restoring other aquatic resources in the San Joaquin River basin, the Delta, or the Estuary may require contributions from the Stanislaus River in addition to those described in this report.

2.4 Developing Foundational Elements Necessary for Conservation Planning ("Logic Chain")

Too often, conservation planning begins with identifying and describing a suite of actions, without first defining the problem that the actions are meant to solve and explicitly defining a set of objectives that can be used to measure success. Taking these first important steps of defining goals and objectives provides a transparent basis for evaluating implications and trade-offs among proposed actions, implementing actions efficiently and within certain time-bounds, and managing actions towards attainment of desired conditions.

The SEP Group did not develop or evaluate Conservation Actions that should be taken on the Stanislaus River in order to improve conditions for native salmonid populations. Rather, the group focused on foundational elements needed to understand the nature and magnitude of challenges to restoring target populations; these elements are also essential to managing restoration activities in an adaptive management context. By developing goals and objectives and by ranking and prioritizing the barriers that prevent attainment of those goals and objectives, the SEP Group sought to provide the "design criteria" for subsequent conservation

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planning and the benchmarks against which to prioritize, implement, and adjust Conservation Actions adaptively.

The SEP Group addressed the following questions to establish a logic chain for development of the Biological and Environmental Objectives for Chinook salmon and *O. mykiss* in the Stanislaus River and for identifying, ranking, and prioritizing stressors that prevent attainment of goals and objectives (Figure 2).

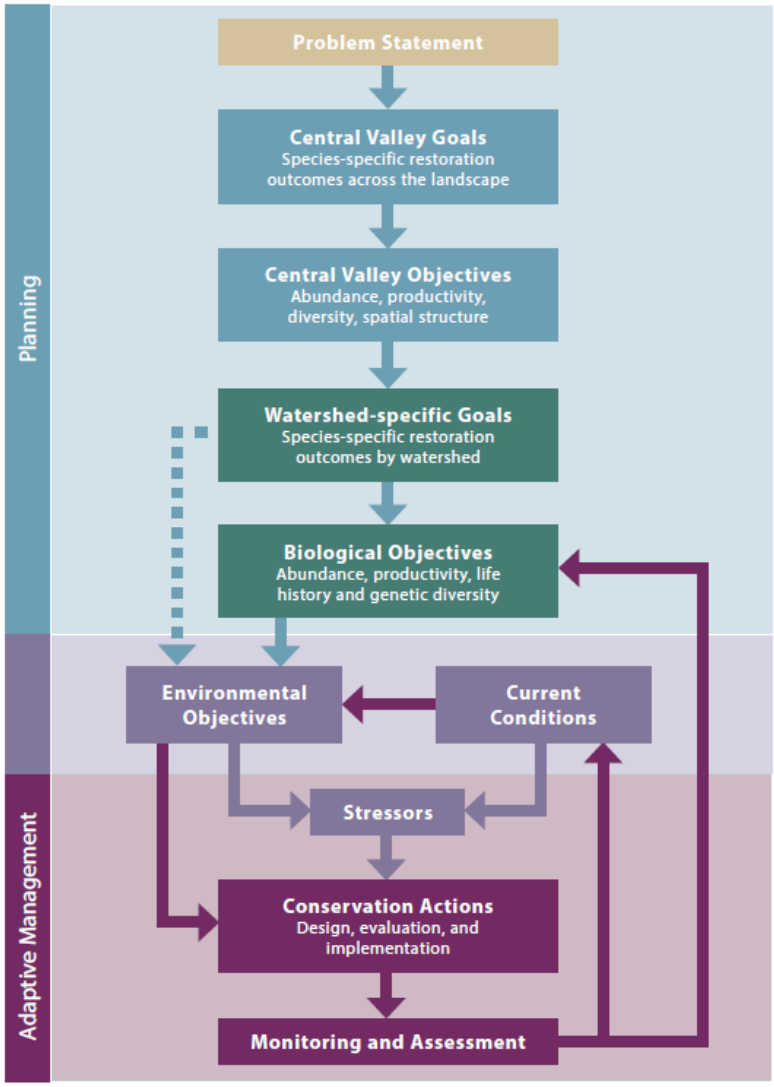


Figure 2
Scientific Evaluation Process Logic Chain

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What is the problem?

For each target species and for the ecosystem as a whole, **problem statements** provide a concise declaration of the ecological issues that require attention. Problem statements are general and factual descriptions of the problem(s) and do not assume particular causes of, or solutions to, those problems. For target species, a problem statement would address, at a minimum, each attribute of viability for which the species is deficient. For example: Central Valley spring-run Chinook salmon populations are imperiled because abundance is well below desired levels, survival rates are inadequate to achieve population growth, populations are severely constrained geographically, and the populations express only a narrow range of the life history variants that are typical of this species.

What outcome(s) will solve the problem?

Central Valley Goals present a vision for species-specific restoration actions across the Central Valley landscape and state desired outcomes that will solve the issue(s) identified in the problem statement. The Central Valley Goals describe outcomes that may be beyond the scope of this or other conservation planning efforts, but they are important for creating a context for any conservation strategy. For example, one Central Valley Goal for spring-run Chinook salmon is to:

Increase the spatial diversity of independent, viable spawning populations of Spring-run Chinook salmon, including establishment of populations in the Southern Sierra Diversity group.

What does solving the problem and attaining the goal look like?

Central Valley Objectives provide specificity to a related Central Valley Goal. Objectives are S.M.A.R.T. statements that indicate what level of restoration constitutes attainment of the goal. Central Valley Objectives provide a clear standard for measuring progress toward a desired outcome in the larger context of the Central Valley. The function of Central Valley Objectives is to define a magnitude of the problem and set a context for planning so that investment in conservation activities on the local scale (e.g., in the Stanislaus River Basin) is appropriately scaled to the larger conservation challenge.

What can efforts in the Stanislaus River contribute to the attainment of Central Valley Objectives?

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To identify relevant targets for a specific plan, Central Valley-wide Goals and Objectives are filtered through the biological, geographic, and policy lenses that constrain the current planning effort. Consideration of the scope (i.e., geographic, policy, biological) for the planning effort enables identification of **Watershed-specific Goals** that can be addressed within that scope. Watershed-specific Goals are a subset of the Central Valley Goals and are tailored to support attainment of Central Valley Goals and Objectives. Watershed-specific Goals describe the contribution to Central Valley Goals and Objectives that can be attained within a particular watershed or geographic unit. For example, one watershed-specific goal for the Stanislaus River is to:

> Achieve freshwater survival rates for fall-run Chinook salmon that are typical of other self-sustaining populations of ocean-type Chinook salmon.

What is the suite of biological outcomes that characterize success?

Biological Objectives define Watershed-specific Goals in S.M.A.R.T. terms—they are the biological outcomes that define success in the area and for the species, and they harmonize the policies proscribed by the scope. For example:

> Freshwater survival rates (egg-smolt) for fall-run Chinook salmon spawned on the Stanislaus River will be XX% by year XXXX of the plan.

Biological Objectives related to focal species or populations are S.M.A.R.T. targets that must be attained within the plan's scope in order to realize Watershed-specific Goals and thereby support Central Valley Goals and Objectives (i.e., what species-specific conditions must be achieved or exist in the Stanislaus River in order to be consistent with the Central Valley Objectives?).

In the context of adaptive management, Biological Objectives are the metrics towards which all Conservation Actions and adjustments to those actions are directed. Until Biological Objectives have been attained, Conservation Actions must be implemented or improved; attainment of the Biological Objectives indicates that conservation efforts have been successful in attaining their related Watershed-specific Goals.

What is the suite of physical and ecosystem conditions that characterize success?

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Environmental Objectives define the physical, chemical, and biological conditions that the SEP Group hypothesized are needed to attain the Biological Objectives. These values are specific to different species, life stages, and habitats and are derived from published literature (e.g., temperature and dissolved oxygen [DO] limits), conceptual and quantitative conceptual models (e.g., area of inundated floodplain), and professional judgment. Like other objectives, these values are specific, measureable, and achievable. They are intended to provide specific guidance for design and prioritization of Conservation Actions to achieve relevant Biological Objectives; their time bounds are defined by the Biological Objectives that they support.

Environmental Objectives are targets that support the attainment of Biological Objectives and Watershed-specific Goals. More specifically, Environmental Objectives quantify the conditions that best available science indicates will lead to the attainment of Biological Objectives. In an adaptive management context, Environmental Objectives should be thought of as hypotheses regarding conditions necessary to attain desired biological outcomes that should be evaluated through research and monitoring and adjusted as necessary to support the Biological Objectives. In the absence of new evidence, the working assumption is that until Environmental Objectives are attained, it is unlikely that Biological Objectives will be attained. Producing these conditions is believed to be necessary, but not a substitute for, attainment of the Biological Objectives. Environmental Objectives provide specific guidance and transparent linkages between the Biological Objectives and the design of Conservation Actions. Similarly, Environmental Objectives inform the design of monitoring activities because monitoring must be capable of detecting progress towards Environmental Objectives that result from Conservation Actions as well as progress towards Biological Objectives as a function of improvements in environmental conditions. If Biological Objectives are attained on a sustained basis prior to full attainment of Environmental Objectives, that would suggest the need to modify the Environmental Objectives in the light of this new evidence. Conversely, failure to attain Biological Objectives despite success in achieving Environmental Objectives is strong evidence that other stresses are impairing attainment of desired biological outcomes. This failure should trigger the following actions:

- New or enhanced management actions to improve environmental conditions and address additional stressors, and
- Refinement of the Environmental Objectives and analysis of stressors to capture those additional conditions critical achieving Biological Objectives.

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What are the barriers to achieving Environmental and Biological Objectives?

Restoration of salmonid populations in the Stanislaus River will require substantial improvements in a variety of environmental conditions. In order to address the barriers to attaining those objectives (referred to in this report as "stressors") in the most efficient manner, the SEP Group characterized, documented, and scored stressors according to the magnitude and certainty of their effect. Magnitude and certainty scores reflected a comparison of current conditions (e.g., as documented in published peer-reviewed literature, grey literature, monitoring data) with relevant Environmental Objectives. Professional judgement of those most familiar with current conditions on the Stanislaus River was also incorporated into scoring of Stressors, but certainty scores were not high when professional judgement was the only source of information on current conditions. Stressor magnitude and certainty scores were then used to prioritize the need for Conservation Actions (e.g., those that would increase rearing habitat; or actions to reduce thermal stress) to eliminate the stress in the near term (when populations are low) and in the long term (assuming populations increase and anticipated changes to the regional climate materialize). Stressor magnitude and certainty scores were also used to characterize the type of response—conservation action, research, or improved monitoring—that would be appropriate for a conservation plan.

Stressors describe the current environmental conditions that prevent attainment of both Environmental Objectives and (both by extension and directly) Biological Objectives. Stresses to Environmental Objectives are generally measured quantitatively. Stressor scoring reflects a combination of the known and hypothesized magnitude of a given stressors effect on the attainment of Biological Objectives as well as the degree of scientific certainty regarding how resolving a stressor will support attainment of Environmental and Biological Objectives. As Conservation Actions are implemented, the relative ranking of Stressors should change as either 1) their effect is ameliorated, 2) scientific understanding of their effect changes, or 3) both of the above. Monitoring is necessary to determine whether Stressors are being ameliorated or becoming worse and whether biological outcomes are responding as expected to any changes in the stressor. Thus, while conservation planning and implementation will focus on attainment of Environmental Objectives and Biological Objectives, adaptive management will address stressors frequently and directly.

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What actions can be taken to achieve the Environmental and Biological Objectives?

As described above, development and evaluation of Conservation Actions does not occur in this report. This report provides the basis for focusing, prioritizing, and evaluating Conservation Actions that will be proposed by others to relieve stress on target salmonid populations and lead to attainment of Environmental Objectives, Biological Objectives, and Watershed-specific Goals. These actions may include flow regime modifications and non-flow measures. Certain Conservation Actions may address Biological Objectives directly without addressing a specific Environmental Objective. For example, a conservation measure intended to reduce juvenile mortality rates (e.g., by directly manipulating competitor or predator populations) would be evaluated by its contribution to attainment of Biological Objectives for productivity.

Conservation Actions are intended to produce beneficial effects. These effects must clearly relate to reduction of high-priority Stressors and progress towards Environmental and Biological Objectives. Monitoring should be designed to detect whether actions are having their intended effects and whether they are having unintended negative effects relative to objectives. Adaptive management will apply monitoring results to adjust Conservation Actions to maximize the intended effect and eliminate or minimize undesirable effects.

For each run of Chinook salmon and the life history types of *O. mykiss* discussed in this report, development of the Biological Objectives centered on achieving the following generalized Watershed-specific Goals:

- Support the fullest natural expression of life history diversity as needed to increase population stability, resilience, and productivity;
- Support productivity (survival) rates characterizing a viable population that are necessary to attain Central Valley abundance and productivity objectives; and
- Maintain genetic integrity of wild stocks to avoid deleterious or undesirable effects to wild populations from introgression and hatchery influence.

Based on these goals, the SEP Group developed the following:

- Biological objectives related to life history, productivity, and genetic attributes of

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viability;

- Environmental Objectives needed to support the Biological Objectives; and
- Description and prioritization of stressors that prevent attainment of Biological Objectives now and in the future.

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3 VIABLE SALMONID POPULATION ATTRIBUTES

The SEP Group's approach to defining Watershed-specific Goals and Biological Objectives for the Stanislaus River was based on four key attributes of viable populations—abundance, life history and genetic diversity, productivity, and spatial structure (McElhany et al. 2000; Lindley et al. 2007; NMFS 2014). These four attributes are referred to as the viable salmonid population (VSP) parameters. Criteria for VSPs (a concept developed by the NMFS [McElhany et al. 2000]) inform the ecosystem and habitat conditions needed to restore Chinook salmon and steelhead. By defining distinct attributes of a viable population in a measureable form, the VSP approach allows for a comprehensive, measureable description of a healthy population and for prioritization of threats to a population's health. The VSP approach is useful for describing a vision for restored salmonid populations because it clearly acknowledges that healthy populations cannot be characterized by any one population attribute (e.g., abundance); rather, all the VSPs must reach acceptable levels before a population can be deemed "healthy."

The Biological Objectives described in this report reflect the distinct outcomes required for salmonid populations in the Stanislaus River and acknowledge that these VSP criteria are inter-related and mutually supportive. For example, natural levels of intra-population diversity and productivity are necessary in order for a population to display an abundance associated with restoration on a sustainable, long-term basis. The scope of this effort (the Stanislaus River) necessitated a different degree of emphasis on each of the VSP parameters. For example, spatial structure (described in detail below) refers to the number and distribution of spawning populations, but the Stanislaus River will only support one spawning population of each of the target salmonids. In other words, spatial structure is most relevant at the species scale and it is outside of this effort's scope, which is focused on the populations within the Stanislaus River.

3.1 Abundance

Abundance, or the number of organisms in a population, is a common species conservation and management metric. Populations or species with low abundance are generally less viable and at higher risk of extinction than large populations for reasons that include increased susceptibility to environmental variation, demographic stochasticity, loss of genetic

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diversity, and interruption of mating systems. Abundance correlates with, and contributes to, other viability parameters, including spatial structure (i.e., distribution and extent), diversity, and productivity. Simply increasing the abundance of organisms (or any other single viability parameter) is not sufficient to guarantee viability into the future. In other words, population viability depends on maintaining acceptable levels of each attribute of viability.

Abundance is also a key metric for determining acceptable levels of harvest for commercially and recreationally valuable species like Chinook salmon. As a result, population abundance targets for this species must exceed the minimum necessary to insulate the population from extinction threats. Production targets (i.e., abundance measured as the number of fish that reach the age where they are targeted by the ocean fishery) for different populations of Chinook salmon and steelhead have been set for many Central Valley rivers; these are incorporated into numerous state and federal policies and regulations such as the AFRP (USFWS 2001) and the WQC Plan (SWRCB 2006).

Abundance is the product of fecundity and survival rates that occur throughout the salmonid life cycle. At the Stanislaus River's carrying capacity, available habitat will constrain abundance; the river's carrying capacity can be adjusted to be consistent with Central Valley Goals and Objectives for the Stanislaus River (e.g., by expanding spawning or rearing habitat availability). However, because abundance is not controlled solely by conditions on the Stanislaus River (i.e., many factors controlling abundance are beyond the geographical scope of this process), the SEP Group did not establish Biological Objectives for abundance of focal salmon populations.

3.2 Life History and Genetic Diversity

Genetic diversity and life history diversity are interrelated components. With respect to genetic diversity, the ability of Chinook salmon and steelhead to navigate and spawn in the rivers where they were born contributes to the highly variable life history patterns and genetic diversity characteristics by facilitating local adaptation (Taylor 1991; Waples 1991). Genetic differences among the different ESUs of Chinook salmon are maintained because many of the life history traits, such as season of adult migration, are genetically inherited

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(Banks et al. 2000; Carlson and Seamons 2008). Individuals within an ESU may have locally adapted gene complexes that improve the survival of their offspring in that habitat (Waples 1991). Introgression among the ESUs or between hatchery and natural-origin salmon can disrupt these gene complexes, thereby changing life history traits and potentially reducing the success of offspring (Ford 2002; Araki et al. 2007). Therefore, to maintain the diversity and productivity of Chinook salmon in the Central Valley and allow ESUs to adapt to local conditions, it is important to create conditions that encourage successful reproduction within locally adapted gene pools and that limit gene flow among ESUs or with hatchery-origin populations.

Life history diversity is often cited as a crucial component of salmonid population resiliency. This is based on theoretical and empirical evidence that the maintenance of multiple and diverse salmon stocks fluctuating independently of each other reduces extinction risk and long-term variation in regional abundances (Roff 1992; Hanski 1998; Hilborn et al. 2003; Schindler et al. 2010). This "portfolio effect" of spreading risk across stocks can also act at the within-population scale (Greene et al. 2009; Bolnick et al. 2011). For example, juvenile Chinook salmon leave their natal rivers at different sizes, ages, and times of the year, and this life history variation is believed to contribute to population resilience (Beechie et al. 2006; Miller et al. 2010; Satterthwaite et al. 2014). Thus, preserving and restoring life history diversity is an integral goal of many salmonid conservation programs (Ruckelshaus et al. 2002). Finally, it is increasingly recognized that strengthening a salmon population's resilience to environmental variability (including climate change) will require expanding habitat opportunities to allow a population to express and maintain its full suite of life history strategies (Bottom et al. 2011).

As with Chinook salmon, life history diversity is critical to the success of *O. mykiss* populations. The native range of *O. mykiss* is widespread, in part, because of its diverse portfolio of life history patterns. *O. mykiss* have the ability to exist as anadromous or adfluvial forms; rear in high elevation headwater streams or coastal estuaries; and reside in lakes. In addition to the genetic component of life history diversity, some phenotypic diversity appears to be driven by individual condition and as a response to prevailing environmental conditions. Studies have shown that juvenile steelhead need to reach a minimum smolt size of approximately 140 millimeter (mm; 5.5 inches [in]) fork length (FL)

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to survive to maturity (Ward et al. 1989; Bond et al. 2008). As river systems vary widely in productivity (e.g., availability of food for juvenile fish), steelhead parr can take anywhere from 1 to 3 or more years to reach this size, so smolt ages vary depending on parr growth rates (Seelbach 1993). Age at first maturity can range from 1 to 4 years in the ocean, with jacks spending just 1 year and most adults spending 2 or 3 years in marine environments before sexually maturing. Unlike Pacific salmon, adult steelhead have the ability to spawn several times in their lifespan. This repeat spawning helps compensate for the relatively small run sizes relative to salmon and periodic inaccessibility or unsuitability of natal streams. A steelhead population's spawning timing can last several months (typically December to April), and emigration of smolts can span several months (typically February to June). Variability in smolt age, age at first maturity, spawning timing, and smolt emigration combine to produce a species that is highly adaptable to a wide range of stream environments, enabling it to succeed in many types of aquatic habitats—from Alaska's large, glacial fed rivers to small coastal streams in southern California.

An important property of wild steelhead that emerges from this variation is that there are usually not distinct cohorts of adults (Kendall et al. 2014). Wild adult steelhead in a river are typically a mix of many cohorts, with fish that smolted at 1 to 3 years of age, matured after 1 to 3 years at sea, with some on their second or third spawning run. Total ages of the adults can range from 2 to 7 or more years. The loss of one cohort to a poor year is not as critical to the viability of the population as it would be if the entire population were based on one or two strong cohorts.

Within the Central Valley, the extensive loss of historical habitat due to dams and the poor quality of the remaining spawning, rearing, and migratory habitats have led to a drastically reduced overall abundance of *O. mykiss* and the near-loss of the steelhead (i.e., anadromous) form in many watersheds. The steelhead form is especially sensitive to habitat loss because its persistence requires high quality fluvial spawning and rearing areas, migratory corridors with high survival, and reasonable ocean survival and productivity. Currently, many rivers in the Central Valley are dominated by one form of *O. mykiss*, the freshwater fluvial, or resident, form. The steelhead form is now largely dominated by hatchery fish, all of which are released as age-1 smolts, and increasingly mature after only 1 year in the ocean. Reversing the loss of life history diversity in *O. mykiss* and establishing conditions that favor

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the anadromous form to be expressed will require extensive habitat improvements in the rivers and the Delta.

Certain components of genetic and life history diversity are controllable by actions taken in the Stanislaus River basin, whereas others will require actions across the larger San Joaquin River basin watershed or larger geographic areas. For example, the diversity of juvenile ages and sizes at outmigration reflects conditions during the rearing and migration phases that occur in the river. The SEP Group established Biological Objectives for life history diversity of each focal population related to the distribution of size and timing of juvenile migration. On the other hand, limiting the influence of hatchery production on the genetic diversity of local populations may require both watershed-specific and region-wide actions. The SEP developed Biological Objectives related to genetic diversity and the stressors that prevent attainment of those objectives now and in the future. Local, watershed-specific solutions may result in progress towards those objectives, although full-attainment of the objectives may require a region-wide approach (i.e., as part of integrating desired outcomes for the Stanislaus with those to be developed for the Merced and Tuolumne rivers).

3.3 Productivity

Productivity represents the ability for populations to grow when conditions are suitable, which is essential to conservation success. Species or populations that display persistent negative population growth, as well as populations with limited ability to respond positively to favorable environmental conditions, are less viable and are at higher risk of extinction. The productivity parameters used in developing Biological Objectives for the Stanislaus River are expressed as population rates (e.g., survival, offspring per adult female). In the absence of density-dependent factors, the productivity parameters measure the ability of salmon to survive to reproduce and reproductive success (McElhany et al. 2000).

Desirable population growth rates are commonly determined by identifying an abundance target and a future date by which that abundance should be attained (e.g., NMFS 2012a). The population growth rate is then calculated as the minimum average population growth needed to achieve the desired abundance in the predetermined timeframe. However, this approach does not always result in productivity estimates that reflect healthy populations.

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An example of this would be if the abundance target could be achieved in less time by a population displaying growth rates typical of the species as a whole.

While population growth rates vary depending on environmental conditions, population demography, and how abundance relates to local habitat carrying capacity, species are often characterized as having "intrinsic" population growth rates that reflect their life history and demographic characteristics (e.g., age at first reproduction, fecundity, survival, and sex ratio). The reproductive success rates and life stage-specific survival rates observed in VSPs are valid reference points for determining adequate productivity goals and targets for managed populations in the absence of density-dependent limitations.

Stage-specific productivity (e.g., egg to smolt survival) can be affected by creating suitable conditions within the habitat used by each life stage. The SEP Group developed Biological Objectives for productivity (survival rates) of salmonid life stages that utilize the Stanislaus River. The SEP Group recognizes that these survival rates may not be achieved when abundance levels approach the carrying capacity of the habitat; thus, the SEP Group's Biological Objectives for juvenile survival are intended to be measured when population abundance is not near estimated carrying capacity (McElhany et al. 2000). In addition, SEP Environmental Objectives specify the extent of habitat creation needed to expand carrying capacity of the Stanislaus River going forward.

3.4 Spatial Structure

Spatial structure refers to the geographic distribution of populations or individuals in a population. McElhany et al. (2000) suggest that a population's spatial structure is made up of the geographic distribution of individuals in the population and the processes that generate that distribution. The structure of a population depends on the quality of habitat available to the population, how the habitat is configured spatially, the dynamics of the habitat, and the dispersal characteristics of individuals in the population (McElhany et al. 2000).

Fresh et al. (2009) point out that spatial structure helps contribute to population persistence by the following:

- Reducing the chance of a catastrophic loss because groups of individuals are widely

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distributed spatially;

- Increasing the chance that locally extirpated or dwindling groups will be rescued by recolonization; and
- Providing more opportunity for long-term demographic processes to buffer a population from future environmental changes.

In addition, there is evidence that broader geographic extent may decrease extinction risk of North American fishes (Rosenfield 2002). Restoring areas that support source populations can increase the overall stability of metapopulations by increasing the number of individuals available to support nearby populations (Fullerton et al. 2011).

The SEP Group did not develop Biological Objectives for spatial structure because this parameter is typically evaluated at the species scale (e.g., number and distribution of populations throughout the Central Valley), and the geographic scope of this effort was limited to the Stanislaus River. Restoring spring-run Chinook salmon spawning population to the Stanislaus River (i.e., attaining the Watershed-specific Goals and Biological Objectives identified in this report) serves Central Valley Goals and Objectives regarding salmonid spatial extent because the Stanislaus River would represent an entirely new (restored) spawning population for this ESU in the Central Valley, as a whole, and the Southern Sierra Diversity Group, in particular (NMFS 2014). In addition, attaining Biological Objectives for fall-run Chinook salmon and *O. mykiss* will allow these populations to serve as vibrant source populations within their respective San Joaquin River basin metapopulations. Therefore, attaining desired biological outcomes on the Stanislaus River contributes to the system-wide spatial structure objectives for Chinook salmon and steelhead throughout the Central Valley (NMFS 2014).

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4 CURRENT STATUS OF CHINOOK SALMON AND *O. MYKISS* IN THE SAN JOAQUIN RIVER BASIN

A general overview of the current status relative to historical status is described for each species below.

4.1 Fall-run Chinook Salmon

Historical records made by Spanish explorers in the early 1800s and later that century by John Muir, Livingston Stone, and others suggest that fall-run Chinook salmon were historically abundant throughout the San Joaquin River basin (Yoshiyama et al. 1996). As European settlement occurred in the area, salmon runs diminished due to habitat degradation and loss. According to a report by the Stanislaus River Fish Group, hydraulic mining and the dams associated with that practice likely caused the initial decline of Chinook salmon and steelhead runs in the Stanislaus River (SRFG et al. 2003). These early dams were small, temporary, and only partial impediments to movement.

While spring-run Chinook salmon were believed to be the primary salmon run in the Stanislaus River, fall-run Chinook salmon also historically inhabited the river and became dominant following construction of Goodwin Dam in 1912, which blocked upstream migration (Yoshiyama et al. 1996). Today, though not a state- or federally- listed species, fall-run Chinook salmon populations across the Central Valley are also severely impacted and vulnerable to extinction (Katz et al. 2012).

Production of fall-run Chinook salmon in the San Joaquin River basin often falls to very low levels (USFWS 2001). Fall-run Chinook salmon production in the Stanislaus River was estimated to average 10,868 fish from 1967 to 1991 (SFWO 2014). This estimate was used to generate the Central Valley Objective (AFRP target derived from the CVPIA "doubling goal") of natural production of 22,000 fish. Adult fall-run Chinook salmon escapement into the Stanislaus River averaged 3,087 fish from 2003 to 2013 (Gutierrez 2014). Escapement (which includes post-harvest mortality) is always less than production (which measures abundance prior to harvest) in a given year; still, these low levels of escapement indicate failure to achieve the CVPIA/AFRP production targets.

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Fall-run Chinook salmon life history diversity is believed to be constrained in the Stanislaus River (Sturrock et al. 2015). For example, based on fall-run Chinook salmon size and date-at-migration from the Caswell rotary screw trap (RST; Figure 1 and Table 8), half of the smolt phenotype migrates within a period of less than 3 weeks in many years. Moreover, some smolt migrants are detected when temperatures or other conditions in the lower San Joaquin River may be inhospitable (e.g., after early June). Similarly, 50% of parr-sized fish pass Caswell in a period that is usually less than 1 month (Tables 6 and 8). Furthermore, in several years a small percentage of juvenile migrants are parr- or smolt-sized fish, whereas in other years (years when juvenile production is low), larger-sized migrants represent the vast majority of all juveniles detected at Caswell (Johnson 2014, pers. comm.). This constriction means that juvenile migrants do not exhibit the life history diversity that may be needed to capitalize on optimal conditions in the lower San Joaquin River, Delta, Estuary, and/or nearshore ocean environments. Fall-run Chinook salmon exhibit high inter-annual variation in size at migration on the Stanislaus River that is related to annual hydrology (Sturrock et al. 2015), which may be exacerbated by lack of adequate rearing habitat. Comparison of adult returns with subsequent juvenile outmigrant counts suggests density-dependent limitation on the Stanislaus River salmon population during dry years (Figure 3; Sturrock and Johnson 2016, pers. comm.).

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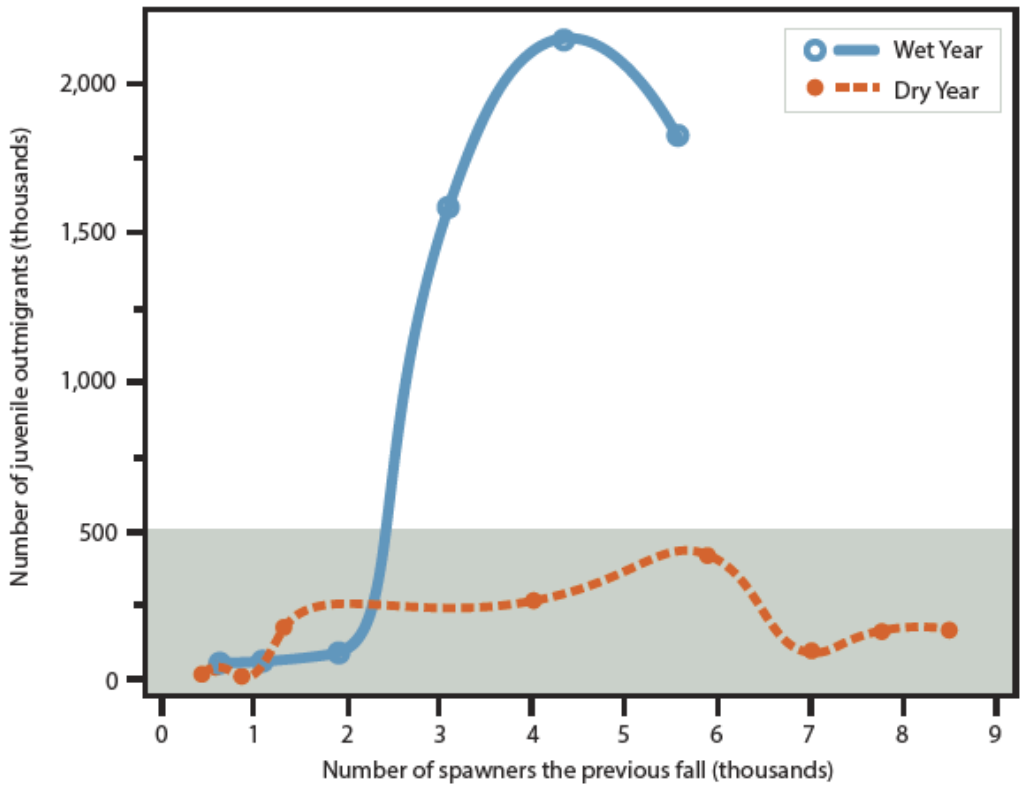


Figure 3
Relationship of Spawners to Subsequent Juvenile Production

Notes:
As measured at Caswell RST on the Stanislaus River. Wet versus dry year type distinction based on actual river flows. (Modified from Sturrock and Johnson 2016, unpublished data)

4.2 Spring-run Chinook Salmon

Historically, spring-run Chinook salmon occurred in the headwaters of all major river systems in the Central Valley, where natural barriers to migration were absent (NMFS 2014). This habitat was estimated to have supported runs as large as 500,000 fish between the late 1880s and 1940s (CDFG 1990: Yoshiyama et al. 2001). Although spring-run Chinook salmon were probably the most abundant salmonid in the Central Valley under historical conditions, large dams eliminated access to almost all historical habitat (Figure 4), and the run has suffered the most severe declines of any of the four Chinook salmon runs in the Sacramento River basin (Fisher 1994). Dams currently block access to the vast majority of historical spawning and rearing habitat of spring-run Chinook salmon and steelhead in the Central

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Valley. Figure 4 depicts the loss of historical spawning habitat for steelhead, which is also generally representative of spring-run Chinook salmon habitat loss.

Before the construction of Friant Dam, 200,000 to 500,000 adult spring-run Chinook salmon were estimated in the San Joaquin River (Yoshiyama et al. 2001). For decades, spring-run Chinook salmon were considered extirpated from the San Joaquin River basin (Fisher 1994). More recently, there have been reports of "spring-running" Chinook salmon in San Joaquin tributaries, including the Stanislaus and Tuolumne rivers (NMFS 2013a), which suggests there is existing potential for spring-run Chinook salmon to recolonize and persist in the Stanislaus River. In addition, in 2014, a reintroduction program was initiated as part of the San Joaquin River Restoration Program, and 54,000 juvenile spring-run Chinook salmon were released into the river.

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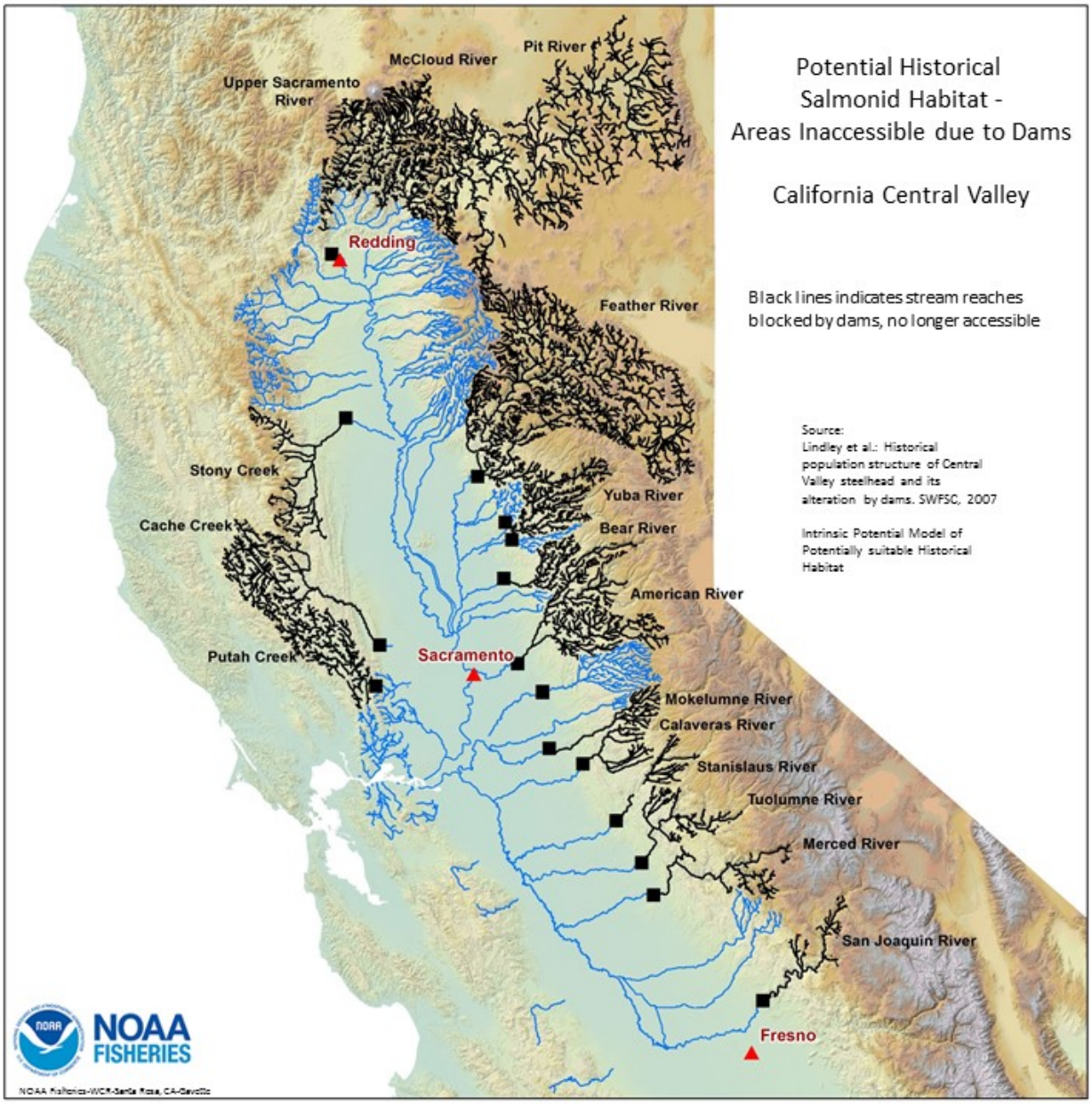


Figure 4

Dams that Currently Block Access to Historical Spawning and Rearing Habitat of Chinook Salmon and Steelhead in the Central Valley

4.3 *O. mykiss* (Steelhead and Resident Rainbow Trout)

Historically, steelhead were found from the upper Sacramento and Pit rivers south to the Kings River and possibly the Kern River systems and in east- and west-side Sacramento River tributaries (Yoshiyama et al. 1996). Lindley et al. (2006) estimated at least 81 steelhead

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populations were distributed throughout the tributaries of the Sacramento and San Joaquin rivers. Presently, dams block access to 80% of historically available habitat and all spawning habitat for about 38% of historical populations (Figure 4; Lindley et al. 2006).

In the San Joaquin River basin today, steelhead are rare and were once thought to be extirpated (McEwan 2001). However, Zimmerman et al. (2009) found evidence for steelhead presence in all three San Joaquin River tributaries, but their methods could not provide estimates of abundance. Monitoring has also detected small populations of non-hatchery origin steelhead in the Stanislaus River and other streams previously thought to be devoid of steelhead (McEwan 2001). In essence, steelhead are found in most Central Valley watersheds where people have made a concerted effort to look for them. A total of 23 *O. mykiss* larger than 406 mm (16 in) in length returned to the Stanislaus River from 2003 to 2011 based on weir count data distributed regularly by FISHBIO, although no sampling was conducted during spring for 2 years during this period (2006 and 2008).

An issue associated with estimating steelhead abundance is the difficulty in distinguishing anadromous fish from the resident form of *O. mykiss* that have matured in the river. In addition, due to their large size and strong swimming abilities, juvenile steelhead are rarely captured in RSTs such as the one located at river mile (RM) 8 near Caswell State Park. It is unclear at this time whether this lack of catch is due to the scarcity of smolts produced in the river, the known poor efficiency of RSTs at catching large juvenile steelhead, steelhead outmigration timing being outside the RST monitoring period, or some combination of these factors.

The resident *O. mykiss* population of the lower Stanislaus River is relatively abundant compared to the rare anadromous form. These stream-maturing and permanent river residents are most abundant in the cold, gravel-bedded reach from Goodwin Dam to Oakdale, and support a popular sport fishery. They are typically found in areas with high to moderate water velocity and some type of structure or cover such as boulders or cobble, large wood, or aquatic vegetation. Demographic information on the population, such as total abundance, age structure, and productivity, are largely unknown. One recent study by Bergman et al. (2014) estimated the total population of *O. mykiss* in the reach extending from the base of Goodwin Dam to 200 meters (m) downstream at about 3,400 fish. Captures

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of *O. mykiss* labeled as adults in the Oakdale RST show fish in this stage ranging from 300 mm FL to 475 mm FL. Records of *O. mykiss* caught at the weir have identified residents up to 550 mm FL, though most are in the 300- to 500-mm FL range.

4.4 Late Fall-run Chinook Salmon

Recent adult salmon weir counts in the Stanislaus River have documented small numbers of Chinook salmon migrating upstream in January, February, and March. Yoshiyama et al. (1996) mention that late fall-run Chinook salmon possibly occurred in the San Joaquin River (based on CDFW reports of late-fall-run fish).

Although the SEP Group did not develop Watershed-specific Goals or Biological Objectives for late fall-run Chinook salmon in the Stanislaus River, it recognized the importance and potential value of diversity in timing of adult migrations that would be provided by such a population, especially in light of the potential effects of projected climate change on environmental conditions. Restoration of this run to the Stanislaus River may be worth considering in the future.

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5 STANISLAUS WATERSHED DESCRIPTION

The Stanislaus River is a major tributary of the San Joaquin River, approximately 113 miles in length, with a watershed covering approximately 1,075 square miles (USFWS 2008; Figure 1). The Stanislaus River originates as the north, middle, and south forks in the western slopes of the Sierra Nevada, mainly in the Stanislaus National Forest. Land uses in the upper and lower watersheds are distinctive. Approximately 90% of the upper watershed (above Goodwin Dam) is forest and 10% is agriculture. While the upper watershed (approximately 940 square miles) remains relatively undeveloped, the lower watershed has been extensively developed to provide water, hydroelectric power, gravel, and conversion of floodplain habitat for agricultural and residential uses (SRFG et al. 2003), with 61% of the land area in agricultural production, 34% in urban development, and 5% is undeveloped.

The Stanislaus River is extensively dammed and diverted. The 32 dams within the Stanislaus River watershed have a total capacity of about 2.85 million acre-feet (maf), or 237% of the average unimpaired runoff (SRFG et al. 2003). On the mainstem, New Melones Dam (RM 68) blocks the river downstream of the confluence of the south, middle, and north forks of the Stanislaus River. New Melones Dam was completed by the U.S. Army Corps of Engineers in 1979; the reservoir is now the largest storage reservoir in the basin, with a storage capacity of 2.4 maf. New Melones Dam and New Melones Lake were designed to control floods up to the 100-year-flood (Kondolf et al. 2001). Downstream from New Melones Lake is Tulloch Dam (RM 60), which forms Tulloch Reservoir. Approximately 1.5 miles downstream of Tulloch Dam is Goodwin Dam (RM 58), which is the main water diversion point on the Stanislaus River. Goodwin Dam blocks passage to the upper watershed for returning anadromous fish.

The average unimpaired runoff in the watershed is about 1.2 maf (Reclamation 2008). The median historical unimpaired runoff is 1.1 maf per year, with a range of between 0.2 and 3.0 maf (USFWS 1995). Snowmelt contributes the largest portion of the flows in the Stanislaus River, with the highest runoff occurring in the months of April, May, and June (Reclamation 2008). Agricultural water supply development in the Stanislaus River watershed began in the 1850s, significantly altering the basin's hydrologic conditions. The current hydrograph differs greatly from unimpaired flow conditions. Spring and summer

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flows are capped at 1,500 cubic feet per second (barring flood releases), while summer flows are increased to maintain downstream water quality. The river section below Goodwin Dam has been identified on the U.S. Environmental Protection Agency (USEPA) Clean Water Act Section 303(d) list for not meeting water quality standards for diazinon, chlorpyrifos, Class A pesticides, unknown toxicity, mercury, and temperature (NMFS 2014).

Historically, 113 miles of the Stanislaus River were anadromous fish habitat (USFWS 2008), but currently only the lower 58 RMs are accessible to anadromous fish, with access terminating at Goodwin Dam (KDH Environmental Services 2008). Compared to historical conditions, the area of suitable salmonid spawning and rearing habitats has been substantially reduced due to anthropogenic influences.

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6 DEVELOPMENT OF GOALS AND OBJECTIVES SPECIFIC TO THE STANISLAUS RIVER

6.1 Overall Approach

The SEP Group developed Watershed-specific Goals and Biological Objectives to reflect improvements that could be attained within the geographic and policy scope (Section 2.3) for the salmon VSP criteria (Section 3). Watershed-specific Goals and Biological Objectives were developed for population productivity as well as genetic and life history diversity. Because establishment and maintenance of viable and healthy populations of Chinook salmon and *O. mykiss* in the Stanislaus River contribute to the Central Valley Goal of improving spatial structure for each species addressed in this report, there was no need to set Watershed-specific Goals and Biological Objectives for spatial structure. Establishing populations that met the criteria for other VSPs, as described in the Biological Objectives, would also support the Central Valley Goal of improving spatial structure for these populations. In addition, S.M.A.R.T. Biological Objectives were not defined for abundance of any of the focal populations, though many previous policies define Central Valley Goals and Objectives for Chinook salmon and *O. mykiss* in terms of target abundances (Section 2.3.1). One of the Watershed-specific Goals for each focal population is increased abundance. However, many factors limit abundance in each life stage throughout the entire life cycle of Chinook salmon and *O. mykiss*. Many of the factors that affect overall abundance occur outside of the spawning and rearing habitat of the Stanislaus River. Thus, actions and actors on the Stanislaus River have only partial control over salmonid abundance in any give year, and Biological Objectives for abundance are inappropriate given the geographical scope of this effort. The Watershed-specific Goals and Biological Objectives are intended to contribute to all of the Central Valley Goals and Objectives, including abundance, though target abundances were not incorporated into Biological Objectives for the Stanislaus River.

The SEP Group developed Watershed-specific Goals for each of the species and runs that would improve and maintain the VSP parameters of genetic and life history diversity and productivity (i.e., population growth rates as affected by survival rates). One of the Biological Goals identified was to support the fullest expression of Chinook salmon and *O.*

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mykiss life history diversity to increase population stability, resilience, and productivity. For Chinook salmon populations, productivity goals were described in three phases:

1. Attain juvenile survival rates that allow for population growth;
2. Attain juvenile survival rates that allow for rapid reattainment of Central Valley Objectives after years with low escapement; and
3. Attain juvenile survival rates that reflect those typical among other Chinook salmon populations across the West Coast.

The specific Biological and Environmental Objectives developed to help achieve the Watershed-specific Goals varied among the species and runs. They were designed to be measurable and monitored over time. In Section 6, the specific metrics associated with each Biological Objective needed to achieve the Central Valley Goals and Objectives are defined, and the rationale and approach for each metric are described.

6.2 Fall-run Chinook Salmon

6.2.1 What is the Problem?

Central Valley fall-run Chinook salmon populations are a species of special management concern because natural production is well below desired levels, survival rates are inadequate to achieve population growth and maintain population resilience, the populations express only a narrow range of the life history variants that are typical of this species, and hatchery influence on wild stocks compounds all of these problems.

The production[3] of San Joaquin fall-run Chinook salmon often falls to very low levels, with generally low spawning escapements across years. Escapement is related to hydrology, with very low escapement following drought conditions and higher (but still sub-par) escapement generally following years with high spring runoff (USFWS 1995; Sturrock et al. 2015). Abundance has generally declined since the 1967 through 1991 period used to set AFRP ocean production objectives. Actual fall-run Chinook salmon counts (escapement) in the

[3] As used here, "production" means the number (abundance) of fish available to the ocean fishery: 2-year-old salmon in the ocean. This term should not be confused with "productivity," which refers to population growth rates and/or the population vital rates (e.g., survival, fecundity) that determine population growth rate.

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Stanislaus River are variable, averaging 3,087 fish from 2003 to 2013 (Gutierrez 2014). Similarly, productivity (measured as juveniles per spawner) appears to be constrained by hydrology, with more juveniles produced for a given number of spawners in years when river flows are high (Figure 3). Juvenile survival rates are generally low for this population (AFRP 2005). Life history diversity of the fall-run Chinook salmon population is constrained throughout the Central Valley (Lindley et al. 2009; Miller et al. 2010; Carlson and Satterthwaite 2011) and in the Stanislaus River, in particular. The influence of hatchery-produced spawners on the Stanislaus River fall-run Chinook salmon population (Kormos et al. 2012; Palmer-Zwalen and Kormos 2013) is well above limits indicative of healthy populations, suggesting that population viability is compromised by hatchery stocks (Araki et al. 2007; Lindley et al. 2007; Johnson et al. 2012). The spatial diversity of fall-run Chinook salmon spawning habitats within the San Joaquin River basin is not a primary concern, as fall-run Chinook salmon spawn in each of the San Joaquin River's main tributaries and are being restored to the San Joaquin mainstem.

6.2.2 What Outcome(s) (Central Valley Goals) will Solve the Problem?

Where applicable, the SEP Group used existing laws, policies, and programs to identify Central Valley Goals. In some cases, the expression of desired conditions in existing laws, policies, and programs was quite general (e.g., to maintain "fish in good condition"), and the SEP Group needed to translate the policy intent into more specific language that would be relevant to planning and management.

Abundance

Increasing abundance of fall-run Chinook salmon is a Goal of state and federal law for the Central Valley, including the San Joaquin River and its three salmon-bearing tributaries. The CVPIA (Section 3406 of the CVPIA, Title 34 of Public Law 102-575) calls for naturally spawning populations of anadromous fish that are double the 1967 to 1991 baseline within 10 years. State law (F&G Code § 6902(a)) and water quality regulations (SWRCB 2006) express the same target.

Productivity and Life History Diversity

Improvements in fall-run Chinook salmon productivity (measured as juvenile survival and adult migration success in freshwater) and increased life history diversity (i.e., size at and

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timing of juvenile migration) are necessary to achieve desired conditions. These desired conditions are described in several relevant policies, including abundance targets for fall-run Chinook salmon in the Central Valley (USFWS 2001), maintaining fish "in good condition" (F&G Code § 5937), and achieving acceptable levels of the criteria NMFS uses to evaluate salmonid population viability (Lindley et al. 2007). The goals of improving productivity and life history diversity among Central Valley salmonids are also consistent with all known fisheries-related management policies in this area.

Genetic Diversity

For fall-run Chinook salmon, concerns about the level of genetic diversity needed to support a healthy and viable population revolve around the influence of hatchery production and management (Williams 2006). A high occurrence of straying of fall-run Chinook salmon occurs between the San Joaquin and Sacramento basins (Johnson et al. 2012; Kormos et al. 2012), potentially due to the relative river flows across various Central Valley tributaries during the return migration as well as hatchery release practices (Marston et al. 2012). In 2010, the U.S. Congress established and funded a hatchery review process in California due to concern that the genetic resources required to support a sustainable salmon fishery and recover at-risk runs of salmon were not being adequately managed using traditional hatchery practices (HSRG 2012). The need to reform the hatchery practices system-wide has been identified by scientists and policymakers based on growing concerns and scientific findings about the potential effects of hatcheries on the viability of salmon and steelhead in their natural habitats (HSRG 2012). In addition, eliminating genetic introgression with spring-run Chinook salmon, or reducing it to a very low level, is a major goal for the maintenance and restoration of fall-run Chinook salmon in the Central Valley (Lindley et al. 2006; HSRG 2014). Thus, providing opportunities for fall-run reproductive isolation is particularly important for the maintenance of fall-run populations in rivers with dams that cause spring-run and fall-run Chinook salmon to spawn in the same area.

6.2.3 What Does Solving the Problem Look Like (Central Valley Objectives)?

Where applicable, the SEP Group used existing laws, policies, and programs to identify Central Valley Objectives. Central Valley Objectives are presented below to provide context for Watershed-specific Goals and Biological Objectives on the Stanislaus River.

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Abundance

Fall-run Chinook salmon production levels for each Central Valley river that would be consistent with the Central Valley-wide Goals of the CVPIA were calculated by the AFRP. The AFRP objective for ocean production of fall-run Chinook salmon for the three salmon-bearing tributaries in the San Joaquin River basin is 78,000, which is divided among the Stanislaus (22,000), Tuolumne (38,000), and Merced (18,000) rivers. Achievement of these targets was intended to occur within a decade after the passage of the CVPIA (USFWS 2001).

Productivity

Laws, policies, and programs that provide guidance for Central Valley Objectives generally do not provide explicit targets for salmonid productivity. However, the AFRP and CVPIA provide insight into the desired rate of population growth for fall-run Chinook salmon—doubling from a baseline within roughly three Chinook salmon generations. Furthermore, the AFRP and CVPIA targets imply that population growth rates will be sufficient to make populations resilient against periodic cohort failures (Johnson et al. 2010). Populations may fluctuate above and below the production target, but they should be resilient such that periodic years of low production, due to any cause, do not prohibit reattainment of an abundance target in the next generation.

These two elements of the AFRP and CVPIA goals for Central Valley production (rebuilding a population over three generations and resilience of the population to short-term declines) were used to develop Watershed-specific Goals and Biological Objectives for productivity (i.e., survival) rates in the Stanislaus River. Furthermore, the SEP Group looked to other viable populations of Chinook salmon to gauge freshwater survival rates that would characterize a Chinook salmon population as being in good condition. It determined that freshwater survival rates needed to support doubling the population growth rate in 9 years and survival rates required to produce a resilient population were lower than is typical of Chinook salmon. Thus, a third Central Valley Objective was established—achieve freshwater survival rates typical of Chinook salmon within 24 years (approximately eight salmon generations).

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Life History Diversity

No policies speak directly to Central Valley Objectives for necessary improvements in the life history diversity of fall-run Chinook salmon. However, there is increasing evidence that habitat loss and simplification have constrained fall-run Chinook salmon life history strategies, and improvements will be necessary to attain the other Central Valley Goals for this run of Chinook salmon (Ruckelshaus et al. 2002; Lindley et al. 2009; Miller et al. 2010; Schindler et al. 2010; Carlson and Satterthwaite 2011; Satterthwaite et al. 2014).

Genetic Diversity

Benchmark metrics have been established based on genetic models to reduce the proportion of hatchery-origin spawners (pHOS) in Central Valley rivers to less than 20% of adult spawners, and preferably less than 5% (even when the hatchery of origin is a conservation-orientated facility using best management practices). A high proportion of hatchery-origin spawners has the potential to increase competition for spawning habitat, reduce reproductive success, and erode mechanisms required for local adaptation of salmon to their environment—ultimately putting them at a high risk of extinction (Araki et al. 2007; Lindley et al. 2007). Specific gene-flow criteria (less than 2% introgression) between ESUs have been proposed to achieve long-term genetic integrity and maintain a low extinction risk for natural populations in the Central Valley (Lindley et al. 2007; HSRG 2014).

6.2.4 How Will this Effort Contribute to Attainment of Central Valley Objectives (Watershed-specific Goals)?

As described, the scope of the SEP Group's current effort is the Stanislaus River through the lower San Joaquin River to the Delta. Specific goals and objectives for the Stanislaus and lower San Joaquin rivers were developed to support the system-wide goals identified.

Abundance

Increased abundance of fall-run Chinook salmon on the Stanislaus River is a Watershed-specific Goal that supports Central Valley Goals and Objectives. Because abundance is the product of fecundity and survival rates throughout the life cycle (and is therefore controlled in many locations, including the Stanislaus River), there is no S.M.A.R.T. Biological Objective for abundance to accompany this Goal (i.e., no Biological Objective for the Stanislaus River).

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There is evidence that salmon abundance and productivity on the Stanislaus River are constrained by limited carrying capacity. Specifically, in years when winter-spring flow rates on the Stanislaus River are low, the number of juveniles produced does not increase as spawning escapement increases. However, juvenile production does increase with spawning escapement under high flow conditions (Figure 3).

The SEP Group used the Central Valley Objective of average annual natural production of 22,000 fall-run Chinook salmon within three salmon generations to set a context for determining Environmental Objectives (e.g., physical, chemical, and biological conditions necessary to support and achieve Biological Objectives) for the Stanislaus River. The purpose of this was to ensure that the Environmental Objectives—especially those related to spatial extent of habitat—included sufficient carrying capacity to attain and support Watershed-specific Goals and the Central Valley Goals and Objectives for Chinook salmon.

Productivity

Adult escapement and ocean production reflect previous spawning stock, female fecundity, and survival through different life stages and Chinook salmon habitats. Juvenile survival rate is the relevant metric that can be controlled at the local spatial scale to affect attainment of Central Valley Goals and Objectives for abundance. Furthermore, productivity is an important attribute of population viability beyond its contribution to abundance (McElhaney et al. 2000). Egg-outmigrant survival rates calculated for the Stanislaus River (Appendix A) reveal that productivity is too low to maintain population viability; survival rates appear to respond positively when winter-spring flow rates are elevated (Figure 3).

As described, the Central Valley Goals and Objectives were used to guide development of Watershed-specific Goals for productivity (freshwater survival rates). Watershed-specific Goals for freshwater survival become progressively more protective over time and describe freshwater survival rates sufficient to generate the following:

- Rebuilding: achieve a population growth rate that supports increasing populations in a relatively short time span (i.e., doubling the population in three generations);
- Resilience: achieve a population growth rate that allows the population to rebound after years with poor returns (i.e., increasing the population up to 2.5-fold in one generation); and

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- Sustainability: achieve freshwater survival rates that are characteristic of salmon in human-modified rivers on the West Coast of North America (i.e., outmigrating smolt represent at least 10% survival from eggs to smolt).

Life History Diversity

Life history diversity must be maintained at a level that allows Chinook salmon populations to respond to varying climatic, hydrologic, and oceanic conditions over time (Beechie et al. 2006; Miller et al. 2010; Spence and Hall 2010; Satterthwaite et al. 2014). There is strong evidence that life history diversity among juvenile Chinook salmon originating from the Stanislaus River is severely constrained and limited diversity impairs population growth, resilience, and viability (Zeug et al. 2014; Sturrock et al. 2015). The SEP Group identified Watershed-specific Goals for life history diversity that must be met to achieve a self-sustaining population of naturally produced fall-run Chinook salmon in the Stanislaus River. For this application, life history diversity objectives were characterized in terms of the size distribution and time distribution of juveniles leaving the river system. The Watershed-specific Goal for fall-run Chinook salmon life history diversity is to:

> **Support the fullest expression of fall-run Chinook salmon life history diversity (as seen in other Central Valley populations and in other rivers that support this phenotype) in order to increase and maintain population stability, resilience, and productivity.**

Genetic Diversity

In addition, the SEP Group adopted a Watershed-specific Goal for genetic diversity to mirror the Central Valley Goal:

> **Maintain genetic integrity of wild fall-run Chinook salmon stocks by minimizing hatchery influence**

To achieve this goal, river conditions that support restoration of a self-sustaining, fall-run Chinook salmon phenotype must be established on the Stanislaus River. Establishing and maintaining such a distinct population requires that gene flow between distinct life history types be limited. It also requires that Environmental Objectives support the fall-running

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phenotype during all life history stages. In addition, the impact of hatchery-origin spawning fish has a large influence on the genetic diversity of natural-origin Chinook salmon population on the Stanislaus River. Hatchery management is a San Joaquin River basin-wide and Central Valley-wide issue in that there are no hatcheries on the Stanislaus River. The SEP Group believed it was important to include the goal within the Stanislaus River scope, to the extent practical, or that attaining this Central Valley Goal relies on actions taken and conditions established within the Stanislaus and lower San Joaquin rivers.

6.2.5 What Suite of Species-specific Outcomes (Biological Objectives) Characterize Success?

Fall-run Chinook salmon abundance continues to decline in the Stanislaus River, indicating that current population biological attributes are not sufficient to maintain a self-sustaining, viable population, much less to attain the SEP Group's goals and objectives. The objectives below were developed to achieve the SEP Group's Watershed-specific Goals for fall-run Chinook salmon on the Stanislaus River.

6.2.5.1 Rationale for Productivity Objectives

In many cases, the desired survival rate of salmonids in any life stage has been calculated based on the desire to attain a given abundance target within a predetermined period. However, survival rates calculated by this method are not necessarily the survival rates that reflect healthy productivity of a Chinook salmon population. Indeed, Pacific salmon populations are characterized by high intrinsic rates of growth (Healey 1991; Quinn 2005) that arise from a strategy of placing eggs in low-productivity riverine environments where incubation and juvenile success rates are relatively high. The capacity to quickly colonize new habitats and rapidly rebound from periods of poor recruitment explain, in part, the widespread and long-term success of Pacific salmon. Furthermore, historical accounts from across the Pacific coast of abundant spawning runs of Chinook salmon attest to the fact that these populations were often limited only by competition for mates and suitable spawning habitats, not survival rates during freshwater juvenile or marine life stages.

Three reviews of Chinook salmon survival in freshwater across their range were assessed by the SEP Group (Healey 1991; Bradford 1995; Quinn 2005). Each study synthesized results of

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numerous other studies to produce average egg to smolt survival. In some cases, the same rivers were studied, but the time series used appeared to differ. Members of the SEP Group contacted the authors of these studies to understand the methodologies that were used and to confirm that the populations studied represented "typical" (i.e., not pristine) conditions across the Chinook salmon range. Using this approach, freshwater survival of 10% was determined to be representative of Chinook salmon in human-modified rivers on the West Coast of North America.

By analyzing current survival rate estimates for Stanislaus River salmon, the SEP Group also learned that it would be extremely difficult or impossible to achieve freshwater survival targets without improvement in the river and Delta environments (Appendix A). No historical data are available from this system to establish the appropriate balance between in-river and through-Delta survival, and no analogous salmon-bearing river systems with such a large inland estuary exist elsewhere. The SEP Group found no reason that survival rates in-river should be greater than or equal to through-Delta survival. Calculated improvements necessary in overall freshwater survival were therefore distributed proportionately across riverine and estuarine habitats. The same approach to allocating responsibility for improved freshwater survival rates was employed by NMFS (2012a).

At higher levels of survival required to attain the Watershed-specific Goals of resilience and sustainability, the approach of generating "equal improvement" for in-river and through-Delta relative survival rates produced survival rate targets in the Delta that may be unachievable (i.e., they would not meet S.M.A.R.T. criteria). Through-Delta survival rates were capped at 50%, and in-river survival rates were adjusted accordingly to attain desired freshwater survival rates.

Freshwater survival rates for rebuilding and resilience assume current post-Delta survival rates through the Estuary and Pacific Ocean. If survival rates in the bay or ocean change substantially, the freshwater survival rate objectives may be adjusted. However, freshwater survival rates for sustainability are typical of Chinook salmon populations across their range (i.e., they reflect typical "productivity" of Chinook salmon populations).

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Survival rates in freshwater may be impacted by density-dependent factors when populations approach local carrying capacity. Freshwater survival rate objectives produced by the SEP Group apply only to situations where the spawner population is lower than the system's targeted carrying capacity (i.e., in years when there should be little effect on overall survival rates of density-dependent competition). As spawner populations increase, the SEP Group may refine productivity objectives to apply to years where the spawner and juvenile cohorts approach intended carrying capacity (i.e., Environmental Objectives for habitat area) for the system. Thus, attainment of current survival objectives should be measured only when the spawning population is below a certain threshold (McElhany et al. 2000); that threshold has not been determined.

In-river productivity rates are also affected by conditions that influence adult migration, holding, and spawning success among adults. Unsuitable conditions (including high temperatures, low DO concentrations, or other migration barriers) during adult migration and holding may result in sub-lethal impacts that reduce productivity between escapement and subsequent juvenile outmigration. Thus, objectives for desired adult migration, holding, and spawning success were developed. Because the holding period for adult fall-run Chinook salmon is abbreviated compared to that observed among spring-run Chinook salmon, a detailed description of the rationale and approach for adult productivity objectives for spring-run Chinook salmon is provided in Section 6.3.5.1.

6.2.5.2 Methods for Productivity Objectives

The SEP Group created a spreadsheet-based life cycle model to investigate which changes to current survival rates in different life stages are necessary to attain Watershed-specific Goals for population growth rates (Appendix A). The purposes of this model are as follows:

- Estimate and evaluate relative survival rates of juvenile Chinook salmon emigrating from the Stanislaus River through the lower San Joaquin River and the Delta, and
- Serve as a tool for the following:
  - Development of specific freshwater juvenile survival (productivity) objectives for Chinook salmon, and
  - Allocation of improvements in survival rates systematically across different reaches of juvenile freshwater habitat at discrete times in the future.

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The spreadsheet model is based on a set of survival rate estimates for freshwater and marine environments generated from data sources used by resource managers. Despite natural variance and measurement uncertainty associated with these data, they represent the best available data. The spreadsheet model can be used to estimate relative differences in survival rates across different habitats and the magnitude of improvement required to meet Biological Objectives for salmon in the Stanislaus River and lower San Joaquin River.

Survival rates for various life stages of San Joaquin River basin Chinook salmon were collected from previous reports and existing data sources (Table 1). Where estimates differed among reports, the SEP Group determined which estimates were most likely to reflect actual conditions; these estimates were referred to as the "Consensus Estimate" in Table 1. Previous studies did not account for mortality between the lowest sampling station in the Stanislaus River (the RST at Caswell) and the Delta, which begins at Vernalis on the San Joaquin River (Figure 1). Survival in this 10.5-RM stretch was estimated from the per-RM average of survival rates upstream of the stretch between Oakdale and Caswell and through the Delta.

Table 1

Calculated Recruits per Spawner Based on Survival Consensus Estimates

Reach	USDOI (2011)	NMFS (2012)	Consensus Estimates	RM	Survival per RM
Eggs to Caswell	6.64%	5.64%	1.87%	46.5	91.79%
Eggs to Oakdale			10.62%	14.4	85.58%
Oakdale to Caswell			16.02%	32.1	94.46%
Caswell to Vernalis[1]			54.09%	10.5	94.32%
Vernalis to Chipps Island	5%	3.75%[2]	3.75%	54.5	94.15%
Chipps Island to Adult[3]	-	-	2.83%[5]	-	-
Adult to Spawner[3]	50%	70%	60.24%	-	-
Recruits per Spawner[4]			**0.02**		

Notes:

1 No existing data were available to estimate survival in the reach between Caswell and the Delta boundary. Survival in this reach was estimated as a function of the average per-RM survival from Oakdale to Caswell and from Vernalis to Chipps Island.

2 Vernalis to Chipps Island survival (3.75%; Brandes, pers. comm.)

3 Assumes no change from current estimated survival rates after juvenile salmon pass Chipps Island (the western edge of the Delta)

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4 Recruits per spawner is calculated as product of survival rates (e.g., Eggs to Caswell × Caswell to Vernalis × Vernalis to Chipps Island × Chipps Island to Adult × Adult to Spawner) × estimated population sex ratio (60% female spawners) × estimated average fecundity (5,813 eggs per spawner).
5 NMFS 2009b
– Estimated juvenile survival rates in different segments of the migration corridor for Stanislaus River Chinook salmon, including survival from egg stage to the RST at Caswell ("Eggs to Caswell"); Eggs To Oakdale RST ("Eggs to Oakdale"); Caswell RST to the Delta ("Caswell to Vernalis"); through the Delta ("Vernalis to Chipps Island"); Delta exit to age-2 fish in the ocean ("Chipps Island to Adult"); and ocean harvest and other adult mortality prior to escapement ("Adult to Spawner"). Consensus estimate is based on calculations from data collected at the RSTs located Oakdale and Caswell, as reported by USFWS, and survival estimates in each segment of fall-run Chinook salmon migration beyond the Caswell RST that the SEP Group considered to be the most accurate. See Section 6.2.5.2 for a description of the Stanislaus River Survival Model (Appendix A).

The model is based on estimated egg deposition (i.e., run size × estimated sex ratio × measured average fecundity) and life stage survival estimates. The conceptual diagram for the spreadsheet model is depicted in Figure 5. Survival estimates were developed for the following:

- Two reaches of the Stanislaus River (i.e., survival from egg deposition to the RSTs at Oakdale (Stanislaus reach 1) and survival from Oakdale to the RSTs at Caswell (Stanislaus reach 2);
- A reach including the lower Stanislaus and San Joaquin rivers from Caswell to Vernalis (San Joaquin River reach);
- The Sacramento San Joaquin Delta from Vernalis to Chipps Island (Delta reach);
- The marine environment prior to harvest; and
- Losses from maturity to spawning escapement.

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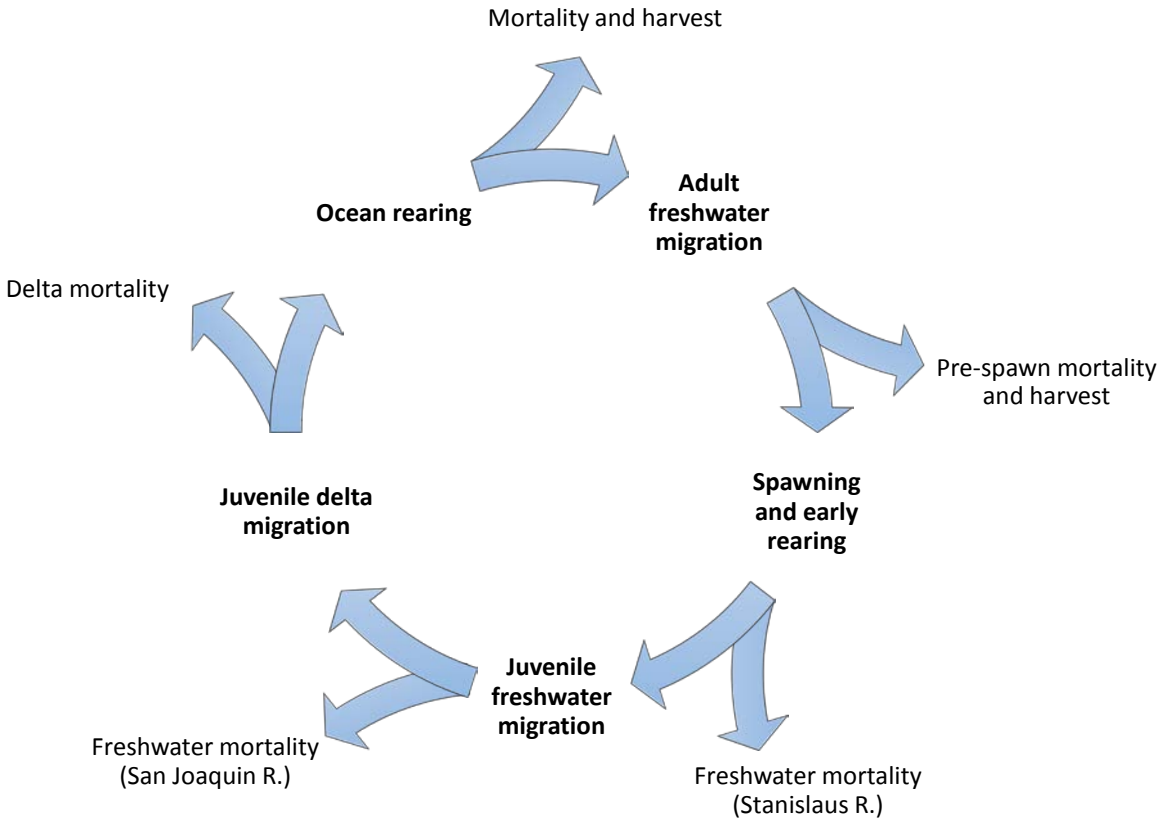


Figure 5
Life Cycle Diagram and Potential Sources of Mortality used in the Stanislaus Survival Model

6.2.5.2.1 Data Sources and Derived Metrics

The following data and derived metrics were represented in the spreadsheet-based Stanislaus Survival Model provided in Appendix A. Derived variables are based on the best available information.

Year

This represents the calendar year when data were recorded. Note that calculation of survival from eggs to subsequent enumeration of juveniles uses data from two different calendar years: the year in which escapement/spawning occurs (year x) and the year in which juvenile outmigrants are caught by RSTs (year x+1).

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Water Year Index

Water years extend from October 1 of one year to September 30 of the next year (e.g., the 2010 water year is from October 1, 2009, to September 20, 2010) to capture the typical wet season in California. The water year index represents hydrology in 1 of 5 categories of water year type (wet, above normal, below normal, dry, critical). Data for the workbook were obtained from California Department of Water Resources.

Oakdale RST Expanded Passage

This is the estimated number of Stanislaus River-origin juvenile Chinook salmon passing Oakdale derived from RST estimates (Cramer Fish Sciences 2013).

Caswell RST Expanded Passage

This is the estimated number of Stanislaus River-origin juvenile Chinook salmon passing Caswell derived from RST estimates (Cramer Fish Sciences 2013).

Adult Production

This is the estimated number of Stanislaus River-origin adult Chinook salmon in a given year-class in the ocean prior to harvest (CHINOOKPROD, USFWS 2013).

Ocean Harvest

This is the estimated number of Stanislaus River-origin adult Chinook salmon in a given year-class harvested by an ocean fishery (CHINOOKPROD, USFWS 2013).

Freshwater Harvest

This is the estimated number of adult Stanislaus River-origin Chinook salmon in a given year-class harvested by a freshwater fishery (CHINOOKPROD, USFWS 2013).

Total Harvest

This is the estimated number of adult Stanislaus River-origin Chinook salmon migrating to the basin harvested by either ocean or freshwater fishery (CHINOOKPROD, USFWS 2013).

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Grandtab Escapement

This is the estimated number of adult Chinook salmon returning to the Stanislaus River each year (Grandtab, USFWS 2013).

Weir Escapement

This is the estimated number of adults migrating upriver after harvest derived from resistance board weir counts (Fuller 2013). These numbers differ from Grandtab escapement because the sampling methodology differs. Results between the two escapement estimates are not systematically different (i.e., one is not consistently higher than the other), and the Grandtab dataset is longer than the Weir Escapement dataset. Thus, weir escapement is provided for reference in the data sheets with model inputs (Appendix A), but weir escapement is not used in the model calculations.

Median % Females

The median proportion of females is calculated from fish surveyed on the Stanislaus River from 1995 to 2013 as 60% of the spawning population of Chinook salmon (see tab titled "Stan sex ratio + fecundity" in Appendix A; Swank, pers. comm.).

Median Fecundity

This is estimated from fish surveyed by CDFW on the Stanislaus River from 1995 to 2013 using a length-fecundity relationship for San Joaquin fall-run Chinook salmon developed by Loudermilk et al. (1990)—median value of 5,813 eggs per female adult Chinook salmon (see tab titled "Stan sex ratio + fecundity" in Appendix A; Swank, pers. comm.).

Vernalis to Chipps Island Survival

The Vernalis to Chipps Island survival is 3.75% based on regionally accepted evaluations (NMFS 2012; Swank, pers. comm.).

Chipps Island to Adult Survival

The Chipps Island to Adult survival is 2.83% (NMFS 2009).

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Ocean to Spawning Escapement

Ocean to Spawning escapement is calculated annually as the ratio of Grandtab spawning escapement and adult production. The geometric mean of annual values is used to parameterize the survival model.

Estimated Egg Deposition

Estimated egg deposition is calculated annually as the product of Grandtab spawning escapement, median proportion of females, and median fecundity.

Eggs to Oakdale Survival

Eggs to Oakdale survival is calculated annually as the ratio of Oakdale RST passage in year x+1 and estimated egg deposition in year x. Geometric mean of annual values is used to parameterize the survival model.

Eggs to Caswell Survival

Eggs to Caswell survival is calculated annually as the ratio of Caswell RST passage in year x+1 and egg deposition in year x. Geometric mean of annual values is used to parameterize the survival model.

Oakdale to Caswell Survival

Oakdale to Caswell survival is calculated annually as the ratio of Caswell RST passage in year x and Oakdale RST passage in year x. The ratio between survival from Eggs to Oakdale and survival from Oakdale to Caswell has been used to develop sub-objectives for egg to fry productivity. Note that the time series for Eggs to Caswell survival and Eggs to Oakdale or Oakdale to Caswell survival are not equal (because of differences in the number of years for which an expanded passage estimate at Oakdale RST has been calculated).

Calculated Caswell to Vernalis Survival

This is calculated annually based on Oakdale to Caswell survival and Vernalis to Chipps Island survival. Survival per RM is first calculated for Oakdale to Caswell and Vernalis to Chipps Island by taking the root equal to the number of RMs. For example, Vernalis to Chipps Island survival is calculated as:

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$$Survival\ per\ RM = 0.0375^{\frac{1}{54.5}} = 0.9415$$

Caswell to Vernalis survival per RM is calculated as the weighted average of estimated Oakdale to Caswell survival per RM and Vernalis to Chipps Island survival per RM. Caswell to Vernalis survival for the reach is calculated by taking survival per RM multiplied to the power equal to the number of RMs. The geometric mean of annual values is used to parameterize the survival model.

Eggs to Vernalis Survival

Eggs to Vernalis survival is calculated annually as the product of Eggs to Caswell survival and Caswell to Vernalis survival.

Target population growth rates (i.e., cohort replacement rates [CRR]) were calculated for each productivity goal (rebuilding, resilience, and sustainability) using the exponential growth equation (equation 2.2 in Haddon 2001):

$$e = (N_t/N_0)^{1/t}$$

where:

e	=	growth rate
t	=	number of generations
N_t	=	population at generation t
N_0	=	population at generation 0 (initial population)

Freshwater survival rates (Eggs to Chipps Island) necessary to achieve the desired growth rate for each productivity goal were calculated by assuming that current population sex ratio, fecundity, and post-Delta survival rates (including ocean harvest rates) were fixed. Following the approach taken by NMFS (2012a), the SEP Group apportioned the necessary increase in freshwater survival equally to two reaches: riverine (Eggs to Vernalis) and estuarine (Vernalis to Chipps Island). Survival necessary to achieve each productivity goal in each reach (riverine and Delta) was calculated by multiplying current survival rates in those two habitats by the same multiplier. For each productivity goal, the multiplier for Delta and

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riverine reaches represented the square root of the quotient of target total freshwater survival rate (those needed to achieve each of the productivity goals) divided by current estimated survival rate through freshwater (e.g., "Consensus Estimate" of current survival rate from Eggs to Caswell × Caswell to Vernalis × Vernalis to Chipps Island* in Table 1).

Within the riverine reach, the target survival rate was further divided into target survival for Eggs to Oakdale, Oakdale to Caswell, and Caswell to Vernalis. The reach from Caswell to Vernalis was calculated as a weighted average of per-mile survival rates in the Delta (Vernalis to Chipps Island) and the Stanislaus River (Eggs to Vernalis). Once the 10.5-mile Caswell to Vernalis survival rate was calculated, it was possible to solve for the remaining stretch of river (Eggs to Caswell) by dividing the river-wide survival rate by the Caswell to Vernalis reach. The Eggs to Caswell survival rate is the Stanislaus-specific survival rate Biological Objective for each of the three juvenile productivity goals, and it is accompanied by the Caswell to Vernalis survival rate that will be affected by conditions (e.g., flows, water temperatures) contributed by the Stanislaus River and other San Joaquin tributaries.

Although several population metrics in the above equations were fixed mean values (proportion of females, fecundity, current Vernalis to Chipps Island survival, and Chipps Island to Adult survival), some parameters were based on annual observed data (Eggs to Vernalis survival and Ocean to Spawning survival; Appendix A). The SEP Group calculated 95% confidence intervals for target freshwater survival rates based on the observed variation in the annual estimates for these two parameters. Using Program R, the SEP Group simulated target freshwater survival using observed data (100,000 iterations) using the logit function to ensure target survival rates were constrained between 0 and 1.

An upper limit was imposed on target freshwater survival rates for Stanislaus River and Delta reaches at 50%. This upper limit assumes that survival rates greater than 50% in either the riverine or the estuarine portion of the freshwater life cycle would be unrealistic. The 50% survival rate limit only affected Biological Objectives for the Delta reach, as current Delta survival is greater than survival in-river, and only for the final increment of improvement in productivity (e.g., freshwater survival rates consistent with "sustainability").

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6.2.5.3 Current Productivity

The SEP Group summarized annual survival estimates for different portions of the freshwater life cycle of fall-run Chinook salmon originating in the Stanislaus River using values found in agency reports and monitoring data (Table 1). Group consensus of SEP members was used to determine the best survival estimate for a given reach based on available information (i.e., the "consensus estimate"). The consensus estimate of survival per reach and survival per RM within each freshwater reach were derived from the following (in order of priority):

1. Annual observed data;
2. Mean values derived from observed data and reported in agency documents; then
3. Estimated survival based on the mean per-RM survival rate immediately upstream and downstream.

Consensus estimates are based on the geometric mean of annual estimates where annual data are available. Overall, the estimated median recruits per spawner of the fall-run Chinook salmon population in the Stanislaus River is 0.02. This growth rate is much lower than the value of 1.0 necessary for a stable population; thus, the current population on the Stanislaus River is in decline. The number of juvenile outmigrants per spawner is strongly and positively correlated with winter-spring flow conditions in the Stanislaus River (Figure 3 and Appendix A), and the spawning cohort in one year is strongly correlated with San Joaquin River flows in the year that that cohort migrated to the ocean (Sturrock et al. 2015).

6.2.5.3.1 Rebuilding: Recruits per Spawner Equal 1.26

The initial Biological Objective for productivity, intended to support the goal of rebuilding the Stanislaus River fall-run population, required establishing survival rates within the Stanislaus and lower San Joaquin River that would support a population growth rate (or CRR) of 1.26; sustained CRR of 1.26 leads to population doubling in three generations. The SEP Group assumed no change in mean survival from Chipps Island to adult and from adult to spawner. Survival in the river (Eggs to Vernalis) and Delta (Vernalis to Chipps Island) were assumed to improve proportionate to current levels.

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Survival necessary in the river (Eggs to Vernalis) and in the Delta (Vernalis to Chipps Island) to achieve a population growth rate of 1.26 (i.e., recruits per spawner required to double the population in three generations) were estimated (Table 2). To achieve a CRR of 1.26, it would require mean freshwater survival of juvenile Chinook salmon of 2.12%. To achieve freshwater survival of 2.12% overall, the following will need to be achieved within 10 years (Table 7):

- Median annual survival from Eggs to Vernalis of 7.55%; and
- Median annual survival from Vernalis to Chipps Island of 28.06%.

Variance around estimated survival rate targets, simulated using observed data and the logit function of R (100,000 simulations), indicated that 95% confidence intervals were constrained between 0 and 1 for survival from Eggs to Vernalis (95% confidence interval: 2.96% to 28.57%) and Vernalis to Chipps Island (7.95% to 71.81%).

Table 2

Survival Rates in Freshwater Environments Necessary to Support Watershed-specific Goal of Rebuilding the Stanislaus River Fall-run Chinook Salmon Population

Reach	Current	RM	Target Survival	Target Survival per RM
Eggs to Vernalis	1.01%	57.0	7.55%	95.57%
Vernalis to Chipps Island	3.75%	54.5	28.06%	97.69%
Chipps Island to Adult[1]	2.83%	-	2.83%[2]	-
Adult to Spawner[1]	60.24%	-	60.24%	-
Recruits per Spawner[3]			**1.26**	

Notes:
1 Assumes no change from current estimated survival rates after juvenile salmon pass Chipps Island (the western edge of the Delta)
2 NMFS 2009b
3 Recruits per spawner is calculated as product of survival rates (e.g., Eggs to Vernalis × Vernalis to Chipps Island × Chipps Island to Adult × Adult to Spawner) × estimated population sex ratio (60% female spawners) × estimated average fecundity (5,813 eggs per spawner).
– Target survivals assume an equal increase over current survival in Delta and riverine habitats. See text for calculation of survival in different riverine stretches.

6.2.5.3.2 Resiliency: Recruits per Spawner Equal 2.5

The population growth rate associated with the rebuilding objective (CRR equals 1.26; Section 6.2.5.3.1) would lead to a situation where low production in any one year could

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severely constrain production in the subsequent generation (i.e., the population would not be resilient). A higher CRR is in keeping with Central Valley Goals and Central Valley Objectives for this population, as the Watershed-specific Goal and this Biological Objective are designed to ensure that survival rates in the river environment do not prevent attainment of AFRP production targets following years with low returns (e.g., as would be necessary to hit a 5-year running average). Again, there is no Biological Objective related to attainment of the AFRP or other abundance target; this productivity objective simply specifies survival rates that are consistent with attainment of goals and objectives for the Central Valley and Watershed-specific Goals.

The SEP Group's second phase of productivity improvement is intended to establish population resilience by achieving freshwater survival rates that support a population growth rate (or CRR) of 2.5. The increase in survival necessary in the river (Eggs to Vernalis) and in the Delta (Vernalis to Chipps Island) required to support population resilience—or a minimum of 2.5 recruits per spawner—were estimated assuming no change in mean survival from Chipps Island to adult or adult to spawner (Table 3). Under these assumptions, a CRR of 2.5 would require freshwater survival of 4.22%. Although freshwater survival of 4.22% is higher than current survival estimates, the SEP Group considered it to be reasonable and achievable after 15 years of restoration effort, especially because it is well below typical freshwater survival for Chinook salmon populations across their range.

To achieve freshwater survival of 4.22% overall, the following will need to be achieved in each reach within 15 years (Table 7), assuming proportionate improvement in survival in the riverine and Delta environments:

- Median annual survival from Eggs to Vernalis of 10.64%; and
- Median annual survival from Vernalis to Chipps Island of 39.52%.

Variance around estimated survival rate targets, simulated using observed data and the logit function of R (100,000 simulations), indicated that 95% confidence intervals were constrained between 0 and 1 for survival from Eggs to Vernalis (95% confidence interval: 5% to 37.51%) and Vernalis to Chipps Island (11.83% to 81.61%).

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Table 3

Survival Rates in Freshwater Environments Necessary to Support Watershed-specific Goal of Resiliency for the Stanislaus River Fall-run Chinook Salmon Population

Reach	Current	RM	Target Survival	Target Survival per RM
Eggs to Vernalis	1.01%	57.0	10.64%	96.15%
Vernalis to Chipps Island	3.75%	54.5	39.52%	98.31%
Chipps Island to Adult[1]	2.83%	-	2.83%[2]	-
Adult to Spawner[1]	60.24%	-	60.24%	-
Recruits per Spawner[3]			**2.5**	

Notes:
1 Assumes no change from current estimated survival rates after juvenile salmon pass Chipps Island (the western edge of the Delta)
2 NMFS 2009b
3 Recruits per spawner is calculated as product of survival rates (e.g., Eggs to Vernalis × Vernalis to Chipps Island × Chipps Island to Adult × Adult to Spawner) × estimated population sex ratio (60% female spawners) × estimated average fecundity (5,813 eggs per spawner).
– Target survivals assume an equal increase over current survival in Delta and riverine habitats. See text for calculation of survival in different riverine stretches.

6.2.5.3.3 Sustainability: Recruits per Spawner Equal 5.95

The SEP Group adopted the average survival rate reported by Quinn (2005)—10% egg to smolt survival—as typical of Chinook salmon populations. This value was selected because Quinn (2005) was the most recent study available on this topic and this value was approximately the mid-point of the values from the two other studies (Healy 1991; Bradford 1995). Assuming no change in survival rates between Chipps Island and adult or from adult to spawner, the SEP Group's third phase of productivity improvement, establishing population sustainability by achieving freshwater survival of 10%, would result in a population growth rate (or CRR) of 5.95.

Although a 10% freshwater survival rate is much higher than current survival rates in the reaches from the Stanislaus River through the Delta, the SEP Group considered this objective to be attainable and perhaps conservative, after 24 years of restoration effort. This reasoning is two-fold: 1) because the survival rate is typical of other Chinook salmon populations studied in human-managed systems from across the range of the species; and 2) the resulting CRR is less than that reported by Quinn (2005) for the Chinook salmon populations in that study.

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The assumption that survival in the river (Eggs to Vernalis) and Delta (Vernalis to Chipps Island) improved proportionately produced an estimated target for Delta survival that was judged not achievable on a sustained basis (i.e., not S.M.A.R.T.; calculated target survival on Table 4). Thus, maximum median through-Delta survival was assumed to be approximately 50%. To achieve the target freshwater survival objective, through-Delta survival of 50% was assumed (adjusted target survival; Table 4). Thus, to achieve an overall freshwater survival of 10%, the following will need to be achieved in each reach within 24 years (Table 7):

- Median annual survival from Eggs to Vernalis of 20%; and
- Median annual survival from Vernalis to Chipps Island of 50%.

Variance around estimated survival rate targets, simulated using observed data and the logit function of R (100,000 simulations), indicated that 95% confidence intervals were constrained between 0 and 1 for survival from Eggs to Vernalis (95% confidence interval: 9.91% to 55.32%) and Vernalis to Chipps Island (19.27% to 91.55%).

Table 4

Calculated Survival Required to Achieve Population Sustainability (10% Freshwater Survival)

Reach	Current	RM	Calculated Target Survival	Adjusted Target Survival	Target Survival per RM
Eggs to Vernalis	1.01%	57.0	20.88%	20%	97.22%
Vernalis to Chipps Island	3.75%	54.5	52.24%	50%	98.74%
Chipps Island to Adult[1]	2.83%	-	-	2.83%[2]	-
Adult to Spawner[1]	60.24%	-	-	60.24%	-
Recruits per Spawner[3]				**5.95**	

Notes:

1 Assumes no change from current estimated survival rates after juvenile salmon pass Chipps Island (the western edge of the Delta)

2 NMFS 2009b

3 Recruits per spawner is calculated as product of survival rates (e.g., Eggs to Vernalis × Vernalis to Chipps Island × Chipps Island to Adult × Adult to Spawner) × estimated population sex ratio (60% female spawners) × estimated average fecundity (5,813 eggs per spawner).

– Summarizes the proportional increase in survival need to achieve 10% freshwater survival based on published values (Healy 1991; Bradford 1995; Quinn 2005), or a minimum of 5.95 recruits per spawner. Proportionate increase of river and Delta survival rates (as described above) resulted in Delta survival rates that the SEP Group believed were unrealistically high. Therefore, the necessary increase in river (Eggs to Vernalis) survival rates was calculated based on a median Delta (Vernalis to Chipps Island) survival rate of 50%.

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6.2.5.4 Results: Productivity Objectives

6.2.5.4.1 Reach-specific Juvenile Freshwater Survival Objectives

Tables 2, 3, and 4 present the CRRs, total freshwater survival rates, and riverine and Delta survival rates necessary to achieve the three Watershed-specific Goals of rebuilding, resilience, and sustainability. The Eggs to Vernalis survival targets form the basis of Biological Objectives that can be attained in the geographic scope of the SEP. The SEP Group estimated survival targets in each freshwater reach bounded by monitoring points (Oakdale, Caswell, Vernalis/Mossdale, and Chipps Island) that are needed in order to achieve the total freshwater survival rates consistent with each of the three productivity Goals (Table 5).

Table 5
Current Reach-specific Survival and Survival Objectives for Three Productivity Goals

Reach	Current	RM	Rebuilding	Resilience	Sustainability
Eggs to Vernalis	1.87%	46.5	10.8%	14.3%	24.80%
Caswell to Vernalis	54.09%	10.5	69.8%	74.4%	80.70%
Vernalis to Chipps Island	3.75%	54.5	28.1%	39.5%	50%
Freshwater Survival	**0.04%**		**2.12%**	**4.20%**	**10%**

Current survival from Caswell to Vernalis was estimated based on the average per-RM survival rates estimated for Eggs to Oakdale and Oakdale to Caswell (Table 1). This average per-RM survival rate was applied to the 10.5 miles of river between Caswell and Vernalis; thus, the increase in survival assigned from Caswell to Vernalis is calculated by averaging the target per RM survival of the Eggs to Vernalis reach and the Vernalis to Chipps Island reach. Survival in the Stanislaus River reaches above Caswell (Eggs to Caswell) are those that will achieve the necessary river survival rates when multiplied by the survival calculated from Caswell to Vernalis (the last part of the riverine migration). That survival rate was disaggregated into components expected upstream and downstream of the first RST, at Oakdale. Current survival rates from Eggs to Oakdale and Oakdale to Caswell were compared only in those years where Oakdale RST data were available. Survival upstream and downstream of Oakdale was calculated only for a subset of the time series used to calculate median Eggs to Caswell survival. As a result, the product of Eggs to Oakdale survival and Oakdale to Caswell survival does not equal the survival estimate for Eggs to

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Caswell. However, it was assumed that the proportionate survival in these two reaches is well estimated by the years in which data were available.

Survival targets for Eggs to Caswell and Caswell to Vernalis were adopted as Biological Objectives for productivity to attain the Watershed-specific Goals for population rebuilding, resilience, and sustainability (Table 7).

6.2.5.4.2 Supplemental Guidance to Support Productivity Objectives in the Stanislaus River

The productivity objectives described above will require improved success across several life stages, including fecundity, egg viability, incubation success, and juvenile survival throughout the Stanislaus River and lower San Joaquin corridors. Although overarching juvenile productivity rates (measured as survival from Eggs to Caswell and survival from Caswell to Vernalis) are the central focus of efforts to restore population productivity on the Stanislaus River, the SEP Group also developed guidance for egg and early juvenile productivity. This guidance allows for identification, prioritization, monitoring, and adaptive management of stressors affecting life stage transitions between adults and early fry as compared to those stressors that affect later juvenile survival (e.g., downstream of Oakdale).

Egg Viability

Viability of Chinook salmon eggs incubated under hatchery conditions is well studied and generally extremely high (more than 90%; Tappel and Bjornn 1983). Egg viability may be compromised by deleterious conditions experienced by migrating adult Chinook salmon (McCullough et al. 2001; USEPA 2003). Such negative effects can be detected by measuring hatchability of eggs taken from females that have completed their migration through freshwater. Low hatching success of eggs incubated under standardized conditions would reveal whether adult migration conditions inhibit attainment of the overall productivity (juvenile outmigrants-per-adult) objective.

The SEP Group established guidance for mean egg viability in hatchery conditions of 95% for eggs taken from female Chinook salmon that complete migration. This sub-objective should be attained by year 9 (Table 7). A small sample from one study on the Stanislaus River

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indicated mean incubation success of 92.5% (AFRP 2008). Ideally, attainment of this sub-objective would involve eggs taken from females caught in the early part of the fall-run migration season, as this is when physical conditions are most stressful to migrating fall-run Chinook salmon females.

Incubation Condition

Egg incubation may be compromised in the field by conditions that are unsuitable physically or chemically (e.g., due to gravel size distribution, temperature, and fine sediment accumulations). The SEP Group identified optimal, sub-optimal, and detrimental levels of physio-chemical variables that are important to egg incubation success (see Section 7.2.4). The combined effect of various levels of these variables on incubation success can be predicted based on previous studies of hatching success where conditions where controlled and varied systematically (e.g., for gravel size-distribution; Tappel and Bjornn 1983).

The SEP Group determined that physical conditions in the river should be those that would support incubation success of 80%, 85%, and 90% for all redds deposited in a given year (as predicted by hatchability under conditions studied by Tappel and Bjornn (1983) and other studies (e.g., Mesick (2001) by years 9, 15, and 24, respectively; (Table 7). The SEP Group emphasizes that it is not anticipating actual egg hatchability of ≥80% in the field; rather the sub-objective provides guidance that physical and chemical conditions (e.g., gravel quality; water temperature; DO; contaminant levels) should be consistent with conditions needed to produce these levels of incubation success in a controlled environment.

Fry Productivity

Egg-outmigrant productivity may also be compromised by low survivorship in very early life history stages (larvae, early fry). Because it is extremely challenging to measure incubation success of naturally deposited eggs directly, the SEP Group established guidance to capture impacts to incubation success as well as mortality that occurs immediately after hatching. By estimating escapement and female fecundity, the potential number of eggs deposited during a spawning season can be estimated. By measuring fry production just downstream of the spawning reach (e.g., at the Oakdale RST), the productivity from the egg stage to the fry stage can be estimated. USFWS (2014) employs such a calculation to estimate winter-run Chinook salmon productivity rates on the Sacramento River. Egg-fry productivity rates have

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been studied in other Chinook salmon populations (e.g., Quinn 2005), and these estimates informed the sustainability objective for expected egg-fry productivity on the Stanislaus River.

The SEP Group established guidance for expected fry production at the Oakdale RST. The geometric mean of egg-fry survival rates at the Oakdale RST from 1995 to 2013 was approximately 14% (based on assumptions regarding spawner sex ratio and female fecundity detailed in Appendix A). Under the assumption that survival of Chinook salmon upstream and downstream of Oakdale improved proportionately, egg to fry survival at Oakdale would be 26.8% and 30.8% by years 9 and 15, respectively, in order to attain the overarching productivity objectives (Eggs to Caswell survival rates; Table 7). The SEP Group's guidance for minimum egg to fry survival to Oakdale RST was slightly lower than that derived mathematically because there was no intention for the guidance to become prescriptive or constrain allocation of restoration effort. Final guidance for egg to fry survival is described in Table 6. The final guidance target for egg to fry productivity (35% by year 24) matches what is typical of Chinook salmon egg to fry survival rates measured elsewhere (Healy 1991; Quinn 2005).

Table 6
Guidance Related to Egg Viability and Incubation Success for Chinook Salmon (Fall- and Spring-run) in the Stanislaus River

Sub-objective	Metric	To be Achieved by
Egg viability	In hatchery hatching success = 95% (lower 90% confidence interval ≥ 87%, n= 5 – 10 females)	Year 9
Incubation condition	Field environmental conditions consistent with > 80% hatchery incubation success	Year 9
	Field environmental conditions consistent with > 85% hatchery incubation success	Year 15
	Field environmental conditions consistent with > 90% hatchery incubation success	Year 24
Egg to fry productivity	Egg to fry (@ Oakdale RST) survival > 25%	Year 9
	Egg to fry (@ Oakdale RST) survival > 30%	Year 15
	Egg to fry (@ Oakdale RST) survival > 35%	Year 24

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6.2.5.4.3 Adult Migration, Holding, and Redd Success Objectives

Adult migration, holding, and redd success objectives include the following:

- At least 90% of adult migrants that pass the weir through survive to spawning;
- Less than 10% of female carcasses retain 10% or more of eggs; and
- Chinook salmon redd viability rate of greater than 90% (as projected by monitoring of temperature, flow, and superimposition).

The rationale for and approach to objectives related to fall-run Chinook salmon adult migration, holding, and redd success are described in detail under spring-run Chinook salmon productivity objectives (Section 6.3.5.1).

Productivity-related objectives and guidance for fall-run Chinook salmon are summarized in Table 7.

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Table 7

Chinook Salmon Productivity Objectives

Objective		Productivity[1]											
Life History Stage		**Juvenile "rebuilding"**			**Juvenile "resiliency"**			**Juvenile "sustainability"**			**Adult and Egg**			
Description	**Briefly**	Juvenile survival rate consistent with population growth rate of 2x over three generations (CRR=1.26)			Juvenile survival rate consistent with population resilience (CRR=2.5)			Juvenile survival rate in freshwater typical of Chinook salmon populations across the Pacific coast (10%)			Survival/reproductive success of adult migrants and indicators of egg incubation success			
	Achieved by When?	Year 10			Year 15			Year 24			Year 9	Year 9	Varies (Year 9, 15, 24; see below)	Varies (Year 9, 15, 24; see below)
	Measure What?	Survival from/to	Survival from/to	Survival total	Survival from/to	Survival from/to	Survival total	Survival from/to	Survival from/to	Survival total	Survival from/to	Egg viability/ deposition	Egg/redd viability	Egg-emergence survival of surrogates
	Measured Where?	Spawning to Caswell [2]	Caswell to Vernalis [2]	Freshwater [3]	Spawning to Caswell [2]	Caswell to Vernalis [2]	Freshwater [3]	Spawning to Caswell [2]	Caswell to Vernalis [2]	Freshwater [4]	Caswell to spawning grounds at onset of spawning [5]	Spawning grounds	Spawning grounds	Spawning grounds
Fall-run	**Wet**	15.0%			18.0%			35.0%			≥ 90%	a) In hatchery hatching success = 95%; b) < 10% of female carcasses retain ≥ 10% of eggs	a) Environmental conditions consistent with in-hatchery incubation success: ≥ 80% (year 9); ≥ 85% (year 15); ≥ 90% (year 24) b) ≥ 90% redds remain intact through incubation period	Egg to fry survival (at Oakdale RST): ≥ 25% (year 9); ≥ 30% (year 15); ≥ 35% (year 24)
	Median Year	10.8%	69.8%	2.12%	14.3%	74.4%	4.20%	24.8%	80.7%	10.0%				
	Dry	5.0%			9.0%			15.0%						
Spring-run	**Wet**	15.0%			18.0%			35.0%			Same as above	Same as above	Same as above	Same as above
	Median Year	10.8%	69.8%	2.12%	14.3%	74.4%	4.20%	24.8%	80.7%	10.0%				
	Dry	5.0%			9.0%			15.0%						

Notes:

1 Juvenile productivity and life history objectives refer only to those Chinook that migrate before temperatures in the mainstem San Joaquin reach 25 degrees Celsius (°C) (77 degrees Fahrenheit [°F]).

2 Survival objectives from Spawning to Caswell are premised on attainment of Caswell to Vernalis survival rate. If median Caswell to Vernalis survival rate is unattainable or exceeded, the Spawning to Caswell survival rate objective will be adjusted accordingly.

3 For reference purposes. Includes through-Delta survival. Conditions on the San Joaquin and its tributaries affect Delta survival; however, responsibility of San Joaquin tributaries for through-Delta survival outcomes is yet to be determined. Improvement in freshwater survival rates assume river survival rates and Delta survival rates will improve proportionately from current levels.

4 For reference purposes. Assumes through-Delta survival of 50%. In this case, the improvement in river and Delta environments is no longer proportionate, as adherence to the proportionate improvement standard would require median survival of >50% in the Delta. There was no consensus that survival rates of > 50% in the Delta could be achieved.

5 Currently, adult survival objectives are only developed for spring-run fish after they have migrated past Caswell. This reflects desired outcomes in the ability of spring-run to successfully "hold" in the river through the summer. Adult survival objectives may be developed (and potentially for fall-run and steelhead) in the mainstem San Joaquin; however, those objectives would be part of basin-wide planning and may require adult migration monitoring in the lower San Joaquin.

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6.2.5.5 Rationale for Timing of Migration Life History Objective

Differences in juvenile Chinook salmon size at and timing of migration are believed to represent different life history strategies. As discussed in Section 3.2 this "portfolio effect" of spreading risk through life history diversity is thought to maximize survival across the subsequent environments salmon are exposed to (e.g., mainstem river, Delta, and ocean). The ideal timing of migration for any size-class is unknown and believed to be variable across years (i.e., depending on future conditions in subsequent environments). Migration of Chinook salmon of different sizes across a broad migration window will reveal that the river environment is supporting a wide range of life history types that are characteristic of healthy Chinook salmon populations. A migration timing window is necessary to ensure that river function is maintained throughout a normal migration period for fall-run Chinook salmon. The SEP Group recognized that it would not be desirable to retain fish in the Stanislaus River beyond the time each year where temperatures in the lower San Joaquin River are unsuitable; thus, migration timing windows may be truncated in any year when temperatures exceed a threshold temperature prior to the end of the time period specified.

6.2.5.6 Methods for Timing of Migration Life History Objective

The metric for this Biological Objective is the presence (absence) of fall-run Chinook salmon juveniles measured on a weekly basis. The timing windows reflected here are similar to those already detected by RSTs in the Stanislaus River. For example, in 2000 (a wet year), outmigrants were detected at Caswell from January 2 to June 25. In 2003 (a drier year), outmigrants were detected at Caswell from January 23 to May 8. A summary of outmigrant timing data collected at the Caswell RST from 1996 to 2014 is provided in Table 8.

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Table 8

Start and End Dates of Migration through the Lower Stanislaus River for Three Migratory Phenotypes of Juvenile Chinook Salmon, as Detected at Caswell Rotary Screw Trap 1996 – 2014

Year	Fry (Smaller than 55 mm [2.2 in] FL)		Parr (Larger than 55 mm [2.2 in], smaller than 75 mm [3 in] FL)		Smolt (Larger than 75 mm [3 in] FL)	
	Start Date	End Date	Start Date	End Date	Start Date	End Date
1996	February 1	April 12[2]	February 16	May 26	February 4	June 27
1997[1]	–	–	–	–	–	–
1998	January 3	April 29	February 18	May 26	March 6	June 30
1999	January 13	June 4	February 14	June 13	March 6	June 30
2000	January 2	April 25	February 4	May 29	March 8	June 25
2001	January 1	May 13	March 7	June 10	January 17	June 17
2002	January 11	April 1	February 9	June 11	March 1	June 12
2003	January 23	April 12	February 5	June 2	February 24	June 10
2004	January 19	April 17	February 26	May 31	February 29	June 8
2005	January 1	April 12	February 14	June 11	January 9	June 21
2006[1]	–	–	–	–	–	–
2007	January 7	May 13	March 10	June 24	February 24	June 27
2008	January 20	March 31	February 29	May 2	March 18	June 16
2009	January 9	April 3	March 8	May 7	March 8	June 2
2010	January 11	May 12	March 3	May 12	February 9	June 1
2011	January 1	May 10	February 14	May 2	February 21	June 27
2012	January 12	May 11	March 12	June 11	March 3	June 29
2013	January 1	April 19	February 22	June 4	January 22	June 4
2014	January 4	May 11	January 21	June 2	February 17	June 8

Notes:
1 These years had trap issues, and the data could not be included.
2 The range shows the first and last detection.
Sources: Cramer Fish Sciences RST database in Zeug et al. 2014; Table from Sturrock et al. 2015.
– = no data

For this objective, parr and smolt migration windows were set 1 to 2 weeks earlier than is typically detected currently; this reflects the desire to produce faster growth rates in-river and thus, earlier appearance of larger size classes among outmigrants. The SEP Group considered these objectives to be easily attainable, as the minimum required to demonstrate

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the suitability of the river corridor (for this objective) is the detection of one juvenile fish in a given size category each week.

The SEP Group recognizes that distinguishing in the field between fall- and spring-run Chinook salmon juveniles is challenging at this time. Thus, the objective will be satisfied by detection of any Chinook salmon juveniles in the specified time window, without regard to parentage. If field techniques that allow distinction between juveniles of different runs become available, the SEP Group will consider how the objective should be implemented on a run-specific basis.

6.2.5.7 Results: Timing of Migration Life History Objective

By year 10, in every year, migration of fall-run Chinook salmon will be detected in every week between the dates shown in Table 9, until such time that the mean daily temperature at Mossdale is greater than or equal to 25 degrees Celsius (°C; 77 degrees Fahrenheit [°F]).

Table 9
Fall-run Chinook Salmon Timing of Migration Objectives

Size Class	Caswell RST		Mossdale[1] Trawl	
	Start Week	End Week	Start Week	End Week
Fry (smaller than 55 mm [2.2 in])	Last of January	Second of April	N/A[2]	N/A[2]
Parr (larger than 55 mm [2.2 in], smaller than 75 mm [3 in])	First of February	Last of May	Second of February	First of June
Smolt (larger than 75 mm [3 in])	Third of February	First of June	February	June

Notes:
1 Tributary contribution can be assigned (e.g., by otolith analyses).
2 Mossdale Trawl does not reliably detect fish smaller than 55 mm (2.2 in).

6.2.5.8 Rationale for Size at Migration Life History Objective

Juvenile Chinook salmon size at migration classes were assumed a proxy for life history strategies. It is important to have a portfolio of such strategies to improve overall survival rates across years (Beechie et al. 2006; Miller et al. 2010; Satterthwaite et al. 2014).

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Currently, in wet years, the Stanislaus River produces a very large proportion of fry-sized juvenile migrants. For example, in 2000, 85% of total outmigrants at Caswell were fry-sized, with a smaller proportion of smolt-sized juveniles (5%). These smaller-sized fish likely have lower outmigration survival rates (Sturrock et al. 2015). Conversely, in dry years such as 2003, a larger proportion of outmigrants are smolt-sized, with approximately 34% of total outmigrants at Caswell classified as smolt-sized (Table 10). The SEP Group is concerned that smolt-sized fish may not survive a late spring migration through the lower Stanislaus River and San Joaquin rivers due to prohibitively warm temperatures during dry years. In wet years, a high proportion of outmigrants leave as fry, likely due to flushing flows and lack of rearing habitat (Fuller 2013, pers. comm.). A more balanced proportional representation of outmigrant size classes across the full winter-spring migration season would allow for bet-hedging and likely result in increased survival across years.

Table 10

Abundance and Proportions of Fry, Parr, and Smolt Outmigrants Sampled by Rotary Screw Traps and Timing of Migration from Stanislaus River in 2000 and 2003

Outmigration Cohort	Migratory Phenotype	N (95% Confidence Interval)	Proportion of the Sample	Duration of Migratory Period (Range)	Duration of "Peak" Migratory Period (Interquartile Range)	Peak Migration Date (Median)
2000 (wetter)	Fry	1,837,656 (1,337,351 to 2,495,523)	0.85	115 days (January 2 to April 25)	4 days (February 14 to February 17)	February 16
	Parr	212,042 (141,238 to 310,174)	0.1	116 days (February 4 to May 29)	29 days (March 18 to April 15)	April 1
	Smolt	100,827 (68,732 to 142,920)	0.05	110 days (March 8 to June 25)	34 days (April 15 to May 18)	May 9
	Total	**2,150,524 (1,577,379 to 2,915,064)**				
2003 (drier)	Fry	79,862 (59,795 to 103,916)	0.5	80 days (January 23 to April 12)	4 days (January 27 to January 30)	January 29
	Parr	25,729 (17,889 to 36,282)	0.16	118 days (February 5 to June 2)	27 days (March 18 to April 13)	March 21
	Smolt	55,573 (38,362 to 77,486)	0.34	107 days (February 24 to June 10)	21 days (April 18 to May 8)	April 25

Source: Sturrock et al. 2015

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6.2.5.9 Methods for Size at Migration Life History Objective

The SEP Group recognized that prescribing specific size-class distributions was not wise or possible because size-class distributions naturally fluctuate (stochastically and with respect to environmental conditions) from year to year, and the ideal size-class distribution for conditions in any given year are unknowable, in advance. On the other hand, the SEP Group believed that it was possible to identify minimum thresholds for the relative abundance of different size-classes because failure to produce these minimum distributions would indicate a failure of the river environment to support a portfolio of life history strategies. Objectives were not prescriptive; rather, the SEP Group asked the following question, "Below what proportion of a given size-class would we be concerned that the river was not providing adequate opportunities for the life history strategies associated with that size class?" The Biological Objectives described below anticipate the attainment of Environmental Objectives (i.e., chemical, physical, and biological conditions) that would allow for greater in-river rearing opportunities. The ranges represent the following:

- Fry: The target is a percentage of the range currently observed across year types, scaled to accommodate an increase in the percentage of parr and smolt size outmigrants while still resulting in a total of well below 100% across all size classes(Sturrock, pers. comm.).
- Parr: The target for wetter years is approximately double the proportion of parr that is currently observed in wetter years (Sturrock, pers. comm.). The target for drier years is approximately 1.5 times the proportion currently observed during drier years. The intent is to set a reasonable target for improved growth and rearing.
- Smolt: The target for wetter years is approximately double the proportion of smolt migrants currently observed in wetter years. The target for drier years is currently attained.

The SEP Group included a temperature off-ramp for measuring the proportional production of each of these size classes to account for the low likelihood of survival for fish entering the lower San Joaquin River when temperatures exceeded a critical threshold.

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6.2.5.10 Results: Size at Migration Life History Objective

By year 12, annual emigrant size-class distribution as measured at Caswell RST (includes only juveniles that migrate before daily mean temperatures exceed 25°C (77°F) at Mossdale) are detailed in Table 11.

Table 11
Fall-run Chinook Salmon Size at Migratory Objectives

Size Class	Wetter Years	Drier Years
Fry (smaller than 55 mm [2.2 in])	20% minimum	20% minimum
Parr (larger than 55 mm [2.2 in], smaller than 75 mm [3 in])	20% minimum	30% minimum
Smolt[1] (larger than 75 mm [3 in])	10% minimum	20% minimum

Notes:
1 Includes only juveniles that migrate before daily mean temperatures greater than 25°C (77°F) at Mossdale – Initial estimates of size class distribution are based on Sturrock et al. (2015)

Size distribution of migrants will be measured on an annual basis, but can also serve to guide management within each year (e.g., approach of the 25°C [77°F] temperature threshold can be used as a trigger to stimulate migration earlier during dry years).

Table 12 summarizes life history diversity objectives for fall-run Chinook salmon.

Table 12

Chinook Salmon Biological Objectives – Life History Diversity Objectives

Objective		Life History Diversity (Migration Timing) [1]				Life History Diversity (Age-class Distribution Minima) [1]	
Description	**Briefly**	Support range of juvenile migration dates to maintain life history diversity				Support range of sizes at juvenile migration dates to maintain life history diversity	
	Achieved by When?	Year 10	Year 10	Year 10	Year 10	Year 12	Year 12
	Measure What?	Detection every week no later than…	Detection every week through at least…	Detection every week no later than…	Detection every week through at least…	Minimum % juvenile migrants annually (wetter years)	Minimum % juvenile migrants annually (drier years)
	Measured Where?	Caswell RST	Caswell RST	Mossdale Trawl	Mossdale Trawl	Caswell RST	Caswell RST
Fall-run	**Fry**	Last week of January	2nd week of April	N/A	N/A	20%	20%
	Parr	1st week of February	Last week of May	2nd week of February	1st week of June	20%	30%
	Smolt	3rd week of February	1st week of June	Last week of February	2nd week of June	10%	20%
Spring-run	**Fry**	1st week of January	2nd week of April	TBD	TBD	20%	20%
	Parr					20%	30%
	Smolt					10%	20%
	Yearling [2]	Detection in ≥ 50% weeks October to January	Detection in ≥ 50% weeks February to April	TBD	TBD	≥ 1.5 yearlings per 1,000 female spawners	

Notes:

1 Juvenile productivity and life history objectives refer only to those fish that migrate before temperatures in the mainstem San Joaquin reach 25°C (77°F).

2 The yearling life history strategy is associated with spring-running adults (fall-run adults may produce yearlings as well, but it is considered to be extremely rare). Production of some yearlings is expected whenever spring-run Chinook reproduce successfully; however, detection of yearlings is only required when sufficient numbers of spring-run salmon reproduce.

N/A = not applicable; TBD = to be determined

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6.2.5.11 Rationale for Genetic Objective

The primary genetic concern for fall-run Chinook salmon in the Stanislaus River is the influence of hatchery-produced fish on the fitness of the local stock and introgression with spring-run Chinook salmon. Artificial propagation of salmon in hatcheries has long played a role in meeting harvest and conservation goals for salmon and steelhead in California. The life history diversity and productivity objectives described above will only be achieved if managers can ensure little or no deleterious consequences to natural populations from hatchery-origin fish. It is necessary to achieve a low level of extinction risk for fall-run Chinook salmon, and part of attaining that acceptable level of risk relates to implementing hatchery best management practices.

Current escapement to the Stanislaus River reflects a very high proportion of hatchery fish produced in other river systems. In 2007, CDFW began marking and tagging a constant fraction (25%) of hatchery production (Constant Fractional Marking Program). Escapement in years 2010 and 2011 were the first 2 years where juveniles from this marking effort returned as 2-, 3-, and 4-year-olds to spawn in freshwater habitats as adults. Approximately 50% and 83% of the adults that returned in 2010 and 2011, respectively, were strays from hatcheries and were not produced from parents who spawned successfully in the Stanislaus River (Kormos et al. 2012; Palmer-Zwalen and Kormos 2013). The majority of the strays were fish that were trucked and released into net-pens in the Estuary (Kormos et al. 2012; Palmer-Zwalen and Kormos 2013). Releases of juveniles in-river versus out-of-basin have been found to have a significant effect on the likelihood that adults will stray to non-natal rivers (Kormos et al. 2012; Palmer-Zwalen and Kormos 2013).

The rationale for establishing a fall-run Chinook salmon Biological Objective related to minimizing introgression with spring-run Chinook salmon mirrors the approach described below in the spring-run Chinook salmon Biological Objectives section.

6.2.5.12 Methods for the Genetic Objective

6.2.5.12.1 Hatchery Influence

The science of hatcheries focuses on several key management concepts that, if implemented, would make a greater contribution to harvest than the existing natural habitat can sustain on

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its own (HSRG 2014). For integrated hatcheries, one key element is managing hatchery- and natural-origin fish as two components of a single gene pool that is locally adapted to the natural habitat. The SEP Group relied on existing literature and reports regarding targets for minimizing hatchery influence in the Central Valley in order to identify objectives for the maximum level of hatchery-influence on the Stanislaus River. The SEP Group acknowledged that hatchery impacts are a regional concern and must be managed throughout the San Joaquin River basin and beyond. Still, an important component of minimizing hatchery influence relates to conditions on the target stream and the health of its natural spawning populations.

6.2.5.12.2 Introgression

The approach for establishing a fall-run Chinook salmon Biological Objective related to minimizing introgression with spring-run Chinook salmon mirrors the approach described subsequently in the spring-run Chinook salmon Biological Objectives section.

6.2.5.13 Results: Genetic Objectives

Benchmark metrics have been established based on genetic models to reduce the pHOS to less than 20% of adult spawners. Therefore, the genetic objective for fall-run Chinook salmon is to achieve, by year 9 of plan implementation, a spawning population that consists of greater than 80% Stanislaus River produced fish. In addition, , at any time that spring-running Chinook salmon adults are in the river, conditions in the Stanislaus River will support fall-run Chinook salmon spawning success in a way that reinforces long-term genetic integrity as measured by greater than 98% of fall-run Chinook salmon spawning with other fall-run Chinook salmon.

Genetic objectives for fall-run Chinook salmon are summarized in Table 13.

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Table 13

Genetic Objectives

Objective		Genetic	
Life History Stage		Adult	Egg/Juvenile
Description	Briefly	Maintain wild run genetic integrity	
	Achieved by When?	Year 9	Whenever spring-running fish are present
	Measure What?	Percentage hatchery origin spawners	Introgression
	Measured Where?	Spawning grounds	Spawning grounds
Fall-run	Wet	pHOS < 20% of spawners	< 2% hatchery influence
	Median Year		
	Dry		
Spring-run	Wet	N/A	< 2% inter-run mating
	Median Year		
	Dry		

6.3 Spring-run Chinook Salmon

6.3.1 What is the Problem?

Central Valley spring-run Chinook salmon populations are listed under state and federal ESAs for the following reasons:

- Natural production is well below acceptable levels;
- Survival rates are inadequate to achieve population growth and maintain population resilience;
- Spatial extent is extremely constrained relative to historic conditions;
- Populations express only a narrow range of the life history variants that are typical of this species; and
- Introgression with fall-run Chinook salmon populations threatens to homogenize this distinct gene pool as well as compounding the other problems.

Spring-run Chinook salmon populations throughout the Central Valley are extremely constrained with regard to all viability criteria (Yoshiyama et al. 2001; Lindley et al. 2007; NMFS 2014). These problems are most evident in the San Joaquin River basin, where spring-run Chinook salmon were extirpated following the construction of impassable dams in the

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mid 20th century. The spring-run was historically the most abundant run of Chinook salmon in the San Joaquin River basin and was among the largest runs along the Pacific Coast (Fry 1961; CDFG 1972, 1990; Yoshiyama et al. 2001). Prior to major dam construction in the mid 20th century, spring-run was the dominant Chinook salmon population in the Stanislaus River (CDFG 1972). Until recently, spring-run Chinook salmon were considered to be extirpated from all waterways in the San Joaquin River basin. There have been manual spring-run Chinook salmon reintroduction efforts on the San Joaquin mainstem below Friant Dam as part of the San Joaquin River Restoration Program. There is growing recognition that spring-running Chinook salmon adults have been observed in San Joaquin tributaries in recent years (Franks 2012); however, the origin of these fish is unknown.

Throughout the Central Valley, genetic threats to spring-run Chinook salmon include introgression with fall-run Chinook salmon (CDFG 1998; Banks et al. 2000), wherever these two populations are forced to spawn in the same habitat (because dams block passage into the higher elevation habitats historically utilized by spring-run). Genetic introgression with fall-run Chinook salmon is a threat to the unique morphological, behavioral, and life historical phenotypes and genotypic distributions that make spring-run distinctive (Smith et al. 1995; CDFG 1998; Banks et al. 2000). Thus, maintaining opportunities for temporal and spatial isolation of spawning between fall- and spring-run Chinook salmon is a challenge that efforts to restore spring-run Chinook salmon to the San Joaquin River basin need to address.

6.3.2 What Outcome(s) (Central Valley Goals) will Solve the Problem?

Abundance

Increasing abundance of Central Valley spring-run Chinook salmon is a goal documented in Hanson (2007, 2008), NMFS (2014), USFWS (2001), and Section 3406 of the CVPIA (Title 34 of Public Law 102-575). These plans stem from different laws (or legal settlements) and take different approaches to restoration; for example, they cover different geographies within the Central Valley and address conceptually different standards for population restoration. As a result, there are multiple restoration goals for abundance of spring-run Chinook salmon in the Central Valley and San Joaquin River basin. However, no single goal applies across the Central Valley, except for the narrative goal described in F&G Code § 5937, which states that dam operators must maintain fish populations "in good condition." This requirement has not been specifically defined for individual rivers. Thus, the SEP Group worked from the clear

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intent of existing policies to restore spring-run Chinook salmon in rivers throughout the Central Valley that they historically occupied, and identified goals and defined objectives that would satisfy that intent in the San Joaquin River basin from a biological perspective.

Productivity and Life History Diversity

Improvements in spring-run Chinook salmon productivity (measured as juvenile survival and adult migration and holding success in freshwater) and increased life history diversity (i.e., size at and timing of juvenile migration) are necessary to:

- Achieve abundance targets for spring-run Chinook salmon in the Central Valley (CVPIA/AFRP);
- Maintain fish "in good condition" (F&G Code § 5937);
- Attain acceptable levels of the criteria NMFS uses to evaluate salmonid population viability (NMFS 2014; McElhany et al. 2000); and
- Be consistent with other fisheries-related and water management-related policies.

No specific goal statements for these attributes have been defined, so the SEP Group worked to define Plan Goals for spring-run Chinook salmon that were appropriate to the geographic and policy scope of this effort.

Spatial Diversity

The NMFS (2014) Recovery Plan for Central Valley salmonids specifies that spring-run Chinook salmon populations will be restored to the southern Sierra diversity group (i.e., the San Joaquin River basin) such that "two populations [are] at low risk of extinction" and "multiple populations at [are maintained at no worse than] a moderate risk of extinction." Restoration of spring-run abundance, productivity, and life history diversity to the San Joaquin River tributaries and mainstem will serve to improve the spatial diversity of this distinct run throughout the Central Valley.

Genetic Diversity

Eliminating genetic introgression with fall-run Chinook salmon or reducing it to a very low level is a major goal for the maintenance and restoration of spring-run Chinook salmon in the Central Valley (Lindley et al. 2007; HSRG 2014). Thus, providing opportunities for

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spring-run reproductive isolation is particularly important for the maintenance of spring-run populations in rivers where high elevation habitat is blocked by dams.

6.3.3 What Does Solving the Problem Look Like (Central Valley Objectives)?

Abundance

An understanding of Central Valley Objectives for abundance of Stanislaus River spring-run Chinook salmon provides valuable context for determining what the Stanislaus River can contribute to restoring spring-run Chinook salmon in the Central Valley as a whole. Furthermore, Central Valley Objectives for spring-run are essential to determining Environmental Objectives (e.g., physical, chemical, and biological conditions necessary to support juvenile rearing) for the Stanislaus River that will support attainment of the Watershed-specific Goal (increasing abundance of spring-run Chinook salmon on the Stanislaus River) and goals and objectives in the larger context of the Central Valley.

The CVPIA (Section 3406 of the CVPIA, Title 34 of Public Law 102-575) calls for naturally spawning populations of anadromous fish that are double the 1967 to 1991 baseline within 10 years. The AFRP identifies Central Valley production targets for spring-run Chinook salmon, but it does not provide specific targets for spring-run production from San Joaquin River tributaries as it does for fall-run (USFWS 2001). This is likely because spring-run Chinook salmon were not detected in the San Joaquin River basin at the time when the CVPIA was passed in 1992 or when the AFRP was finalized in 2001. Still, spring-run Chinook salmon produced naturally on the Stanislaus River would contribute to the CVPIA/AFRP objectives for total natural production of spring-run Chinook salmon in the Central Valley.

The NMFS Recovery Plan (NMFS 2014) identifies the level of spring-run Chinook salmon abundance that is sufficient to achieve the narrow outcome of "recovery," which in the ESA context means delisting this population. The Central Valley Goal particular to the San Joaquin River basin states that there must be at least two populations at low risk of extinction in the southern Sierra diversity group. For a population to have a "low risk" of extinction, NMFS (2014) specifies, among other things, that it must achieve a census population size of at least 2,500 individuals. Spread over a 3-year generation length, this translates to a 3-year running average population of approximately 833 returning adults.

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The SEP Group determined that delisting spring-run Chinook salmon, as per the NMFS (2014) Recovery Plan, would represent only a preliminary step to fully restoring spring-run Chinook salmon to the San Joaquin River basin and Stanislaus River. In other words, the SEP Group's view was that delisting was a preliminary desired outcome, but that would not satisfy other Central Valley-wide policies regarding spring-run Chinook salmon (e.g., CVPIA, F&G Code §5937). Historically, the Stanislaus River's spring-run Chinook salmon population was larger than its fall-run population (CDFG 1972; Yoshiyama et al. 2001), and the SEP Group found no biological reason to expect that the spring-run population would be only a small fraction of the fall-run Chinook salmon population in the future, following restoration of the river. A Stanislaus River population of 833 returning spring-run spawners per year would be less than 10% of the escapement of approximately 13,225 fish that is implied by the Central Valley Objective for Stanislaus River fall-run Chinook salmon (assuming current harvest rates; Table 1). In addition, the SEP Group found no reason why the Stanislaus River would not be capable of supporting as many spring-run or total Chinook salmon as the restored San Joaquin mainstem below Friant Dam. The San Joaquin River Restoration Program has a target of restoring 30,000 spring-run Chinook salmon and 10,000 fall-run Chinook salmon to the mainstem below Friant Dam (Hanson 2007, 2008). Finally, the SEP Group noted that observed annual escapement to Butte Creek (a tributary to the Sacramento River that is much smaller than the Stanislaus River) has exceeded 10,000 spring-run Chinook salmon in more than half the years since carcass surveys began in in 2001 (GrandTab 2014). As a result of these considerations, the SEP Group determined that the Central Valley Objective for the natural production of Stanislaus River spring-run Chinook salmon roughly equals the Central Valley Objective for natural production of Stanislaus River fall-run Chinook salmon, which is the natural production in the ocean of 22,000 2-year-old salmon per year on average. The SEP Group believed this Central Valley Objective for the Stanislaus River may actually be conservative.

Spatial Diversity

NMFS (2014) calls for multiple populations in the San Joaquin River basin to be established, at least two of which must be at "low risk" of extinction and others must be at no greater than "moderate risk" of extinction.

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Productivity

The SEP Group determined that Central Valley Objectives for productivity of spring-run Chinook salmon (young-of-the-year [YOY] juveniles and adults) are identical to those for fall-run Chinook salmon. The AFRP (USFWS 2001) and CVPIA provide guidance regarding the desired rate of population growth for anadromous fish populations in the Central Valley as a whole; the CVPIA is clear that anadromous fish populations in the Central Valley were expected to double from a baseline within 10 years. Furthermore, the CVPIA and AFRP imply that populations should be resilient such that periodic years of low production (due to any cause) do not constrain a population's ability to reattain any abundance targets in the following generation. In addition, restoration of a spring-run Chinook salmon population to a state where it is "in good condition" (per F&G Code § 5937) was taken to mean that spring-run Chinook salmon below dams in the Central Valley should display survival rates that support population growth rates typical of this species throughout its range. The SEP Group also looked to other viable populations of Chinook salmon to gauge freshwater survival rates that would characterize a restored Chinook salmon population in the Stanislaus River.

Spring-run Chinook salmon are different from fall-run Chinook salmon in that they return to freshwater several months before they spawn. They wait in freshwater, without feeding, throughout the summer in a process known as "holding." This protracted period of freshwater residence exposes spring-run Chinook salmon adults to additional mortality in freshwater if environmental conditions are not adequate. Maintenance of the unique life history strategy of spring-run Chinook salmon requires protection of all phases of their life cycle, especially the holding period.

Life History Diversity

Spring-run Chinook salmon are noted for producing a yearling life history variant. Yearling juveniles spend up to a full year in rivers before migrating to the ocean (Moyle 2002; Williams 2006). No policies speak directly to Central Valley-wide Objectives for necessary improvements in the life history diversity of spring-run Chinook salmon. However, there is increasing evidence that life history strategies of spring-run Chinook salmon are constrained in the Stanislaus River, and improvements will be necessary to attain Central Valley Goals for this population. There is evidence of yearling juvenile salmon that are likely not sub-yearling progeny of fall-run Chinook salmon and may represent the yearling life history

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strategy (Figure 6). From 1996 to 2013, 49 yearlings (visually defined) were detected prior to May 1 at the Caswell RST (Zeug et al. 2014; Cramer Fish Sciences, unpublished data).

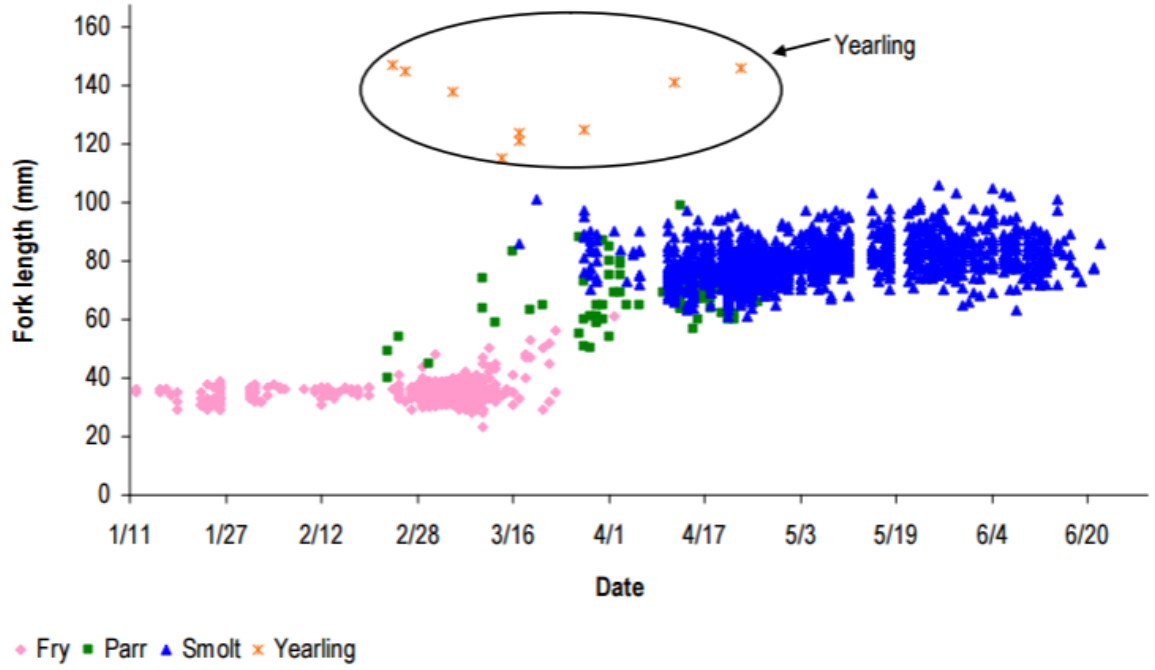


Figure 6
Estimates of Natural- and Hatchery-produced Fish Contributions to Stanislaus River Spawning Population

Source: Watry et al. 2007.

Genetic Diversity

Specific gene-flow criteria (less than 2% introgression) between ESUs have been proposed to achieve long-term genetic integrity and maintain a low extinction risk for natural populations in the Central Valley (Lindley et al. 2007; HSRG 2014).

6.3.4 How Will this Effort Contribute to Attainment of these Central Valley Objectives (Watershed-specific Goals)?

As described, the scope of the SEP Group's current effort is the Stanislaus River through the lower San Joaquin River to the Delta. Specific goals and objectives for the Stanislaus and lower San Joaquin rivers were developed to support the system-wide goals identified.

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Abundance

Establishing a self-sustaining population of spring-run Chinook salmon on the Stanislaus River is a Watershed-specific Goal that will advance Central Valley Goals and Objectives, including delisting this species and achieving CVPIA production targets. No specific abundance target for spring-run Chinook salmon on the Stanislaus River accompanies this goal. Attainment of a Central Valley abundance objective for any particular river requires adequate conditions throughout the fish's life cycle. Abiotic and biotic conditions in the Stanislaus River and lower San Joaquin River must support, but may not be sufficient to result in, attainment of this objective, depending on conditions in the Delta and ocean. Thus, increased abundance is a Watershed-specific Goal, but no specific abundance target was established as a Biological Objective for spring-run in the Stanislaus River.

As with other anadromous populations in the SEP's scope, the SEP Group used Central Valley Objectives for abundance as context for defining Watershed-specific Goals and Environmental Objectives for the Stanislaus River. Specifically, to appropriately scale Environmental Objectives for the river, it was assumed that natural production of spring-run Chinook salmon from the Stanislaus River would be roughly equivalent to the Central Valley Objective for fall-run Chinook salmon (or 22,000 fish per year on average). The adult returns (escapement) that would result from this level of ocean production of spring-run depends on assumptions regarding ocean and in-river harvest targets; such targets are zero currently because the spring-run Chinook salmon is threatened. However, commercial and recreational fisheries may be restored as spring-run populations are restored across the Central Valley.

Spatial Diversity

The Stanislaus River watershed is believed to be amongst the most likely candidates in the southern Sierra diversity group to support a population of spring-run Chinook salmon at low risk of extinction, given the current habitat available below dams. As a result of the geographic limits set by this scope, Watershed-specific Goals and Biological Objectives were not required for the spatial diversity of spring-run Chinook salmon—the SEP Group's focus on restoring spring-run abundance, life history diversity, productivity, and genetic integrity to the Stanislaus River satisfies, in part, the spatial diversity objectives in the Central Valley.

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Productivity

Central Valley Goals and Objectives were used to guide development of Plan Goals for productivity (freshwater survival rates). The goals for spring-run Chinook salmon productivity track those for fall-run Chinook salmon. The goals are to be implemented in phases and become progressively more protective over time, to achieve freshwater survival rates sufficient to generate the following results:

- Rebuilding: achieve a population growth rate that supports increasing populations in a relatively short time (i.e., doubling the population in three generations);
- Resilience: achieve a population growth rate that allows the population to rebound after years with poor returns (i.e., increasing the population up to 2.5-fold in one generation); and
- Sustainability: achieve freshwater survival rates that are characteristic of salmon in human-modified rivers on the West Coast of North America (i.e., outmigrating smolt represent at least 10% survival from eggs to smolt).

The SEP Group acknowledges that it would be extremely difficult or impossible to achieve freshwater survival targets without improvement in the river and Delta environments; thus necessary improvements in overall freshwater survival were distributed across riverine and estuarine habitats.

Life History Diversity

Life history diversity must be maintained to allow for Chinook salmon populations to respond to varying climatic, hydrologic, and ocean conditions over time (Beechie et al. 2006; Miller et al. 2010; Spence and Hall 2010; Satterthwaite et al. 2014). The Watershed-specific Goal for spring-run Chinook salmon life history diversity was to:

> **Support the fullest expression of spring-run Chinook salmon life history diversity (as seen in other Central Valley populations and in other rivers that support this phenotype). In particular, a goal for spring-run population restoration in the Stanislaus River is to achieve measureable production of yearling juveniles, a life history type that is the hallmark of stream-type Chinook salmon such as the spring-run. Attaining the fullest expression will result in increased population stability, resilience, and productivity**

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Genetic Diversity

The SEP Group's intent is to create conditions that support restoration of a self-sustaining spring-run phenotype that contributes to the overall diversity, productivity, abundance, and resilience of Chinook salmon populations in the San Joaquin River basin and the Central Valley as a whole. The SEP Group adopted a Watershed-specific Goal for genetic diversity to mirror the Central Valley Goal:

> **Maintain genetic integrity of wild spring-run Chinook salmon by minimizing genetic introgression with fall-run Chinook salmon.**

Establishing and maintaining such a distinct population requires that gene flow between distinct life history types be limited. It also requires that Environmental Objectives support the spring-running phenotype at all life history stages.

6.3.5 What Suite of Species-specific Outcomes (Biological Objectives) Characterize Success?

In many cases, Biological Objectives for spring-run Chinook salmon in the Stanislaus River are identical to those the SEP Group adopted for fall-run Chinook salmon on the Stanislaus River. For large portions of their life cycle, spring-run and fall-run Chinook salmon from the same river are exposed to similar or identical conditions. Therefore, juvenile survival and somatic growth rates, YOY size distribution, and timing of juvenile migration for spring-run and fall-run Chinook salmon are expected to overlap largely (Yoshiyama et al. 1998; Moyle 2002; Williams 2006). Furthermore, it is not currently possible to distinguish definitively between juvenile fall-run and spring-run Chinook salmon in the field; monitoring for differences between these populations' vital rates would be impractical if not impossible.

Substantial and important differences between spring-run and fall-run Chinook salmon are apparent in their upstream migration timing (hence their different names), the protracted delay between migration and spawning ("holding") that spring-run display, and the production of a small but measurable fraction of yearling migrants by spring-run Chinook adults (Figure 7). These differences in behavior and life history lead to important differences

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in the environmental conditions that are needed to support spring-run and fall-run Chinook salmon.

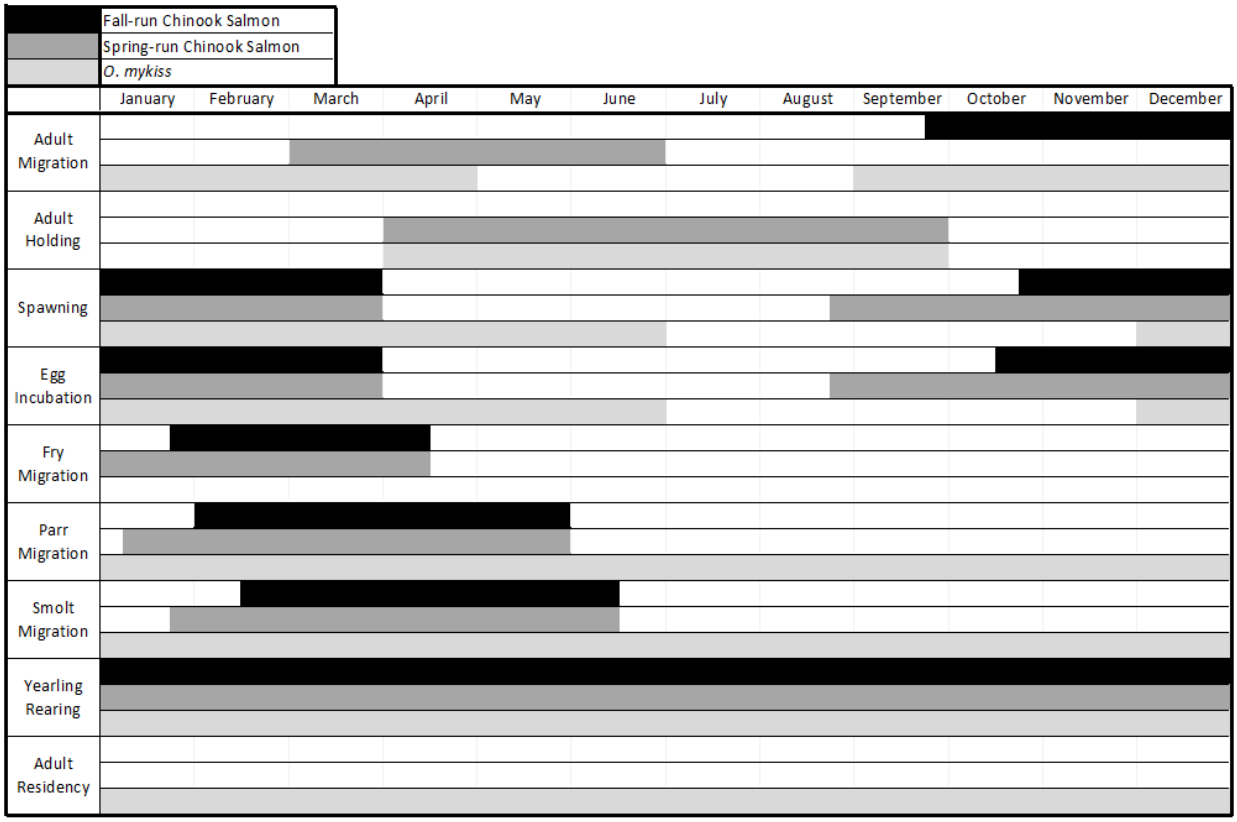


Figure 7

Timeline for Chinook Salmon and *O. mykiss* Migration and Rearing Periods in the San Joaquin River Basin

6.3.5.1 Rationale for Productivity Objectives

The Watershed-specific Goals for productivity (survival) of juvenile spring-run Chinook salmon are the same as those set for fall-run Chinook salmon. Although it is possible to distinguish spring-run Chinook salmon from fall-run Chinook salmon (using genetic and/or otolith markers), the SEP Group considered it impractical to measure differences in the survival rate of spring-run and fall-run Chinook salmon juveniles. The SEP Group found no reason to expect different juvenile survival rates among YOY spring-run Chinook salmon juveniles than those identified for fall-run Chinook salmon in the Stanislaus River. Because juvenile per spawner productivity objectives are the same for fall-run and spring-run, total

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juvenile production expected at Caswell in any year should reflect the total number of Chinook salmon adults returning in the prior year. The proportional mix between spring-run and fall-run spawners will not affect the juvenile production objective. Similar to fall-run, should productivity objectives not be met, monitoring for the attainment of egg productivity targets and adult productivity objectives will facilitate identification of the phase(s) of the life cycle in which problems occur (e.g., pre-spawning mortality or egg viability impacts vs. egg incubation impacts).

Spring-run Chinook salmon juvenile productivity might differ from fall-run Chinook salmon productivity if the production of the yearling life history phenotype far exceeds the objectives for this life history type, making it a larger proportion of outmigrants than observed in other rivers. This outcome is explicitly addressed within the objectives for yearling production, as the objective for yearling production includes a specific conversion between yearlings and YOY migrants such that overall egg to outmigrant survival can be evaluated fairly.

The same freshwater survival rates for spring-run Chinook salmon and fall-run Chinook salmon will generate different population growth rates if ocean mortality for spring-run is different than that assumed (based on recent data) for fall-run Chinook salmon from the Stanislaus River. The assumption that spring-run ocean mortality will ultimately be similar to current fall-run ocean mortality cannot be addressed at this stage because it is not known how fishing regulations will change to reflect restoration of spring-run Chinook salmon, and there is some amount of spring-run Chinook salmon bycatch in the current fishery. If ocean mortality rates for spring-run Chinook salmon remain different from those for fall-run Chinook salmon, productivity objectives for year 10 (rebuilding) and year 15 (resilience) may be modified accordingly.[4]

The SEP Group designed targets for adult holding success and redd persistence that apply to fall-run and spring-run Chinook salmon. These objectives are described in the context of spring-run Chinook salmon because, unlike fall-run Chinook salmon, spring-run Chinook

[4] The third productivity objective (sustainability) is not influenced by ocean survival rates.

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salmon experience a prolonged period of holding between their arrival in the river and the onset of spawning. It is during this period that spring-run Chinook salmon complete gametogenesis. The amount of time spent holding by fall-run Chinook salmon is generally much less than for spring-run. Yet, there is frequently a holding period between the end of migration and onset of spawning, and the objectives described in this report provide necessary context for evaluating and improving conditions during fall-run adult migration (the life history stage in which this run completes gametogenesis). Survival and success rates of Chinook salmon during holding periods can strongly influence overall population productivity—having survived through so many other phases of the life cycle, holding fish are extremely valuable from a population dynamics point of view. Holding and redd persistence objectives support the goals of restoring the unique behavioral phenotype of spring-run Chinook salmon and improving productivity for fall-run and spring-run Chinook salmon.

6.3.5.2 Methods for Productivity Objectives

6.3.5.2.1 Juvenile Productivity

Specific calculations and assumptions regarding the Biological Objectives for juvenile survival of spring-run Chinook salmon and for guidance regarding egg productivity targets are described in Section 6.2.5.2 for fall-run Chinook salmon productivity objectives. Because the survival objectives for spring-run and fall-run juvenile Chinook salmon are the same, the total number of Chinook salmon spawners (fall + spring) in a given year results in a minimum number of juvenile Chinook salmon outmigrants (fall + spring) at Caswell and Mossdale in the following year. This total will not vary based on the ratio of spring-run to fall-run Chinook salmon spawners.

In addition to the YOY size classes identified for fall-run Chinook salmon, the SEP Group expects that the existence of spring-run Chinook salmon spawning adults will correspond to production and detection of yearling outmigrants (Moyle 2002; Williams 2006). If yearling production rates or the ratio of spring-run to fall-run Chinook salmon adults is low, the total number of juveniles produced by the Chinook salmon spawning class should not be affected by this investment in the yearling life history strategy because yearlings will be a very small fraction of the total outmigrants resulting from any year-class of eggs. However, investment

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in yearlings may affect the total number of juveniles expected under the following conditions:

- Yearling production is much higher than the minimum specified in the life history size-class distribution objective, suggesting a substantial fraction of spring-run egg production is directed toward a yearling strategy and not a YOY strategy; and
- Spring-run populations are a substantial fraction (greater than 33%) of the total spawning population such that spring-run Chinook salmon investment in a yearling life history strategy affects overall productivity estimates.

Under these conditions, the productivity objectives would credit the previous year's production of YOY juveniles as though three smolts had been produced in year "y" for each yearling-sized fish produced in year "y+1." This is based on expectations that the ratio of survival of smolt-sized spring-run Chinook salmon to yearling-sized fish would be approximately 33% (i.e., one yearling survives for every three smolt-sized fish that attempt a yearling strategy). The basis for this conversion is that a 50% overwintering mortality is commonly assumed for fall-run Chinook salmon fingerlings (Mullan 1990). Because spring-run Chinook salmon YOY juveniles would need to survive through summer months before emigrating as the following year's yearlings, the SEP Group assumed that additional mortality would occur; therefore, they increased the expected mortality of spring-run Chinook salmon YOY to the yearling life stage to 66%.

6.3.5.2.2 Adult Productivity

In order to support the life history strategy of the spring-run phenotype and the productivity of this run, the vast majority of adult spring-run Chinook salmon that migrate into the Stanislaus River must survive until spawning commences. Generally speaking, there is no reason to expect much mortality of either spring-run or fall-run adult migrants of in the river if there is suitable habitat (i.e., cover, temperature, DO) in which they can hold. Furthermore, holding spring-run (and migrating fall-run adult) females should experience conditions that facilitate spawning success; post-spawning egg retention should be low. Finally, the SEP Group expects that a very high proportion of redds constructed by fish that over-summer in the river (spring-run) and by adult fall-run migrants will experience good conditions throughout the incubation period. Redd persistence will be indicated when redds

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are not superimposed on other redds, dewatered, scoured, or otherwise heavily disturbed, and when redds experience water quality conditions that are generally conducive to egg development and fry emergence. Attaining these objective will require, among other things, sufficient summer holding habitat for returning spring-run adults as well as adequate spawning habitat for spring-run that can be isolated (temporally, physically, or by temperature or flow conditions) from spawning fall-run Chinook salmon.

6.3.5.3 Results: Productivity Objectives

6.3.5.3.1 Juvenile Productivity Objectives

Juvenile productivity objectives include the following:

- Rebuilding Objective : Eggs to Caswell survival greater than 10.8%;
- Resilience Objective: Median Eggs to Caswell survival greater than 14.3%; and
- Sustainability Objective: Median Eggs to Caswell survival equal to 24.8%.

See fall-run Chinook salmon productivity objectives (Section 6.2.5.3) for further description of juvenile productivity objectives and supplemental guidance to support egg incubation success in the Stanislaus River.

6.3.5.3.2 Adult Holding and Redd Success Objectives

Adult holding and redd success objectives include the following for spring-run Chinook salmon:

- At least 90% of adult migrants that pass the weir through survive to spawning;
- Less than 10% of female carcasses retain 10% or more of eggs; and
- Chinook salmon redd viability rate of greater than 90% (as projected by monitoring of temperature, flow, and superimposition).

All spring-run Chinook salmon productivity Biological Objectives are summarized in Table 7.

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6.3.5.4 Rationale for Timing of Migration Life History Objective

The Watershed-specific Goal is to support the fullest expression of spring-run Chinook salmon life history diversity in order to increase population stability, resilience, and productivity.

Size at date of migration was used as a proxy for life history strategy. An objective that specifies a window for juvenile migration is necessary to ensure that river function is maintained during a normal migration period. Allowing for spring-run Chinook salmon migration throughout a broad migration window is intended to expose some spring-run Chinook salmon juveniles to "optimal" migration conditions (throughout their life cycle) whenever those optimal conditions occur (a timing that is expected to vary unpredictably with the timing of hydrological, estuarine, and marine conditions, across years).

6.3.5.5 Methods for Timing of Migration Life History Objective

In other Central Valley watersheds where they co-occur, spring-run Chinook salmon spawning begins approximately 1 month (or more) earlier than fall-run Chinook salmon (Yoshiyama et al. 1998; Moyle 2002). Thus, the expectation that detection of migrating fry-sized spring-run Chinook salmon juveniles would begin at least 3 weeks earlier than fall-run fry ought to be easily attained in a healthy river.

The migration timeframe for yearling-sized fish was based on yearling emigration data from Mill, Deer, and Butte creeks (Figure 25 of Lindley et al. 2004). The SEP Group investigated migration timing patterns in Sacramento River tributaries and determined that among watersheds and across years, yearling emigration primarily occurred throughout the migration period that was weeks or months long, and less so in single, short-duration pulses, which were more common for fry (Ward et al. 2004; Lindley et al. 2004; McReynolds et al. 2006, 2007; Garmin and McReynolds 2008, 2009). Collectively, these studies suggest that yearlings emigrate over a broader timeframe than fry.

The SEP Group recognizes that distinguishing between fall- and spring-run Chinook salmon juveniles in the field is challenging at this time. Thus, these life history objectives will be satisfied by detection of appropriately sized Chinook salmon juveniles, without regard to

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parentage, in the specified time window. If field techniques that allow distinction between juveniles of different runs become available, the SEP Group will consider how the objective should be implemented on a run-specific basis.

6.3.5.6 Results: Timing of Migration Life History Objective

By year 15 of plan implementation, Chinook salmon monitoring will detect, in every year, migration of spring-run Chinook salmon juveniles as shown in Table 14.

Table 14
Spring-run Chinook Salmon Timing of Migration Objectives at Caswell Rotary Screw Trap

Size/Life History Type	Frequency	Start	Fall-run Start	End (Both Runs)
Yearling (to be measured two calendar years following parent cohort return [escapement])	a) Detection in at least 50% of weeks between the second week of October to January, and b) 50% of weeks February to April (The division between time periods is intentional and meant to ensure that some yearlings migrate in each of the time periods)	October	No Applicable Objective	April
YOY (Fry, Parr, and Smolt)[1]	Every week	First week of January	Last week of January	First week of June

Note:
1 See Table 9 for definitions of fry, parr, and smolt size classes.

This yearling migration timing objective will be in place any time spring-run Chinook salmon are spawning in the Stanislaus River. Because overall yearling abundance may be low, the SEP Group's expectation is only that yearling-sized Chinook salmon will be detected, at least once, in 50% of weeks between the second week of October and January and in 50% of weeks between February and April. However, it may only be a measureable objective when spring-run escapement and spawning are sufficient to produce a number of yearlings that can satisfy the objective. There are 30 weeks in the entire period, so at least 15 yearlings would need to be detected to meet the objective of at least one yearling detection in 50% of weeks in the two time periods.

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The minimum number of yearlings needed to meet the objective implies that a total escapement of at least 16,700 spring-run Chinook salmon is needed. This is based on the following assumptions:

- At least 1.5 yearlings are produced per 1,000 returning adult females (i.e., 1.5 yearlings per 1,000 female spawners; see size at migration life history objective below);
- 60% of the escaped fish are females (as per current estimate for fall-run Chinook salmon; Appendix A); and
- A sampling efficiency for yearlings similar to that of Butte Creek, the system from which the minimum yearling/spawner expectation is derived.

If the assumptions above are met and escapement is lower than this target, the yearling production objective can be revised to an expectation that roughly equal numbers of yearling are detected in each of the two time periods (October to January and February to April).

As described below, the SEP Group believes it is likely that yearling production will be substantially greater than the 1.5 per 1,000 spawner rate identified in the size at migration life history objective. Additionally, the SEP Group believes that choosing the lowest documented yearling-to-spawner ratio known in the Central Valley (Butte Creek) is highly conservative, and this objective should be easily exceeded in a healthy river.

6.3.5.7 Rationale for Size at Migration Life History Objective

Size at date of migration was used as a proxy for life history strategy. The timing of migration objective (Section 6.3.5.6) establishes targets for the duration of the migration timing window, whereas this objective identifies a minimal distribution of size at migration among juvenile spring-run Chinook salmon. Production of a broad portfolio of spring-run Chinook salmon sizes during migration is intended to generate at least some spring-run Chinook salmon that are of "optimal" size to capitalize on conditions (throughout their freshwater migration) that exist in a given year. The SEP Group recognizes that the size class that will perform best under a given year's set of environmental conditions is not knowable in advance and varies from year to year. Production of a wide portfolio of size at migration is

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needed so that some proportion of the population is appropriately sized to take advantage of conditions in each year (Satterthwaite et al. 2014).

6.3.5.8 Methods for Size at Migration Life History Objective

For YOY migrants, the SEP Group found no reason to expect a different annual size class distribution for spring-run than was expected for fall-run. Run-specific size class distributions may differ at any given time because the two populations spawn at different times; however, over the course of a migration season (the time step at which this objective is implemented), the overall distribution of size classes should be similar across runs. These minima seem reasonably attainable, based on the size-class distributions currently observed in the river (Figure 6; Table 8), and should capture intended benefits of anticipated habitat restoration activities. Furthermore, it would not be practical to attempt to measure differences in the annual size distribution at migration of spring-run Chinook salmon juveniles versus fall-run Chinook salmon juveniles. If field techniques that allow distinction between juveniles of different runs become available, the SEP Group will consider how this objective should be implemented on a run-specific basis.

The yearling production objective was calculated based on the expectation that at least 1.5 yearlings can be produced per 1,000 returning adult females, which is the minimum ratio detected for Butte Creek in the years 2001 to 2007 (Ward et al. 2004; McReynolds et al. 2006, 2007; Garman and McReynolds 2008, 2009). The rate of yearling production for spring-run detected in Butte Creek is the lowest rate among the populations that have been studied on Sacramento River tributaries (Ward et al. 2004; Lindley et al. 2004; McReynolds et al. 2006, 2007; Johnson and Merrick 2012). For example, the percentage of yearlings among juvenile spring-run Chinook salmon on Butte Creek ranged from 0.01% to 0.05% during 2001 through 2006 (Ward et al. 2004; McReynolds et al. 2006, 2007). This compares to approximately 5% of all juveniles being yearlings on Deer and Mill creeks from 1994 to 2010 (Johnson and Merrick 2012). These numbers are believed to underestimate the true proportion of spring-run yearlings present. This is due to the following: 1) capture efficiency for yearling salmon is less than for YOY; and 2) the sampling location was downstream of redds built by fall-run Chinook salmon, which are generally expected to produce a much lower proportion of yearling migrants than spring-run Chinook salmon.

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The SEP Group expects the yearling productivity objectives to be easily attainable in a restored Stanislaus River. Given the lack of information on yearling production rates for the Stanislaus River (spring-run escapement has only been sporadically monitored or documented; Franks 2012), there was no evidence to justify a higher yearling production rate. Failure to attain the objective will strongly suggest some impediment to yearling production in the Stanislaus River that should be investigated and addressed. If, over several years, the yearling to spawner ratio is higher than the very low level targeted here, it is recommended to increase the objective to account for the higher capacity to produce the yearling life history type.

This yearling production objective will be in place any time spring-run Chinook salmon are spawning in the Stanislaus River. However, it may only be a measureable objective when spring-run Chinook salmon escapement and spawning are sufficient to produce a number of yearlings that can be reliably detected. It is estimated that total escapement of approximately 5,600 spring-run Chinook will be necessary to detect whether this objective is being met assuming the following:

- Yearling production of at least 1.5 per 1,000 returning adult females and 60% of escapement are females (as per the current estimate for fall-run Chinook salmon; Appendix A
- A sampling efficiency for yearlings similar to that for Butte Creek (the system from which the minimum yearling/spawner expectation is derived)

When escapement is lower than this target, the objective should be revised such that at least one yearling is detected any time that spring-run escapement is greater than 1,100 fish. Yearling-sized fish are currently detected in the RSTs of the Stanislaus River (Watry et al. 2007), despite the fact that since the installation of the VAKI RiverWatcher weir run by FISHBIO, the cumulative number of spring-run Chinook salmon escapement (2007 to 2012) has not exceeded 70 individuals (Franks 2012).

6.3.5.9 Results: Size at Migration Life History Objective

By year 15, generate a broad size-class distribution of emigrating juveniles such that the annual emigrant size-class distribution as measured at Caswell RST is as follows:

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- For YOY migrants, same size distribution minima as for fall-run objective; and
- For yearling migrants, minimum of 1.5 yearlings per 1,000 female spawners.

Biological Objectives for spring-run Chinook salmon life history diversity are summarized in Table 12.

6.3.5.10 Rationale for Genetic Objective

Central Valley spring-run Chinook salmon have a unique life history and physiology, which facilitate their abilities to ascend to higher elevation habitat than fall-run and delay spawning for several months (Healey 1991; Yoshiyama et al. 2001). However, much of this high-elevation spawning habitat is no longer accessible to salmon due to the presence of dams, thus limiting the opportunity for differences in spawning locations between spring- and fall-run Chinook salmon (Figure 4; Lindley et al. 2006; Moyle et al. 2008). In rivers with dams blocking access to historic spawning habitat, such as the Sacramento and Feather rivers, hybridization between spring- and fall-run Chinook salmon has occurred (Banks et al. 2000; CDFG 1998). For creeks where access to historic spawning habitat is not blocked by dams (e.g., Mill and Deer creeks), genetic differences between spring- and fall-run Chinook salmon have been maintained and documented (Banks et al. 2000). Due to the genetic, life history, morphological, ecological, and behavioral differences between spring- and fall-run Chinook salmon, the two runs are designated as different ESUs and are managed based on these designations (Waples 1991; Smith et al. 1995; NMFS 2004).

One primary way to maintain distinct and heritable life history characteristics among ESUs is to limit gene flow among ESUs and allow for co-evolved gene complexes to be established and maintained through processes of local adaptation. Providing opportunities for spring-run Chinook salmon reproductive isolation is particularly important for the maintenance of spring-run Chinook salmon populations in rivers where high elevation habitat is blocked by dams.

The objective and rationale are not intended to prescribe or preclude the introduction of individuals with a spring-run Chinook salmon genetic lineage (e.g., from current spring-run ESU populations). Rather, it is possible that spring-run Chinook salmon that are genetically distinct from fall-run Chinook salmon are recolonizing San Joaquin River tributaries on their

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own or were never entirely extirpated. Spring-run Chinook salmon are also part of a large reintroduction effort on the mainstem San Joaquin River downstream of Friant Dam that may result in additional colonization of the San Joaquin tributaries in the future. The intent of this objective is to promote the recolonization of the San Joaquin River and its tributaries as well as the long-term success of individuals that exhibit spring-run life history characteristics independent of their near-term genetic origin.

6.3.5.11 Methods for the Genetic Objective

Gene-flow criteria (less than 2% introgression) between ESUs have been proposed to achieve long-term genetic integrity and maintain a low extinction risk for natural populations (Lindley et al. 2007; HSRG 2014). Initial hybridization and introgression between runs should be avoided because, once gene flow between runs has occurred, it will be more difficult to establish and maintain genetic isolation between runs in the future. The SEP Group assumed that the general guidance for introgression between ESUs should apply to introgression between spring-run and fall-run in the Stanislaus River.

6.3.5.12 Results: Genetic Objective

Immediately following plan implementation, conditions on the Stanislaus River will be established that support spring-run Chinook salmon spawning success and reinforcement of long-term genetic integrity as measured by greater than 98% of spring-running Chinook salmon spawn with other spring-running salmon.

Genetic objectives for spring-run Chinook salmon are summarized in Table 13.

6.4 Central Valley Steelhead

6.4.1 What is the Problem?

Central Valley steelhead are listed as a threatened species under the federal ESA. Natural production is well below desired levels, survival rates are inadequate to achieve population growth and maintain population resilience, the populations express only a narrow range of the life history variants that are typical of this species, and hatchery influence on wild stocks compounds all of these problems.

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Counts of steelhead in the San Joaquin River basin's three major tributaries—the Stanislaus, Tuolumne, and Merced rivers—are at very low levels (McEwan 2001). Unlike Chinook salmon, there is no dedicated escapement survey for steelhead. However, counts at weirs on these rivers all show only a few adult steelhead returning in any given year, and no fish returning in some years. The species exists in larger numbers as the resident rainbow life history form in the tailwaters below the major rim dams, but the anadromous, ESA-listed form of *O. mykiss* is extremely rare.

6.4.2 What Outcome(s) (Central Valley Goals) Will Solve the Problem?

Abundance

Increasing abundance of Central Valley steelhead is a goal of several policies governing Central Valley salmonids. The CVPIA (Section 3406 of the CVPIA, Title 34 of Public Law 102-575) calls for naturally spawning populations of anadromous fish that are double the 1967 to 1991 baseline within 10 years. State law (F&G Code § 6902(a)) and water quality regulations (SWRCB 2006) express the same target. In addition, increased abundance of this life history type will be required in order to recover the population (i.e., delist the population from the federal ESA). Furthermore, increased abundance of resident *O. mykiss* is believed to be necessary in order to support the following:

- Increased frequency of the anadromous phenotype;
- Resilience of *O. mykiss* populations to prolonged natural occurrence of conditions that render anadromy a poor strategy; and
- Local recreational fisheries.

Productivity and Life History Diversity

Improvements in Central Valley productivity (measured as parr survival and smolt production) and increased life history diversity (i.e., more anadromous adults) are necessary for the following reasons:

- To achieve abundance targets for steelhead in the Central Valley;
- To maintain fish "in good condition" (F&G Code § 5937);
- To achieve acceptable levels of the criteria NMFS uses to evaluate salmonid population viability (McElhany et al. 2000); and
- To be consistent with other fisheries-related and water management-related policies.

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Genetic Diversity

For steelhead, as for salmon, concerns about genetic diversity and what is needed to sustain healthy and viable populations revolve around the influence of hatchery production and management (Williams 2006). In the Sacramento River basin, steelhead populations are dominated by hatchery fish, as there are hatcheries on Battle Creek, the Feather River, and the American River. However, as none of the three major San Joaquin River tributaries has a steelhead hatchery, straying of stocked steelhead is not currently a major concern in these rivers. The closest steelhead hatchery to the San Joaquin tributaries is on the Mokelumne River, an eastside tributary.

6.4.3 What Does Solving the Problem Look Like (Central Valley Objectives)?

Abundance

Central Valley Objectives for resident *O. mykiss* abundance have not been determined. The AFRP set an abundance objective of 13,000 naturally produced steelhead, but this only applied to the Sacramento River above the RBDD. This estimate was based on Mills and Fisher (1994), which calculated returns from a combination of RBDD ladder counts, hatchery returns, and estimates based on harvest rates. The NMFS Recovery Plan (NMFS 2014) has targets for the minimum number of viable steelhead populations needed for recovery by watershed and sub-region; a viable population at low risk of extinction is defined as having a minimum adult escapement of 2,500 individuals over 3 years, with a minimum effective population size of 500 fish in freshwater. This implies an average minimum escapement of 850 steelhead each year.

Productivity

The CVPIA and AFRP inform Central Valley Objectives for population growth rates as these policies call for doubling of anadromous fish populations in 10 years. Current productivity is not sufficient to produce the Central Valley Objective (AFRP target) of 13,000 naturally produced steelhead in the upper Sacramento River or 850 adults (ESA recovery target) in most rivers in the Central Valley. Survival and population growth rates need to improve greatly to meet these system-wide objectives.

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Life History Diversity

Existing policies inform Central Valley Objectives for life history diversity among *O. mykiss,* emphasizing the need to support the anadromous life history type (steelhead). The extensive loss of historic spawning and rearing habitat in the Central Valley has led to a near loss of steelhead in many watersheds. Currently, many rivers in the Central Valley are dominated by the freshwater fluvial, or resident, form of *O. mykiss*, also known as rainbow trout. Reversing this loss of life history diversity will require extensive habitat improvements in the rivers and Delta, which will allow for higher production of parr with faster growth rates, greater smolt survival, and higher adult survival. These changes should lead to increases in the proportion of *O. mykiss* population represented by the anadromous form.

Genetic Diversity

The Central Valley steelhead population is currently dominated by hatchery fish, all of which are released as age-1 smolts. Hatchery fish tend to increasingly mature after only one year in the ocean, and to have low numbers of repeat spawners. This has led to few age-classes of fish present in populations and an overall loss of diversity within the Central Valley population. Natural production of steelhead in Central Valley rivers and hatchery reforms are needed to reverse the genetic influence of hatchery-origin steelhead populations.

6.4.4 How will this Effort Contribute to Attainment of Central Valley Objectives (Watershed-specific Goals)?

As described, the scope of the SEP Group's current effort is the Stanislaus River through the lower San Joaquin River to the Delta. Specific goals and objectives for the Stanislaus and lower San Joaquin rivers were developed to support the system-wide goals identified.

Abundance

The Watershed-specific Goal for steelhead abundance in the Stanislaus River is to increase steelhead escapement to permit, delist, and eventually permit a limited, regulated catch and release steelhead fishery.

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Productivity

The SEP's goals for *O. mykiss* include producing riverine growth, density, and survival levels for *O. mykiss* that encourage production of sufficient numbers of anadromous smolt to support a viable steelhead population.

Life History Diversity

The Watershed-specific Goal for life history diversity is to support the fullest expression of *O. mykiss* life history diversity in order to increase population stability, resiliency, and productivity.

Currently, the San Joaquin River basin's tributaries are dominated by the resident form of *O. mykiss*. Increasing expression of the anadromous phenotype is necessary to meet NMFS recovery goals and the SEP's Watershed-specific Goals for steelhead.

Genetic Diversity

The genetic Watershed-specific goal for *O. mykiss* on the Stanislaus River is to maintain an independent population that is largely free from the influence of steelhead hatchery strays.

6.4.5 What Suite of Species-specific Outcomes (Biological Objectives) Characterize Success?

The SEP Group has set Biological Objectives for *O. mykiss* that differ in many respects from those for Chinook salmon. This is partially due to *O. mykiss* displaying very different, complex life history strategies that are more diverse (within and across populations) and more plastic (within individuals) than those displayed by Chinook salmon. For example, *O. mykiss* populations display resident forms and anadromous forms, both of which must be protected in order to maintain population productivity and stability. In addition, the timing of the various migration and rearing periods for various *O. mykiss* life stages and age-classes is highly variable even within the same population (Figure 7).

Few data exist regarding steelhead demographics on the Stanislaus River, and no data exist on their age structure, growth rates, or survival rates. Nonetheless, the anadromous form of *O. mykiss* is underrepresented in the Stanislaus River, and it will require large improvements in river and Delta habitats to reach suitable levels of abundance, productivity, and diversity.

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6.4.5.1 Rationale for O. mykiss Abundance Objectives

Total adult *O. mykiss* abundance is affected by conditions that are controllable solely on the Stanislaus River. As such, there is a Biological Objective for *O. mykiss* abundance, which is a significant difference from Chinook salmon Biological Objectives. Additionally, productivity and the balance between the anadromous and resident life history strategies are strongly influenced by resident *O. mykiss* density. Because abundance (density) is a specific, measureable desired outcome (Biological Objective) and driver of other Biological Objectives, the SEP Group's Biological Objectives for *O. mykiss* abundance are described in sections describing resident parr density (Section 6.4.5.4.1) and a range of life history objectives for the Stanislaus population (Section 6.4.5.8).

As with Chinook salmon, no specific Biological Objective is set for the number of steelhead that must return to the Stanislaus River. However, the inclusion of the Biological Objective for abundance for resident *O. mykiss* in the Stanislaus River will ultimately contribute in the attainment of the Central Valley Objectives for steelhead. Furthermore, combined with the Biological Objective for resident *O. mykiss* abundance, Central Valley Objectives for steelhead are essential to determining Environmental Objectives (e.g., physical, chemical, and biological conditions necessary to support juvenile rearing; see below) for the Stanislaus River that will support attainment of larger goals and objectives.

In order to qualify as one of the two independent, viable populations of steelhead in the San Joaquin River basin called for in the NMFS Recovery Plan (NMFS 2014), the steelhead population must be a naturally produced population at low risk of extinction. The NMFS Recovery Plan (NMFS 2014) states that a viable population at low risk of extinction should have a minimum adult escapement of 2,500 individuals over 3 years, with a minimum effective population size of 500 fish in freshwater (the census size of standing stock; for every one fish returning two fish remain in ocean; 850 escapement in 1 year). The abundance objective would be measured as a minimum 3-year running average of 850 adult steelhead (not counting sexually immature fish, such as "half-pounders"), with a minimum effective population size of 500 in any given year.

Given the popularity of this species as a sportfish, it may be desirable in the future to allow a sport fishery on the recovered steelhead population of the Stanislaus River. Adult

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escapement beyond the recovery threshold would allow for a catch and release steelhead sport fishery in the Stanislaus River, assuming a low level of mortality from hooking and handling. If hooking mortality rates, defined as total catch and release fishing-related mortality up to outmigration as kelts, were an average of 15% (Ashbrook et al. 2010), then an escapement of 1,000 wild adult steelhead would allow for 850 fish to survive to the kelt stage. These figures imply that the final restoration target for steelhead in the Stanislaus River should be 1,000.

These levels of abundance are lower than the abundance levels anticipated for fall-run and spring-run Chinook populations (in Central Valley Objectives). Even in relatively healthy watersheds, steelhead are not typically as abundant as salmon populations. While salmon spawning runs often number in the hundreds of thousands to low millions, healthy wild steelhead runs typically reach hundreds in smaller coastal streams, thousands in larger rivers, and up to tens of thousands of fish in major river systems of the Northwest and northern California (Busby et al. 1996).

6.4.5.2 Rationale for Productivity Objectives

Increasing smolt production levels while maintaining a strong resident rainbow trout population will require production of a larger number of age-0 *O. mykiss* and an increase in the somatic growth rate of *O. mykiss* on the Stanislaus River. Abundance (density) and growth rate affect the relative rate of anadromy in *O. mykiss* populations (McMillan et al. 2012; Kendall et al. 2014). Even at good smolt-to-adult return rates, a minimum number of smolts are needed to support Central Valley Goals and Objectives for steelhead abundance. High smolt production may also help swamp predators in the lower river and Delta and result in increased survival. Faster growing *O. mykiss* juveniles typically smolt at younger ages, as long as they reach approximately 140 mm FL by the spring (Seelbach 1993). Large smolts have been shown to have higher survival to the adult stage (Ward et al. 1989).

The growth rates of juvenile *O. mykiss*, as well as the timing of growth, can vary greatly among watersheds in California. Sogard et al. (2012), using passive integrated transponder (PIT)-tag mark recapture methods, found that juveniles in two central coastal streams, Scott Creek and Soquel Creek, grew very slowly during the dry summer and fall months (0.11 mm/day [0.004 in/day] and 0.14 mm/day [0.006 in/day], respectively). These streams

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had faster growth rates for fish during the winter-spring months (0.24 mm/day [0.009 in/day] and 0.21 mm/day [0.008 in/day]) when flows were relatively high, even though water temperatures were colder. Lower American River juveniles grew 1.12 mm/day (0.044 in/day) in the summer-fall months, likely due to the warm water temperatures and high food production in that system, and those juveniles grew at 0.61 mm/day (0.024 in/day) in the winter-spring months (Sogard et al. 2012). Hence, stream flows, water temperatures, and food production can clearly interact to produce wide-ranging growth rates in the same life stage of this species in different seasons of the year.

6.4.5.3 Methods for Productivity Objectives

In the near future, an *O. mykiss* population model for the Stanislaus River may be available, which would allow for the setting of age- and stage-specific survival rates for in-river and through-Delta reaches. A similar survival methodology for steelhead escapement could be used, as was developed for fall-run Chinook salmon escapement described in Section 6.2.5.2. However, current data limitations present challenges for establishing Biological Objectives for *O. mykiss* productivity. For example, through-Delta survival rates of steelhead are not well known, and have often been assumed to be low (e.g., 10% in NMFS 2012a). Recent acoustic tagging studies suggest that survival may be much higher, as results from a recent 6-year study have estimated through-Delta survival rates at 54% in 2011 (Buchanan 2013) and 32% in 2012 (Buchanan 2015).[5] In addition, steelhead smolts are more likely the Chinook salmon juveniles to avoid capture in RSTs because they are often larger and stronger swimmers than Chinook juveniles (Volkhardt et al. 2007).

To overcome data limitations, alternative methods of measuring *O. mykiss* productivity are proposed, including measures of parr density and growth rates, smolt size, and smolt production. Smolt production is a direct measurement of anadromy in the *O. mykiss* population, whereas higher growth and survival of *O. mykiss* parr (i.e., among the "resident" population) are believed to be correlated with higher frequency of anadromy. Snorkel

[5] The Buchanan (2015) study used large hatchery steelhead, which might account for these relatively high rates, but they are much higher than survival rates from studies on Chinook salmon, which also used large hatchery smolts.

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surveys on the Stanislaus River (Kennedy 2008) have shown very low densities (0 to 0.15 per square meter [m^2]) of age-0 *O. mykiss* in most locations, with a location near Goodwin showing higher densities (0.30 per m^2). Bergman (2014) estimated 0.63 to 2.13 fish per linear meter (3.28 feet [ft]) in the Stanislaus River in a reach just below Goodwin Dam. By comparison, Kozlowski (2004) electrofished 19 sites on the lower Yuba River and estimated that there was an average of approximately 0.40 age-0 *O. mykiss* per m^2. Even this density is very low compared to populations in coastal California streams, where average densities of over two fish per m^2 are common in electrofishing surveys (Sogard et al. 2012).

6.4.5.4 Results: Resident O. mykiss Productivity Objectives

6.4.5.4.1 Parr Density

The density of juvenile *O. mykiss* shall increase over time to one age-0 individual per m^2 or 20,000 per river km (0.62 RM),[6] on average, in specified reaches, by year 15. This could be measured though snorkel surveys, electrofishing, or other appropriate sampling techniques.

6.4.5.4.2 Parr Growth Rates

The growth rates of individual age-0 and age-1 *O. mykiss* shall increase over time to 0.60 mm/day (0.024 in/day) by year 15. An exception to this requirement shall be at age-0 densities over 2 per m^2 on average, or 2,000 per river km, on average, at which growth rates could be as low as 0.40 mm/day (0.016 in/day), to allow for lower growth rates at high juvenile densities. Growth rates could either be measured by capturing, PIT tagging, and recapturing juvenile *O. mykiss* in the river or estimated by back calculating lengths at age from scales.

This rate is intermediate between the lower Mokelumne River, which has colder water temperatures and smaller invertebrates than the lower American River, which has extremely fast growth due to warm water temperatures and good invertebrate production.

[6] One age-0 *O. mykiss* per m^2 translates to roughly 20,000 per river km (0.62 mile), assuming a river averaging 20 m (65.6 ft) wide.

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Productivity Biological Objectives for *O. mykiss* are summarized in Table 15.

Table 15

Resident *O. mykiss* Productivity Objectives

Objective		Productivity	
Life History Stage		Juvenile Density	Juvenile Growth Rate
Description	**Briefly**	Densities of *O. mykiss* that support desired frequency of anadromy in the population	Average individual growth rates that support desired frequency of anadromy in the population
	Achieved by When?	Year 15	Year 15
	Measure What?	Population density (parr/river km^2)	Average growth rate (mm/day)
	Measured Where?	Upstream of Oakdale, in reaches identified as having high quality *O. mykiss* holding habitat	Upstream of Oakdale, in reaches identified as having high quality *O. mykiss* holding habitat
Resident *O. mykiss*		The minimum density of age-0 *O. mykiss* during the summer equals $1/m^2$ on average	Minimum average growth of both age-0 and age-1 *O. mykiss*, averaged over an entire season, equals 0.60 mm/day

Note:
km^2 = square kilometer

6.4.5.5 Results: Anadromous O. mykiss (Steelhead) Productivity Objectives

6.4.5.5.1 Smolt Size

By year 15, at least 90% of the smolts (Stage 5 in Table 16) observed in the lower Stanislaus River should be 150 mm (5.9 in) FL or greater in length.

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Table 16

Life Stage Numbering and Nomenclature for *O. mykiss*, with Special Reference to Steelhead Life History

Stage No.	Stage Name	Stage Description
1	Egg-sac fry	Newly emerged, still has egg yolk visible
2	Fry	Small parr, only a few weeks old
3	Parr	Distinct parr marks, scales not silvery
4	Silvery parr	Scales slightly silvery
5	Smolt	Bright silvery scales, dark edges on caudal fin
6	Adult	Sexually mature fish

Current technology for measuring steelhead smolt production in large rivers is limited, especially in rivers with high and turbid spring flows. Steelhead smolts are believed to be strong enough swimmers that they can avoid capture in RSTs. The most successful methods for counting smolts have been inclined-screen traps and video cameras, which require some type of structure, such as a weir or low-head dam, to concentrate fish and allow individuals to be captured or filmed. Potential future technologies include next-generation Didson imaging sonar system cameras and mark-resight estimates based on PIT tagging of age-0 or age-1 fish prior to smolt emigration combined with mobile PIT-tag antennae.

6.4.5.5.2 Parr and Smolt Production

The number of naturally produced smolts (Stages 4 and 5 in Table 16) greater than 150 mm (5.9 in) FL per adult female steelhead shall be at least 165 by year 15 of the implementation of habitat restoration. This could be measured at either Caswell or another suitable location further downstream, but prior to the confluence with the mainstem San Joaquin River. The methodology would be the same as for smolt size; but it would not necessarily require that smolts be captured, rather only be observed well enough to be identified and counted.

6.4.5.5.3 Parr and Smolt Survival

By year 15, 90% of all the silvery parr and smolts (Stages 4 and 5 in Table 16) counted at the lower end of the gravel bedded reach must be detected at the lower river/beginning of Delta.

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6.4.5.5.4 Adult Spawning

By year 15, when adult steelhead are present and spawning, their eggs will have a minimum egg to emergence survival rate of 35% in the wild. See Section 6.2.5.4.2 (Supplemental Guidance to Support Productivity Objectives in the Stanislaus River) for further details regarding the identification, prioritization, monitoring, and adaptive management of this objective.

Biological Objectives for productivity of the steelhead life history type are summarized in Table 17.

Table 17

Steelhead Productivity Objectives

Objective		Productivity								
Life History Stage		Juvenile Smolt Size		Juvenile Smolt Production		Juvenile Smolt Survival			Adult
Description	Briefly	Proportion of smolts (Stages 4 and 5 in Table 16) observed should be of a size able to survive the ocean phase and return as anadromous adult		Naturally produced smolts (Stages 4 and 5 in Table 16) per female spawner increase to levels consistent with other healthy steelhead populations…		Smolt survival – smolt (Stages 4 and 5 in Table 16) survival rate consistent with population resilience			Egg survival consistent with…
	Achieved by When?	Year 15		Year 15		Year 15			Year 15
	Measure What?	FL		Number of smolts per female spawner		Survival through lower Stanislaus River			Egg survival
	Measured Where?	To be determined (Caswell area)		Caswell (or other location prior to confluence with mainstem)		Lower end of gravel bedded reach		Delta entry	
Steelhead		At least 90% of the smolts (Stages 4 and 5) observed should be 150 mm (5.9 in) FL or greater in length		Naturally produced smolts (Stages 4 and 5) emigrating from the river each year shall increase to at least 165 per female spawner		> 90%			> 35%
		FL	150 mm (5.9 in)	3-year running average					
		Percentage	90%						
		Year type	All years	Minimum	165				

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6.4.5.6 Rationale for Life History Objectives

The proportion of anadromous adults in the Stanislaus River appears to be very low. Several factors are likely contributing to this low production of anadromous individuals. The river habitat may not be producing many age-0 *O. mykiss.* Those that are produced may be growing slowly or have poor survival. Delta habitat conditions may result in low survival of smolt. In rivers with healthy wild steelhead, the majority of juveniles tend to be produced by anadromous mothers, even if there are female resident rainbow present (Donohoe et al. 2008). The sex ratio of adult resident *O. mykiss* tends to be heavily biased toward males (Rundio et al. 2012). Genetic parentage analysis has shown that resident males contribute more to the next generation of steelhead than resident females (Christie et al. 2011). This is consistent with species that exhibit partial anadromy, where resident males are predicted to be more abundant (Jonsson and Jonsson 1993).

Age-0 *O. mykiss* have not yet selected an anadromous or resident life history pathway (Thorpe et al. 1998; Beakes et al. 2010). Tracking the proportion of those that eventually smolt is a measure of the life history diversity of the *O. mykiss* population. In a population dominated by the resident form, nearly all will choose to mature in the stream as residents due to the following (Satterthwaite et al. 2009):

- Generations of selective pressure against anadromy, likely from some combination of low smolt survival;
- Large asymptotic size; and/or
- High survival rates of adult residents.

In keeping with the Watershed-specific goal for life history (i.e., to support the fullest expression of *O. mykiss* life history diversity in order to increase population stability, resiliency, and productivity), Biological Objectives were established to provide for a balance between anadromous and resident *O. mykiss* life history types. These objectives also support the Watershed-specific goal for abundance, as they will maintain a minimum number of adult residents to allow the continuation of the popular sport fishery in the lower Stanislaus River. Finally, the life history Biological Objectives support population resilience by creating a "refuge population" of *O. mykiss* in the Stanislaus River that can potentially give rise to anadromous progeny.

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6.4.5.7 Methods for Life History Objectives

These Biological Objectives for steelhead use different metrics to measure, sometimes directly, sometimes indirectly, the proportion of the *O. mykiss* population that is anadromous versus resident. The SEP Group acknowledges that there is no method available to determine the future migratory life history of individual *O. mykiss* parr in the Stanislaus River. Therefore, the general approach adopted was to increase overall productivity of juveniles, individual growth rates, and survival rates in the Stanislaus River. In concert with increased smolt to adult survival rates in the lower San Joaquin River and the Delta, these parameters should lead to higher numbers of juveniles following the anadromous life history strategy (Satterthwaite et al. 2010).

6.4.5.8 Results: Life History Objectives

6.4.5.8.1 Anadromy – Juvenile Stage

By year 15, a minimum of 150 steelhead smolts shall be produced per female spawner in the poorest water years up to a minimum of 300 per female spawner in good water years. This will be tracked on a broodyear basis, as smolt years in steelhead do not necessarily match broodyears. Measurement of how well this objective has been achieved will require accurate estimates of adult escapement and smolt production each year for several years, plus ages of smolts in order to assign broodyears.

6.4.5.8.2 Anadromy – Adult Stage

By year 15, the proportion (as a 5-year running average) of all counted adult *O. mykiss* over a full season shall be a minimum of 25% resident (less than 460 mm [18.1 in] FL), counted during the summer or fall) and 20% anadromous (greater than 460 mm [18.1 in] FL) individuals (counted during the spawning migration). Stream resident adults could be counted by snorkel surveys or estimated by mark and recapture through hook and line sampling. Anadromous adults could be estimated at a weir, snorkel surveys, or redd surveys.

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6.4.5.8.3 Anadromy – Maternal Origin

The proportion of age-0 *O. mykiss* that are the progeny of anadromous mothers shall increase to a minimum of 45% by year 15. This percentage could be met with approximately ten times more resident adults (approximately age 3 and older) than adult steelhead.

This objective is measureable and should be monitored using otolith microchemistry studies. Several published papers have used otolith microchemistry to determine the maternal origin of individual *O. mykiss* (Donohoe et al. 2008; Zimmerman et al. 2009). For this type of study, it is best to take otoliths from age-0 fish to avoid biases from sampling older fish that have decided to become resident, as it is known that anadromy in *O. mykiss* has some genetic heritability.

6.4.5.8.4 Anadromy – Balance

The objective for anadromy—balance is by year 15, attain and maintain a minimum abundance of resident adults (as defined by a combination of year-round presence, size at age, and scale analysis) that at least meets the lower end of the abundance range (i.e., a superpopulation of 1,492 to 7,873 age 1+ [or 3 to 9 age 1+ per 100 m^2 (1,076 ft^2)]) specified by Bergman et al. (2014). Resident adult numbers can be estimated by mark recapture studies, snorkel surveys, or electrofishing.

6.4.5.8.5 Anadromy – Smolt Emigration

In most *O. mykiss* populations that produce steelhead, the largest, oldest smolts (often age 3) emigrate first, followed by the smaller, younger smolts (age 2 and age 1) as the emigration progresses. In order to maintain this age-class diversity among smolts, environmental conditions should be suitable for smolt emigration for several months of the year. Steelhead smolts have been detected emigrating from the Stanislaus River anywhere from December through June, based on data from the Caswell and Oakdale RSTs, though the abundance of smolts is usually greatest from January through April. Thus, by year 15, the Stanislaus River RSTs should detect emigrating steelhead smolts (Stages 4 [silvery parr] and 5 [smolt] of at least 150 mm [5.9 in] FL in a minimum of 4 months of each emigration season [October through September]).

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Biological Objectives for life history diversity for *O. mykiss* on the Stanislaus River are summarized in Table 18.

Table 18

***O. mykiss* Life History Diversity Objectives**

<table>
<tr><th colspan="2">Objective</th><th colspan="6">Life History Diversity (Anadromy)</th></tr>
<tr><th colspan="2">Life History Stage</th><th colspan="4">Juvenile</th><th colspan="2">Adult</th></tr>
<tr><td rowspan="4">Description</td><td>Briefly</td><td colspan="2">Smolts produced per female spawner indicative of healthy spawner</td><td>Supports anadromy via a sufficient proportion of juveniles with anadromous O. mykiss mothers</td><td>Supports a range of outmigration dates for life history diversity</td><td>Support viable levels of both life history types</td><td>Support viable levels of both life history types</td></tr>
<tr><td>Achieved by When?</td><td colspan="2">Year 15</td><td>Year 15</td><td>Year 15</td><td>Year 15</td><td>Year 15</td></tr>
<tr><td>Measure What?</td><td colspan="2">Smolts/ female spawner</td><td>Proportion of age-0 juveniles with anadromous maternal origin in otolith</td><td>Smolt (Stages 4 and 5; at least 150 mm [5.9 in] FL) Detection</td><td>Proportion of adult O. mykiss</td><td>Resident adult abundance</td></tr>
<tr><td>Measured Where?</td><td colspan="2">Spawning reach</td><td>Age-0 O. mykiss collected in rearing areas</td><td>Caswell RST</td><td></td><td>Reach just downstream of Goodwin Dam</td></tr>
<tr><td colspan="2" rowspan="3">O. mykiss</td><td colspan="2">This shall be tracked on a brood year basis</td><td></td><td></td><td></td><td>Age 1+ fish superpopulation > 1,492 to 7,873</td></tr>
<tr><td>Annual hydrology > 50% exceedance</td><td>> 300</td><td rowspan="2">> 45%</td><td rowspan="2">Minimum of 4 months of the year</td><td>> 25% resident – Summer</td><td rowspan="2">3 to 9 age 1+ fish per 100 m^2 (1,076 ft^2)</td></tr>
<tr><td>Annual hydrology ≤ 50% exceedance</td><td>> 150</td><td>> 20% anadromous – immigrating adults</td></tr>
</table>

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7 ENVIRONMENTAL OBJECTIVES

The Environmental Objectives developed by the SEP Group are intended to represent physical and chemical conditions needed to support the Biological Objectives for Chinook salmon populations and the *O. mykiss* population (including resident and anadromous life history types) within the Stanislaus River. They define the physical and chemical conditions needed to attain the Biological Objectives. They also provide life stage-specific guidance that should be used in the development, prioritization, and adaptive management of Conservation Actions.

Attainment of Watershed-specific Goals and Biological Objectives is unlikely until Environmental Objectives are met; thus, the speed with which Environmental Objectives are met is important. In addition, producing these necessary environmental conditions is not a substitute for attaining the Biological Objectives. In other words, attainment of the Biological Objectives is the intent; attainment of Environmental Objectives should result in achievement of Biological Objectives, but adjustment of the Environmental Objectives may be necessary to ensure full attainment of the desired biological outcomes. Environmental Objectives are considered hypotheses of the conditions necessary to support the Biological Objectives; thus, they should be implemented within an adaptive management framework that allows for modification if necessary to achieve desired biological outcomes.

Environmental objectives have been developed to support the following life stages:

- Adult upstream migration;
- Adult holding;
- Spawning;
- Egg incubation; and
- Juvenile rearing and migration.

The specific criteria for each Environmental Objective and category are detailed in this section and summarized in Appendix B. Temperature, DO, and contaminants are critical to all life stages; these parameters are discussed by life stage in this section. A more integrated discussion of temperature, DO, and contaminants is provided in Appendix C. A general

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approach for and the intended application of the Environmental Objectives as well as descriptions of key variables are also presented below.

7.1 General Approach for, and Intended Application of, Environmental Objectives

Environmental Objectives are intended to quantify the desired habitat and ecosystem conditions in the planning area (e.g., Stanislaus River) necessary to achieve and sustain the Biological Objectives. Environmental Objectives are defined in terms of a range of specific measurable parameters that together make up suitable environmental conditions for the species in question. Because habitat and ecosystem condition needs vary across species as well as among different life history stages within a single species, Environmental Objectives are defined separately for each species and life history stage combination.

In general, and specifically in the application of Environmental Objectives to the identification and prioritization of Stressors and the subsequent development of Conservation Actions, it is important to note that Watershed-specific Goals and Biological Objectives can only be attained if all of the target species' life history stages are successful. As a result, though Environmental Objectives are specified by distinct life history stages, attaining the Biological Objectives related to each life history stage will require that Environmental Objectives for all life history stages for the species be achieved.

Environmental Objectives for each species and life history stage have been assigned the following:

- A timing window indicating the months of the calendar year during which the conditions described by the objectives should be maintained, and
- A geographic range (defined by reach) where the objectives are applicable.

It is important to note that Environmental Objectives do not necessarily need to be met across the specified geographic range in order to achieve Biological Objectives. Rather, the geographic range merely indicates those reaches where sufficient spatial habitat extent (quantified as a component of Environmental Objectives where applicable) can be achieved, given inherent characteristics of the system (e.g., geologic, topographic, and geomorphic).

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Geographic ranges have been defined as broadly as possible to allow for maximum flexibility in the attainment of Environmental Objectives, given the inherent constraints of the system.

In some cases, for some portion of the applicable timing window or during some years, only a subset of the optimal conditions for a given species or life history stage may be attainable. However, this does not necessarily indicate that an individual or cohort experiencing those sub-optimal conditions will not contribute to population success or the attainment of Biological Objectives. For this reason, Environmental Objectives have been defined in three categories of conditions for all applicable parameters:

- Optimal conditions
  - Contribute to the health and growth of individuals and the population without harmful effects
  - Support the attainment of the Biological Objectives
- Sub-optimal conditions
  - Associated with some degree of impact at the individual or population level (e.g., observable or measurable stress, increased vulnerability to disease, reduced growth, reduced survival)
  - May or may not support attainment of the Biological Objectives
    - Where likelihood of detriment increases with lower suitability (relative to optimal range), or decreased occurrence (frequency or duration) of suitable conditions
- Detrimental conditions
  - Associated with a significant level of harm at the individual or population level
  - Do not support and are a detriment to the attainment of one or multiple Biological Objectives

Optimal conditions are supportive of individual and population health as well as fitness. Sub-optimal conditions, by contrast, if maintained for an extended period or experienced across multiple parameters, should be considered harmful and will inhibit the potential for the species/life history stage experiencing them to contribute to the attainment of the Biological Objectives for that year-class.

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When looked at in their totality, the complete set of Environmental Objectives provides a spatial and temporal depiction of the system that will support the attainment and maintenance of the Biological Objectives. Therefore, Environmental Objectives are intended to serve as the basis for the development and evaluation of Conservation Actions designed to create the habitat and ecosystem conditions necessary to support Biological Objectives. Achieving the Biological Objectives will therefore require a suite of Conservation Actions that together address Environmental Objectives. In cases where it has been provided, the required spatial extent of the habitat conditions specified in the Environmental Objectives is a function of population size and fish density relative to habitat area relationships and has been calculated based on the target population size.

Additionally, prior to achieving desired Environmental Conditions, habitat conditions may be less optimal for certain species and life history stages than for others. Resolving the conditions for one life history stage may therefore have a disproportionately large effect on the ability to advance Biological Objectives for other or all of that species' life history stages. To inform prioritization of Conservation Actions, the SEP Group identified, described, and prioritized stressors to provide guidance on the relative impact of existing stressors on life history stages (Section 8).

Given the dynamics and needs necessary to achieve Biological Objectives, the SEP Group anticipates the need for a conservation plan that encompasses the following:

- A suite of Conservation Actions designed to achieve all Environmental Objectives;
- A phased implementation approach for those objectives through time; and
- Prioritized sequences for implementation based, in part, on the relative needs of different life history stages and the evolving habitat extent of the growing population.

7.2 Environmental Objectives and Supporting Rationale for each Life Stage

7.2.1 Adult Upstream Migration

Chinook salmon and steelhead return from the ocean to freshwater to spawn in the rivers of the Central Valley. Fall-run Chinook salmon return to San Joaquin River tributaries, including the Stanislaus River, between late September and December (Figure 7). Spring-running Chinook salmon have been observed in San Joaquin Tributaries in recent

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years and are being restored to the mainstem San Joaquin under the San Joaquin River Restoration Program. These fish are expected to migrate to their spawning grounds between March and June (Figure 7; SJRRP 2010). Central Valley steelhead migrate upstream from September through April (Figure 7).

After spawning, Chinook salmon adults die, whereas steelhead may attempt to return to the Estuary and Pacific Ocean for possible repeat spawning in subsequent years. Both Chinook salmon and steelhead cease to eat during their spawning migrations; somatic energy reserves and nutrients are used to complete the upstream journey, the processes of attaining and defending nest sites and mates, and spawning. Nutrients and energy are also allocated to production of gametes. Adult migration and gametogenesis are energy-intensive and time-sensitive activities; thus, delays caused by barriers or disorientation can result in death, lost opportunities to spawn, or other forms of reduced reproductive success.

Chinook salmon and steelhead typically return to their natal streams to reproduce, a process called homing, and its opposite (i.e., returning to a non-natal stream to spawn) is called straying. Several modes of orientation play a role in successful homing. However, once adult fish enter freshwater, olfactory identification of water emanating from the natal stream is the dominant cue driving salmonid orientation (Healy 1991; Quinn 2005). In highly managed watersheds like those of the Central Valley where large fractions of a river's flow may be diverted at one or more locations along the migration path, homing success can be influenced by the amount of flow from a particular spawning stream that reaches migrating adult salmon and the ratio of flow from various source streams in a watershed (Marsten et al. 2012). The magnitude of pulse flows or attraction flows to facilitate adult migrations, and the ratio of flows from various San Joaquin River tributaries that must reach any point along the migratory corridor, are not addressed as Environmental Objectives because establishing such San Joaquin River basin-wide objectives will require completion of Environmental and Biological Objectives for all the major San Joaquin River tributaries and the mainstem. Likewise, base flow conditions in the Stanislaus River as well as the mainstem San Joaquin below its confluence with the Stanislaus River are not identified here.

Environmental Objectives that are required for successful completion of adult migrations (from freshwater entry to arrival at holding sites for spring-run Chinook salmon) or to

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spawning grounds (for fall-run Chinook salmon and steelhead) include those for temperature, DO, minimum channel depth at critical riffles, and contaminants (metals and pesticides). Contaminants can interfere with migration success and subsequent reproductive success; therefore, maximum tolerable levels of these compounds are also included. Although adult Chinook salmon and steelhead may have different environmental requirements for optimal performance, such differences were not apparent in the literature. Thus, all Environmental Objectives for adult migration apply to runs of Chinook salmon and steelhead.

Poor environmental conditions may result in the delay of spawning migrations rather than outright mortality. Delayed migrations are expected to negatively affect reproductive success. Consistent with this expectation are the observations that adult (sockeye) salmon migrate at speeds much faster than those that would be energetically optimal (Brett 1983) and that fat reserves are largely depleted by the time fish spawn and die (as reviewed in Quinn 2005). This report assumes that "optimal" conditions for adult migration are those that result in no delay (i.e., 0-hours delay) in the migration process, and "sub-optimal conditions" will result in delays that are less than 24 hours. Environmental conditions that result in migration delays greater than 24 hours are considered "detrimental." Delays of greater than 24 hours may result in reduced ability to acquire and defend spawning territory, mates, or completed redds. In addition, environmental conditions that result in extended delay of migration are likely to be associated with stresses that affect fecundity (e.g., egg or sperm viability).

A summary of the Environmental Objectives detailed below for the adult upstream migration life stage is provided in Table B-1 (Appendix B).

7.2.1.1 Temperature

7.2.1.1.1 Temperature Objective Rationale (Adult Upstream Migration)

Water temperature affects all aspects of salmonid metabolism and physiology. Low water temperatures are not likely to be a problem for migrating Central Valley salmonids. High water temperatures approaching physiological limits occur with some frequency in most of the larger Central Valley rivers (Williams 2006). These temperatures result in high

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metabolic rates and increased susceptibility to disease (USEPA 1999, 2003; NRC 2004). In addition, increases in temperature reduce the ability of water to hold DO, which may stress migrating salmonids. Finally, development and maintenance of gametes appear to be negatively affected by prolonged exposure to elevated temperatures (Berman and Quinn 1990 as cited by USEPA 1999).

7.2.1.1.2 Temperature Approach (Adult Upstream Migration)

Several literature reviews provide insight into temperature levels that are optimal, sub-optimal, or detrimental to the success of migrating adult Chinook salmon and steelhead. The SEP Group relied primarily on USEPA (1999, 2003) guidance for temperature effects on Pacific salmon and supplemented that information when newer information and studies specific to Central Valley salmon were available.

Wherever possible, temperature thresholds are reported as both a daily average (corresponding roughly to the temperature thresholds reported from studies using constant temperature conditions) and 7-day average of daily maximum temperatures (7DADM), as per the practice of the USEPA (2003). The 7DADM that corresponds to a daily threshold was calculated by adding half of the difference between daily average and daily maximum temperatures (USEPA 2003) to the daily threshold reported in the literature. For the Stanislaus River, the average difference during the summer and fall months between daily average and daily maximum temperatures was approximately 3°C (5.4 °F) at the Orange Blossom Bridge gage. So, a conversion factor of 1.5°C (2.7°F) was added to daily recommended temperature thresholds to estimate the "midpoint" temperature for the corresponding 7DADM. For some temperature-related effects, other temperature metrics are reported when the effect occurs on a shorter or longer timeframe.

7.2.1.1.3 Temperature Objectives (Adult Upstream Migration)

Raleigh et al. (1986) identified weekly average optimal temperatures of 8°C to 12°C (46.4°F to 53.6°F) for Chinook salmon; however, USEPA (1999, 2003) identified no sub-optimal impacts at constant temperatures lower than 14°C (57.2°F). Optimal temperatures range from 9.5°C to 15.5°C (49.1°F to 59.9°F) as a 7DADM (accounting for the typical difference between daily average and daily maximum temperatures in the Stanislaus River).

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Sub-optimal temperatures (those associated with negative sub-lethal effects) ranged from constant laboratory temperatures of 14°C to 19°C (57.2°F to 66.2°F) or 15.5°C to 20.5°C (59.9°F to 68.9°F) as a 7DADM. Exposure to high water temperatures facilitates infection among migrating adult salmonids (Noga 1996). USEPA (2001) identified an elevated risk of disease spread at weekly average temperatures between 14°C to 17°C (57.2°F to 62.6°F) and a high risk of infection at prolonged exposure to temperatures greater than 18°C (64.4°F; USEPA 2003). USEPA (2003) reported reduction in migration fitness due to cumulative stresses associated with prolonged exposure to temperatures 17°C to 18°C (62.6°F to 64.4°F). Swimming performance is reduced at temperatures greater than 20°C (68°F; USEPA 2003); however, Williams (2006) and Richter and Kolmes (2005) indicate that migration may be impeded when temperatures are as low as 19°C (66.2°F). Many sources recommend maintaining temperatures less than 20°C to 21°C (68°F to 69.8°F) to prevent direct impairment of Chinook salmon migrations (USEPA 1999, 2003; Richter and Kolmes 2005). Furthermore, although the impact of water temperatures on developing embryos is not well understood, there is evidence that developing reproductive tissues exposed to high temperature may be less viable than those that are formed under cooler temperatures. USEPA (2003) indicates that eggs in holding females exposed to constant temperatures greater than 13°C (55.4°F) suffer reduced viability. Berman (cited by USEPA 1999) found that offspring of adult Chinook salmon that had been held for 2 weeks at temperatures between 17.5°C to 19°C (63.5°F to 66.2°F) had higher pre-hatch mortality as well as developmental abnormality rates and lower weight than a control group. The SEP Group's 7DADM of 15.5°C to 20.5°C (59.9°F to 68.9°F) reflects the thresholds for sub-optimal effects, including delays in adult migration that would exceed 24 hours.

Detrimental temperatures are those that will tend to prohibit attainment of Biological Objectives for the Stanislaus River. The Incipient Upper Lethal Temperature (IULT) for Chinook salmon may be as low as 21°C to 22°C (69.8°F to 71.6°F) for adult Chinook salmon and steelhead during migration (Richter and Kolmes 2005; USEPA 1999, 2003). Williams (2006) reported that salmon returning to the Stanislaus River in 2003 endured water temperatures greater than 21°C (69.8°F) on their migration; however, there is no information regarding the fate of adults that experienced these temperatures or their offspring.

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Given the range of detrimental effects to migrating adult salmon and steelhead and their future offspring, and the different exposure timesteps in which these negative effects would be expected to occur, the SEP Group provides several thresholds for detrimental temperature effects. Weekly mean temperatures greater than 18°C (64.4°F) expose migrating salmonids to a high risk of disease, which could lead to catastrophic failure of a year-class (e.g., NRC 2004). On a 7DADM basis, temperatures greater than 20.5°C (68.9°F) must be avoided in the migration corridor. Instantaneous temperatures (e.g., daily maxima) must be below 22°C (71.6°F) to avoid detrimental effects to migrating adult salmon.

Table 19 summarizes the temperature objectives for adult upstream migration for Chinook salmon and steelhead.

Table 19
Temperature Objectives for Chinook Salmon and Steelhead Adult Upstream Migration

Habitat Type	Temporal Extent	Condition	Range (Metric)
Delta to Holding/ Spawning Grounds	Fall-run: Late September to December Spring-run: March to June Steelhead: September to April	Optimal	8°C to 14°C (46.4°F to 57.2°F) (Daily Average)
			9.5°C to 15.5°C (49.1°F to 59.9°F) (7DADM)
		Sub-optimal	14°C to 19°C (57.2°F to 66.2°F) (Daily Average)
			15.5°C to 20.5°C (59.9°F to 68.9°F) (7DADM)
		Detrimental	> 18°C (64.4°F) (Weekly Average)
			> 19°C (66.2°F) (Daily Average)
			> 20.5°C (68.9°F) (7DADM)
			> 22°C (71.6°F) (Instantaneous)

7.2.1.2 Dissolved Oxygen

7.2.1.2.1 Dissolved Oxygen Rationale (Adult Upstream Migration)

The DO is critical to producing the energy adult salmonids need to complete their upstream migrations. Oxygen consumption increases exponentially with increased swimming velocity (Brett 1964), and adult salmon tend to migrate at speeds approaching their physiological maxima. The capacity of water to hold DO varies inversely with temperature and the concentration of other substances dissolved in the water. In addition, increasing abundance of organic material in the water column can generate increasing demand for DO (e.g., biochemical oxygen demand [BOD]; Tetra Tech 2006; USEPA 2006). High temperatures,

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high concentrations of dissolved substances, and high BOD contribute to periodically low levels of DO in the San Joaquin mainstem.[7] As a result, areas of the lower San Joaquin River and Delta are listed as being impaired on the USEPA Clean Water Act Section 303(d) list for not meeting water quality standards due to low DO (USEPA 2011). These low levels of DO have been observed to delay or block adult salmon migrations into the San Joaquin River basin during some years.[7]

7.2.1.2.2 Dissolved Oxygen Approach (Adult Upstream Migration)

The SEP Group relied on DO criteria established by the USEPA (1986), the Central Valley Regional Water Quality Control Board (CVRWQCB; 2015a), and other technical literature to identify DO objectives that are optimal (no negative effects), sub-optimal (observably negative, sub-lethal effects), and detrimental (preventing attainment of Biological Objectives) ranges for migrating adult salmonids. The Washington State Department of Ecology (WDOE; 2002) reported that DO concentrations above 8 to 9 milligrams per liter (mg/L) are needed for maximum swimming performance in salmon. Several researchers report decreased swimming efficiency at DO less than 7 mg/L (Dahlberg et al. 1968; WDOE 2002). The DO levels below 5 to 6 mg/L elicited avoidance (WDOE 2002). Davis (1975) reported a "distress" response when adult salmon were exposed to DO less than 6 mg/L.

Hallock et al. (1970) found that adult Chinook salmon migrating up the San Joaquin River avoided DO concentrations below 5 mg/L. However, their observation that these fish began to migrate when DO increased above 5 mg/L is not conclusive evidence that DO levels between 5 to 6 mg/L are acceptable. First, these fish had already suffered an extended delay while avoiding DO levels below 5 mg/L, so this is not an indication that the fish Hallock et al. (1970) observed would not have been delayed had they initially encountered DO levels between 5 to 6 mg/L. Second, the final fates and reproductive successes of the fish Hallock et al. (1970) observed were not recorded. Therefore, it is not known if the eventual migration through waters with low DO had negative fitness consequences.

[7] See http://www.sjrdotmdl.org/concept_model/about.htm and sources cited there.

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The regulatory limit for DO in the Stockton Deep Water Ship Channel (DWSC) is 6 mg/L during months when fall-run Chinook salmon migrate; however, that standard applies only to the DWSC, not other waters that San Joaquin River basin fall-run Chinook salmon might migrate through. The standard in other stretches of the fall-run migratory pathway is 5 mg/L. Similarly, the standard is only 5 mg/L during the spring (CVRWQCB 2015a). Spring-run Chinook salmon adults (which were not known to be present in the San Joaquin River basin when the regulatory standard was implemented) require the same levels of DO as do fall-run Chinook salmon and steelhead are believed to require similar DO levels to complete migration; therefore, the 6 mg/L boundary between sub-optimal and detrimental conditions must apply during the spring migration season as well. DO concentrations above 8 mg/L were assumed to represent optimal conditions, and concentrations below 6 mg/L were detrimental. Between 6 and 8 mg/L was identified as sub-optimal for migrating and holding adults.

7.2.1.2.3 Dissolved Oxygen Objectives (Adult Upstream Migration)

Table 20 provides a summary of DO objectives for adult upstream migration for Chinook salmon and steelhead.

Table 20
Dissolved Oxygen Objectives for Chinook Salmon and Steelhead Adult Upstream Migration

Habitat Type	Temporal Extent	Condition	Range (Metric)
Delta to Holding/ Spawning Grounds (Main Channel)	Fall-run: Late September to December Spring-run: March to June Steelhead: September to April	Optimal	> 8 mg/L (Daily Minimum)
		Sub-optimal	6 to 8 mg/L (Daily Minimum)
		Detrimental	< 6 mg/L (Daily Minimum)

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7.2.1.3 Channel Depth

7.2.1.3.1 Channel Depth Rationale (Adult Upstream Migration)

Migrating adult salmonids require water of sufficient depth to facilitate upstream passage. Although migrating salmonids can transit areas with water that is less than their body depth, such conditions are not desirable as they cause stresses associated with the following:

- Increased drag and reduced swimming efficiency,
- Low oxygen availability (if gills are exposed),
- Exposure to predators and poachers,
- Abrasion on the riverbed,
- Crowding, and the
- Cumulative effect of these negative conditions.

7.2.1.3.2 Channel Depth Approach (Adult Upstream Migration)

Riffles that do not provide depths greater than the body depth of an adult salmon between adjacent pools impede salmon migration. For many decades, the CDFW (2013) has used a protocol for determining minimum depth of the critical (most shallow) riffle, which is applied in higher-elevation waterways to determine necessary instream flows (depth increases with increased flow). The methodology for calculating necessary flows from estimates of critical riffle depth may not be applicable to low gradient, mainstem rivers. However, the criteria for estimating minimum depths and minimum extent of those depths in the shallowest riffle are relevant and likely conservative estimates for mainstem rivers. Indeed, to account for the long distances that migrating salmon must travel in mainstem rivers, the SEP Group has modified the CDFW criteria to include a longitudinal minimum depth (i.e., addressing depths in riffles up and downstream of the critical [shallowest] riffle).

The critical riffle methodology (as modified by the SEP Group) describes the boundary between sub-optimal and detrimental conditions. In other words, this Environmental Objective describes the minimum allowable depth of the Stanislaus and lower San Joaquin rivers. An optimal depth distribution (in cross-section and longitudinally) has yet to be determined and would likely depend on factors such as water temperature, clarity, DO, and velocity as well as the density of salmon migrating during any particular period.

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7.2.1.3.3 Channel Depth Objectives (Adult Upstream Migration)

The SEP Group developed the following depth objectives for adult upstream migration:

- Shallowest riffle (critical riffle):
  - At least 25% of the entire transect (perpendicular to flow) of the shallowest riffle in the migratory corridor will be deeper than or equal to 0.3 m (1 ft), and
  - At least 10% of the entire transect will be contiguously greater than or equal to 0.3 m (1 ft; CDFW 2013).
- Frequency of shallow riffles:
  - 90% of the riffles in the migratory corridor must satisfy the requirements of the critical riffle for depths greater than or equal to 0.46 m (1.5 ft) instead of greater than or equal to 0.3 m (1.0 ft).

7.2.1.4 Contaminants

7.2.1.4.1 Contaminants Rationale (Adult Upstream Migration)

The Stanislaus River, San Joaquin River, Delta, and San Francisco Bay have been identified as impaired for pesticides on the USEPA Clean Water Act Section 303(d) list (SWRCB 2010; USEPA 2011). In addition, mercury, selenium, and nutrients have been identified as impairing beneficial uses in the Stanislaus River, San Joaquin River, Delta, and San Francisco Bay (SWRCB 2010; USEPA 2011). Contaminants have the high potential to adversely impact the successful completion of adult migration throughout the migratory corridor. However, mercury and selenium bioaccumulation in the ocean is likely low, and returning adults cease to eat during their migration, so there are low risks to adult salmonid migration from mercury and selenium (though exposure earlier in the life cycle may impair adult performance; CEDEN 2014c). There is some evidence that other contaminants (e.g., hydrocarbons and metals) from urban runoff have caused pre-spawn mortality in salmonids in the Pacific Northwest (Scholz et al. 2011); however, there are no data that suggest that these contaminants are at the levels that would impact upmigrating salmonids to the Stanislaus River. Therefore, pesticides and nutrients are the only contaminants that were analyzed by the SEP Group for direct impacts on adult salmon migration to and in the Stanislaus River.

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Adult fish are typically less sensitive to pollutants than juveniles; however, pre-spawn adult salmonids are likely less tolerant of chemical stressors because they have used most of their accumulated fat stores for gamete production (NMFS 2008, 2010, 2013b). It is probable that some pre-spawn migrating adults will die because of short-term exposures to pesticides or nutrients (i.e., ammonia, nitrate, or nitrite), especially when subjected to additional stressors such as elevated temperatures. Pre-spawn mortality is a particularly important factor in the recovery of salmonid populations with low abundance because every adult is crucial to the population's reproductive potential and viability (NMFS 2013b).

Successful migration of adult fish may also be impeded by exposures to sub-lethal concentrations of pesticides and nutrients or indirect ecological impairments caused by excessive nutrients. For example, most pesticides, in addition to other chemical contaminants like metals, have been found to disrupt fish olfaction (Hansen et al. 1999; Scholz et al. 2000; Moore and Waring 2001). This disruption of the olfactory sense can eliminate the detection of natal waters or disrupt orientation in adult migrants, which can increase straying (Potter and Dare 2003; Scott and Sloman 2004). Pollutants have also been found to alter migration patterns and delay timing in adult migrating Atlantic salmon in the Maramichi River, Canada (Elson et al. 1972). Furthermore, contaminant exposures have been found to result in metabolic costs in fish that may decrease salmonids' ability to complete subsequent life stages (Beyers et al. 1999; Coghlan and Ringler 2005).

Nutrients occur naturally; however, anthropogenic activities may elevate levels of certain nutrients or change the ratios among different nutrients, which can result in impairments to aquatic life. For example, ammonia, nitrite, and nitrate (to a lesser extent) have been found to be toxic to fish via disruption of oxygen transport by the blood (Russo et al. 1974; Camargo et al. 2005; USEPA 2013). Anthropogenic sources of nutrients (e.g., nitrogen and phosphorus) from activities like agriculture, urbanization, sewage treatment, and livestock operation have been shown to cause eutrophication in Central Valley rivers (CVRWQCB 2013a; Gowdy and Grober 2005; Schlegel and Domagalski 2015). Detrimental impacts from eutrophication include increased temperatures, hypoxia, disrupted migratory corridors, and reduced habitat associated with macrophytes or the release of biotoxins by cyanobacteria or other phytoplankton (Berg and Sutula 2015; Boyer and Sutula 2015; Gowdy and Grober 2005; Schlegel and Domagalski 2015).

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For more information on the rational, approach, or objectives for contaminants, see Appendix C, Section 1.3.

7.2.1.4.2 Contaminants Approach (Adult Upstream Migration)

The SEP Group relied on adopted numeric water quality objectives for pesticides from the Sacramento and San Joaquin River Water Quality Control Plan and proposed pesticide water quality objectives from developing pesticide control programs (CVRWQCB 2011, 2014, 2015a,b) to determine pesticide levels that would not cause adverse impacts to adult migration. In addition, for pesticides that do not have state or federally promulgated objectives or criteria, the SEP Group used the USEPA Office of Pesticide Programs (OPP) aquatic-life benchmarks with a level of concern for impacts to endangered and threatened species as the safe level for pesticides.

Unfortunately, no pesticide monitoring program exists throughout the migratory corridor for Stanislaus River salmonids, nor is there likely a program that will exist in the future that will be able to monitor all possible pesticides that may adversely impact adult salmonids during their migration to the Stanislaus River spawning area. Furthermore, the multitude of possible pesticide combinations, differing biochemical interactions of pesticides, and variations of direct and indirect effects preclude the possibility of quantifying the true impact of pesticides on salmonids in the Central Valley (e.g., EC25 of a surface water sample that included direct and indirect impacts of all contaminants).

The SEP Group has relied on a pesticide prediction model (Hoogeweg et al. 2011) to estimate the current frequency of pesticide water quality objective or benchmark exceedances to categorize optimal, sub-optimal, and detrimental conditions for adult migration pesticide Environmental Objectives. That is, the categories are an evaluation of the risks that a species is exposed to pesticide concentrations that could cause harm in a river reach; pesticide conditions were estimated and categorized for each month of the year. The categories assume that, while zero occurrences of pesticides are preferred, such low levels of exposure may not be achievable considering the amount of urban and agricultural development in the Central Valley. Models, monitoring, toxicity bioassays, and other information will need to be updated, developed, conducted, and further gathered in the future to determine if

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pesticide concentrations are adversely impacting salmonid migration to the Stanislaus River. The SEP Group used this approach (i.e., frequency of water quality criteria or benchmark exceedances) for all Chinook and steelhead life stages. For more information or rationale for this approach, see Appendix C, Section 1.3.

Nutrient imbalances can impair salmonid adult migration through direct toxicity and ecological use impairments, so the SEP Group used two approaches to develop nutrient Environmental Objectives. To evaluate the possible direct toxicity of ammonia, nitrite, and nitrate to salmonids in the Stanislaus River, the SEP Group relied on promulgated USEPA (2013) aquatic-life criteria for toxicological effects from ammonia and literature benchmarks for protective concentrations for nitrate and nitrite exposures. Phosphate does not appear to have direct toxicological impacts to fish or daphnids at ecologically relevant concentrations (Kim et al. 2013), so it is not considered further for this evaluation.

The second category of nutrient Environmental Objectives is ecological use impairments (e.g., migratory corridors), which would include nutrient imbalances that result in a reduction of beneficial habitat for salmonids. Recent efforts for evaluating environmental impacts from nutrients have moved away from the strict application of a single nutrient concentration criterion across broad landscapes or watersheds (Tetra Tech 2006; USEPA 2000). These efforts were developed, in part, because predefined nutrient limits could result in eutrophication in all waterbodies. The evaluation of appropriate nutrient levels requires the evaluation of aquatic beneficial uses needing protection, and classification of waterbodies by type and trophic status as well as consideration of other external environmental factors (Tetra Tech 2006; USEPA 2000). For example, an indirect way to evaluate possible nutrient impairments is to examine some of the detrimental outcomes of nutrient impairments (e.g., depressed DO, excessive macrophytes, or chlorophyll-a concentrations).

7.2.1.4.3 Contaminants Objectives (Adult Upstream Migration)

Pesticide water quality objectives and benchmark concentrations are displayed in Tables 21 and 22. Pesticide concentrations necessary to protect Chinook salmon and steelhead migration are expected to be similar. The optimal condition for pesticide occurrence is less than 1% chance of a pesticide exposure or exposure to a combination of pesticides that

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exceed water quality objectives or aquatic-life benchmarks in a given day of a month (Bin 1, Table 23). This frequency corresponds to the allowed frequency of exceedances to protect aquatic beneficial uses for current water quality objectives and criteria (40 Code of Federal Regulations [CFR] Part 131; CVRWQCB 2014).

Table 21

Central Valley Regional Water Quality Control Board Adopted and Proposed Water Quality Objectives for Current Use Pesticides

Pesticide	Acute (µg/L)	Chronic (µg/L)
Adopted Water Quality Objectives[1]		
Diazinon	0.16	0.1
Chlorpyrifos	0.025	0.015
Carbofuran	40	40
Simazine	4	4
Thiobencarb	1	1
Pentachlorophenol	5.3	4
Copper	5.7	4.1
Proposed Water Quality Objectives[2]		
Bifenthrin	0.00006	0.00001
Cyfluthrin	0.0002	0.00004
Lambda cyhalothrin	0.00003	0.00001
Cypermethrin	0.00004	0.00001
Esfenvalerate	0.0002	0.00003
Permethrin	0.006	0.001

Notes:
1 CVRWQCB 2015a
2 Proposed water quality objectives for the Central Valley Pyrethroid Pesticides TMDL and Basin Plan Amendment (CVRWQCB 2015b)

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Table 22

U.S. Environmental Protection Agency Office of Pesticide Programs' Aquatic-life Benchmarks for the 40 Pesticides that Pose the Greatest Risk in the Central Valley Region

Pesticide	Pesticide Type	Acute Benchmark (µg/L)	Endangered and Threatened Acute Benchmark (µg/L)	Chronic Benchmark (µg/L)	Source of Acute/ Chronic Value[1]
Abamectin	Insecticide	0.17	0.017	0.006	IA/IC
Bifenthrin	Insecticide	0.075	0.0075	0.0013	FA/IC
Bromacil	Herbicide	6.8	0.68	3000	AA/FC
Captan	Fungicide	13.1	1.31	16.5	FA/FC
Carbaryl	Insecticide	0.85	0.085	0.5	IA/IC
Chlorothalonil	Fungicide	1.8	0.18	0.6	IA/IC
Chlorpyrifos	Insecticide	0.05	0.005	0.04	IA/IC
Clomazone	Herbicide	167	16.7	350	AA/FC
Copper hydroxide	Fungicide	5.9	0.59	4.3	IA/IC
Copper sulphide	Insecticide/Algaecide	5.9	0.59	4.3	IA/IC
Cyfluthrin	Insecticide	0.0125	0.00125	0.007	IA/IC
Cyhalofop butyl	Herbicide	245	24.5	134	FA/FC
Cypermethrin	Insecticide	0.195	0.0195	0.069	FA/IC
Deltamethrin	Insecticide	0.055	0.0055	0.0041	IA/IC
Diazinon	Insecticide	0.11	0.011	0.17	IA/IC
Dimethoate	Insecticide	21.5	2.15	0.5	IA/IC
Diuron	Herbicide	2.4	0.24	26	AA/FC
Esfenvalerate	Insecticide	0.025	0.0025	0.017	IA/IC
Hexazinone	Herbicide	7	0.7	17000	AA/FC
Imidacloprid	Insecticide	35	3.5	1.05	IA/IC
Indoxacarb	Insecticide	12	1.2	3.6	FA/IC
Lambda cyhalothrin	Insecticide	0.0035	0.00035	0.002	IA/IC
Malathion	Insecticide	0.3	0.03	0.035	IA/IC
Mancozeb	Fungicide	47	4.7	N/A	AA/na
Maneb	Fungicide	13.4	1.34	N/A	AA/na
Methomyl	Insecticide	2.5	0.25	0.7	IA/IC
(s)-Metolachlor	Herbicide	8	0.8	30	AA/FC
Naled	Insecticide	25	2.5	0.045	AA/IC
Oxyfluorfen	Herbicide	0.29	0.029	1.3	AA/FC
Paraquat	Herbicide	0.396	0.0396	N/A	AA/na

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Pesticide	Pesticide Type	Acute Benchmark (µg/L)	Endangered and Threatened Acute Benchmark (µg/L)	Chronic Benchmark (µg/L)	Source of Acute/ Chronic Value[1]
Pendimethalin	Herbicide	5.2	0.52	6.3	AA/FC
Permethrin	Insecticide	0.01	0.001	0.0014	IA/IC
Propanil	Herbicide	16	1.6	9.1	AA/FC
Propargite	Insecticide	37	3.7	9	IA/IC
Pyraclostrobin	Fungicide	0.0015	0.00015	0.002	FA/FC
Simazine	Herbicide	36	3.6	960	AA/FC
Thiobencarb	Herbicide	17	1.7	1	AA/IC
Tralomethrin	Insecticide	0.055	0.0055	0.0041	IA/IC
Trifluralin	Herbicide	7.52	0.752	1.14	AA/FC
Ziram	Fungicide	9.7	0.97	39	FA/IC

Notes:
1 Identifies which taxa was the most sensitive to the pesticide from available toxicity evaluations defined as FA = fish acute; IA = invertebrate acute; AA = Algae Acute; FC = fish chronic; IC = invertebrate chronic; na = not available.
Sources: USEPA OPP. Table modified from Hoogeweg et al. (2011).
– Aquatic-life benchmarks are used by the USEPA OPP for risk assessments in the registration of pesticides. To assess a pesticide not listed, the entire list of nearly 500 pesticide benchmarks can be acquired at https://www.epa.gov/pesticide-science-and-assessing-pesticide-risks/aquatic-life-benchmarks-pesticide-registration

Table 23

Categories of Predicted Pesticide Aquatic-life Benchmark Exceedances

Bin Category	Condition	Range of the Frequency of Benchmark Exceedances		
1	Optimal	0	–	0.017
2	Sub-optimal	0.018	–	0.055
3		0.056	–	0.1
4		0.101	–	0.153
5		0.154	–	0.206
6		0.207	–	0.303
7	Detrimental	0.304	–	0.447
8		0.448	–	0.5
9		0.501	–	0.589
10		0.59	–	0.994

Note:

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Frequencies were calculated from the total number of predicted exceedance days for each month from 2000 to 2009. Any day that had at least one pesticide that exceeded benchmarks was counted as an exceedance day. – Source: Adapted from Hoogeweg et al. 2011

It is estimated that exposure of salmon to pesticides 30% of the time would impede olfaction enough to reduce the intrinsic population growth by 2% (1.08 versus the 1.10 control; Baldwin et al. 2009). Furthermore, a 2% reduction in intrinsic population growth is estimated to reduce salmon population more than 30% over 20 years. Assuming that the frequency of pesticide exposures has a similar impact on salmonid physiology and responses across all life stages, exposures of pesticides greater than 30% (Bins 7 – 10, Table 23) would represent detrimental conditions. Accordingly, sub-optimal conditions would include Bins 2 – 6, Table 23. See Appendix C, Section 1.3.3.1 for more information.

Environmental Objectives for ammonia, nitrate, and nitrite toxicity (nutrient toxicity) are provided in Table 24. The USEPA (2013) has promulgated aquatic-life ambient water quality criteria for ammonia for the protection of sensitive species, including salmonids. The USEPA has not developed water quality criteria for protection from direct toxicity to fish or other aquatic life for nitrate or nitrite, so the SEP relied on literature benchmarks for these constituents. The toxicity of ammonia, nitrate, and nitrite are highly dependent on other environmental factors (e.g., pH, temperature, and DO); therefore, an evaluation of the environmental conditions will require a consideration of these other factors.

Table 24

Nutrient Toxicity Objectives for All Life Stages of Chinook Salmon and Steelhead

Nitrogen Species	Maximum Average Continuous Concentration
Ammonia[1]	1.9 mg total NH_3-N/L @ pH 7.0 and 20°C (68°F)
Nitrate[2]	2 mg NO_3-N/L
Nitrite[3]	0.06 mg NO_2-N/L

Notes:

1 USEPA (2013) *Aquatic Life Ambient Water Quality Criteria for Ammonia – Freshwater 2013*. Ammonia toxicity is temperature- and pH-dependent. Actual ammonia limits can be calculated using the following equation:

$$CCC = 0.8876 \times \left(\frac{0.0278}{1 + 10^{7.688-pH}} + \frac{1.1994}{1 + 10^{pH-7.688}}\right) \times \left(2.126 \times 10^{0.028 \times (20-MAX(T,7))}\right)$$

2 Camargo et al. (2005)

3 Russo et al. (1974)

– (Ammonia) NH_3 -N/L = milligrams of ammonium as nitrogen per liter

– (Nitrite) NO_2-N/L = milligrams of nitrite as nitrogen per liter

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– (Nitrate) NO_3 – N/L = milligrams of nitrate as nitrogen per liter

The USEPA (2000) has provided guidance for developing nutrient criteria for rivers and streams. The generalized environmental conditions that define oligotrophic, mesotrophic, and eutrophic lotic systems are displayed in Table 25. The San Diego Regional Water Quality Control Board adopted water quality objectives for nitrate (10 mg/L), total nitrogen (1.0 mg/L), and total phosphorus (0.1 mg/L)—not to be exceeded 10% of the time—as part of a Rainbow Creek nutrient total maximum daily load (SDRWQCB 2006). These objectives are waterbody-specific, but they can be used as a general level of nutrients that may cause impairments to aquatic life beneficial uses. Nutrient concentrations and other environmental conditions (e.g., DO and primary productivity metrics) should be assessed in combination to determine ecological support for adult upstream migration.

Table 25
Suggested Boundaries for Trophic Classifications of Lotic Systems from USEPA (2000)

Variable (Units)	Oligotrophic to Mesotrophic Boundary	Mesotrophic to Eutrophic Boundary
Mean benthic chlorophyll (mg/m^2)	20	70
Maximum benthic chlorophyll (mg/m^2)	60	200
Sestonic chlorophyll (µg/L)	10	30
Total nitrogen (µg/L)	700	1500
Total phosphorus (µg/L)	25	75

Note:
mg/m^2 = milligrams per square meter

7.2.2 Adult Holding

Spring-run Chinook salmon migrate upstream in the spring and require deep, cool, well-oxygenated water during the summer months while they rest and wait to spawn in the early fall. Adult *O. mykiss* also require cool, well-oxygenated water in which to hold as they await the spawning period during the summer months. The holding behavior among fall-run Chinook salmon is abbreviated, relative to the length of the holding period for spring-run and *O. mykiss*; however, fall-run may spawn days to weeks after arriving on the spawning grounds, so they too require adequate holding conditions. During these resting periods,

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salmonids seek to minimize energy expenditures by avoiding high temperatures, high velocities, low oxygen, and disturbances from predators or people.

Environmental objectives for the adult holding life stage were established for temperature, DO, water depth and velocity, and contaminants. No objectives were developed for potential disturbance (people and predators) or distribution of holding habitat as these parameters seem unlikely to adversely impact oversummering adult salmonids in the current and future states of the Stanislaus River. The objectives and supporting rationale for each of these parameters is discussed below. A summary of Environmental Objectives is provided in Table B-2 of Appendix B.

7.2.2.1 Temperature (Adult Holding)

7.2.2.1.1 Temperature Rationale (Adult Holding)

Optimal water temperatures during the holding stage will allow adult salmon to maintain a low metabolic rate. High temperatures during holding can increase their metabolic rate to a point where sufficient energy reserves will not be available for the rigors of digging redds, spawning, and nest guarding. Elevated pre-spawn mortality can occur if water temperatures are too high during the holding period (McCullogh 1999).

7.2.2.1.2 Temperature Approach (Adult Holding)

As described in detail in Appendix C (Section 1.1.2), the SEP Group relied primarily on USEPA (2003) guidance for temperature effects on Pacific salmon.

7.2.2.1.3 Temperature Objectives (Adult Holding)

The USEPA (2003) reports reduced viability of gametes in holding adult salmonids at constant temperatures in excess of 13°C (55.4°F). While lethal temperatures (1 week constant exposure) range from 23°C to 26°C (73.4°F to 78.8°F), disease risk is high at 18°C to 20°C (64.4°F to 68°F). Sustained water temperatures above 27°C (80.6°F) are lethal to adult spring-run Chinook salmon (Moyle et al. 1995). Temperature objectives are provided in Table 26.

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Table 26

Temperature Objectives for Chinook Salmon and *O. mykiss* Adult Holding

Habitat Type	Temporal Extent	Condition	Range (Metric)
Main Channel	April through September	Optimal	< 13°C (55.4°F) (Daily Average)
			< 14.5°C (58.1°F) (7DADM)
		Sub-optimal	13°C to 17°C (55.4°F to 62.6°F) (Daily Average)
			14.5°C to 18.5°C (58.1°F to 65.3°F) (7DADM)
		Detrimental	> 18°C (64.4°F) (Weekly Average)
			> 19°C (66.2°F) (Daily Average)
			20.5°C (68.9°F) (7DADM)
			> 22°C (71.6°F) (Instantaneous)

7.2.2.2 Dissolved Oxygen (Adult Holding)

7.2.2.2.1 Dissolved Oxygen Rationale (Adult Holding)

Low levels of DO can result in adverse physiological effects on salmonids, up to and including death. Low DO levels can be associated with high nutrient inputs; contaminated runoff from urban, industrial, or agricultural lands; or mass die-offs of algal species.

7.2.2.2.2 Dissolved Oxygen Approach (Adult Holding)

The SEP Group used the same approach for holding habitat as was used for upstream migration (Section 7.2.1.2.2).

7.2.2.2.3 Dissolved Oxygen Objectives (Adult Holding)

The SEP Group used the same objectives for holding habitat as was used for upstream migration (Section 7.2.1.2.3); however, these objectives are applied only to habitats upstream of Oakdale (Table 27).

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Table 27

Dissolved Oxygen Objectives for Chinook Salmon and *O. mykiss* Adult Holding

Habitat Type	Temporal Extent	Condition	Range (Metric)
Main Channel	April through September	Optimal	> 8 mg/L (Daily Minimum)
		Sub-optimal	6 to 8 mg/L (Daily Minimum)
		Detrimental	< 6 mg/L (Daily Minimum)

7.2.2.3 Water Depth and Velocity (Adult Holding)

Water velocity experienced by adults during holding should be low enough so that little energy is expended. Spring-run Chinook salmon may hold for several months in a stream prior to spawning, so it is essential that they limit how much energy they use during this period. Water depth should be sufficient to provide cover and refuge from predators and human disturbance.

7.2.2.3.1 Water Depth and Velocity Rationale (Adult Holding)

Holding adult salmon seek to maximize energy reserves through occupying habitats with minimal nonzero velocities. Energy expended to hold position is energy not available for redd construction, spawning, and redd defense. Disturbance by predators or humans result in flight response of fish seeking to escape, using additional energy beyond that necessary to hold position.

7.2.2.3.2 Water Depth and Velocity Approach (Adult Holding)

The depth of the river should provide sufficient cover to hide from predators. Spring-run Chinook salmon hold in pools that are at least 1 m to 3 m (3.3 ft to 9.8 ft) deep (Moyle et al. 1995), and usually greater than 2 m (6.6 ft) deep (Moyle 2002).

Holding pools for adult spring-run Chinook salmon have been characterized as having moderate water velocities ranging from 0.15 meter per second (m/s) to 0.4 m/s (0.5 feet per second [ft/s] to 1.3 ft/s; DWR et al. 2000). According to Moyle (2002), the adults prefer mean water column velocities of 0.15 m/s to 0.8 m/s (0.49 ft/s to 2.6 ft/s).

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Holding pools usually have a large bubble curtain at the head, underwater rocky ledges, and shade cover throughout the day. Adult spring-run Chinook salmon also seek cover in smaller "pocket" water behind large rocks in fast water (Moyle et al. 1995).

7.2.2.3.3 Water Depth and Velocity Objectives (Adult Holding)

Targets for depth and velocity are presented in Table 28.

Table 28
Depth and Velocity Objectives for Chinook Salmon Adult Holding

Habitat Type	Temporal Extent	Variable	Optimal Condition
Main Channel	April through September	Depth	≥ 1.5 m (4.9 ft)
		Velocity	< 0.37 m/s (1.2 ft/s)

7.2.2.4 Contaminants (Adult Holding)

7.2.2.4.1 Contaminants Rationale (Adult Holding)

Water quality conditions can impact survival during the salmonid holding period. Studies in the Pacific Northwest have shown high pre-spawn mortality in Coho salmon due to urban contaminants such as in stormwater runoff (Feist et al. 2011; Scholz et al. 2011). In addition to pesticides, urban runoff contaminants often include metals, petroleum, and other compounds. However, unlike pesticides, there is no evidence that these other types of contaminants are currently causing an adverse impact in the holding reaches in the Stanislaus River. Consequently, no Environmental Objectives for these other contaminants are addressed in this report. However, contaminant exposures have been found to result in metabolic costs in fish that may decrease the ability of salmonids to complete subsequent life stages (Beyers et al. 1999; Coghlan and Ringler 2005), so urban runoff and other non-point discharges should occasionally be assessed in the future to confirm that there are no adverse impacts to salmonids.

Nutrient constituents (i.e., ammonia, nitrate, and nitrite) can cause direct toxicity to holding salmonids. Similar to adult migration, excessive nutrients can result in adverse environmental conditions that reduce the fitness and survival of holding adults (e.g., low DO or elevated temperatures).

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7.2.2.4.2 Contaminants Approach (Adult Holding)

For discussion of the SEP Group's approach to setting pesticide objectives and objectives for concentrations of nitrogen-based nutrients, see Section 7.2.1.4.2.

7.2.2.4.3 Contaminants Objectives (Adult Holding)

Pesticide water quality objectives and benchmark concentrations are displayed in Tables 21 and 22. Pesticide concentrations necessary to protect Chinook salmon and *O. mykiss* holding are expected to be similar. Based on the described approach of pesticide Environmental Objectives, the optimal condition for pesticide occurrence would be less than a 1% chance (Bin 1, Table 23) of a pesticide exposure, or exposure to a combination of pesticides that exceed water quality objectives, or aquatic-life benchmarks in a given day of a month. This frequency corresponds to the allowed frequency of exceedances to protect aquatic beneficial uses for current water quality objectives and criteria (40 CFR Part 131; CVRWQCB 2014).

It is estimated that salmon exposed to pesticides at a frequency 30% of the time would impede olfaction enough to reduce the intrinsic population growth by 2% (1.08 versus the 1.10 control; Baldwin et al. 2009). Furthermore, a 2% reduction in intrinsic population growth is estimated to reduce salmon population more than 30% over 20 years. Assuming that the frequency of pesticide exposures has similar impact on salmonid physiology and responses across all life stages, exposures of pesticides greater than 30% (Bin 7 – 10, Table 23) would represent detrimental conditions. Accordingly, sub-optimal conditions would include Bins 2 – 6, Table 23. See Appendix C, Section 1.3.3.1 for more information.

Ammonia, nitrate, and nitrite concentrations necessary to protect holding adult salmonids are provided in Table 24.

7.2.3 Spawning

Salmonids in the Pacific portion of North America have evolved a life history that requires rivers and streams with relatively high gradients for reproduction and rearing. These waterways are cold, low in trace elements, low in nutrients, and high in DO. Movement within the sediment is adequate to disperse fine materials to lower elevations and larger

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pools more quickly than the larger sediments, resulting in sorting of sediment differentially in low and high velocity waters. Factors such as high water temperatures, high spawner densities, and presence of pathogens can contribute to prespawn mortality or high rates of egg retention in females (Quinn et al. 2007).

The extensive building of large dams resulted in alteration of spawning habitats (Lignon et al. 1995). The dams impede migration of adult salmonids to high elevation spawning areas. At the same time, dams alter a river's hydrograph and sediment supply, reducing movement and availability of large sediment downstream of the dam and allowing fine sediment to settle into interstitial spaces among gravel and cobble. This altered geomorphology reduces suitability of any remaining spawning habitat downstream of a dam. Studies often focus on changes in the purely structural aspects of spawning habitat downstream of dams (i.e., habitat quantity). For example, Hanrahan et al. (2004) evaluated spawning habitat in a large drainage area in the Columbia River system. The spawning habitat parameters Hanrahan et al. (2004) considered were a typical set of depth, velocity, substrate, and channel-bed slope.

Dams also alter water quality aspects of salmon spawning habitat. Water retained behind the dam for extended periods can have high levels of nutrients and trace elements that are toxic to various salmonid life stages. Water stored behind a dam also absorbs heat, causing temperatures to rise and DO levels to drop when it is released downstream. These changes in water quality caused by dams often create physiological stress on the salmonids using the river below the dam.

The structure of redds requires specific characteristics for sediment, water quality, and placement of the redd within the river's geomorphology (Tonina and Buffington 2009). Free flowing rivers develop an alternating pool/riffle sequence structure that gives a non-uniform distribution of sediment within the river. The faster moving riffles have coarser sediment than the slower flowing pool areas. Redds are generally built in the faster moving water that occurs in the coarse sediment areas, at the top and bottom of the riffles. The distribution of sediment sizes, along with water velocity and depth, is an essential component of spawning habitat. Redd distribution in a river is patchy, reflecting the non-uniform distribution of sediment. Availability of coarse substrate (up to 10% of body length), swift water flow, and the structure of a redd are important to maintaining water quality in the nest for egg

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incubation (Tonina and Buffington 2009; Merz et al. 2013). In addition, redd placement at the top or bottom of the riffles increases the permeation of water through the redd, thus improving water quality and increasing survival of eggs over the 1.5 to 3 months of incubation. Stressful conditions can negatively affect spawning success.

There is evidence that salmon production in the Stanislaus River is limited by carrying capacity constraints, particularly in dry years (Figure 3). The apparent limit on juvenile production in dry years suggests that limited available habitat constrains success in spawning and egg incubation, or juvenile rearing, or both.

Parameters considered important in this review of spawning habitat are quantity and quality of available habitat, as defined by temperature, DO, water flow (depth and velocity), availability of coarse sediment (sediment size distribution), habitat quantity and distribution, and contaminants (pesticides and trace elements). Optimal levels of some of these parameters vary between species (gravel particle size distribution, depth, velocity, and temperature), while the criteria for DO, pesticides, and trace element contaminants are the same for both species. Most of the variation between species is a result of differences in body size, which has often been identified as the primary factor affecting variance in salmonid spawning habitat (Kondolf 2000; Zeug et al. 2013). Body size determines the preferred particle size distribution that makes up quality spawning habitat.

7.2.3.1 Temperature (Spawning)

7.2.3.1.1 Temperature Rationale (Spawning)

The background and development of these temperature objectives are discussed in Appendix B, Section 1.1. Adult spawning Chinook salmon and *O. mykiss* temperature needs are generally similar to their eggs. Considerations specific to spawning habitat include temperature triggers for spawning and potential thermal stress that could lead to high rates of prespawn mortality and egg retention. In general, the temperature criteria for eggs are protective of spawning and the subsequent egg incubation phase.

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7.2.3.1.2 Temperature Approach (Spawning)

Salmonid eggs and larvae require cold water to successfully complete spawning and incubation. With the construction of impassable dams, Chinook salmon spawning in the San Joaquin Valley became dependent on cold-water storage in reservoirs to provide sufficient cold-water storage to protect their incubating eggs. The accessible supply of cold-water storage limits successful spawning habitat for Chinook salmon populations in the Central Valley in general, and the San Joaquin River basin in particular.

USEPA (2003) found that constant temperatures between 4°C to 12°C (39.2°F to 53.6°F) result in good egg survival and that a narrower range (6°C to 10°C [42.8°F to 50°F]) is optimal; a 7DADM of less than 13°C (55.4°F) is recommended (Table 29 in Section 7.2.3.1.3). In a review, the USFWS (1999 cited by Myrick and Cech 2004) concluded that temperature-related egg mortality in Chinook salmon increased at temperatures above 13.3°C (55.9°F) and this is the limit applied in most regulatory arenas (e.g., NMFS 2009b; SWRCB Order 90-05). A review of research on different populations of Chinook salmon from within and outside of the Central Valley indicated that temperatures between 6°C and 12°C (42.8°F to 53.6°F) were optimal for Central Valley Chinook salmon (Myrick and Cech 2004).

As with Chinook salmon, *O. mykiss* eggs and larvae require cold water to successfully complete incubation. With the construction of impassable dams, *O. mykiss* eggs incubating in the San Joaquin Valley became dependent on cold-water storage in reservoirs. The accessible supply of cold-water storage limits successful spawning habitat for *O. mykiss* populations in the southern Central Valley. Additional study of temperature impacts on *O. mykiss* eggs is needed (Myrick and Cech 2004). Optimal incubation temperatures for *O. mykiss* occur in a narrower range than those for Chinook salmon. Indeed, Myrick and Cech (2004) warned against managing water temperatures for the upper end of the Chinook salmon thermal tolerance range in waterways and during periods when steelhead are also incubating because incubating steelhead cannot tolerate such high temperatures. Richter and Kolmes (2005) concluded that egg mortality increased as incubation temperatures exceeded 10°C (50°F), and substantial mortality may occur when temperatures exceed 13.5°C to 14.5°C (56.3°F to 58.1°F). Based on experience at hatcheries in the Central Valley, optimal incubation temperatures appear to be in the 7°C to 10°C (44.6°F to 50°F) range (Myrick and

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Cech 2004). California's steelhead management plan (McEwan and Jackson 1996) suggests a slightly higher temperature range (from 9°C to 11°C [48.2°F to 51.8°F]).

7.2.3.1.3 Temperature Objectives (Spawning)

Temperature objectives for Chinook salmon and *O. mykiss* spawning are provided in Tables 29 and 30.

Table 29

Temperature Objectives for Chinook Salmon Spawning

Habitat Type	Temporal Extent	Condition	Range (Metric)
Spawning Gravel	Fall-run: Late October to March Spring-run: Late August to March	Optimal	6°C to 12°C (42.8°F to 53.6°F) (Daily Average)
			< 12.5°C (< 54.5°F) (7DADM)
		Sub-optimal	4°C to 6°C (39.2°F to 42.8°F) (Daily Average))
			12°C to 13.3°C (53.6°F to 55.9°F) (Daily Average)
			12.5°C to 13.8°C (54.5°F to 56.8°F) (7DADM)
		Detrimental	> 13.3°C (55.9°F) (Daily Average)
			> 13.8°C (56.8°F) (7DADM)

Table 30

Temperature Objectives for *O. mykiss* Spawning

Habitat Type	Temporal Extent	Condition	Range (Metric)
Spawning Gravel	December to June	Optimal	7°C to 10°C (44.6°F to 50°F) (Daily Average)
			10.5°C (50.9°F) (7DADM)
		Sub-optimal	4°C to 7°C (39.2°F to 44.6°F) (Daily Average)
			10°C to 13.5°C (50°F to 56.3°F) (Daily Average)
			10.5°C to 14.0°C (50.9°F to 57.2°F) (7DADM)
		Detrimental	> 13.5°C (56.3°F) (Daily Average)
			> 14.0°C (57.2°F) (7DADM)

7.2.3.2 Dissolved Oxygen (Spawning)

7.2.3.2.1 Dissolved Oxygen Rationale (Spawning)

The background and development of these DO objectives are discussed in Appendix B, Section 1.2. Adult spawning Chinook salmon and *O. mykiss* DO needs are generally similar

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to their eggs. However, the eggs are more sensitive to oxygen minima. Since the result of spawning is the production of eggs, the dissolved criteria for eggs becomes the limiting factor for spawning. Therefore, the spawning DO objective in Section 7.2.3.2.3 is the same as the DO objective identified for egg incubation.

7.2.3.2.2 Dissolved Oxygen Approach (Spawning)

The summaries of egg incubation mortality through hatching and incubation growth rates (Section 7.2.4.1.2) provide rationale for the DO objectives identified in Section 7.2.3.2.3.

7.2.3.2.3 Dissolved Oxygen Objectives (Spawning)

The DO objectives for Chinook salmon and *O. mykiss* spawning are provided in Table 31.

Table 31
Dissolved Oxygen Objectives for Chinook Salmon and *O. mykiss* Spawning

Habitat Type	Temporal Extent	Condition	Range (Metric)
Gravel (measurement must occur in gravel, not water column)	Fall-run: Late October to March Spring-run: Late August to March *O. mykiss*: December to June	Optimal	> 8 mg/L (Daily Minimum)
		Sub-optimal	6 to 8 mg/L (Daily Minimum)
		Detrimental	< 6 mg/L (Daily Minimum)

7.2.3.3 Depth and Velocity (Spawning)

7.2.3.3.1 Depth and Velocity Rationale (Spawning)

Depth and velocity of water are two components of salmonid spawning habitat that salmonids can detect. As such, these parameters are considered core components of spawning habitat for salmon and *O. mykiss* (Hanrahan et al. 2004). These two habitat features have been part of the definition of salmonid spawning habitat for more than 50 years (Wickett 1958; Thompson 1972; Bovee 1978). As a result, these habitat features have become important to a form of river habitat evaluation called IFIM/PHABSIM (for early

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work on Stanislaus River, see Aceituno 1993). Recent work has been performed on the Stanislaus River modeling discharge-habitat relationships for rearing salmonids (Bowen et al. 2012).

7.2.3.3.2 Depth and Velocity Approach (Spawning)

The tool used to describe depth and velocity is referred to as the habitat suitability index (HSI) or habitat suitability criteria. Both refer to a curve that represents the relative usefulness of particular depth (y-axis) or velocity (x-axis) for spawning by ascribing an index value of 0 to 1 (0 = useless, 1 = most preferred). These HSI charts are developed from measurements of actual redd locations (e.g., Gard 2006), which are then used to produce a probability curve with the x-axis representing the increments of the measured component that were used (such as depth) and the y-axis showing the percent of redds that fell in that increment. If a large sample of redd measurements is made, the probability curves for the depths and velocities can become the HSI by making the highest probability equal to 1 and adjusting all other values equally (essentially divide by maximum probability). The depth and velocity spawning criteria are based on the assumptions that HSI greater than 0.6 is optimal, all other values of habitat used are suboptimal ($0 < HSI \leq 0.6$), and all values outside of the range used by salmonids are considered detrimental (which is essentially habitat that cannot be used for spawning). In this context, "non-habitat" is a better term than "detrimental."

Chinook salmon have been observed spawning in a broad range of water depths (0.15 m to 4.6 m [0.5 ft to 15 ft]), although the preferred range is approximately 0.61 m (2 ft) deep for fall-run (Gard 2006). Using these data, optimal habitat is 0.3 m to 0.76 m (1 ft to 2.5 ft) in depth, with sub-optimal ranging from 0.15 m to 0.3 m (0.5 ft to 1 ft) on the shallow end and 0.76 m to 3.05 m (10 ft) in deeper water. Although spawning has been observed to depths of nearly 4.6 m (15 ft), very few observations of spawning have been made in water greater than 3.05 m (10 ft) deep.

Gard (2006) found that optimal water velocity ranged from 0.3 m/s to 1.2 m/s (1 ft/s to 4 ft/s). Outside of that range, velocities down to 0.12 m/s (0.4 ft/s) and up to 1.5 m/s (5 ft/s) could support some spawning, but should be considered sub-optimal. Gard (2006) had few

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observations of spawning at velocities greater than 1.2 m/s (4 ft/s); thus, 1.2 m/s (4 ft/s) should be considered the upper limit of spawning.

For *O. mykiss*, depth and velocity requirements are slightly lower than for Chinook salmon due to the smaller average size of adult *O. mykiss*. Bovee (1978) indicated depths of 0.36 m (1.17 ft) on average (range of 0.15 m to 0.61 m [0.5 ft to 2 ft]) were satisfactory, and these results are supported by more recent literature (Hannon 2015, pers. comm.). As with Chinook, *O. mykiss* are more sensitive to water velocity than depth when selecting redd locations.

Velocities during spawning of 0.3 m/s to 1.1 m/s (1 ft/s to 3.6 ft/s) are recommended for the Central Valley (Hannon 2015, pers. comm.). Bovee (1978 as cited by McEwan and Jackson 1996 and USFWS 1995) found 0.61 m/s (2.0 ft/s) was the preferred velocity, and Reynolds et al. (1993) found 0.46 m/s (1.5 ft/s) was preferred. Sub-optimal velocities are identified as a very small range at the lower end of the velocities; flows outside that overall range are considered to be detrimental or "non-habitat."

7.2.3.3.3 Depth and Velocity Objectives (Spawning)

Depth and velocity objectives for Chinook salmon and *O. mykiss* spawning (eggs and larvae) are provided in Tables 32 and 33.

Table 32
Depth and Velocity Objectives for Chinook Salmon Spawning

Habitat Type	Temporal Extent	Condition	Range (metric)
Spawning Gravel	Fall-run: Late October to December Spring-run: Late August to October	Optimal	Depth: 0.3 m to 0.76 m (1 ft to 2.5 ft)
			Velocity: 0.3 m/s to 1.2 m/s (1 ft/s to 4 ft/s)
		Sub-optimal	Depth: 0.15 m to 0.3 m (0.5 ft to 1 ft) and 0.76 m to 3.05 m (2.5 ft to 10 ft)
			Velocity: 0.12 m/s to 0.3 m/s (0.4 ft/s to 1 ft/s)
		Detrimental	Depth: < 0.15 m (< 0.5 ft) or > 3.05 m (> 10 ft)
			Velocity: < 0.12 m/s (< 0.4 ft/s) or > 1.5 m/s (> 5 ft/s)

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Table 33

Depth and Velocity Objectives for *O. mykiss* Spawning

Habitat Type	Temporal Extent	Condition	Range (metric)
Spawning Gravel	December to April	Optimal	Depth: 0.15 m to 0.61 m (0.5 ft to 2 ft)
			Velocity: 0.5 m/s to 1.1 m/s (1.6 ft/s to 3.6 ft/s)
		Sub-optimal	Depth: 0.08 m to 0.15 m (0.26 ft to 0.5 ft) and 0.61 m to 1 m (2 ft to 3.3 ft)
			Velocity: 0.32 m/s to 0.4 m/s (1.1 ft/s to 1.3 ft/s)
		Detrimental	Depth: < 0.08 m (0.26 ft) or > 1 m (> 3.3 ft)
			Velocity: < 0.3 m/s (< 0.98 ft/s) or > 1.2 m/s (> 4 ft/s)

7.2.3.4 Sediment Size Distribution

7.2.3.4.1 Sediment Size Distribution Rationale Sediment Size Distribution

Sediment size is an important consideration in the construction of redds. The female fish must be able to move most of the coarse sediments at the chosen site with a fanning of her tail. There is a long history and a large number of evaluations of coarse sediment available for review (Reiser and Bjornn 1979; Barnhart and Parsons 1986; Healey 1991; Williams 2006). These evaluations indicate a large variation in the extent sizes of gravel considered appropriate by salmon for spawning. Much of this variation is a result of varying size of the females.

7.2.3.4.2 Sediment Size Distribution Approach (Spawning)

Coarse gravel is essential for holding salmonid eggs in the redd without blocking the water flow necessary to provide oxygen to incubating eggs. Kondolf and Wolman (1993) give an extensive review of studies to identify characteristics of gravel that are chosen by salmonids (also see Kondolf 2000; Riebe et al. 2014). Kondolf and Wolman (1993) looked at a variety of gravel size metrics and species. The two species will be differentiated based on size. Optimal grain size for a salmon redd varies with the size of the female. The largest size of a female for *O. mykiss* was assumed to be 600 mm (23.6 in). The largest assumed size for Chinook was assumed to be 1,000 mm (39.4 in). For the purposes of this report, the D_{50} metric (median

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grain diameter) was used to determine appropriate grain sizes as reported in Kondolf and Wolman (1993) and Kondolf (2000).

Based on Kondolf and Wolman (1993) and Kondolf (2000), average values for D_{50} were abstracted in two ways. Kondolf and Wolman (1993) presented box-and-whisker plots that summarized the distribution of gravel sizes used for spawning by salmonids from a large number of studies for each species. Using these plots, the optimal level for each species was defined as the interquartile range, or that from the lower 25% (D_{25}) to the upper 75% (D_{75}) of the distribution of gravel sizes. For Chinook, this gives a range from 48 mm to 22 mm (1.89 in to 0.87 in). For *O. mykiss*, the range is from 25 mm to 15 mm (0.98 in to 0.59 in). The full range of the distribution of gravel sizes used for spawning by salmonids was then used to define the sub-optimal ranges—Chinook run from 80 mm to 10 mm (3.15 in to 0.39 in) and *O. mykiss* from 48 mm to 10 mm (1.89 in to 0.39 in).

The second method for determining the optimum and suboptimum values was derived from the relationship between female size and D_{50} of sediment as presented in Figure 4 of Kondolf (2000). The optimum range was defined as the values between the best fit line (average for all values) and half the distance between the best fit line and upper envelope curve limit line. The full range is from the lowest value recorded for females of a given size to the upper envelope curve limit line. Sub-optimal values are all the values in the full range that are outside the optimum range. Using this method, the *O. mykiss* optimum range was 35 mm to 20 mm (1.38 in to 0.79 in; full range was 55 mm to 5 mm [2.2 in to 0.2 in]), and the Chinook optimum range was 60 mm to 30 mm (2.36 in to 1.18 in; full range was 85 mm to 25 mm [3.35 in to 0.98 in]). Riebe et al. (2014) suggest a broader range of grain sizes may define the optimum range, depending on fish size distribution for a watershed.

Averaging these two assessments (using data from many studies) gives a *O. mykiss* optimum range of 30 mm to 15 mm (1.18 in to 0.59 in) and a full useable range of 50 mm to 10 mm (1.97 in to 0.39 in). The Chinook optimum with this same averaging technique results in an optimum range from 55 mm to 25 mm (2.2 in to 0.98 in) and a full useable range of 80 mm to 10 mm (3.15 in to 0.39 in). Detrimental values are anything outside the full range of observed spawning (it is detrimental in the sense that it is, by definition, not spawning habitat). The detrimental range includes coarse sediment that is too large for a female to

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move and too large of a proportion of fine sediment relative to larger gravel (greater than 10 mm), which may plug interstitial spaces between gravel and small cobble, thus reducing water flow.

7.2.3.4.3 Sediment Size Distribution Objectives (Spawning)

Coarse sediment objectives for Chinook salmon and *O. mykiss* spawning are provided in Tables 34, 35, and 36.

Table 34
Sediment Size Distribution Objectives for Chinook Salmon Spawning

Habitat Type	Temporal Extent	Condition	Range (Metric)
Spawning Gravel	Fall-run: Late October to December Spring-run: Late August to October	Optimal	D_{50} 55 mm to 25 mm (2.2 in to 0.98 in)
		Sub-optimal	D_{50} 80 mm to 56 mm (3.15 in to 2.2 in) and 24 mm to 10 mm (0. 94 in to 0.39 in)
		Detrimental	Not spawning habitat D_{50} < 9 mm (0.35 in) or > 81 mm (3.19 in)

Table 35
AFRP Recommendations for Sediment Particle Size Distribution for Spawning Habitat

Particle Size (in)	Percent passing	Percent retained
4 or 5	95% to 100%	0% to 5%
2	75% to 85%	15% to 30%
1	40% to 50%	50% to 60%
¾	25% to 35%	60% to 75%
½	10% to 20%	85% to 90%
¼	0% to 5%	95% to 100%

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Table 36

Sediment Size Distribution Objectives for *O. mykiss* Spawning

Habitat Type	Temporal Extent	Condition	Range (Metric)
Spawning Gravel	December to April	Optimal	D_{50} 30 mm to 15 mm (1.18 in to 0.59 in)
		Sub-optimal	D_{50} 50 mm to 30 mm (1.97 in to 1.18 in) and D_{50} 15 mm to 10 mm (0.59 in to 0.39 in)
		Detrimental	Not spawning habitat D_{50} < 9 mm (< 0.35 in) or D_{50} > 51 mm (> 2 in)

7.2.3.5 Habitat Quantity and Distribution Objectives (Spawning)

A number of objectives associated with spawning habitat do not fit into an optimal and sub-optimal framework. They will be dealt with in this subsection as a group and will not have a table of values. The first of these objectives addresses the question of how much habitat Chinook and *O. mykiss* need for spawning. Other subsections described the quality of the habitat needed but do not address the quantity of that habitat. A spreadsheet model was developed and used to estimate the number of female Chinook that would be needed to reach the population goal that has been identified for the Stanislaus River (Appendix A).

The fall-run Chinook salmon minimum suitable spawning habitat area target was identified as 14.7 acres, assuming attainment of the AFRP production target (i.e., 22,000 natural production in the ocean) for the Stanislaus River. This habitat would be located particularly at the tail of holding pools. The calculations used to set the suitable spawning habitat area target are based on an average redd size for Chinook salmon of 10 m^2 (107.6 ft^2; Hannon 2015, pers. comm.) and the fact that an escapement of 9,942 salmon (for a total of 5,965 female spawners) would be necessary to achieve the AFRP target for a natural production of fall-run Chinook salmon from the Stanislaus River, with the following assumptions:

1. The population is 60% female;
2. Average fecundity is 5,813 eggs;
3. Egg-Age 2 survival rates are those identified in the rebuilding objective (Items 1 through 3 on this list are SEP population model assumptions; see Appendix A);
4. Mean redd size for fall-run and spring-run Chinook salmon on the Stanislaus is 10 m^2; and

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5. Minimum spawning habitat would be the space needed to support one redd for each spawning female, with no overlap among redds or open space (i.e., territory buffer) between redds.

The spawning habitat needed for 5,965 female spawners equals a minimum of 14.7 acres as demonstrated in the following equation:

$$10\ m^2\ [107.6\ ft^2]/female\ \times 5{,}965\ females = 59{,}650\ m^2\ [641{,}855\ ft^2] = 14.7\ acres$$

There is no evidence that spring-run would have different redd sizes than fall-run in the Stanislaus River. The spring-run production target, survival rates from egg to age 2, fecundity, and the ratio of males to females were assumed to be the same as those for fall-run. Therefore, the amount of spawning habitat needed for spring-run would be the same as fall-run at 14.7 acres.

The *O. mykiss* target was identified as 2.7 acres. The *O. mykiss* redd size used to arrive at this value is 5.43 m^2 (58.4 ft^2; Orcutt et al. 1968) and a territory buffer of 50% (just over 2.5 m^2 [26.9 ft^2]), resulting in a value of 8 m^2 (86.1 ft^2) per female. The population size would be an average of 600 female spawners. The calculation for *O. mykiss* spawning habitat is demonstrated in the following equation:

$$600\ females\ \times 8\ m^2\ [86.1\ ft^2]\ per\ female = 4{,}800\ m^2\ = 1.19\ acres$$

In addition, spawning habitat is needed for resident rainbow trout to meet the *O. mykiss* objective. For resident *O. mykiss*, 1.35 m^2 (14.5 ft^2) per redd was used, plus a territory buffer of 50%, for a total of approximately 2 m^2 (21.5 ft^2) per redd (Hannon 2015, pers. comm.). The target population size for resident rainbows is 3,000 adult females. The calculation is demonstrated in the following equation:

$$3{,}000\ females\ \times 2\ m^2\ [21.5\ ft^2]\ per\ female = 6{,}000\ m^2\ = 1.48\ acres$$

Thus, the total amount of spawning habitat needed for *O. mykiss* is 1.2 acres for *O. mykiss* plus 1.5 acres for resident rainbow trout, for a total of 2.7 acres.

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Additional considerations for spawning habitat for Chinook and *O. mykiss* include the need for cover and feeding areas adjacent to spawning areas such as holding pools, undercut banks, overhanging vegetation, large wood, and boulders. Spawning habitat should be increased in locations in the river that address the specific needs of spring-run and *O. mykiss*, in addition to fall-run. A possible action would be to provide additional spawning habitat in the canyon downstream of Goodwin Dam where temperatures are generally low and fall-run are less likely to spawn.

7.2.3.6 Contaminants (Spawning)

7.2.3.6.1 Contaminants Rationale (Spawning)

The background and development of these contaminant objectives are discussed in Appendix C, Section 1.3. Adult spawning Chinook salmon and *O. mykiss* likely have some differences in sensitivities to the various contaminants; however, the SEP Group found no studies that supported separate Environmental Objectives for contaminants. Therefore, the contaminant objectives will be applicable to all species during their period of spawning.

Mercury and selenium toxicity were not considered in setting objectives for spawning salmonids. Mercury and selenium bioaccumulation in the ocean are likely low, and returning adults cease to eat during their spawning period, so there are low risks to adult salmonid spawning from mercury and selenium. Therefore, pesticides and nutrients are the only contaminants that have perceived direct impacts on adult spawning in the Stanislaus River.

Pesticides can have lethal and sub-lethal impacts to salmonid spawners. Pre-spawn mortality of adult salmonids from pesticide exposures is discussed in Section 7.2.1.4.1; there is some evidence that salmonids will die from exposure prior to spawning. However, the studies of the causes of prespawn mortality did not specify whether mortality occurred during the acts of migration, holding, or spawning (Scholz et al. 2011).

Sub-lethal impacts of pesticides are more likely than direct mortality of spawners. Most pesticides, in addition to other chemical contaminants such as metals, have been found to disrupt fish olfaction (Hansen et al. 1999; Scholz et al. 2000; Moore and Waring 2001).

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Disruption in olfaction has been linked to the elimination of fish behaviors important for reproduction (Potter and Dare 2003; Scott and Sloman 2004). For example, the pyrethroid insecticide cypermethrin inhibited male Atlantic salmon from detecting and responding to the reproduction priming pheromone prostaglandin, which is released by ovulating females (Moore and Waring 2001). The males exposed to cypermethrin did not respond to prostaglandin with the expected increased levels of plasma sex steroids and expressible milt. The disruption of spawning synchronization would likely result in an increase in the number of unfertilized eggs in the river (NMFS 2009c).

Pesticide exposures have been found to decrease the number of viable fertilized eggs. For example, Moore and Waring (2001) found that salmon egg and milt exposed to cypermethrin resulted in a greater proportion of unfertilized eggs. Adult zebrafish exposed to low doses of deltamethrin for 3 months showed reduced fecundity in females, and the number of unhatched fertilized eggs increased when compared to the control (Sharma and Ansari 2010). Furthermore, even short adult exposures to pesticides have been shown to impair fish reproduction. For instance, Brander et al. (2016) observed that 21-day exposures to bifenthrin caused significant differential expression of genes related to reproduction and immune function at sub-lethal concentrations to *Menidia beryllina* (inland silversides). Additionally, Brander et al. (2016) reported a statistically significant 30% reduction in fertilized eggs from the adult *M. beryllina*, and their population dynamic modeling predicted that these reductions in reproductive success would cause a significant decline in fish population over time.

Nutrient constituents (i.e., ammonia, nitrate, and nitrite) can also cause direct toxicity to spawning adults. Similar to the previous life stages, excessive nutrients can result in adverse environmental conditions that reduce the fitness and survival of spawning adults (e.g., low DO or elevated temperatures).

7.2.3.6.2 Contaminants Approach (Spawning)

For discussion of the SEP Group's approach to setting pesticide objectives and objectives for concentrations of nitrogen-based nutrients, see Section 7.2.1.4.2.

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7.2.3.6.3 Contaminants Objectives (Spawning)

Pesticide water quality objectives and benchmark concentrations are displayed in Tables 21 and 22. Pesticide concentrations necessary to protect Chinook salmon and *O. mykiss* spawning are expected to be similar. Based on the described approach of pesticide Environmental Objectives, the optimal condition for pesticide occurrence would be less than a 1% chance (Bin 1, Table 23) of a pesticide exposure or exposure to a combination of pesticides that exceed water quality objectives or aquatic-life benchmarks in a given day of a month. This frequency corresponds to the allowed frequency of exceedances to protect aquatic beneficial uses for current water quality objectives and criteria (40 CFR Part 131; CVRWQCB 2014).

It is estimated that salmon exposed to pesticides at a frequency 30% of the time would impede olfaction enough to reduce the intrinsic population growth by 2% (1.08 versus the 1.10 control; Baldwin et al. 2009). Furthermore, a 2% reduction in intrinsic population growth is estimated to reduce salmon population more than 30% over 20 years. Assuming that the frequency of pesticide exposures has similar impact on salmonid physiology and responses across all life stages, then exposures of pesticides greater than 30% (Bin 7 – 10, Table 23) would represent detrimental conditions. Accordingly, sub-optimal conditions would include Bins 2 – 6, Table 23. See Appendix C, Section 1.3.3.1 for more information.

Ammonia, nitrate, and nitrite concentrations necessary to protect spawning adult salmonids are provided in Table 24.

7.2.4 Egg Incubation

The egg incubation life stage takes place in the gravel, beginning when the female salmon or *O. mykiss* deposits her eggs in a redd and ending when fry swim up out of the river bottom. The time period from egg deposition to fry emergence from the redd for a particular egg lasts roughly 3 to 5 months, depending on egg and alevins developmental rates, which are determined by water temperature. Egg incubation in the Stanislaus River generally occurs from late October through March for fall-run Chinook salmon and from December through June for *O. mykiss*. For spring-run Chinook salmon in the Sacramento River basin, egg incubation generally occurs from September through March; it is assumed that that

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timeframe would apply for spring-run Chinook salmon in the Stanislaus River should a population become reestablished there.

Salmon and *O. mykiss* eggs incubating in the gravel are vulnerable to low DO, warm water temperatures, poor water quality, physical disturbance (e.g., people walking on redds), redd scour from high flows, and low flows that result in redd dewatering or insufficient water velocity to maintain water quality. The eggs require clean, cold, well-oxygenated water. Without enough swift water moving through the redd to sweep out fine sediment and metabolic waste, the eggs cannot receive sufficient clean, oxygenated water for proper development and mortality often results. In order to evaluate whether the Stanislaus River is providing conditions during egg incubation that will support attainment of the Biological Objectives, Environmental Objectives for water temperature, DO, fine sediment, and contaminants were established. The objectives and supporting rationale for each of these parameters is discussed below. The objectives for water temperature are species-specific and are presented as such, whereas the objectives for DO and water quality do not vary by species, so one set of objectives is presented for all three species. A summary of Environmental Objectives is provided in Table B-4 of Appendix B.

7.2.4.1 Temperature (Egg Incubation)

7.2.4.1.1 Temperature Rationale (Egg Incubation)

Suitable water temperature is necessary for normal behavior, growth, and viability of all life stages of salmonids, including the egg incubation stage. Water temperature and developmental rate are tightly and positively correlated in salmonids (Healey 1991; Quinn 2005); however, above certain temperatures, enzymatic function is compromised and food resources are utilized inefficiently. For example, eggs and alevins incubated at temperatures that are either too cold or too warm produce smaller fry than they would at optimal temperatures (USEPA 2001). Hatching and emergence success decrease as temperatures rise above the threshold for optimum development. Direct egg mortality due to elevated temperatures occurs in the Central Valley (Williams 2006). Temperature-related mortality and habitat limitation will likely become serious problems for Central Valley salmonids in the future because of global climate change (Lindley et al. 2007).

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7.2.4.1.2 Temperature Approach (Egg Incubation)

The SEP Group relied on water temperature criteria established by the USEPA Region 10 Guidance for Pacific Northwest State Tribal Temperature Water Quality Standards (2003) to identify optimal, sub-optimal, and detrimental water temperature conditions for Chinook salmon. The USEPA (2003) recommends using the 7DADM metric for evaluating temperature impacts on salmonid life stages. The 7DADM metric is the 7-day average of daily maximum water temperatures. The SEP Group used water temperature ranges for optimal, sub-optimal, and detrimental to describe the objectives for Chinook salmon and *O. mykiss*.

Chinook Salmon

Salmonid eggs and larvae require suitable water temperatures to complete incubation. The length of time it takes for eggs to hatch depends mostly on water temperature. In addition, warm water temperatures can decrease egg survival. The USEPA (2003) found that constant temperatures between 4°C to 12°C (39.2°F to 53.6°F) result in good egg survival and that a narrower range (6°C to 10°C [42.8°F to 50°F]) is optimal. In a review, the USFWS (1999 cited by Myrick and Cech 2004) concluded that temperature-related egg mortality in Chinook salmon increased at temperatures above 13.3°C (55.9°F); this is the limit applied in most regulatory arenas (e.g., NMFS 2009b; SWRCB Order 90-05). A review of research on different populations of Chinook salmon from within and outside of the Central Valley indicated that temperatures between 6°C and 12°C (42.8°F to 53.6°F) were optimal for Central Valley Chinook salmon (Myrick and Cech 2004).

O. mykiss

As with Chinook salmon, *O. mykiss* eggs and larvae require cold water to successfully complete incubation. With the construction of impassable dams, *O. mykiss* eggs incubating in the San Joaquin Valley became dependent on cold-water storage in reservoirs. The accessible supply of cold-water storage limits successful spawning habitat for *O. mykiss* populations in the southern Central Valley. There is a lack of peer-reviewed studies on the temperature tolerances of Central Valley anadromous *O. mykiss* eggs, and additional study of temperature impacts on this species' eggs is needed (Myrick and Cech 2004). Optimal incubation temperatures for *O. mykiss* occur in a narrower range than those for Chinook salmon. Indeed, Myrick and Cech (2004) warned against managing water temperatures for

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the upper end of the Chinook salmon thermal tolerance range in waterways and during periods when *O. mykiss* are also incubating because incubating *O. mykiss* cannot tolerate such high temperatures. Richter and Kolmes (2005) concluded that egg mortality increased as incubation temperatures exceeded 10°C (50°F) and substantial mortality may occur when temperatures exceed 13.5°C to 14.5°C (56.3°F to 58.1°F). Based on experience at hatcheries in the Central Valley, optimal incubation temperatures appear to be in the 7°C to 10°C (44.6°F to 50°F) range (Myrick and Cech 2004). California's steelhead management plan (McEwan and Jackson 1996) suggests a slightly higher temperature range (from 9°C to 11°C [48.2°F to 51.8°F]).

7.2.4.1.3 Temperature Objectives (Egg Incubation)

Egg incubation temperature objectives are described below for Chinook salmon (Table 37) and *O. mykiss* (Table 38).

Table 37
Temperature Objectives for Chinook Salmon Egg Incubation

Habitat Type	Temporal Extent	Condition	Range (Metric)
Gravel	Fall-run: Late October to March Spring-run: Late August to March	Optimal	6°C to 12°C (42.8°F to 53.6°F) (Daily Average)
			< 12.5°C (< 54.5°F) (7DADM)
		Sub-optimal	4°C to 6°C (39.2°F to 42.8°F) (Daily Average)
			12°C to 13.3°C (53.6°F to 55.9°F) (Daily Average)
			12.5°C to 13.8°C (54.5°F to 56.8°F) (7DADM)
		Detrimental	> 13.3°C (55.9°F) (Daily Average)
			> 13.8°C (56.8°F) (7DADM)

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Table 38

Temperature Objectives for *O. mykiss* Egg Incubation

Habitat Type	Temporal Extent	Condition	Range (Metric)
Gravel	December to June	Optimal	7°C to 10°C (44.6°F to 50°F) (Daily Average)
			< 10.5°C (50.9°F) (7DADM)
		Sub-optimal	4°C to 6.9°C (39.2°F to 44.4°F) (Daily Average)
			10°C to 13.5°C (50°F to 56.3°F) (Daily Average)
			10.5°C to 14.0°C (50.9°F to 57.2°F) (7DADM)
		Detrimental	> 13.5°C (> 56.3°F) (Daily Average)
			> 14.0°C (> 57.2°F) (7DADM)

7.2.4.2 Dissolved Oxygen (Egg Incubation)

7.2.4.2.1 Dissolved Oxygen Rationale (Egg Incubation)

Adequate concentrations of DO in water are critical for salmon and *O. mykiss* survival. In freshwater streams, hypoxia can impact the growth and development of salmon and *O. mykiss* eggs, alevins, and fry as well as the swimming, feeding, and reproductive ability of juveniles and adults. If salmonids are exposed to hypoxic conditions for too long, mortality can result (Carter 2005). Without achieving optimal or some combination of optimal and sub-optimal Environmental Objectives for DO (described below), the Biological Objectives for Chinook salmon and *O. mykiss* productivity will likely not be met.

7.2.4.2.2 Dissolved Oxygen Approach (Egg Incubation)

The SEP Group relied on DO criteria established by the USEPA (1986) and the CVRWQCB (2015a), as well as relevant technical literature (e.g., WDOE 2002), to identify DO objectives that are optimal (no negative effects), sub-optimal (observably negative, though not significantly harmful), and detrimental (clearly harmful) ranges for various salmonid life stages and/or transitions.

The criteria established by the USEPA (1986) and CVRWQCB (2015a) covered cold-water species in one category; separate criteria for Chinook salmon and *O. mykiss* were not provided. This blanket approach of protecting salmon and *O. mykiss* with one set of DO criteria is supported by the available literature, and as such, the SEP Group followed that approach.

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The summaries of egg incubation mortality through hatching and incubation growth rates provide rationale for the DO objectives identified in Table 39.

Egg Incubation Mortality through Hatching

The effect of low DO on salmon egg mortality largely depends on incubation temperatures. Under laboratory conditions at favorable incubation temperatures, mortality rates when DO levels greater than or equal to 9 mg/L should be less than 1%, less than 2% at a concentration of 7 mg/L, and between 2% and 6% at a concentration of 6 mg/L (WDOE 2002). Survival rates at oxygen concentrations below 4 mg/L are highly variable. All tests at concentrations below 1.7 mg/L resulted in 100% mortality (WDOE 2002). Mortality rates related to low DO concentrations increase substantially at temperatures that are warmer than ideal. In water at 13.4°C (56.1°F), a decrease in DO from 11 mg/L to 10 mg/L caused a 4% reduction in survival through hatching, and at 7 mg/L, egg survival decreased by 19%. Furthermore, in the laboratory studies that produced these results (WDOE 2002), post-hatch salmon larvae (alevin) did not need to push their way up through gravel substrate to emerge as would wild fish. Optimal fitness will likely be required for optimal emergence from the gravel in natural environments. Thus, the effect of depleted oxygen levels on egg incubation success may be more profound than revealed by simple laboratory studies of egg hatching success. Sub-lethal impacts of high temperatures probably play an important role in overall egg incubation success rates.

Any decrease in the mean oxygen concentration during the incubation period appears to directly reduce the size of newly hatched salmonids (WDOE 2002). At favorable incubation temperatures, the level of this size reduction remained slight (less than or equal to 5%) when mean oxygen concentrations were 10 mg/L or more. At DO concentrations of 9 mg/L, the size of hatched fry was reduced by approximately 8%. Mean concentrations of 7 mg/L and 6 mg/L were associated with 18% and 25% reductions in emergent fry size, respectively.

7.2.4.2.3 Dissolved Oxygen Objectives (Egg Incubation)

DO objectives for egg incubation for Chinook salmon and *O. mykiss* are presented in Table 39.

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Table 39

Dissolved Oxygen Objectives for Chinook Salmon and *O. mykiss* Egg Incubation

Habitat Type	Temporal Extent	Condition	Range (Metric)
Gravel (measurement must occur in gravel, not water column)	Fall-run: Late October to March Spring-run: Late August to March *O. mykiss*: December to June	Optimal	> 8 mg/L (Daily Minimum)
		Sub-optimal	6 to 8 mg/L (Daily Minimum)
		Detrimental	< 6 mg/L (Daily Minimum)

7.2.4.3 Fine Sediment (Egg Incubation)

7.2.4.3.1 Fine Sediment Rationale (Egg Incubation)

High levels of fine sediment in spawning gravels are known to negatively affect spawning success (Kondolf 2000) through suffocation and or entrapment (Jensen et al. 2009). High proportions of fine sediment may reduce the flow of oxygenated water to eggs, thus reducing the removal of metabolic wastes and potentially slowing embryo development (Greig et al. 2005; Jensen et al. 2009). Fine sediment may also entomb the egg and provide a physical barrier to hatching and fry emergence (Franssen et al. 2012). Studies of the effects of fines have often compared levels of fines with percent survival of eggs (e.g., Tappel and Bjornn 1983). There is a great deal of variation in the relationship of fine sediment to egg survival, but Jensen et al. (2009) evaluated many of the studies in an attempt to get a common assessment of the information available. This meta-analysis found that egg survival greatly declined when the proportion of sediment less than 0.85 mm (0.033 in) was greater than 10%. Relationships between egg survival and percent fines were also observed for slightly larger sediment size classes, but the effect was less pronounced. For example, the proportion of sediment less than 4.8 mm (0.189 in) was negatively correlated with survival of eyed eggs; however, the effect threshold was higher at 50% proportion of sediment of less than 4.8 mm. The data Jensen et al. (2009) provide for a fine sediment upper limit of 6.4 mm is largely from Tappel and Bjornn (1983), and with the enormous scatter in survival values, it does not appear to improve the evaluation of limits to define optimum conditions. Combining the

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data from previous studies, Jensen et al. (2009) were able to produce curves for several species, including Chinook salmon and *O. mykiss*. The data have a large amount of variation in them, but the relationships will allow the development of criteria for maintaining gravel quality for spawning.

7.2.4.3.2 Fine Sediment Approach (Egg Incubation)

The values for fine sediment are largely developed from Jensen et al. (2009). It is important to note that data for very low fine sediment values do not support 100% survival of eggs. The y-intercepts of the relationships given in Jensen et al. (2009) indicate the average survival of between 80% and 95% when fines less than 0.85 mm (0.033 in) are at extremely low values. The y-intercepts for the 4.8 mm (0.189 in) fines also are not at 100% and, in fact, are lower than the values for 0.85 mm (0.033 in), which seems counter-intuitive. Variation in egg survival is enormous at those low levels of fines, ranging from approximately 20% to nearly 100%. Using the data, 80% was set as a baseline value for egg survival under a "no fine sediment" condition. It was assumed that no more than a 10% decline from the baseline should be allowed under optimal conditions; thus, fine sediment that allows for greater than or equal to 70% egg survival is considered optimal. Sub-optimal conditions are assumed to be between 50% and 70% egg survival. Conditions that are equal to or less than 50% survival are assumed to be detrimental.

Using the percent survival above, fine sediment values were extracted from the graphs using direct inspection. The curve for all species egg survival versus fine sediment less than 0.85 mm (0.033 in) was used as the curve includes a 95% confidence interval. The lower 95% bound was used to provide the most conservative (minimum) estimate for percent fines. The inspection results in a 5% fines limit for optimum habitat and a 10% fines limit for sub-optimal habitat. Any higher percentage of fines smaller than 0.85 mm (0.033 in) would be considered detrimental.

The data for sediment smaller than 4.8 mm (0.189 in) are less clear. There are results from studies using green eggs and eyed eggs. The results indicate a very different response by the green and eyed eggs; the eyed eggs exhibit higher survival rates, likely because of their more advanced developmental stage. It is likely that green eggs have lower survival overall

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because the early developmental stage increases sensitivity to stressful conditions. The effect of fine sediment on overall egg survival mostly occurs during the sensitive green egg stage; thus, the green egg curve was used to set fine sediment thresholds for the 4.8 mm (0.189 in) sediment size class. In addition to variation in egg survival due to developmental stage, egg survival for green and eyed eggs varied among studies conducted using different salmonid species. *O. mykiss* green eggs show higher survival than Chinook green eggs; however, Chinook eyed eggs show higher survival than *O. mykiss*. This was interpreted to mean that the data were highly variable; there is little evidence to support using different survival rates for Chinook and *O. mykiss*. Thus, the *O. mykiss* curve from the green eggs graph was used, giving 5% fines as the upper limit for optimal conditions and 15% as the upper limit for sub-optimal conditions. Anything greater than 15% fines (less than 4.8 mm [0.189 in]) is considered detrimental.

7.2.4.3.3 Fine Sediment Objectives (Egg Incubation)

Table 40 provides fine sediment objectives for Chinook salmon and *O. mykiss* egg incubation.

Table 40
Fine Sediment Objectives for Chinook Salmon and *O. mykiss* Egg Incubation

Habitat Type	Temporal Extent	Condition	Range (Metric)
Gravel (measurement must occur in gravel, not water column)	Fall-run: Late October to March Spring-run: Late August to March *O. mykiss*: December to June	Optimal	< 5% smaller than 4.8 mm (0.189 in)
		Sub-optimal	5% to 15% finer than 4.8 mm (0.189 in) or 5% to 10% finer than 0.85 mm (0.033 in)
		Detrimental	> 15% smaller than 4.8 mm (0.189 in) or > 10% smaller than 0.85 mm (0.033 in)

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7.2.4.4 Contaminants (Egg Incubation)

7.2.4.4.1 Contaminants Rationale (Egg Incubation)

Poor water quality has a high potential of impacting the survival and recovery of salmonids. Pesticides, mercury, and selenium have the ability to impact all life stages of salmonids, including the egg incubation stage. Exposure to these contaminants can occur through transfer from the maternal parent or through direct contact in the water or gravel. For example, mercury and selenium exposure to eggs and early-life stages (ELS) will be from maternal transfer because eggs are fairly resistant to these contaminants, and toxicity to mercury and selenium typically occurs from long-term bioaccumulation (Appendix C, Section 1.3.1). Effects to ELS fish from mercury and selenium include developmental deformities, reduced hatch, increased pre-swimup mortality, and behavior abnormalities.

Contrary to mercury and selenium, current use pesticides do not typically bioaccumulate to the same extent, and toxicity to eggs and ELS salmonids can occur from river exposures. In addition to a reduction in fertilized eggs, further evidence supports the theory that pesticides impact salmonid egg to fry development. For example, Du Gas (2008) observed that exposures to herbicides atrazine and chlorothalonil in gravel-bed flume incubators resulted in reduced survival to hatch, increased finfold deformities, reduced condition factors at emergence, and premature emergence in sockeye salmon. Furthermore, another laboratory study that exposed Chinook eyed eggs and alevins to dinosed (herbicide), diazinon (organophosphate insecticide), and esfenvalerate (pyrethroid insecticide) resulted in abnormal swimming behavior, myoskeletal abnormalities, and metabolic disruptions as well as mortality at high concentrations (Viant et al. 2006). Alevins were much more sensitive to pesticide exposures than the eyed eggs, which emphasizes the importance of pesticide exposures to the critical life stages of alevin development and emergence (Viant et al. 2006; Finn 2007; Du Gas 2008).

Nutrient constituents (i.e., ammonia, nitrate, and nitrite) can also cause direct toxicity to incubating eggs. Similar to the previous life stages, excessive nutrients can result in adverse environmental conditions that reduce the fitness and survival of incubating eggs (e.g., low DO or elevated temperatures).

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7.2.4.4.2 Contaminants Approach (Egg Incubation)

For discussion of the SEP Group's approach to setting pesticide objectives and objectives for concentrations of nitrogen-based nutrients, see the Contaminants Approach section for Adult Upstream Migration (Section 7.2.1.4.2).

Unlike the evaluation for adult salmonids, selenium and mercury may impact the success of incubating eggs. The SEP Group relied on the draft USEPA National Freshwater Selenium Ambient Water Quality Criterion for Aquatic Life (2014) for the Environmental Objectives to protect salmonid species in the Stanislaus River against adverse effects. The criteria have yet to be promulgated; however, the criteria are consistent with the relevant technical literature on selenium toxicology. The Environmental Objective should be reevaluated once the USEPA selenium criteria are finalized. No criteria have been promulgated for the protection of fish from mercury impacts. However, in recent literature, researchers have developed fish tissue mercury concentration benchmarks that are estimated to be protective of adult and ELS fish (Appendix C, Section 1.3.2.2). The SEP Group relied on these benchmark concentrations as the level that would be fully protective of salmonids during their egg incubation stage. Furthermore, selenium and mercury objectives are presented as the maximum contaminant concentration to be found in eggs and ELS fish tissue, as well as the maximum tissue concentration allowable in maternal salmonids to prevent the toxicological transfer of mercury and selenium. This is because egg and ELS fish exposure to mercury and selenium is through maternal transfer (Wiener and Spry 1996; Presser and Luoma 2013; USEPA 2015).

7.2.4.4.3 Contaminants Objectives (Egg Incubation)

Pesticide water quality objectives and benchmark concentrations are displayed in Tables 21 and 22. Pesticide concentrations necessary to protect Chinook salmon and *O. mykiss* egg incubation are expected to be similar. Based on the described approach of pesticide Environmental Objectives, the optimal condition for pesticide occurrence would be less than a 1% chance (Bin 1, Table 23) of a pesticide exposure or exposure to a combination of pesticides that exceed water quality objectives or aquatic-life benchmarks in a given day of a month. This frequency corresponds to the allowed frequency of exceedances to protect

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aquatic beneficial uses for current water quality objectives and criteria (40 CFR Part 131; CVRWQCB 2014).

It is estimated that salmon exposed to pesticides at a frequency of 30% of the time would impede olfaction enough to reduce the intrinsic population growth by 2% (1.08 versus the 1.10 control; Baldwin et al. 2009). Furthermore, a 2% reduction in intrinsic population growth is estimated to reduce salmon population more than 30% over 20 years. Assuming that the frequency of pesticide exposures has similar impact on salmonid physiology and responses across all life stages, then exposures of pesticides greater than 30% (Bin 7 – 10, Table 23) would represent detrimental conditions. Accordingly, sub-optimal conditions would include Bins 2 – 6, Table 23. See Appendix C, Section 1.3.3.1 for more information.

Mercury objectives for the egg incubation life stage are presented in Table 41. The objectives apply to the mercury concentrations in the eggs themselves as well as the concentrations in the maternal fish to prevent the transfer of mercury at toxicological levels.

Table 41
Mercury Objectives for Chinook Salmon and *O. mykiss* during the Egg Incubation Life Stage

Condition	Egg and Maternal Ovary mg/kg (wet weight)	Maternal Fish mg/kg whole body (wet weight)
Optimal	< 0.02	< 0.20
Sub-optimal	0.02 to 0.10	0.20 to 1.0
Detrimental[1]	> 0.1	> 1.0

Note:
1 Sub-lethal impacts to fish are estimated to occur above optimal conditions. Detrimental impacts are assumed to occur at mercury tissue concentrations that are expected to create 25% or greater injury to the fish. A 25% effect, or EC25 metric, is a consistent threshold to determine chronic toxicity assessments for regulatory compliance (SWRCB 2012).

Selenium objectives for the egg incubation life stage are presented in Table 42. The objectives apply to the selenium concentrations in the eggs themselves as well as the concentrations in the maternal fish to prevent the transfer of selenium at toxicological levels. In addition, aqueous selenium objectives are presented for lentic and lotic systems to protect aquatic life from bioaccumulating toxic levels of selenium.

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Table 42

U.S. Environmental Protection Agency Draft National Freshwater Selenium Ambient Water Quality Criterion for Aquatic Life

Media Type	Fish Tissue		Water Column	
Criterion Element	**Egg/Ovary**	**Fish Whole Body or Muscle**	**Monthly Average Exposure**	**Intermittent Exposure**
Magnitude	15.8 mg/kg (dry weight [wt.])	8.0 mg/kg whole body or 11.3 mg/kg muscle (skinless, boneless filet; dry wt.)	1.2 micrograms per liter (µg/L) in lentic aquatic systems 3.1 µg/L in lotic aquatic systems	$WQC_{int} = \frac{WQC_{30\text{-}day} - C_{bkgrnd}(1 - f_{int})}{f_{int}}$
Duration	Instantaneous measurement	Instantaneous measurement	30 days	Number of days per month with an elevated concentration
Frequency	Never to be exceeded	Never to be exceeded	Not more than once in 3 years on average	Not more than once in 3 years on average

Notes:
From USEPA 2015. These draft criteria are presented to give a relative magnitude of selenium levels above which could pose risks to aquatic life. In addition, the criteria are presented as an example of the type of approach that could be used to assess selenium impacts to aquatic life.
WQC = Water Quality Criterion

Ammonia, nitrate, and nitrite concentrations necessary to protect salmonid incubating eggs are provided in Table 24.

7.2.5 Juvenile Rearing and Migration

The juvenile rearing and migration life stage encompasses all of those developmental stages, life history strategies and associated behaviors and phenotypic expressions that occur subsequent to emergence and prior to either ocean entry (for anadromous forms) or sexual maturation (for resident forms; principally applicable to *O. mykiss*). Depending on the species, these may include the following:

- Fry, parr, smolt, and yearling developmental stages;
- Anadromous, resident, and estuarine migratory behaviors; and
- Habitat areas
  - Within the bank-full channel (in-channel); and

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- Adjacent to it on higher gradient, shorter inundation off-channel floodplains, floodplain terraces, backwaters, and intermittent side channels (short-inundation floodplains); and
- Lower gradient, longer inundation valley floodplains and wetlands (long-inundation floodplains).

There is evidence that salmon production in the Stanislaus River is limited by carrying capacity constraints, particularly in dry years (Figure 3). The apparent limit on juvenile production in dry years may indicate that the Stanislaus River currently only provides enough high-quality juvenile rearing habitat to support production of a limited number of juveniles. Rearing habitat limitation is consistent with the observation that the number of juveniles produced per spawner increases dramatically in years with higher winter-spring flows (Figure 3).

Generally, optimal conditions for juvenile salmonid rearing involve a balance of the following—a) water quality conditions (e.g., temperature, DO, contaminant concentrations); b) physical attributes of habitat (water depth, suitable cover, and substrate); c) extent of available habitat relative to fish territory size (as a function of fish size, fish density, prey density, and habitat structure); d) ecosystem and food web conditions (e.g., prey availability, predator density, and competition); and e) activity levels (as a function of the interaction of a, b, c, and d with water velocity)—such that juvenile salmonids can sustain metabolic needs while maximizing growth (Quinn 2005). However, these conditions vary across a range of sub-habitat types within the riverine landscape used by juvenile salmonids. Various sub-habitats may also be used differently by each salmonid species, specific life history stages of a given salmonid species (Roper et al. 1994; Bradford et al. 2001; Merz et al. 2015), and individuals within a life history stage that are developing at different rates (e.g., "young"/small smolts may utilize habitats differently than older/larger ones). In the San Joaquin River basin's Mokelumne River, juvenile Chinook salmon have been shown to prefer off-channel floodplain habitat for rearing, while juvenile *O. mykiss* prefer in-channel riffle habitat (Merz et al. 2015).

For a given species, the interaction of different life history stages with different sub-habitats can additionally reinforce cohort and population-level life history diversity and associated

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resilience (McClure et al. 2008; Zimmerman et al. 2015). For example, juvenile Chinook salmon rearing on floodplains can experience greater maximum size, diversity in growth, and exposure to environmental pollutants than juvenile salmon reared in the associated river channel (Sommer et al. 2001, 2005; Jeffres et al. 2008; Henery et al. 2010). For juvenile *O. mykiss*, in-channel rearing habitat with more variable flow has been associated with higher levels of anadromy (Pearsons et al. 2008; Kendall et al. 2014). In characterizing optimal rearing habitat conditions, it is appropriate to do so by sub-habitat and species.

Depending on the salmonid species and life history stage, there may not be a clear delineation between those sub-habitats used for rearing and for migration. For example, the same channel reach may theoretically be used by juvenile *O. mykiss* for rearing at the same time as it is being used for juvenile Chinook salmon as a migration corridor. Similarly, the same valley floodplain area may be used as a migration pathway by an outmigrating juvenile Chinook salmon smolt and a primary rearing area for a Chinook salmon parr. Juvenile Chinook salmon and *O. mykiss* may also continue to rear as they move downstream, whereas Central Valley steelhead seem to move downstream relatively quickly once they begin their emigration from upstream rearing areas.

For the purposes of Environmental Objectives development, the SEP Group characterizes migration as downstream movement in outmigrating anadromous or estuarine juveniles. Migration objectives include physical habitat conditions (e.g., temperature) that support smoltification, allow for passage (e.g., depth, free flowing rivers not obstructed by barriers, partial barriers, or water diversions), and facilitate movement (e.g., velocity) as well as habitat heterogeneity and distribution that support distributed velocity refugia, downstream rearing behavior, and predator avoidance (e.g., turbidity). Rearing and migration habitat are differentiated based on the primary function it is serving to a given individual or species during the time they are occupying it. In cases where a habitat is serving as both rearing and migration functions simultaneously for a given species, optimal conditions for rearing are prioritized. The SEP Group recognizes that the natural, historic overlap in these functions speaks to their inherent alignment, and within the appropriate range, diversity in conditions within a given sub-habitat type supports life history diversity and resilience in the population.

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7.2.5.1 Temperature

7.2.5.1.1 Temperature Rationale (Juvenile Rearing and Migration)

Juvenile salmonid growth, life stage duration, and metabolic efficiency are directly influenced by water temperature (Quinn 2005). Several authors have hypothesized that Central Valley populations of Chinook salmon and steelhead may tolerate warmer temperatures than those of other populations (e.g., Myrick and Cech 2004). In the San Joaquin River basin's Tuolumne River, there is limited evidence of this warm temperature tolerance in *O. mykiss* populations (Farrell et al. 2015). For juvenile salmonids who are actively feeding over a certain range of temperatures, growth increases with increasing temperatures as long as food is readily available; increasing temperatures may lead to decreased growth or death when food supplies are not sufficient to support increases in metabolic rate. Temperatures ultimately limit growth and survival at thresholds that are species-, population-, and individual-specific.

Temperatures that produce mortality among Pacific salmon depend, to some extent, on acclimation temperatures—higher acclimation temperatures produce higher IULT (Myrick and Cech 2004). Various sources indicate an IULT for Chinook salmon in the range of 24°C to 25°C (75.2°F to 77°F; e.g., Myrick and Cech 2004). Baker et al. (1995) found that Central Valley Chinook salmon had an IULT between approximately 22°C to 24°C (71.6°F to 75.2°F). Negative sub-lethal effects (those that may increase susceptibility to other mortality mechanisms) begin to occur at temperatures lower than the IULT. In the laboratory, when fish have access to full rations, growth of juvenile salmonids increases with temperature up to their physiological limits; however, when food supply is limited (as it often is under normal conditions in the field), optimal and sub-optimal growth and mortality occur at lower temperatures. For example, Mesa et al. (2002) detected increased levels of heat shock proteins (an indicator of stress) after several hours of exposure to 20°C (68°F) for Columbia River fall-run Chinook salmon.

7.2.5.1.2 Temperature Approach (Juvenile Rearing and Migration)

Chinook Salmon

Among juvenile fall-run Chinook salmon from California's Central Valley population, Marine and Cech (2004) found decreased growth, reduced smoltification success, and

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impaired ability to avoid predation at temperatures above 20°C (68°F). They also reported that fish reared at temperatures of 17°C to 20°C (62.6°F to 68°F) experienced increased predation relative to fish raised at 13°C to 16°C (55.4°F to 60.8°F), although they found no difference in growth rate among fish reared in these two temperature ranges (Marine and Cech 2004). The finding of decreased performance at temperatures above 17°C (62.6°F) is consistent with several studies that suggest, when food supplies are not super-abundant, optimal growth and survival among Chinook salmon occurs at temperatures somewhat lower than 17°C (62.6°F). The USEPA (2003) identifies constant temperatures of 10°C to 17°C (50°F to 62.6°F) and 7DADM less than 18°C (64.4°F) as being optimal conditions for juvenile Chinook salmon when food supplies are limiting. The USEPA (2003) recommends 16°C (60.8°F) 7DADM as a maximum criterion for the following:

- Safely protecting juvenile salmon and trout from lethal temperatures;
- Providing upper optimal conditions for juvenile growth under limited food during the period of summer maximum temperatures and optimal temperatures for other times of the growth season;
- Avoiding temperatures where juvenile salmon and trout are at a competitive disadvantage with other fish;
- Protecting against temperature-induced elevated disease rates; and
- Providing temperatures that studies show juvenile salmon and trout prefer and are found in high densities.

Based on this recommendation, 16°C (60.8°F) 7DADM or less has been established as the optimal water temperature for juvenile rearing and migration in the river channel.

As indicated, the temperatures that can be tolerated by rearing juvenile Chinook salmon depend largely on food availability. The USEPA (2003) indicates that, when food supplies are unlimited, temperatures from 13°C to 20°C (55.4°F to 68°F; constant) may be optimal. Recent studies on Central Valley Chinook salmon rearing on inundated floodplains reveal excellent survival and growth rates at even higher temperatures. Growth and survival for limited periods have been recorded at temperatures as high as approximately 25°C (77°F) (Katz, unpublished data; Jeffres, unpublished data). The increased tolerance for high temperatures in these fish is believed to be related to the high prey densities and food quality available on floodplains, coupled with low activity costs (Sommer et al. 2001; Henery,

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unpublished data) and suggests that when food is not limiting, Chinook salmon can tolerate and even thrive at temperatures approaching the physiological limits observed in the laboratory (i.e., IULT). As a result, the SEP Group assumed that following successful restoration of floodplain habitats (and during periods when juvenile Chinook salmon actually occupy inundated floodplains), rearing Chinook juvenile salmon could survive temperatures approaching 25°C (77°F) for limited periods of time. Based on these distinctions, temperatures greater than 25°C (77°F) were established as detrimental for salmon rearing on long-inundation floodplains only. However, the SEP Group also recognizes that exposure to such warm water temperatures greatly increases disease risk, and stress from other water quality factors (e.g., DO or contaminants) likely reduces thermal tolerance. When Chinook salmon are not in habitats that support super-abundant food resources (e.g., in-channel habitats), lower temperatures are required to avoid negative sub-lethal effects.

Elevated water temperatures can inhibit the parr-smolt metamorphosis (smoltification) in salmonids. Chinook salmon can smolt at temperatures ranging from 6°C to 20°C (42.8°F to 68°F; Myrick and Cech 2004). However, salmon that undergo smoltification at higher temperatures (greater than 16°C [60.8°F]) tend to display impaired smoltification patterns and reduced saltwater survival (Myrick and Cech 2004). Marine and Cech (2004) found that Central Valley Chinook salmon rearing in temperatures greater than or equal to 20°C (68°F) suffered altered smolt physiology, and other studies from within this ecosystem suggest that negative effects of temperature on the parr-smolt transition may occur at temperatures less than 20°C (68°F). Richter and Kolmes (2005) cite two studies that indicated negative impacts on Chinook salmon smoltification success at temperatures greater than 17°C (62.6°F). USEPA (2003) indicates that smoltification impairment may occur at temperatures between 12°C to 15°C (53.6°F to 59°F).

O. mykiss

Laboratory studies show that incipient lethal temperatures for juvenile *O. mykiss* occur in a range between 27.5°C to 29.6°C (81.5°F to 85.3°F), depending on acclimation temperatures (Myrick and Cech 2005). Temperature influences growth and lipid content in *O. mykiss* (McMillan et al. 2012). Optimal temperatures for *O. mykiss* juvenile growth occur between 15°C to 19°C (59°F to 66.2°F; Moyle 2002; Richter and Kolmes 2005). In addition to growth, temperature may also influence *O. mykiss* ecological interactions and life history (Reese and

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Harvey 2002; Kendall et al. 2014). For example, *O. mykiss* juveniles suffer adverse impacts of competition with pikeminnow at temperatures greater than 20°C (68°F), though no competitive impact is detectable at lower temperatures (Reese and Harvey 2002). Temperature has been correlated with anadromy versus residency in juvenile *O. mykiss* (Kendall et al. 2014), with warmer temperatures associated with anadromy in some cases (Sogard et al. 2012; Benjamin et al. 2013; Doctor et al. 2014). The variable nature of these correlations does not support the use of temperature objectives in isolation as a mechanism for promoting anadromy.

Steelhead may be particularly sensitive to high temperatures during the smoltification process. The USEPA (2003) indicates that temperatures greater than 12°C (53.6°F) inhibit steelhead metamorphosis into smolt. Richter and Kolmes (2005) and USEPA (1999) cited studies that present a range of temperatures between 11°C to 14°C (51.8°F to 57.2°F) that may inhibit steelhead smoltification. Myrick and Cech (2005) cautioned that smolting steelhead in the Central Valley must experience temperatures less than 11°C (51.8°F) to successfully complete this metamorphosis. The critical temperature at which smoltification becomes inhibited may vary from run to run (Richter and Kolmes 2005).

7.2.5.1.3 Temperature Objectives (Juvenile Rearing and Migration)

Temperature objectives for juvenile rearing and migration life stages for Chinook salmon and *O. mykiss* are provided below in Table 43.

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Table 43

Temperature Objectives for Chinook Salmon and *O. mykiss* Juvenile Rearing, Migration, and Smoltification

Habitat Type	Temporal Extent	Condition	Range (Metric)
Channel	Fall-run: Last week of January to 2nd week of June	Optimal	6°C to 16°C (42.8°F to 60.8°F) (7DADM)
		Sub-optimal	16°C to 20°C (60.8°F to 68°F) (7DADM)
		Detrimental	> 20°C (> 68°F) (7DADM)
Floodplain – Short Inundation	Spring-run: Last week of December to 2nd week of June	Optimal	10°C to 18°C (50°F to 64.4°F) (7DADM)
		Sub-optimal	18°C to 20°C (64.4°F to 68°F) (7DADM)
		Detrimental	> 20°C (> 68°F) (7DADM)
Mainstem	*O. mykiss*: January to December (year-round)	Optimal	15°C to 19°C (59°F to 66.2°F) (Daily Average)
			16.5°C to 21.5°C (61.7°F to 70.7°F) (7DADM)
		Sub-optimal	20°C to 25°C (68°F to 77°F) (Daily Average)
			21.5°C to 26.5°C (70.7°F to 79.7°F) (7DADM)
		Detrimental	> 25°C (> 77°F) (Daily Average)
			26.5°C (79.7°F) (7DADM)
			> 27.5°C (> 81.5°F) (Instantaneous)

7.2.5.2 Dissolved Oxygen (Juvenile Rearing and Migration)

7.2.5.2.1 Dissolved Oxygen Rationale (Juvenile Rearing and Migration)

Adequate concentrations of DO in water are critical for salmon and *O. mykiss* survival. In freshwater streams, hypoxia can impact the growth and development of salmon and *O. mykiss* fry as well as the swimming, feeding, and reproductive ability of juveniles. If salmonids are exposed to hypoxic conditions for too long, mortality can result (Carter 2005). Factors affecting DO levels may vary among sub-habitats used during juvenile rearing and migration. On floodplains, DO levels may be spatially variable and driven by factors such as temperature, wind mixing, and BOD. In channel, DO is typically less spatially heterogeneous (relative to salmonid needs) and presumed to be driven principally by temperature, with potential influence from groundwater, mixing, and BOD lower in the system.

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7.2.5.2.2 Dissolved Oxygen Approach (Juvenile Rearing and Migration)

Salmonids may be able to survive when DO concentrations are low (less than 5 mg/L), but growth, food conversion efficiency, and swimming performance will be adversely affected (Bjornn and Reiser 1991). Davis (1975) reviewed numerous studies and reported no impairment to rearing salmonids if DO concentrations averaged 9 mg/L, while at oxygen levels of 6.5 mg/L, "the average member of the community will exhibit symptoms of oxygen distress," and at 4 mg/L, a large portion of salmonids may be affected. The WDOE (2002) concludes that a monthly or weekly average concentration of 9 mg/L and a monthly average of the daily minimum concentrations should be at or above 8.0 to 8.5 mg/L to have a negligible effect (5% or less) on growth and support healthy growth rates. The USEPA (1986) states that due to the variability inherent in growth studies, the reductions in growth rates seen above 6 mg/L are not usually statistically significant, while reductions in growth at DO levels below 4 mg/L are considered severe. The WDOE (2002) recommended that DO levels below 5 to 6 mg/L should be considered a potential barrier to the movement and habitat selection of juvenile salmonids. Given that recommendation, the SEP Group has established that DO levels below 6.0 mg/L are detrimental for juvenile salmon.

7.2.5.2.3 Dissolved Oxygen Objectives (Juvenile Rearing and Migration)

The DO objectives for Chinook salmon and *O. mykiss* juvenile rearing and migration are provided in Table 44. It is not necessary to separate DO objectives by habitat type because juvenile salmon and *O. mykiss* are affected by DO the same whether they are in the main river channel or in the floodplain.

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Table 44

Dissolved Oxygen Objectives for Chinook Salmon and *O. mykiss* Juvenile Rearing and Migration

Habitat Type	Temporal Extent	Condition	Range (Metric)
River channel or Floodplain (water column measurement)	Fall-run: Last week of January to 2nd week of June Spring-run: Last week of December to 2nd week of June *O. mykiss*: January to December (year-round)	Optimal	> 8 mg/L (Daily Minimum)
		Sub-optimal	6 to 8 mg/L (Daily Minimum)
		Detrimental	< 6 mg/L (Daily Minimum)

7.2.5.3 Contaminants (Juvenile Rearing and Migration)

7.2.5.3.1 Contaminants Rationale (Juvenile Rearing and Migration)

Like the other life stages, contaminants have the high potential to impact juvenile rearing and migration. In fact, the greatest impact that contaminants may have is to the health and survival of the juvenile rearing and migration life stages. For example, herbicides and insecticides are designed to target the organisms at the base of the food web that rearing salmonids rely on. In addition, pesticides have been found to disrupt fish behaviors and biochemistry necessary for survival at this life stage (e.g., predator avoidance, feeding, metabolism, growth, osmoregulation, and orientation) (Beyers et al. 1999; Coghlan and Ringler 2005; Potter and Dare 2003; Scott and Sloman 2004). Furthermore, the nearshore, low-flow habitats that provide the greatest benefit to rearing and migratory juveniles typically have higher concentrations and loads of pesticides, which compounds the impact on salmonids in their preferred habitat (NMFS 2008, 2009c, 2011c). Finally, juvenile salmonids exposed to pesticides and other olfactory inhibiting contaminants during development may fail to imprint to their natal waters, which can lead to increased adulthood straying (NMFS 2009c).

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Because of the short time period and the type of food web that juvenile salmonids use during rearing and migration, there is typically low risk to mercury and selenium toxicity. However, there are some instances where environmental condition may stimulate methylmercury production and pose toxicological risks to rearing and migrating juveniles. For example, in 2006, episodic flooding in the San Joaquin River watershed, Delta, and other Central Valley river basins created conditions where YOY fish methylmercury concentrations increased 4- to 5-fold higher than typical concentrations and to levels that could pose risks to fish health (Slotton et al. 2007).

Nutrient constituents (i.e., ammonia, nitrate, and nitrite) can also cause direct toxicity to rearing and migrating juveniles. Similar to the previous life stages, excessive nutrients can result in adverse environmental conditions that reduce the fitness and survival of incubating eggs (e.g., low DO or elevated temperatures). (See Appendix C, Section 1.3 for more detailed information on effects of pesticides, nutrients, mercury, and selenium.)

7.2.5.3.2 Contaminants Approach (Juvenile Rearing and Migration)

For discussion of the SEP Group's approach to setting pesticide objectives and objectives for concentrations of nitrogen-based nutrients, see the Contaminants Approach section for Adult Upstream Migration (Section 7.2.1.4.2). The approaches for selenium and mercury Environmental Objectives are similar to egg incubation life stages (see Section 7.2.4.4.2).

7.2.5.3.3 Contaminants Objectives (Juvenile Rearing and Migration)

Pesticide water quality objectives and benchmark concentrations are displayed in Tables 21 and 22. Pesticide concentrations necessary to protect Chinook salmon and *O. mykiss* juvenile rearing and migration are expected to be similar. Based on the described approach of pesticide Environmental Objectives, the optimal condition for pesticide occurrence would be less than a 1% chance (Bin 1, Table 23) of a pesticide exposure or exposure to a combination of pesticides that exceed water quality objectives or aquatic-life benchmarks in a given day of a month. This frequency corresponds to the allowed frequency of exceedances to protect aquatic beneficial uses for current water quality objectives and criteria (40 CFR Part 131; CVRWQCB 2014).

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It is estimated that salmon exposed to pesticides at a frequency of 30% of the time would reduce juvenile growth through olfaction disruption enough to reduce intrinsic population growth by 2% (1.08 versus the 1.10 control; Baldwin et al. 2009). Furthermore, a 2% reduction in intrinsic population growth is estimated to reduce salmon population more than 30% over 20 years. Consequently, exposures of pesticides greater than 30% (Bin 7 – 10, Table 23) would represent detrimental conditions. Accordingly, sub-optimal conditions would include Bins 2 – 6, Table 23. (See Appendix C, Section 1.3.3.1 for more information.)

Mercury objectives for juvenile rearing and migration for Chinook salmon and *O. mykiss* are presented in Table 45. (See Appendix C, Section 1.3.3.2 for more information.)

Table 45
Mercury Objectives for Chinook Salmon and *O. mykiss* for Juvenile Rearing and Migration

Condition	Juvenile Fish mg/kg whole body (wet weight)
Optimal	< 0.20
Sub-optimal	0.20 to 1.0
Detrimental[1]	> 1.0

Note:
1 Sub-lethal impacts to fish are estimated to occur above optimal conditions. Detrimental impacts are assumed to occur at mercury tissue concentrations that are expected to create 25% or greater injury to the fish. A 25% effect, or EC25 metric, is a consistent threshold to determine chronic toxicity assessments for regulatory compliance (SWRCB 2012).

Selenium objectives for the rearing and migration life stage are presented in Table 42. The objectives apply to the selenium concentrations in the juvenile fish tissue. In addition, aqueous selenium objectives are presented for lentic and lotic systems to protect rearing and migrating juvenile salmonids from bioaccumulating toxic levels of selenium.

Ammonia, nitrate, and nitrite concentrations necessary to protect salmonid juveniles are provided in Table 24.

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7.2.5.4 Physical Characteristics of Rearing Habitat (Juvenile Rearing and Migration)

Physical attributes of rearing habitat include the following:

- Water depth and velocity, and
- Cover, structure, and substrate.

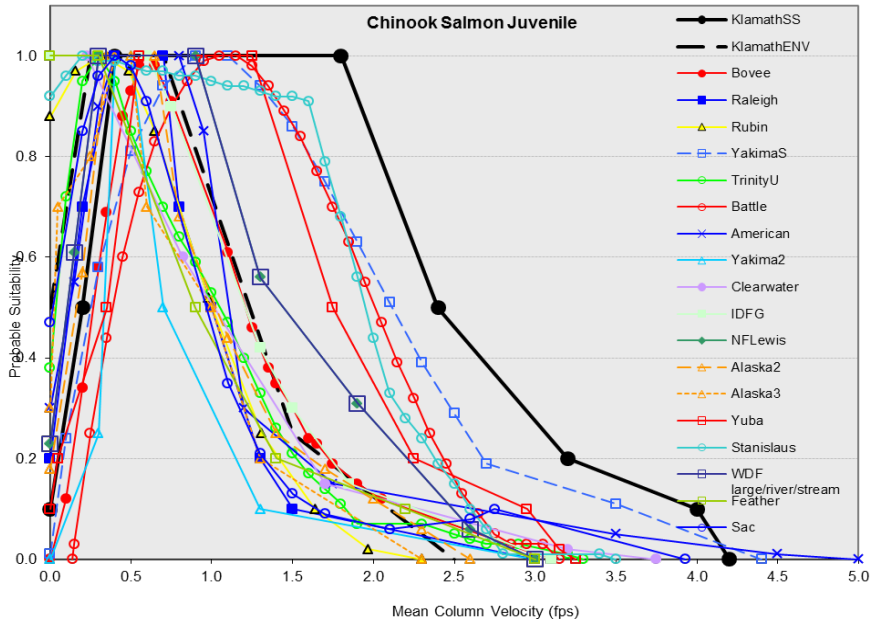
The rationale and approach to defining objectives for attributes in each of these groups are described separately below, and objectives are summarized in Table 47 (located in Section 7.2.5.4.5).

7.2.5.4.1 *Water Depth and Velocity Rationale (Juvenile Rearing and* Migration)

Depth and velocity of flow play a critical role in habitat quality for juvenile salmonids. Water depth and water velocity are parameters commonly applied to habitat suitability models for juvenile salmonids, and different combinations of water velocity and depth can contribute to habitat physical and ecological functions as well as heterogeneity within and across habitat types. For juvenile salmonids, water velocity is a key driver of activity level, which interacts with temperature, DO, and prey availability-driven consumption rate to affect growth rate (see Section 1.3.5.3), and suitable depths support foraging behavior and predator avoidance (Gregory 1993). Optimal depth and velocity for juvenile salmonids can vary significantly between systems and for fish of different sizes (Figure 8). Research on juvenile Chinook salmon rearing on flooded rice fields in the Yolo Bypass found no significant correlation between depth and growth for depth ranges of approximately 0.15 m to 0.61 m (6 in to 2 ft) at low velocities and a consistent prey density (Katz, unpublished data).

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A) Velocity



B) Depth

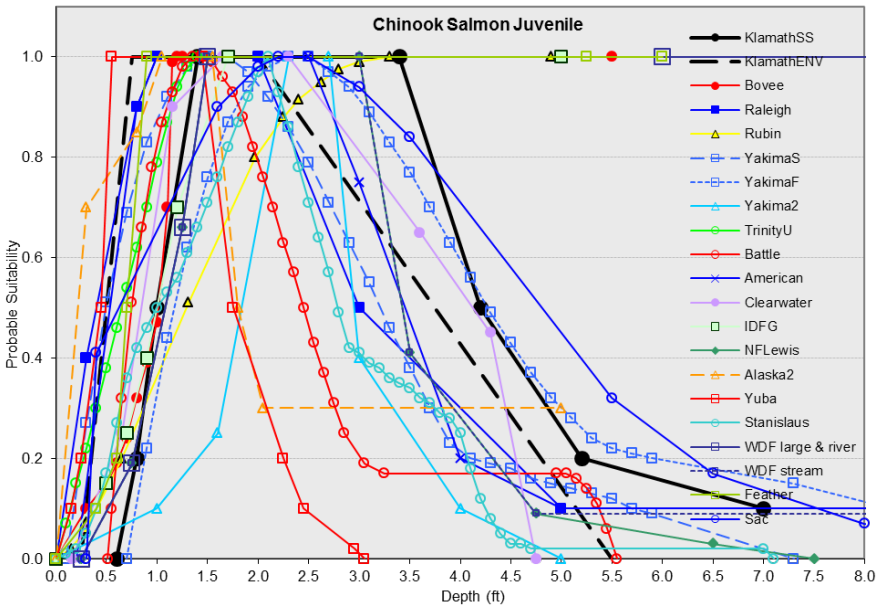


Figure 8

Habitat Suitability Index Values for A) Velocity and B) Depth for Juvenile Chinook Salmon on Multiple Rivers

Note:
Compiled by SJRRP (2012) from multiple published and unpublished empirical (when available) and modeled datasets. The Stanislaus River is indicated by the teal circles.

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7.2.5.4.2 Water Depth and Velocity Approach (Juvenile Rearing and Migration)

Juvenile Chinook salmon habitat suitability models for depth and velocity have been developed previously for the Stanislaus River (Aceituno 1990) and applied to floodplain habitat estimates for the San Joaquin River (SJRRP 2012). These estimates suggest optimal depth values between 0 m and 1.4 m (0 ft and 4.5 ft) in floodplain or off-channel conditions (Aceituno 1990; SJRRP 2012). The same studies assigned optimal velocity values for those habitat types at between 0 m/s and 0.91 m/s (0 ft/s and 3 ft/s; Aceituno 1990). These values are based on the velocity requirement for Chinook salmon. While the needs of *O. mykiss* may be different and may use short inundation off-channel habitats for rearing under certain circumstances, research suggests that their primary rearing habitat is in-channel (Merz et al. 2015). Therefore, the SEP Group has used values supporting Chinook salmon as the basis for floodplain objectives. Depth and velocity objectives have been defined consistently across short and long inundation floodplains, with the additional guidance that shorter inundation floodplains may exhibit higher velocities as a function of gradient and more confined channel geometry. Productivity on longer inundation floodplains, by contrast, may benefit from slower velocities often associated with longer hydraulic residence times.

Water velocity in-channel is generally assumed to be greater than in off-channel habitats. Velocity is flow-dependent and variable within and across years as well as at a sub-habitat scale as a function of habitat structure. Additionally, in-channel habitat may be used simultaneously by multiple species and life history stages. As such, no single velocity or velocity range objective was defined for in-channel habitat. Increased flow variability during the summer has been correlated with higher levels of anadromy in juvenile *O. mykiss* (Pearsons et al. 2008; Kendall et al. 2014), whereas increased residency has been hypothesized (Pearsons et al. 1993; Cramer et al. 2003; McMillan et al. 2007) to be linked with more stable summer high flows and correlated with increased summer flows in females (Berejikian et al. 2013). Flow variability in the Stanislaus River has declined significantly from historic unimpaired conditions under reservoir operations. To support anadromy in juvenile *O. mykiss*, the SEP Group has additionally defined a flow variability objective for in-channel habitat.

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7.2.5.4.3 Cover, Structure, and Substrate Rationale (Juvenile Rearing and Migration)

Cover, structure, and substrate are core components of the physical habitat for juvenile salmonids that can interact with other physical habitat components (e.g., water velocity and depth) and ecosystem dynamics (e.g., primary and secondary productivity, predator-prey interactions) to influence habitat use by juvenile salmonids. Cover and structure, specifically, have been correlated with the density in juvenile salmonids (McMahon and Hartman 1989), and substrate remediation in the form of gravel augmentation has been correlated with increased habitat use by juvenile salmonids in the Merced River (Selheim et al. 2015).

7.2.5.4.4 Cover, Structure, and Substrate Approach (Juvenile Rearing and Migration)

As concepts, cover and structure have significant overlap—encompassing a range of common physical elements and differing primarily based on the function they serve for juvenile salmonids. For example, a root wad might be considered cover when its function is to provide juveniles with refuge from predators or high flows; a root wad might be considered structure when its function is to increase habitat complexity, regulate territory size, or provide a base for invertebrate prey to attach. Similarly, for juvenile fish, substrate of a certain size (e.g., large cobble or boulders) can provide cover and structure.

Many studies have examined a range of physical structures definable as "cover" in terms of the extent to which they support suitable habitat for juvenile salmonids (Raleigh 1986; Hampton 1988; WDFW and WDOE 2004; Sutton 2006). Physical structures constituting cover and suitability scores for common cover types are not addressed consistently across these studies. In 2012, the San Joaquin River Restoration Program developed a summary of habitat suitability scores for cover from multiple sources for use in modelling suitability of floodplain rearing habitat (Table 46; SJRRP 2012). Average HSI scores from this summary were applied as the basis for floodplain rearing habitat cover objectives.

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Table 46

Summary of Habitat Suitability Index Scores for Juvenile Salmon Cover

Cover Type	HSI score for each cover type				Average HSI Value
	Raleigh 1986	Sutton 2006	WDFW and WDOE 2004	Hampton 1988	
No Cover	0.01	N/A	0.1	0.1	0.07
Woody Debris	0.9	0.6	N/A	0.7	0.73
Cobble/Boulder	0.2	0.5	N/A	0.18	0.29
Grass	N/A	0.5	0.48	N/A	0.49
Gravel	0.25	0.3	N/A	N/A	0.28
Willow	N/A	0.8	N/A	N/A	0.80
Undercut Bank	1	1	1	1	1.00
Aquatic Vegetation	0.3	0.6	1	0.5	0.60
Overhanging Vegetation	0.38	0.8	1	0.1	0.57
Root Wad	N/A	0.7	1	0.7	0.80

Note:
Summary of HSI scores for juvenile salmon from a range of sources developed for application to assessment of floodplain habitat quality by the SJRRP (2012)

Substrate objectives were defined separately for short inundation floodplain, long inundation floodplain, and in-channel habitat types. Substrate objectives are defined broadly to comport with the habitat gradient and target velocity range as well as support vegetative cover establishment and the assumed productivity mechanisms. For in-channel habitats areas, to the extent that spawning and rearing areas overlap spatially, substrate should be defined based on needs for spawning and egg incubation and emergence. However, substrate objectives for in-channel rearing habitat have additionally been provided here and are applicable to those in-channel areas not targeted for spawning.

7.2.5.4.5 Physical Characteristics of Rearing Habitat Objectives (Juvenile Rearing and Migration)

Objectives defining the physical characteristics of rearing habitat for Chinook salmon and *O. mykiss* juveniles are provided in Table 47.

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Table 47

Physical Rearing Habitat Objectives (Including Metrics for Cover, Substrate, Depth, and Velocity) for Juvenile Chinook Salmon and *O. mykiss*

Habitat Type	Parameter	Condition	Range (Metric)
Floodplain – Short Inundation	Substrate	Optimal	> 5% fines to support vegetation recruitment
	Cover	Optimal	Average HSI score of ≥ 0.5 for all cover types Or: HSI for individual cover types: Woody debris ≥ 0.9 Cobble boulder ≥ 0.5 Overhanging vegetation ≥ 0.8 Root wad ≥ 1
	Depth	Optimal	0.15 m to 1.22 m (0.5 ft to 4 ft) Averaged spatially
		Sub-optimal	1.23 m to 2.13 m (4 ft to 7 ft) Averaged spatially
	Velocity	Optimal	0 m/s to 0.9 m/s (0 ft/s to 3 ft/s)
		Sub-optimal	> 0.9 m/s (> 3 ft/s)
Floodplain – Long Inundation	Substrate	Optimal	> 5% fines to support vegetation recruitment
	Cover	Optimal	Average HSI score of ≥ 0.5 for all cover types
	Depth	Optimal	0.15 m to 1.22 m (0.5 ft to 4 ft) Averaged spatially
		Sub-optimal	1.23 m to 2.13 m (4 ft to 7 ft) Averaged spatially
	Velocity	Optimal	0 m/s to 0.9 m/s (0 ft/s to 3 ft/s) s
		Sub-optimal	> 0.9 m/s (> 3 ft/s)
Channel	Substrate	Optimal	See spawning habitat requirements
	Cover	Optimal	Average HSI score of ≥ 0.5 for all cover types Or: HSI for individual cover types: Woody debris ≥ 0.9 Cobble boulder ≥ 0.5 Overhanging vegetation ≥ 0.8 Root wad ≥ 1
	Flow variability	Optimal	Summer flow variability that mimics the natural hydrograph; intended to contribute to the expression of anadromy

Notes:
Cover metrics are defined by HSI values for various cover types (averaged either across cover types or for individual cover types). Rearing habitat objectives apply year-round for *O. mykiss*, last week of January to second week of June for fall-run Chinook salmon, and last week of December to second week of June for spring-run Chinook.

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7.2.5.5 Rearing Habitat Accessibility and Extent: Inundation Timing, Frequency, and Duration (Juvenile Rearing and Migration)

The preceding sections described the water quality and physical elements of high-quality rearing habitats. Some rearing habitats are ephemeral and the temporal overlap between the juvenile rearing period and the existence of the different rearing habitats determines, in part, the benefits attributable to these habitats. In addition, timing and duration of inundation of certain shallow water rearing habitats affect their value to rearing juvenile salmonids. Finally, the area of inundated habitat must be sufficient to achieve Biological Objectives for the focal salmonid populations.

7.2.5.5.1 *Habitats, Timing, and Associated Parameters (Juvenile Rearing and Migration)*

Timing of rearing and migration can be presumed to occur year-round when considering all three salmonid species covered in this report, although the timing varies by species and across years,. For juvenile fall-run Chinook salmon (fry, parr, and smolt), the rearing and migration period has been defined as extending from the last week of January through the second week of June. For spring-run Chinook salmon, this period extends from the last week of December through the second week of June. For *O. mykiss*, the juvenile rearing period is considered to be year-round. As such, a separate rearing period for yearlings has not been defined. However, a specific period has also been identified with different objectives to support smoltification in anadromous life history forms of *O. mykiss* that extends from December through March.

Rearing and migration Environmental Objectives have been defined for three primary habitat types as follows:

1. **Floodplain – long inundation**: This habitat type serves the specific functions of rearing habitat for juvenile Chinook salmon and migration "rest stop" and predator avoidance pathway for juvenile Chinook salmon and *O. mykiss*. It is applicable to the lower section of the river (downstream of Ripon) and characterized by lower gradients and longer seasonal inundation event durations (10 to 21 days) that allow for autochthonous primary and secondary production and result in high prey densities. This productivity is supported by a substrate with a higher proportion of

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fines, shallower water depths, and lower velocities. As a result of the low velocities and high prey densities, the optimal temperature range and maximum temperature threshold for this habitat are higher.

2. **Floodplain – short inundation**: This habitat type serves the specific functions of rearing habitat for juvenile Chinook salmon and *O. mykiss* and migration "rest stop" and predator avoidance pathway for juvenile Chinook salmon and *O. mykiss*. It is applicable to the portions of the river upstream of Ripon and characterized by higher gradients and shorter seasonal inundation events (1 to 9 days) that support elevated prey densities primarily through allochthonous input of displaced terrestrial invertebrates and, to a lesser extent, benthic invertebrate drift. As a function of the gradient, velocities are generally higher and substrate coarser, though depths remain lower than in-channel. Optimal temperature range is similar to that of in-channel habitats.
3. **In-channel**: This habitat type serves the specific functions of rearing habitat for juvenile *O. mykiss* and migration pathways for juvenile Chinook salmon and *O. mykiss*. It is applicable to all portions of the river (including side channels and braided channels) and characterized by perennial flows and a greater range of depths and velocity than off-channel habitats. Prey densities are generally lower than off-channel habitats and velocities are greater, resulting in a lower temperature range and maximum temperature threshold than long-inundation floodplain habitats. Colder temperatures in this habitat also support smoltification during certain times of year, and variability in flow and temperature support anadromy in *O. mykiss* (Pearson et al. 2008; Soggard et al. 2012; Benjamin et al. 2013; Kendall et al. 2014).

Several of the critical parameters applied to quantify desired conditions are common to multiple habitat types. Sections 7.2.5.5.2 through 7.2.5.5.6 provide a breakdown of desired conditions for each species, organized by parameter, for each applicable habitat type. Tables B-5a through B-5d in Appendix B provide a summary of these Environmental Objectives.

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7.2.5.5.2 Inundation Duration and Frequency Rationale (Juvenile Rearing and Migration)

The flood pulse and seasonal inundation of floodplains drive key hydrologic and geomorphic processes that provide substantial habitat and trophic benefits to river ecosystems and fish (Junk 1989; Junk et al. 2004; Poff et al. 2010). The action of floodplain inundation and the extension of the photic zone it creates have been shown to enhance phytoplankton biomass (Schemel et al. 2004; Sommer et al. 2004; Ahearn et al. 2006), zooplankton growth (Müller-Solger et al. 2002; Grosholz and Gallo 2006), and drift invertebrate biomass (Sommer et al. 2001a, 2001b; Benigno and Sommer 2008). Greater frequency of inundation has also been linked to higher levels of invertebrate productivity (Grosholz and Gallo 2006). It is therefore not surprising that juvenile Chinook salmon rearing on floodplains and other off-channel habitats tend to be larger and in better physical condition than those that rear in the main channel of rivers (Sommer et al. 2001; Jeffres et al. 2008; Limm and Marchetti 2009; Henery et al. 2010).

In higher gradient off-channel and floodplain habitats, short duration inundation can displace terrestrial invertebrates from soil and vegetation, and drive terrestrial invertebrate distribution by modifying heterogeneity of organic matter (Langhans 2006). In low gradient floodplains, longer inundation times and extended solar exposure can stimulate autochthonous primary and secondary production that can drive high prey densities and fish production (Grosholz and Gallo 2006). Research from the Cosumnes River floodplain found that secondary productivity began to increase in as little as 10 days after inundation (Jeffres unpublished data) and reached high levels at approximately 14 days (Grosholz and Gallo 2006). A similar pattern was observed in the Yolo Bypass floodplain (Katz, unpublished data). Research in the Yolo Bypass further indicates that after approximately 21 days, productivity levels have stabilized or are in decline (Katz, unpublished data), and Grosholz and Gallo (2006) recommend a 2- to 3-week flooding duration and frequency to best support native fish.

The timing of inundation, both on its own and through its interaction with duration and frequency, also exerts significant influence over floodplain habitat quality for salmonids. On an annual time scale, under unimpaired flow conditions, inundation event frequency is often tied closely with water year type, and many habitats may not inundate during dryer years.

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In order for rearing habitat benefits to be realized for a given cohort, inundation must occur in 1 out of every 2 years (assuming a yearling strategy in some percentage of outmigrants). At a daily time scale, for short duration inundation events, where displacement of terrestrial invertebrates is a main prey source, the frequency of inundation drives the timing of both habitat availability and increased prey density. For longer inundation events, autochthonous production may continue to increase during a single event, primarily as a function of duration (Grosholz and Gallo 2006). Research from the Yolo Bypass and Cosumnes floodplains, however, indicates that drawdown between events can reset the productivity cycle once productivity rates have begun to stabilize or decline (Grosholz and Gallo 2006; Katz, unpublished data).

7.2.5.5.3 Inundation Duration and Frequency Approach (Juvenile Rearing and Migration)

Inundation objectives presented here apply habitat type-specific inundation event duration and timing as a surrogate for mechanism and extent of food production and availability (assuming other identified parameters/conditions, including temperature, water quantity, and substrate type). Specifically, short-duration inundation events are assumed to have elevated levels of invertebrate drift (benthic and terrestrial) as primary prey source, whereas long-inundation events are assumed to have autochthonous secondary productivity as a primary prey source, with terrestrial and benthic invertebrate drift as a secondary source. Duration of discrete events is measured based on a period following a minimum drawdown time. Minimum annual frequency has been established based on the potential for floodplain rearing benefits to have been experienced by adults in any given year, assuming a mix of primarily 2- and 3-year-old retuning adults.

7.2.5.5.4 Inundation Duration and Frequency Objectives (Juvenile Rearing and Migration)

Specific objectives for inundation for juvenile Chinook salmon and *O. mykiss* rearing are provided in Table 48.

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Table 48

Environmental Objectives for Inundation for Juvenile Chinook Salmon and *O. mykiss* Rearing

Habitat Type	Temporal Extent	Parameter	Range (Metric)
Floodplain – Long Inundation	Fall-run: Last week of January to 2nd week of June	Duration	10 to 21 wetted acre days
		Frequency	Minimum of 1 in 3 years recurrence interval; Minimum of 1 week drawdown to distinguish discrete event
Floodplain – Short Inundation	Spring-run: Last week of December to 2nd week of June *O. mykiss*: January to December (year-round)	Duration	1 to 9 wetted acre days
		Frequency	Minimum of 2 in 3 years recurrence interval during all years (minimum of 1 week drawdown to distinguish discrete event); Minimum of 1 event per year in wet years/years where inundation occurs

7.2.5.5.5 Habitat Spatial Extent and Distribution Rationale (Juvenile Rearing and Migration)

In order for Biological Objectives to be achieved, spatial extent of rearing habitat must be sufficient to support the combined habitat needs of all rearing juveniles within the system necessary to achieve Biological Objectives.

Juvenile Chinook salmon either defend or rely on food from an area of territory (Cramer and Ackerman 2009), even when schooling (Neuswanger 2014). Additionally, territory size is thought to limit the density and production of stream-dwelling salmonids (Chapman 1966; Allen 1969; Grant and Kramer 1990). Territory size requirements of individual fish of a given size tend to be constant regardless of the local numbers of fish abundance (Grant and Kramer 1990; Cramer and Ackerman 2009), and in natural systems result in competition for space and displacement of smaller/weaker individuals (Titus 1990; Keeley 2001; Keeley 2003; Cramer and Ackerman 2009). Smaller/weaker individuals in turn occupy sub-optimal territories (Titus 1990; Keeley 2001) and are likely to experience increased stress, which may reduce growth and fitness, and increased mortality. Providing adequate quantity and quality of territory during rearing and emigration may therefore reduce the negative effects associated with competition for space (SJRRP 2012).

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An important component of territory size is the relationship between territory size and fish body size, also known as the "allometry of territory size" (Grant and Kramer 1990). Because salmonids in streams defend territories, from small (post-emergent) juveniles until they either become ocean-ready fish (smolts) or become sexually mature, they must increase the area they defend to meet increasing food and energy (energetic) requirements as they grow (Keeley and Slaney 1996). The result is a dynamic where territory requirements expand through time for growing fish, while fish numbers are diminishing. The required extent and distribution of rearing and migration habitat for juvenile salmonids can therefore be conceptualized as a function of their abundance, size, emigration speed, and survival rate. From this perspective, rearing habitat needs vary based on location and time, where the rearing habitat extent necessary in any one location is equivalent to that which is required by the maximum number of juvenile fish that will occupy that habitat on any day during the rearing and emigration period.

Grant and Kramer (1990) provided a general, multi-species (interspecific) regression model for allometric territory size that attempted to account for variability among species. Following the rational above, allometric territory size relationships may be applied as a predictor of space requirements and maximum densities of juvenile salmonids in streams.

7.2.5.5.6 Habitat Spatial Extent and Distribution Approach (Juvenile Rearing and Migration)

To establish objectives for spatial extent and distribution of rearing habitat, the Emigrating Salmonid Habitat Estimation (ESHE) model, developed by Cramer Fish Sciences and The Nature Conservancy (SJRRP 2012), was applied. The ESHE model simulates stationary growth (rearing) and downstream movement (emigration) of individual, daily groups (cohorts) of juvenile spring-run and fall-run Chinook salmon. The model tracks their numbers (abundance), average speed, size, the amount of territory needed per fish (territory size), and the amount of suitable habitat required to sustain the number of juvenile salmon present within a model reach. Model outputs provide daily estimates of the number of juvenile spring-run and fall-run Chinook salmon present in each model reach and the required area of suitable habitat needed to support them throughout the rearing and emigration period. A detailed description of the ESHE model is presented in Appendix D.

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The ESHE model applies multiple parameters (and associated functions) in order to calculate juvenile salmon abundance and habitat needs of daily cohorts, including the following:

- **Initial abundance**: the number of juvenile Chinook salmon entering the model based on the target number of reproducing parent fish;
- **Initial timing and size**: the number of fish on each day that exit the spawning grounds and the average size of the fish exiting the spawning grounds;
- **Migration speed**: the daily downstream movement of juvenile salmon in each reach;
- **Survival rate**: the number of fish that avoid death each day in each reach;
- **Growth**: the daily growth and resulting size of juvenile salmon in each reach;
- **Territory size**: territory size requirements of juvenile salmon in each reach based on their size; and
- **Required suitable habitat**: the required suitable habitat needed to support the juvenile salmon present in each reach.

The values for each of the parameters described above were populated based on a combination of measured and modeled data. Whenever possible and appropriate, preference was given to measured data from the Stanislaus River. A summary of key model inputs is provided in Table 49.

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Table 49

Summary of Key Emigrating Salmonid Habitat Estimation Model Inputs along with Sources and Notes

Parameter	Value
Number of Reproducing Fish	Target: 13,200 (Fall-run); 13,200 (Spring-run) Current: 2,150 (Fall-run)
Female Fish Percentage	60%
Number of eggs per fish (fecundity)	5,813
Egg Survival to Emergence	0.68
Yearlings Percentage	15%
Entry Numbers and Location	RM 58 – 54 (25.64%) RM 53 – 49 (40.98%) RM 53 – 49 (13.46%) RM 43 – 39 (8.77%) RM 38 – 34 (11.15%)
Migration Speed – Pre-smolts	4.14, 12.62, or 24.91 km/day (2.57, 7.84, or 15.48 miles/day)
Migration Speed – Smolts	7.11, 18.55, or 35.13 km/day (4.42, 11.53, or 21.83 miles/day)
Egg to Smolt Survival	10.18%
Egg Survival (Current)	33%
Egg Survival (Target)	68%
Habitat Quality	100%

To provide habitat spatial extent and distribution objectives that would account for differences in rearing and migration behavior across wet and dry years and be applicable to cohort abundance consistent with existing and target population sizes, separate ESHE model runs were completed for current and target population levels under slow and fast outmigration scenarios (four total model runs). Results from the model runs are presented in Table 50.

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Table 50

Summary of Key ESHE Model Inputs Along with Sources and Notes

ESHE Results			
Abundance	**Migration Type**	**Habitat Area (m^2)**	**Habitat Area ($Acres^2$)**
Current	Fast	25,055	6.19
Current	Slow	278,346	68.78
Target	Fast	330,541	81.68
Target	Slow	2,861,357	707.05
Estimated Inundated Area (Example)			
Habitat Quality	**Abundance**	**Migration**	**Inundated Area (Acres)**
7% to 30% (SJRRP 2012)	Target	Slow	2,356.8 – 10,100.7

Notes:
– Rearing habitat need outputs from the ESHE model for slow current and target Chinook salmon populations at slow and fast emigration rates.
– Habitat area needs estimates assume 100% suitability.
– The Estimated Inundated Area (Example) applies the measured range of on-the-ground habitat suitability from the San Joaquin River to the highest output (Target/Slow) from the four modeled scenarios as an example of how ESHE-estimated habitat extent objectives translate into habitat extent need on the ground.

It is important to note that model results assume 100% habitat suitability. However, actual habitat suitability within a given area of rearing habitat may be significantly lower. As a component of their floodplain habitat needs analysis, the San Joaquin River Restoration Program compiled and examined on-the-ground information on habitat condition from the San Joaquin River basin and found that floodplain habitat suitability ranged from 7% to 30% (SJRRP 2012). Relating the estimated habitat area need provided by ESHE to the percentage of habitat suitability on-the-ground yields the required rearing habitat area. An example to this effect is provided in Table 50.

In order to account for differences among years, rearing habitat spatial extent objectives were established based on the range of 100% suitable habitat area needs estimated across the four modeled scenarios. Calculating on-the-ground habitat spatial extent needs for the Stanislaus River will require the application of this range to applicable on-the-ground percent habitat suitability. Habitat distribution objectives were similarly presented as a range, describing the range in percent of the total habitat area necessary in any given reach. Rearing habitat spatial extent and distribution needs were calculated based on targets for spring- and fall-Chinook salmon and are intended to apply primarily to floodplain rearing habitat.

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8 STRESSORS

Stressors are conditions (physical, biological, or ecological) within the system that limit or inhibit the attainment, existence, maintenance, or potential for desired conditions, as characterized by the Biological and Environmental Objectives. Identification of stressors is critical in order to:

- Highlight components of desired conditions that are not being achieved; and
- Identify the specific obstacles (i.e., stressor[s]) inhibiting desired conditions.

As a complement to the identification of stressors, ranking stressors accomplishes the following:

- Enables the development of specific actions to achieve desired conditions by resolving stressors; and
- Facilitates the prioritization and sequencing of those actions to maximize benefit by addressing the most significant stressors first.

In cases where other prioritization considerations (e.g., financial and political) prevent stressors from being addressed in order of importance, stressor ranking also helps to correctly set expectations about the extent of progress towards desired conditions that a given action will achieve, and/or the suite and scale of actions necessary to achieve or make progress towards desired conditions.

8.1 Stressor Identification and Ranking Approach

The process for identifying and ranking stressors includes the following four key steps:

1. **Identification of the range of stressors affecting each life history stage.**
   For each life stage, stresses that limit the success of that life stage were identified (e.g., lack of suitable holding habitat for migrating adult salmonids). Stressors, or drivers of stresses, were framed in terms of parameters specified in Environmental Objectives (e.g., temperature and DO). Stressors not specifically addressed in the objectives that could impact Biological or Environmental Objectives were also included (e.g., predation). In some cases, stressors may be interrelated both for a given life history stage (as when two lower magnitude stressors cumulatively result in a third

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higher magnitude stressor) or across life history stages (as when a stress to one life history stage results in a different stress to one or more subsequent life history stages).

- Assignment of stressors for each life history stage as relevant to current and future scenarios. Stressors were considered as relevant to 1) current population and conditions, 2) target population and conditions, or 3) both.
  - In the first case, the stressor affects the species or ecosystem under current conditions, and/or at the current species population levels.
  - In the second case, the stressor, although not currently impacting populations or ecosystem conditions, is predicted to become impactful once populations approach recovery; when ecosystem conditions progress towards desired conditions; or as a function of some other trend, transition, or tipping point occurring in the future.
  - In the third case, a stressor is currently having an impact on the species, and it is expected that the magnitude or nature (e.g., scale and predictability) of that impact will change as populations increase, progress towards Environmental Objectives is made, or some other future condition comes into being.

2. **Scoring of coarse scale stress and component fine scale stressors, by life history stage for current conditions and target of future conditions as applicable.**
   Stressors are assigned a score of 1 to 4 points (1 being lowest and 4 being highest) in two categories: magnitude and certainty. Magnitude scores are based on the scale and severity of the impact to populations from the stress. Certainty scores are based on the understanding of a stressor's related impact as a function of the available information base as well as the predictability of that impact. In combination, magnitude and certainty scores generate an overall score, guide stressor ranking, and provide indication about the appropriate stressor response. Although stressors are scored separately for each life history stage, score definitions for magnitude and certainty are common to all life history stages, allowing for ranking of stressors across life history stages. The highest score for any stressor is then assigned to the life stage stress; a life stage stress cannot be scored lower than any of the stressors. Scores for each life stage were adjusted upward from the highest component stressor score based on professional judgement if the SEP Group felt there were synergistic effects among

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component stressors. Additional details about the stressor scoring process are provided in the next section.

3. **Stressor ranking and prioritization across life history stages.**
   Once scored, stressors for individual life history stages are combined for each of the three species (fall-run Chinook salmon, spring-run Chinook salmon, and *O. mykiss*). Stressors are then sorted and ranked based on their magnitude and certainty scores, and assigned a stressor response type also based on scoring. In addition to the severity of the stress, a high magnitude score indicates the potential need for a major action, depending on certainty. A low magnitude score, depending on certainty, suggests a need for either 1) monitoring to ensure the magnitude does not increase, or 2) research to confirm the low magnitude score and potentially inform adaptive management. Because stressor ranking is intended to guide and prioritize the development of actions to advance objectives and achieve desired conditions, stressors with high magnitude and high certainty are considered the highest priority.

8.1.1 Stressor Identification

The SEP Group identified stressors by examining the Environmental Objectives for each life stage and identifying the following:

- Which Environmental Objectives were not being achieved under current conditions,
- Any aspects of Biological Objectives that were not being achieved under current conditions and would not be addressed by meeting the Environmental Objectives, and
- Any specific factors that were currently inhibiting achievement of Environmental Objectives and Biological Objectives.

In many cases, a stressor is directly related to an Environmental Objective. For example, the lack of suitable habitat for spring-run Chinook salmon holding is a stressor that is directly related to the Environmental Objective for spring-run adult holding habitat. However, in other cases, a stressor is a category that may encompass multiple Environmental Objectives. For example, lack of suitable migratory conditions for fall-run Chinook salmon is a stressor for the juvenile rearing and migration life stage that addresses multiple Environmental Objectives and biological processes, including water quality, flow, habitat, and predation. In

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general, the SEP Group used expert opinion to develop stressors that the group felt prevented attainment of Environmental Objectives and Biological Objectives in the Stanislaus River. The collective knowledge and experience of the SEP Group was used to develop a comprehensive list of stressors. The process of stressor scoring and ranking was informed and supported by the quality and quantity of existing information (data and literature).

8.1.2 Assignment of Stressors to Current and Future Conditions

The SEP Group assigned stressors according to the potential to achieve Biological Objectives under two scenarios:

1. Current conditions; and
2. Twenty years in the future and assuming the attainment of the Biological Objectives (i.e., fish populations approaching goals for the Stanislaus River) and increased air temperatures.

The assumption of a restored population under Scenario 2 implied that habitat requirements would be greater than under current conditions and sufficient to support population goals for the Stanislaus River. The assumption of increased air temperatures under Scenario 2 implied that temperature would be more of a stressor in the future compared with current conditions.

8.1.3 Stressor Scoring

8.1.3.1 Scoring Framework Adapted from DRERIP

The Delta Regional Ecosystem Restoration Implementation Plan (DRERIP), the first of four regional plans intended to implement the CALFED Ecosystem Restoration Program, developed specific guidance for the evaluation of actions and stressors to assess performance and guide adaptive management.[8] The DRERIP includes a scoring framework for ranking the effect of different actions to achieve an objective. The framework applies magnitude and certainty scores as a basis for a balanced ranking sensitive to spatial and temporal scale. The

[8] Available from: http://www.delta.dfg.ca.gov/erpdeltaplan/science_process.asp

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stressor ranking the SEP Group used applies an adapted version of the DRERIP framework, leveraging the same balanced and replicable approach to scoring, but with minor modifications to accommodate the application of the framework to the ranking of stressors limiting desired conditions as opposed to actions to achieve them.

8.1.3.2 Key Concepts and Terminology

8.1.3.2.1 Magnitude

Magnitude assesses the size or level of the impact from a stressor. Magnitude can be assigned using consideration of population or habitat effects, and higher scores require consideration of the scale or extent.

8.1.3.2.2 Certainty

Certainty describes the scientific basis for scoring the scale and magnitude of a particular stressor. Certainty considers both the predictability and understanding of linkages in the driver-linkage-outcome pathway from the stressor to the impact.

8.1.3.2.3 Other Key Component of Scoring

The terms importance, predictability, and understanding are used in the magnitude and certainty scoring definitions to characterize conceptual model linkages between a driver (i.e., stressor) and an outcome (stress).

Importance

The degree to which a stressor-stress linkage controls an outcome or impact relative to other stressors and linkages affecting that same outcome. The stressor analysis was designed to encompass all known potential stressors, linkages, and outcomes, but this concept recognizes that some are more important than others in determining how the system works.

Predictability

The degree to which the performance or the nature of the outcome can be predicted from the stressor. Predictability seeks to capture the variability in the stressor-stress relationship. Predictability can encompass temporal or spatial variability in conditions of a stressor,

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variability in the processes that link the stressor to the outcome, or variability in the level of understanding about the cause-effect relationship. Any of these forms of variability can lead to difficulty in predicting change in an outcome based on changes in a stressor.

Understanding

A description of the known, established, and/or generally agreed upon scientific understanding of the cause-effect relationship between a single stressor and a single outcome (i.e., stress). Understanding may be limited due to the following: lack of knowledge and information; disagreements in the interpretation of existing data and information; the basis for assessing the understanding of a linkage or outcome is based on studies done elsewhere and/or on different organisms; or conflicting results have been reported. Understanding should reflect the degree to which the stressor analysis and scoring does, in fact, represent conditions in the system.

8.1.3.3 Specific Scoring Criteria

8.1.3.3.1 Criteria for Scoring Magnitude

4-High

Expected sustained major population-level effect, e.g., natural productivity, abundance, spatial distribution and/or diversity (both genetic and life history diversity) or a landscape scale habitat effect, including habitat quality, spatial configuration and/or dynamics; this requires a large-scale action.

3-Medium

Expected sustained minor population effect or effect on large area (regional) or multiple patches.

2-Low

Expected sustained effect limited to small fraction of a population, addresses productivity and diversity in a minor way, or limited spatial (local) or temporal habitat effects.

1-Minimal

Little effect.

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8.1.3.3.2 Criteria for Scoring Certainty: Understanding and Predictability

Scoring for certainty hinges on the level of a) understanding, b) predictability, and to a lesser extent c) importance. Certainty is based on the understanding score, which is modified (shifted up or down) by the associated predictability that accompanies the understanding, as shown in Figure 9.

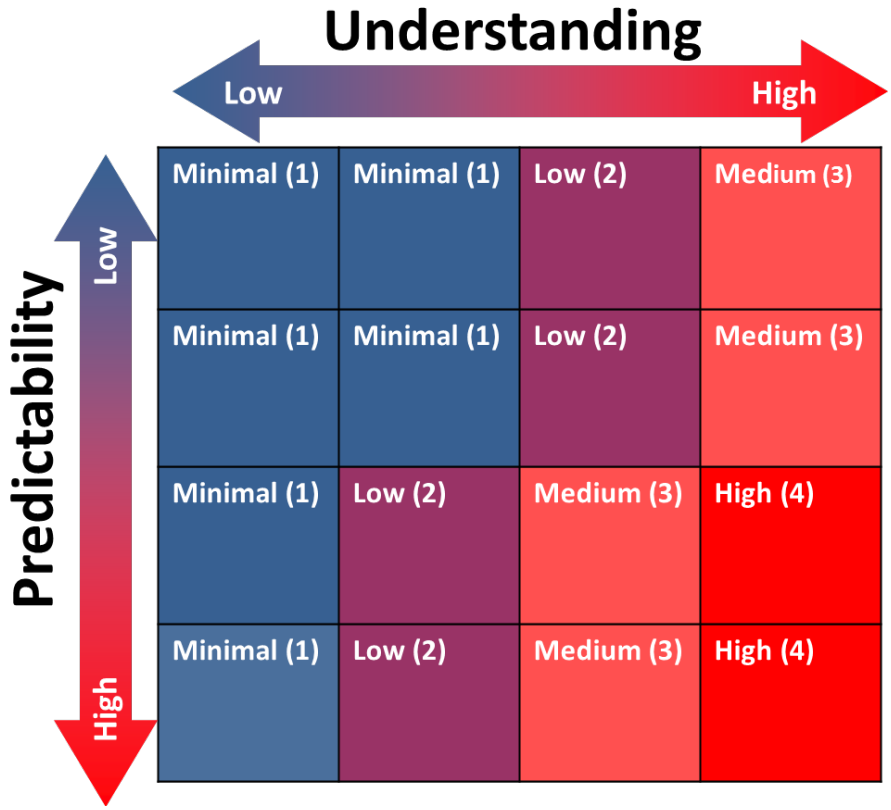


Figure 9
Matrix Depicting Certainty Scoring Based on a Combination of Understanding and Predictability

Note:
Understanding and predictability have specific definitions that determine the resulting score on the certainty matrix. See text for definitions.

8.1.3.3.3 Scoring Understanding (as a Component of Certainty Scoring)

Understanding is "**high**" based on:

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- Near-term condition:
  - Either:
    - Recent (i.e., within the last 10 years) and robust (e.g., multiple years spanning wet and dry conditions) agency data on the system for the stressor/variable of interest; or
    - More than one peer-reviewed paper of conditions on the system from within the last 20 years generally support the score.
- Long-term condition:
  - In general, future conditions are expected to be less certain than the near-term condition (because data or published papers are not yet available). A "high" certainty in the long term is warranted when:
    - There is an established (high understanding per above) trend suggesting that the near-term conditions are highly likely to maintain the certainty over the next 20+ years, or
    - There is a well-understood relationship between increased abundance of salmonids (the operating assumption of the long-term condition) and the certainty of the stressor.

Understanding is "**medium**" based on:

- Near-term condition:
  - Either:
    - There are agency data on the system for the stressor/variable of interest, but the data are not as recent and/or not as abundant/robust as described for the high score, or
    - One peer-reviewed paper from the scientific literature and/or grey literature reports on the system from multiple disparate sources (i.e., different projects, not periodic interim reports from the same project) from within the last 20 years generally support the score.
- Long-term condition:
  - A "medium" certainty in the long term is warranted when:

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- There is some evidence suggesting that the near-term conditions are highly likely to continue or to increase the certainty of the score over the next 20+ years, or
- There is evidence to suggest a relationship between increased abundance of salmonids in the system (the operating assumption of the long-term condition) and the certainty of the stressor.

Understanding is "**low**" based on:

- Near-term condition:
  - No recent or robust data are available and score is supported by one scientific grey literature report on the system from within the last 20 years.
- Long-term condition:
  - There is little or no evidence suggesting that the near-term conditions are predictive of conditions 20+ years into the future and little evidence suggesting that increases in salmonid abundance will make the stressor score more certain in the future.

8.1.3.3.4 Scoring Certainty

4-High:

- Understanding is "high," and
- Nature of outcome (i.e., stress) is either: a) predictable (i.e., largely unconstrained by variability in ecosystem dynamics, other external factors, or b) is expected to confer effects under conditions or times of greatest importance (i.e., control over the outcome relative to other drivers and linkages affecting that same outcome).

3-Medium:

- Understanding is "high" (see scoring for 4) but nature of outcome is somewhat unpredictable, **or**
- Understanding is "medium" and nature of outcome (i.e., stress) is predictable (i.e., largely unconstrained by variability in ecosystem dynamics or other external factors).

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2-Low:

- Understanding is "medium" but nature of outcome is somewhat unpredictable, **or**
- Understanding is "low" and nature of outcome (i.e., stress) is predictable (i.e., largely unconstrained by variability in ecosystem dynamics or other external factors).

1-Minimal:

- Understanding is lacking, **or**
- Understanding is "low" and nature of outcome (i.e., stress) is unpredictable (i.e., greatly dependent on highly variable ecosystem processes or other external factors).

8.1.3.4 Scoring Stress Based on Contributing Stressors

Once all the fine scale component stressors had been scored, each coarse scale life stage stress was given the highest score for any fine scale stressor; a life stage stress cannot be scored lower than any of the component stressors. Scores for each life stage were adjusted upward from the highest component stressor score based on professional judgement if the SEP Group felt there were synergistic effects among component stressors.

8.1.4 Stressor Ranking and Prioritization

Stressor prioritization is a function of the combination of scores for magnitude and certainty. Scores in these categories not only combine to produce the overall stressor ranking, but also provide insight into the appropriate stressor response where:

- High magnitude → Action
- Low magnitude → No action
- Hi certainty → Monitoring
- Low certainty → Research

In combination, magnitude and certainty scores reveal even greater detail about appropriate stressor response and prioritization where:

- High magnitude + High certainty → High priority action response
- High magnitude + Low certainty → High priority research response

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- Low magnitude + High certainty → Low priority monitoring response
- Low magnitude + Low certainty → Low priority research response

Additionally, upper mid-range certainty scores, although still strong enough to warrant action (as opposed to research), indicate the likely need for adaptive management of the action and/or subsequent associated actions in order to achieve the desired stressor reduction. Similarly, low mid-range certainty scores indicate a high research priority with a focus on clarifying the design of specific action(s) to respond to and resolve the stressor. Figure 10 presents the full range of stressor responses associated with different magnitude and certainty score combinations.

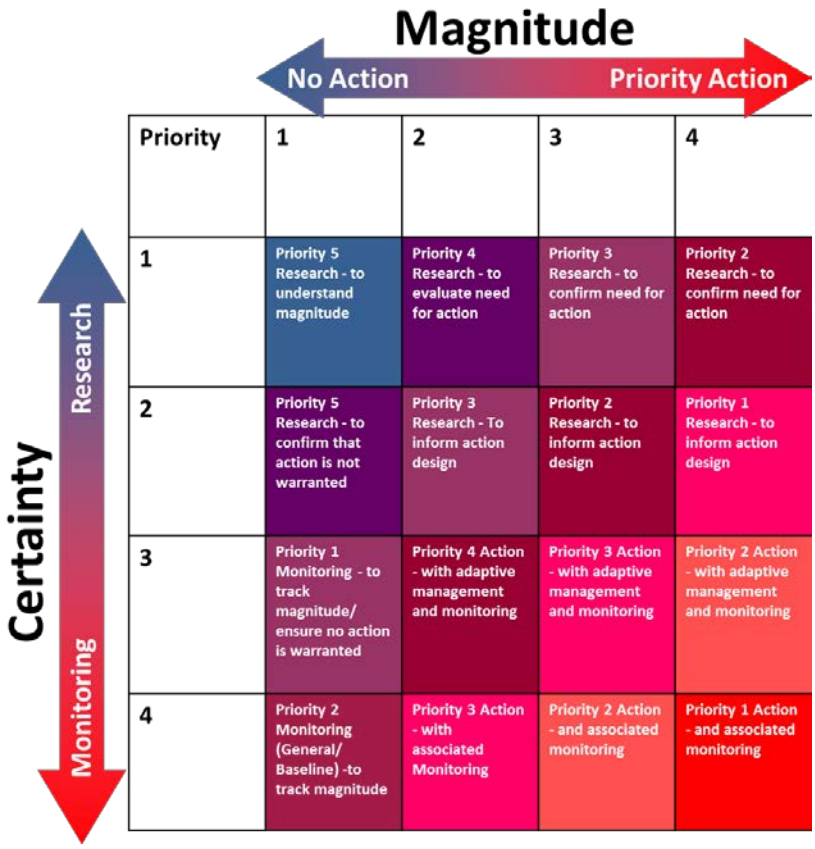


Figure 10
Stressor Response Priorities Based on Combined Magnitude (Horizontal) and Certainty (Vertical) Scores

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Note:
Magnitude and certainty have specific definitions that determine the resulting score on the Priority matrix. See text for definitions.

To develop the overall stressor response prioritization for each species, stressor magnitude and certainty scores for all life history stages were combined. Stressor response priorities were then assigned to the coarse scale multi-variate stressors and the fine scale individual variable driven stressors. They were then grouped based on those applicable to near-term conditions (i.e., current and recovering populations) and long-term conditions (i.e., target populations). The results of this synthesis are summarized in Figures 23 through 29.

8.2 Stressors on Adult Migration

Adult migration through freshwater represents one of the last stages in the Chinook salmon life cycle and a key (and most often terminal) stage in the anadromous *O. mykiss* life cycle. Individuals that reach this stage have avoided mortality in earlier life stages and therefore have very high value from a life history perspective.

The SEP Group evaluated two categories of stress in the near term and long term for adult salmonids migrating into the San Joaquin and Stanislaus rivers, including the following:

- Failure to reach the natal stream due to straying or direct mortality, and
- Indirect lethal and sub-lethal impacts to migrating salmon (those that affect their subsequent holding or spawning success).

In addition, for fall-run Chinook salmon, the stress arising from late access to the spawning grounds was evaluated. Measuring any of these effects presents challenges: delays and direct mortality of migrating adults may go unnoticed if it occurs downstream of the first monitoring station in freshwater, and detecting reduced gamete viability generally requires directed studies of incubation success (e.g., in a hatchery).

Water temperature, DO, in-river predation/poaching, physical and biological passage barriers, toxic chemicals, and attraction flows are among the factors (stressors) that contribute to stress on the target populations during their adult migrations (Tables 52 through 54). Near-term stresses reflect those that would impede attainment of

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Environmental or Biological Objectives under current conditions, including densities of target populations that may occur on the path to attainment of near-term objectives. Evaluation of stress in the long term assumed that adult salmon densities would increase substantially and that regional warming trends occur as anticipated (Cayan et al. 2008; Dettinger et al. 2004).

Complete blockage of salmonid migration due to impassable barriers (i.e., dams) is a stress that occurs during adult migration. Note that the population impact associated with this stress was assessed in the life stages following adult migration as a function of the amount and quality of holding, spawning/incubation, and juvenile rearing habitats below the dams. In other words, the effect of impassable barriers is captured by the stress associated with inadequate habitat available in subsequent life stages. As long as the extent of quality habitats for any freshwater life stage is limited below the dam and additional acreage of those high quality habitats are available above impassable dams, the dams will represent a stressor that impairs the ability of salmonid populations on the Stanislaus River to attain the Biological Objectives described in this report. Whether the stress created by inadequate habitat availability in any life stage is best alleviated by allowing for adult migration beyond the dams or by creating new habitat below the dam is a question that will be evaluated by comparing different conservation proposals (i.e., it is beyond the scope of this report).

8.2.1 Current Migration Timing Pattern

Scoring of stress is based on the potential exposure to stressors along the full migration pathway in the San Joaquin and Stanislaus rivers and across the range of each population's adult migration timing window (see Figure 7). For comparison, current temporal distribution of fall-run Chinook salmon adult migration into the Stanislaus River was estimated from passage data collected at the counting weir located near the City of Riverbank (approximately RM 31.5). Some adult migration occurs through most of the target migration window for fall-run Chinook salmon in all years (Table 51); migration typically begins in late September and the run is largely completed by late December. Typically, 50 % of the annual escapement of fall-run Chinook salmon has occurred by the end of October, although in some years this milestone is not attained until early November. The distribution

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of returning adults appears coincident with fall pulse flows (engineered releases from reservoirs) that are intended to stimulate upstream migration (Figure 11).

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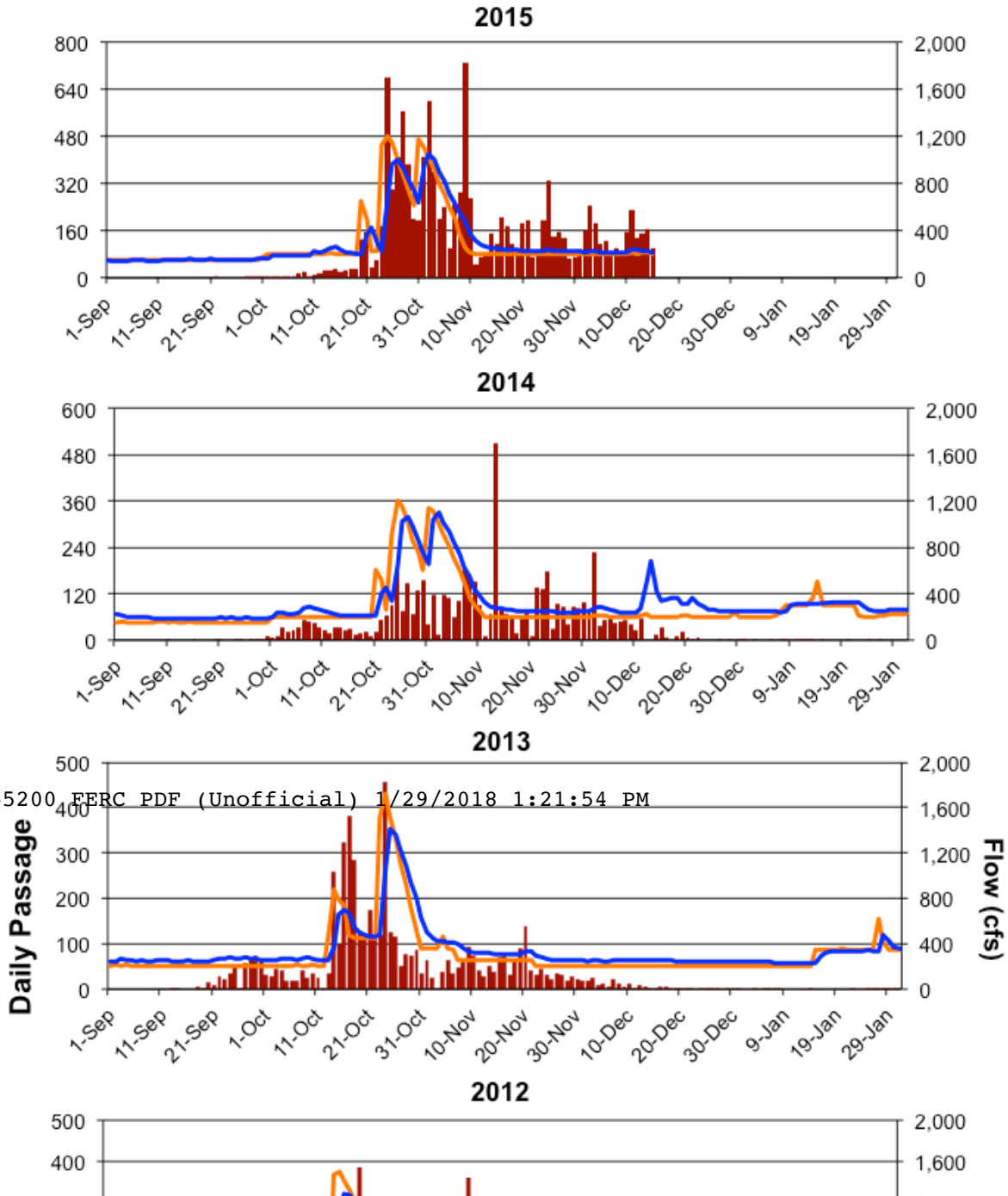


Figure 11

Daily Adult Fall-run Chinook Salmon Passage

Notes:
Daily adult fall-run Chinook salmon passage (red bars; left axis) measured at the Stanislaus River weir with respect to river flow measured at Goodwin Dam (GDW; orange line; right axis) and Ripon (RIP; blue line, right axis). Years 2009 – 2015 are shown, except for 2011 because high river flows made weir counts unreliable in that year.
Source: FISHBIO, unpublished data. Provided by J.D. Wikert, US Fish and Wildlife Service, December 2015.

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Spring-run Chinook salmon and steelhead migrations in the Stanislaus River are not well monitored at this time, so the SEP Group's knowledge of adult movements in these two populations is based on ad hoc observations.

Table 51

Cumulative Timing of Adult Fall-run Chinook Salmon Migration Past the Stanislaus River Weir, 2003 – 2014

	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014
Sep 29 –Oct 5						10%	10%	10%	Weir Data Unreliable		10%	
Oct 6 – 12	10%, 25%	10%		10%	10%	25%				10%		
Oct 13 – 19			10%				25%	25%		25%	25%	10%
Oct 20 – 26		25%	25%		25%	50%					50%	
Oct 27 – Nov 2	50%	50%		25%	50%		50%	50%		50%		25%
Nov 3 – 9			50%	50%		75%		75%		75%	75%	
Nov 10 – 16	75%	75%	75%	75%	75%		75%			90%		50%
Nov 17 – 23		90%					90%	90%			90%	75%
Nov 24 – 30	90%		90%	90%	90%	90%						
Dec 1 – 7												90%

Note:
Numbers and shading represent percentiles of total returns for each year. Escapement timing in 2011 is not shown because flows during that year made weir counts unreliable for much of the migration season.
Source: FISHBIO, unpublished data. Provided by J.D. Wikert, US Fish and Wildlife Service, December 2015

8.2.2 Stress: Failure to Reach Holding or Spawning Habitat in the Natal Stream (Stanislaus) due to Direct Action of Stressors (e.g., Mortality, Straying, and Extreme Delays) (Adult Migration)

Direct mortality and straying rates for Stanislaus-natal fish are currently unknown because adult salmon presence is not monitored regularly in the Delta, San Joaquin River, or lower Stanislaus River. However, straying of San Joaquin River Chinook salmon is believed to be high, especially when elevated Delta export and reduced San Joaquin River inflow levels alter hydrodynamic patterns in a way that affects homing ability (Marston et al. 2012). Current environmental conditions in the lower San Joaquin (below the Stanislaus confluence) and lower Stanislaus rivers are expected to have a direct, negative influence on

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successful migration into the Stanislaus in a way that would inhibit Stanislaus River productivity.[9]

Various factors, acting alone and in combination, may result in failure of adult salmon to reach the Stanislaus River; data associated with these factors differ in quantity and quality. Hourly measures of temperature and DO are available from year-round, long-term monitoring at several locations in the migratory corridor of Chinook salmon and steelhead returning to the Stanislaus River. Toxin concentrations also factor into this stress, but available data quality and quantity, as well as the spatial and temporal distribution of data, vary over a range of compounds. In-river fishing mortalities (legal and illegal) are not well monitored, so certainty regarding their effect is minimal. Improved monitoring of certain environmental conditions as well as study of the timing of salmonid migration into the San Joaquin basin and Stanislaus watershed will be needed to fully understand the population-level effects of this stress.

8.2.2.1 Fall-run Chinook Salmon

Failure of Stanislaus-bound fall-run Chinook salmon to reach the Stanislaus River in the near term as a direct result of poor environmental conditions was scored as a "medium" magnitude stress (Table 52) with a minimal degree of certainty. Certainty could be improved with additional monitoring of migrating adult salmon lower in the watershed (e.g., near where the San Joaquin River enters the Delta and/or the confluence of the Stanislaus River and San Joaquin River).

[9] The SEP Group currently has no Biological Objective pertaining to adults failing to reach the Stanislaus River or straying into the Stanislaus from other natal watersheds (but see Biological Objective regarding genetic effects of hatchery strays). Without additional monitoring for adult salmon entering the lower San Joaquin River, such an objective would not be measureable. Management of the Stanislaus River is only partially responsible for conditions in the lower San Joaquin River. Additional objectives for migration success and associated Environmental Objectives will be incorporated into the SEP's report on objectives and stressors for the San Joaquin Basin as a whole. Stresses impacting adult migration into the Stanislaus from the San Joaquin are documented here because they may affect Biological Objectives for other life stages and as a placeholder for issues that must be addressed in a basin-wide assessment of stressors.

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Without corrective action, failure of Stanislaus-bound fall-run Chinook salmon to reach spawning grounds as a direct response to poor environmental conditions will remain a "medium" magnitude stress (Table 52) over the long term. Without additional monitoring, certainty of this stress will remain minimal in the long term.

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Table 52

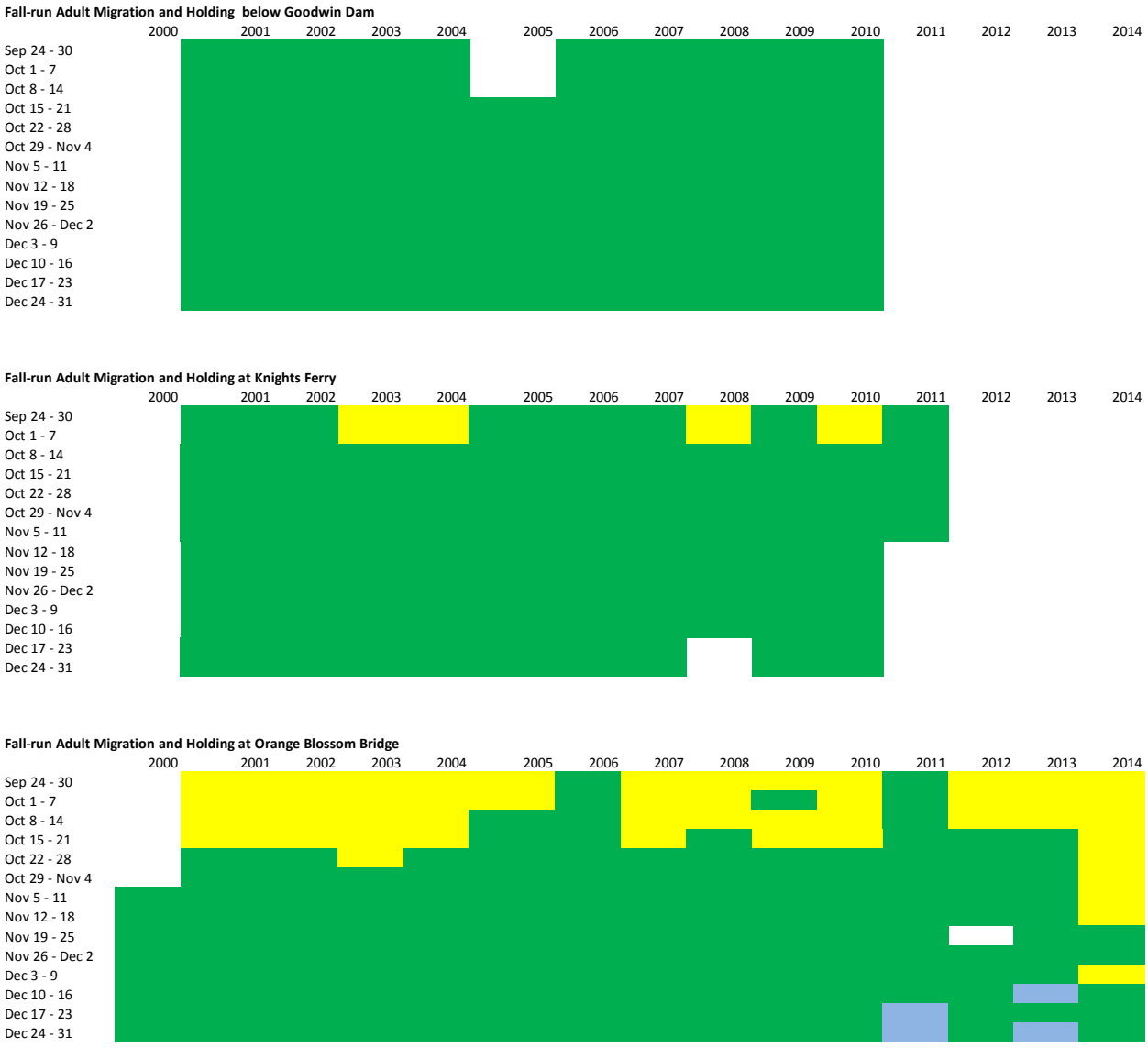
Adult Migration (Fall-run Chinook Salmon) Stressor Scores

Stress	NT M	NT C	LT M	LT C	Where	When	Stressors: Temperature NT	Temperature LT	DO NT	DO LT	Toxins NT	Toxins LT	Fishing and Poaching NT	Fishing and Poaching LT	Passable Physical Barriers (incl. low water levels and SAV) NT	Passable Physical Barriers (incl. low water levels and SAV) LT	Attraction Flows NT	Attraction Flows LT
Failure to Reach Holding or Spawning Habitat in the Natal Stream (Stanislaus) due to Direct Action of Stressors (e.g., mortality, straying, and extreme delays)	3	1	3	1	Ripon and downstream to Stockton DWSC	Late Sept through early Oct	M: 2 C: 1	M: 2 C: 1	M: 2 C: 1	M: 2 C: 1	M: 1 C: 1	M: 1 C: 1	M: 1 C: 1	M: 1 C: 1			M: 3 C: 1	M: 3 C: 1
Indirect Mortality (e.g., disease outbreaks) and Sub-lethal Negative Effects	3	3	4	3	Primarily Stockton DWSC to Ripon (temperatures remain high up to Orange Blossom Bridge in some years)	Late Sept through mid Oct to mid Nov, depending on location	M: 3 C: 3	M: 4 C: 3	M: 3 C: 2	M: 4 C: 2	M: 3 C: 2	M: 3 C: 2			M: 2 C: 1	M: 2 C: 1	M: 3 C: 2	M: 3 C: 2
Limited Early Access to River (relative to migration window) due to Impassable or Unsuitable Conditions	3	2	3	2	Primarily Stockton DWSC to Ripon (temperatures remain high up to Orange Blossom Bridge in some years)	Late Sept through early Oct	M: 3 C: 2	M: 3 C: 2	M: 3 C: 2	M: 3 C:2	M: 2 C: 1	M: 2 C: 1					M: 3 C: 2	M: 3 C: 2

Notes:
– Stress and stressors (i.e., contributing factors to a particular stress) for fall-run adult migration in the Stanislaus River for the near term (current conditions) and long term (assuming restored abundance goals and higher air temperatures). Scores for each stress were evaluated and assigned based on the scores for contributing stressors.
– M: Magnitude assesses the size or level of the impact from a stressor. Magnitude can be assigned using consideration of population or habitat effects, and higher scores require consideration of the scale or extent.
– C: Certainty describes the scientific basis for scoring the scale and magnitude of a particular stressor. Certainty considers both the predictability and understanding of linkages in the driver-linkage-outcome pathway from the stressor to the impact.
– Blank space denotes that stressor that is listed for the cell was not scored for the associated row because it is not believed to contribute to the stress identified in that row.
Scoring:
4 = High
3 = Medium
2 = Low
1 = Minimal
LT = long term
NT= near term

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Comparing the desired adult migration window for Stanislaus River fall-run Chinook salmon run (late September through December) with the timing of temperature and DO conditions downstream of the weir, there is evidence that adult fall-run Chinook salmon migration to the Stanislaus River could be delayed or blocked completely during key time periods in the migration window, either in the lower San Joaquin River mainstem or the lower Stanislaus River, in most years (Figure 12).



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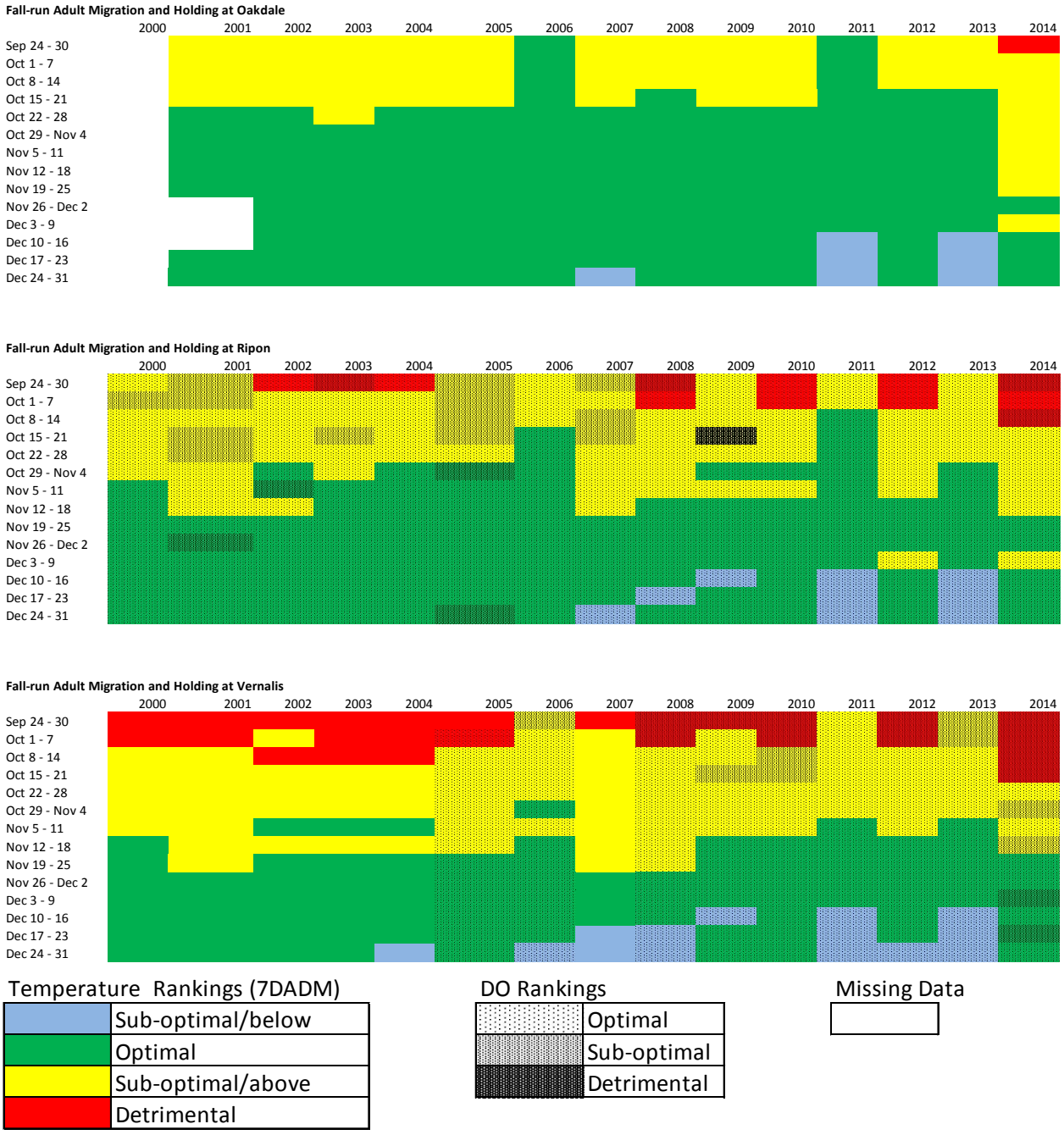


Figure 12

Fall-run Chinook Salmon Adult Migration and Holding

Notes:
Temperature and DO rankings based on observed data during periods of adult migration and holding. Time periods with rankings of sub-optimal or detrimental provide evidence for the potential for barriers to migration and/or reduced egg viability. Rankings reflect the Environmental Objectives for temperature and DO (Section 7). Data are from the California Data Exchange Center for each location.

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High temperatures and low DO likely block salmon migration at levels that are recorded in most years in the lower San Joaquin and lower Stanislaus rivers (see Environmental Objectives for Adult Migration, Section 7.2.1) during the first few weeks of the fall-run Chinook salmon migration (late September and early October). Furthermore, fall-run Chinook salmon migration into the Stanislaus River corresponds with the onset of scheduled pulse flows (Figure 11), and these pulses typically occur in the second or third week of October, several weeks after the fall-run migration is expected to begin. Prior to the onset of flows that may cue fall-run Chinook migration, any adult fish waiting to begin migration in the Delta or lower San Joaquin River would be exposed to poor water quality conditions that may be associated with mortality or straying. Scored collectively, these factors probably have a sustained minor population-level effect (or "medium" magnitude) on adult salmon attempting to reach the Stanislaus River. The certainty of this stress is minimal because there is "medium" to "high" understanding of the relationship across multiple factors (DO and temperature) on this stress, but the predictability is "low." Some individuals can and do complete their migration despite very poor conditions in the migratory corridor, and the timing of adult migration is related to the timing of return from the ocean, which is uncertain and not well monitored. Negative consequences of low DO and high temperatures may be reinforced by the direct effect of toxins on migration success. Generally, toxin concentrations are not high enough to cause complete migration failure for prolonged periods (Hoogeweg et al. 2011); however, the interaction of multiple toxins with high temperatures and low DO levels leads to minimal certainty of the magnitude score (i.e., the magnitude of the effect of toxins on migration success may be higher than expected).

8.2.2.2 Spring-run Chinook Salmon

Failure of Stanislaus-bound spring-run Chinook salmon to reach the Stanislaus River in the near term was scored as a "medium" magnitude stress with a minimal degree of certainty in the near term (Table 53). As described for fall-run Chinook salmon, certainty regarding this stress is "minimal" because the magnitude is related to the temporal distribution of salmon returns from the ocean (i.e., the stock of adult migrants available to begin river migration at any point in time), a factor that is not well monitored.

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Without corrective action, failure of Stanislaus-bound spring-run Chinook salmon to reach the Stanislaus River is expected to be a high magnitude stress over the long term (Table 53). Temperatures are expected to increase in the future and will exacerbate low DO conditions in the lower San Joaquin River and Delta. These conditions will increase the stress caused by lack of attraction pulse flows later in the migration window or pulses of limited size and duration. The projected deterioration of migration conditions, combined with an increase in density (and temporal distribution) of migrating spring-run adults, will increase the certainty of this stress to a low level in the long term. Magnitude will still depend on temporal distribution of returning migrants, but, unless corrected, the period of inhospitable migration conditions is expected to become so large that the certainty of the impact is increased. As with fall-run Chinook salmon, increased monitoring of spring-run adult migrants upstream and in the lower part of the watershed would increase the certainty of this stress.

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Table 53

Adult Migration (Spring-run Chinook Salmon) Stressor Scores

	NT		LT				Stressors											
							Temperature		DO		Toxins		Fishing and Poaching		Passable Physical Barriers (incl. low water levels and SAV)		Attraction Flows	
Stress	M	C	M	C	Where	When	NT	LT	NT	LT	NT	LT	NT	LT	NT	LT	NT	LT
Failure to Reach Holding or Spawning Habitat in the Natal Stream (Stanislaus) due to Direct Action of Stressors (e.g., mortality, straying, and extreme delays)	2	1	3	2	Ripon and downstream to Stockton DWSC	Late September through early October	M: 2 C: 1	M: 3 C: 2	M: 2 C: 1	M: 3 C: 2	M: 1 C: 1	M: 1 C: 1	M: 1 C: 1	M: 1 C: 1			M: 2 C: 1	M: 3 C: 2
Indirect Mortality (e.g., disease outbreaks) and Sub-lethal Negative Effects	3	2	4	2	Primarily Stockton DWSC to Ripon (temperatures remain high up to Orange Blossom Bridge in some years)	Most of March through June in most years	M: 3 C: 2	M: 4 C: 2	M: 3 C: 2	M: 3 C:2	M: 2 C: 1	M: 2 C: 1			M: 2 C: 1	M: 2 C: 1	M: 3 C: 2	M: 4 C: 2

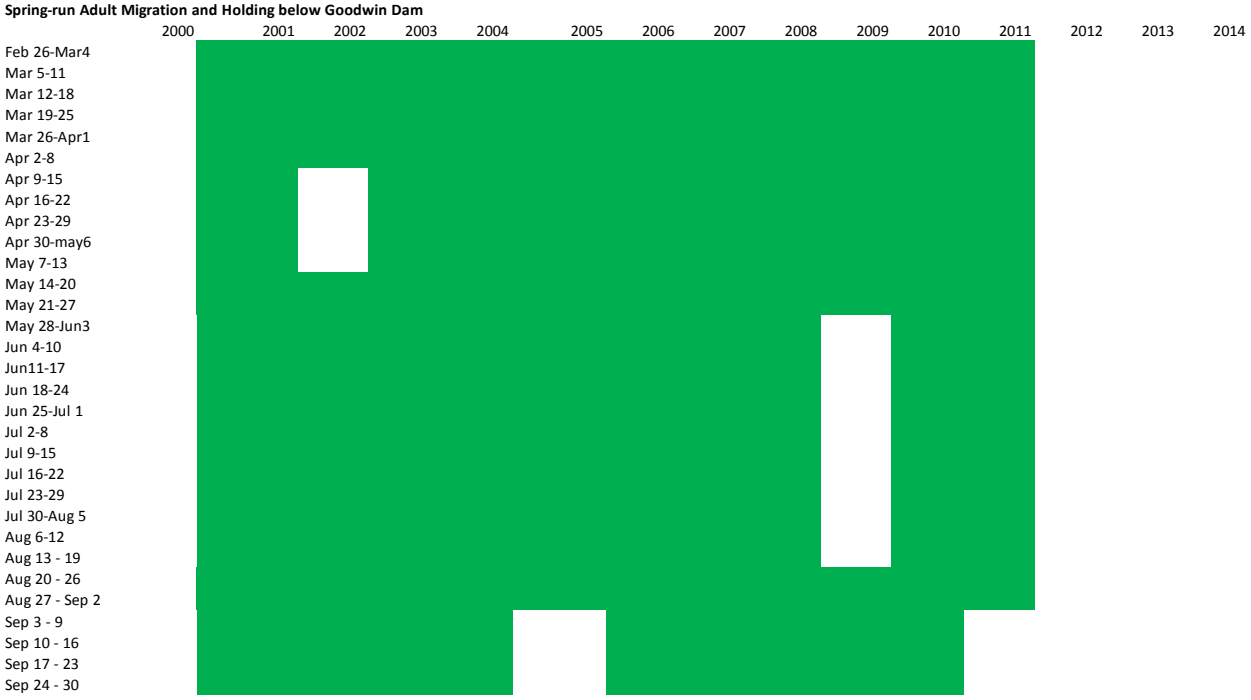
Notes:
– Stress and stressors (i.e., contributing factors to a particular stress) for spring-run adult migration in the Stanislaus River for the near term (current conditions) and long term (assuming restored abundance goals and higher air temperatures). Scores for each stress were evaluated and assigned based on the scores for contributing stressors.
M: Magnitude assesses the size or level of the impact from a stressor. Magnitude can be assigned using consideration of population or habitat effects, and higher scores require consideration of the scale or extent.
– C: Certainty describes the scientific basis for scoring the scale and magnitude of a particular stressor. Certainty considers both the predictability and understanding of linkages in the driver-linkage-outcome pathway from the stressor to the impact.
– Blank space denotes that stressor that is listed for the cell was not scored for the associated row because it is not believed to contribute to the stress identified in that row.
Scoring:
4 = High
3 = Medium
2 = Low
1 = Minimal
LT = long term
NT = near term

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Unlike the fall-run, migration conditions become progressively worse during the spring-run Chinook salmon migration period—spring-run that delay migration are unlikely to find suitable conditions later in the migration season. Adult spring-run Chinook salmon exposed to a combination of high temperatures, low DO, and extremely low river flows are likely to experience significant delays that cause them to stray to other watersheds where better conditions prevail or die as they wait for suitable migration conditions to occur. The combination of factors that produce straying and/or mortality during migration are likely to affect a fraction of adult migrants in a recovering spring-run population in the near term. Based on the timing of temperature and DO conditions during the spring (Figure 13), it is likely that as the spring-run population grows in the near term, many adult spring-run Chinook salmon will experience conditions that can block their migration toward holding grounds in the Stanislaus River during part of their migration season. Temperatures that can block migration occur at Ripon and Vernalis after May in most years and earlier than May under drought conditions. Those DO conditions known to block Chinook salmon migrations (see Environmental Objectives for Adult Migration, Section 7.2.1) also occur frequently in the Stockton DWSC from June through the summer and at Vernalis starting in July. Finally, pulse flows that might attract adult spring-run occur in late April and May as part of water quality standards designed to improve survival of emigrating juvenile Chinook salmon; however, before and after these scheduled pulses occur, required base flows in the lower San Joaquin and Stanislaus rivers may be inadequate to promote adult migration. Straying or mortality resulting from temperature-related or DO-related migration blockages (or the interaction of these factors with contaminant concentrations) may be expected for the latter half of the migration period, but the certainty of this effect is minimal because of uncertainty regarding the timing pattern of spring-run entering the San Joaquin basin.

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Spring-run Adult Migration and Holding below Goodwin Dam

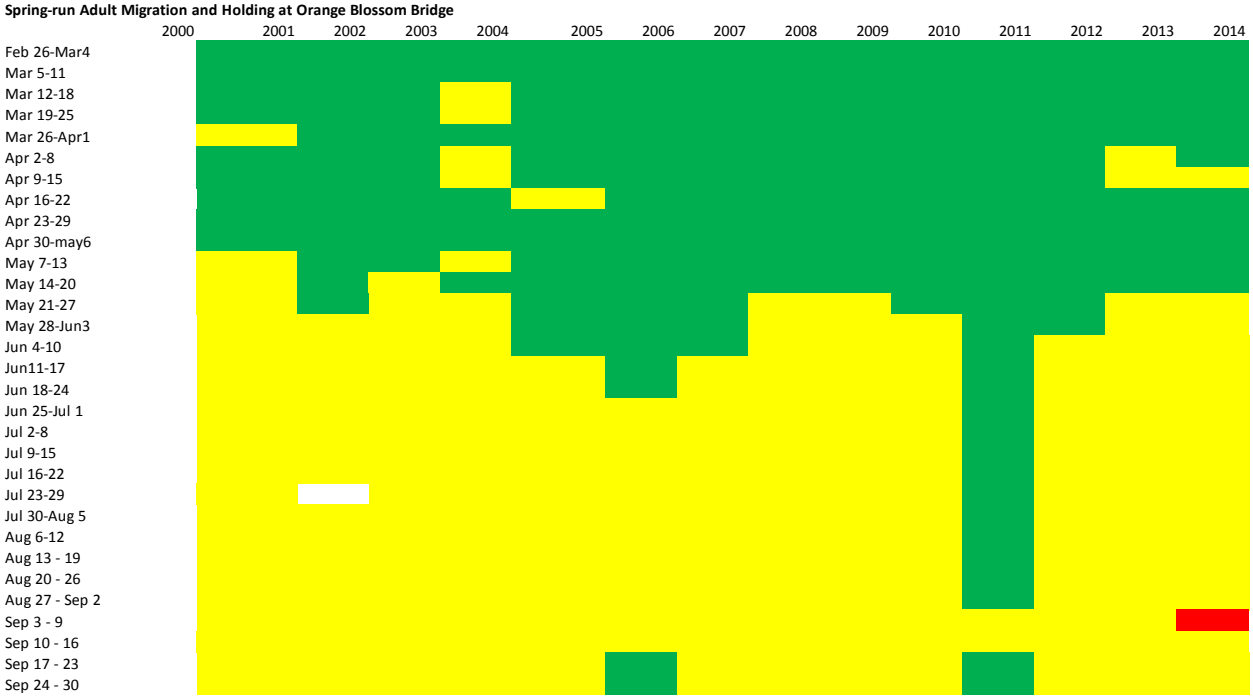


Spring-run Adult Migration and Holding at Knights Ferry



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Spring-run Adult Migration and Holding at Orange Blossom Bridge

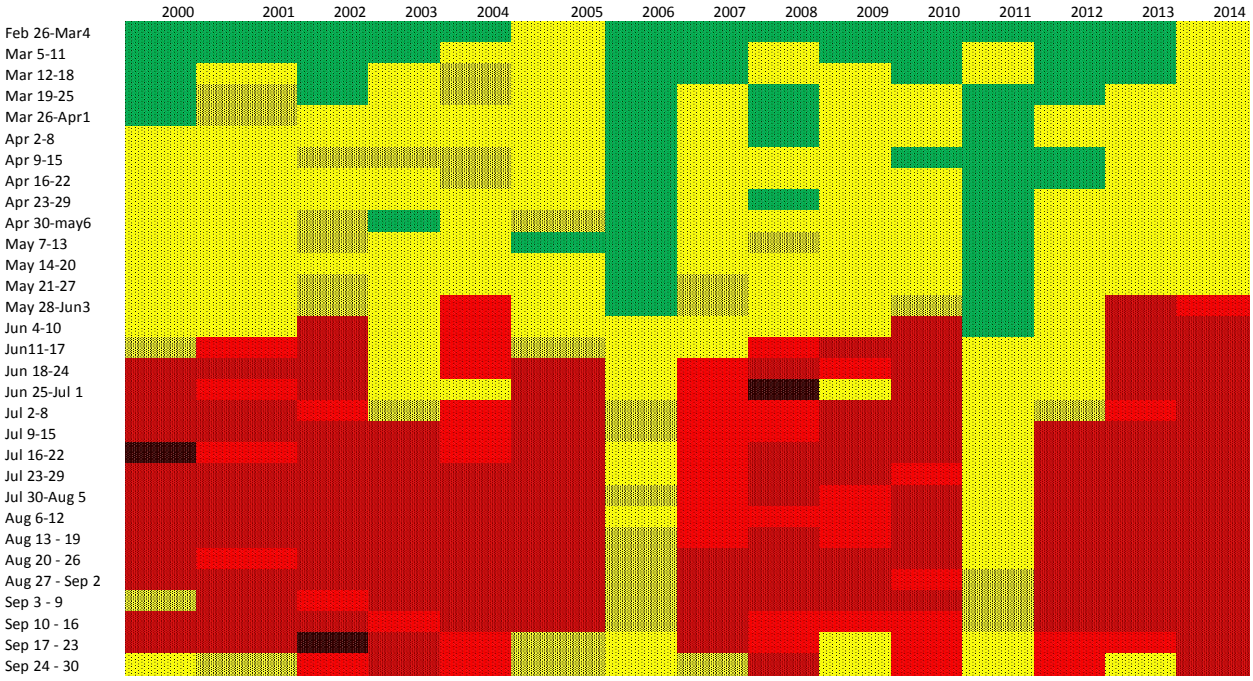


Spring-run Adult Migration and Holding at Oakdale

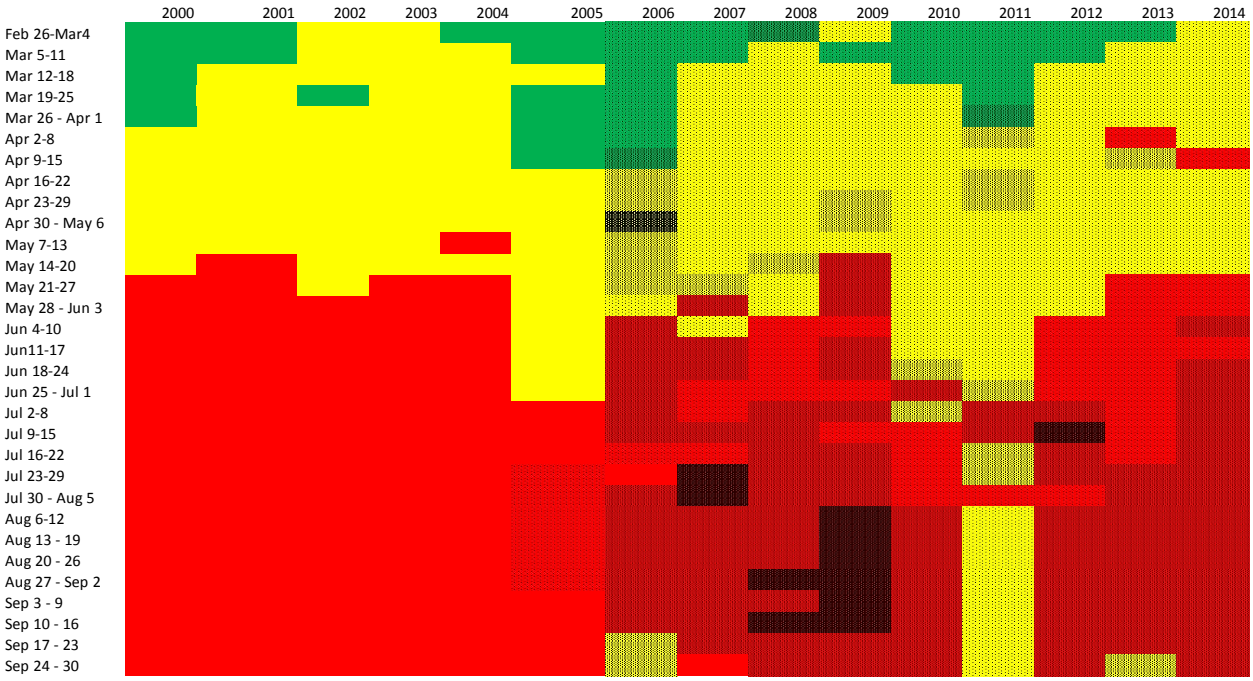


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Spring-run Adult Migration and Holding at Ripon



Spring-run Adult Migration and Holding at Vernalis



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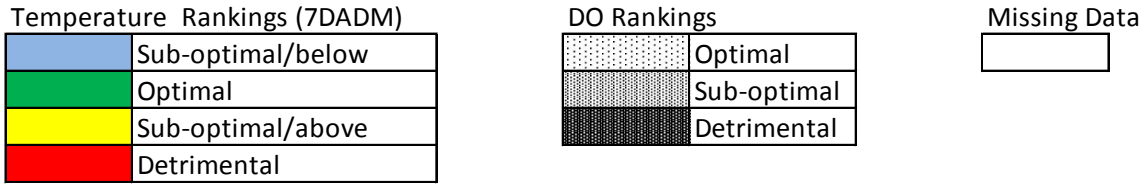


Figure 13

Spring-run Chinook Salmon Adult Migration and Holding

Notes:
Temperature and DO rankings are based on observed data during periods of adult migration and holding. Time periods with rankings of sub-optimal or detrimental provide evidence for the potential for barriers to migration and/or reduced egg viability. Rankings reflect the Environmental Objectives for temperature and DO (Section 7). Data are from the California Data Exchange Center for each location.

Temperature increases expected in the long term will likely increase the magnitude of direct effects on spring-run migration as a larger fraction of the population experiences inhospitable migration conditions. High temperatures in the long term will also tend to reduce DO levels experienced by adult Chinook salmon migrating into the lower San Joaquin and Stanislaus rivers, especially because current regulations allow for lower DO levels in the Stockton DWSC during the spring than during the fall-run Chinook salmon migration season (CVRWQCB 2015a). Furthermore, pulse flows intended to help transport juvenile Chinook salmon are currently scheduled from mid April to mid May, but the timing of these pulse flows may strand a significant fraction of upmigrating adult spring-run Chinook salmon (i.e., those that return later in the season) in the Delta and lower San Joaquin River. As a result, direct impacts to spring-run Chinook salmon migration success in the long term are expected to increase to a sustained major population-level effect. The certainty of this effect in the long term increases to "low" because the duration of conditions that block upstream migration is expected to cover a larger portion of the migration window. Again, certainty could be improved with additional monitoring of spring-run Chinook salmon adult migrants.

8.2.2.3 Steelhead

Stressful conditions that would cause failure of steelhead migration to spawning grounds on the Stanislaus River are expected to generate low level stress with a minimal degree of certainty in the near term (Table 54). Stressful conditions that could result in migration failure occur early and late in the migration season in most years. Certainty of direct effects on migration success is "minimal" for the reasons described for Chinook salmon; also,

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migration timing of steelhead may be more plastic than it is for Chinook salmon (i.e., some steelhead that experience poor migration conditions may be able to wait for improved migration conditions to arise).

Without corrective action, factors that would drive blockage of migrating steelhead are likely to remain a "low" magnitude stress (Table 54) in the long term. Without additional monitoring, certainty will remain minimal, meaning the magnitude of the stress could be higher or lower than estimated here.

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Table 54

Adult Migration (Steelhead) Stressor Scores

	Near Term		Long Term				Stressors											
							Temperature		DO		Toxins		Fishing and Poaching		Passable Physical Barriers (incl. low water levels and SAV)		Attraction Flows	
Stress	M	C	M	C	Where	When	Near Term	Long Term	Near Term	Long Term	Near Term	Long Term	Near Term	Long Term	Near Term	Long Term	Near Term	Long Term
Failure to Reach Holding or Spawning Habitat in the Natal Stream (Stanislaus) due to Direct Action of Stressors (e.g., mortality, straying, and extreme delays)	2	1	2	1	Primarily Stockton to Ripon; toxins may be a problem up to Orange Blossom Bridge	September through mid October	M: 2 C: 1	M: 2 C: 1	M: 2 C: 1	M: 2 C: 1	M: 1 C: 1	M: 1 C: 1	M: 1 C: 1	M: 1 C: 1			M: 2 C: 1	M: 2 C: 1
Indirect Mortality (e.g., disease outbreaks) and Sub-lethal Negative Effects	3	1	3	1	Primarily Stockton DWSC to Ripon (temperatures remain high up to Orange Blossom Bridge in some years)	September through mid October (temperature and DO) and March through April (temperature and toxins)	M: 3 C: 1	M: 3 C: 1	M: 2 C: 1	M: 2 C: 1	M: 3 C: 1	M: 3 C: 1			M: 1 C: 3	M: 1 C: 3	M: 3 C: 1	M: 3 C: 1

Notes:
– Stress and stressors (i.e., contributing factors to a particular stress) for steelhead adult migration in the Stanislaus River for the near term (current conditions) and long term (assuming restored abundance goals and higher air temperatures). Scores for each stress were evaluated and assigned based on the scores for contributing stressors.
– M: Magnitude assesses the size or level of the impact from a stressor. Magnitude can be assigned using consideration of population or habitat effects, and higher scores require consideration of the scale or extent.
– C: Certainty describes the scientific basis for scoring the scale and magnitude of a particular stressor. Certainty considers both the predictability and understanding of linkages in the driver-linkage-outcome pathway from the stressor to the impact.
– Blank space denotes that stressor that is listed for the cell was not scored for the associated row because it is not believed to contribute to the stress identified in that row.
Scoring:
4 = High
3 = Medium
2 = Low
1 = Minimal

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The steelhead adult migration period is longer than that for spring-run or fall-run Chinook salmon (Figure 7). Temperatures that would block migrating adult steelhead occur during the early part of this migration window at Vernalis and occasionally at Ripon (Figure 14). Steelhead may occasionally be blocked by low DO at Vernalis and the Stockton DWSC early in the migration season. Toxins do not reach concentrations that would be expected to completely block steelhead migrations for a protracted period (Hoogeweg et al. 2011; see Appendix B). However, concentrations may be lethal or cause complete migration blockage sporadically from March through May in the lower San Joaquin and infrequently in the lower Stanislaus River (between Ripon and Orange Blossom Bridge) during April and May. The frequency of such events and uncertainty regarding the temporal distribution of adult steelhead migrations and interaction of toxins with high temperature and/or low DO conditions leads to "minimal" certainty regarding the effect of toxins on this stress.

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Steelhead Adult Migration, Holding, and Post-spawning (Kelts) at Goodwin Dam

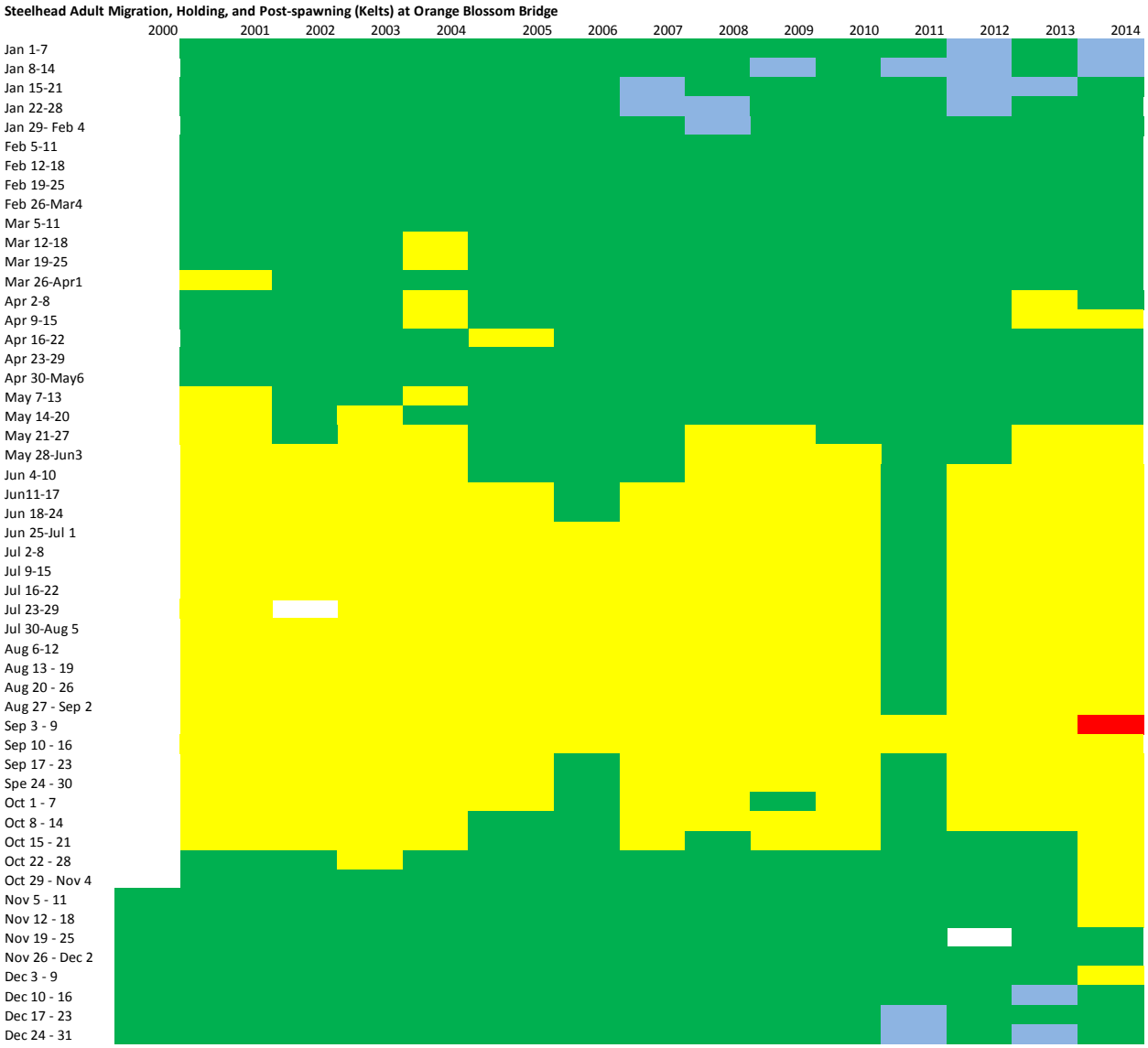


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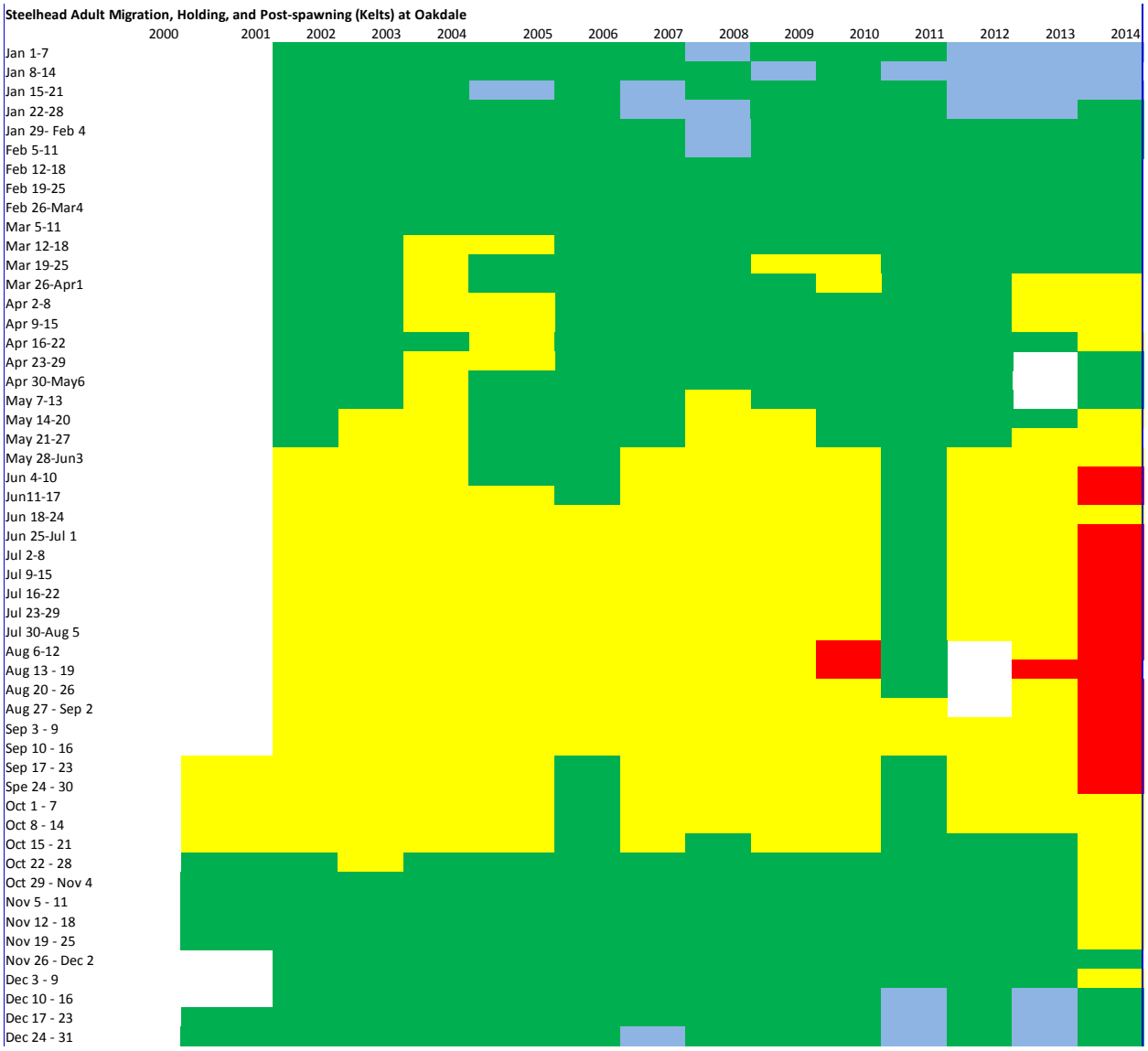
Steelhead Adult Migration, Holding, and Post-spawning (Kelts) at Knights Ferry



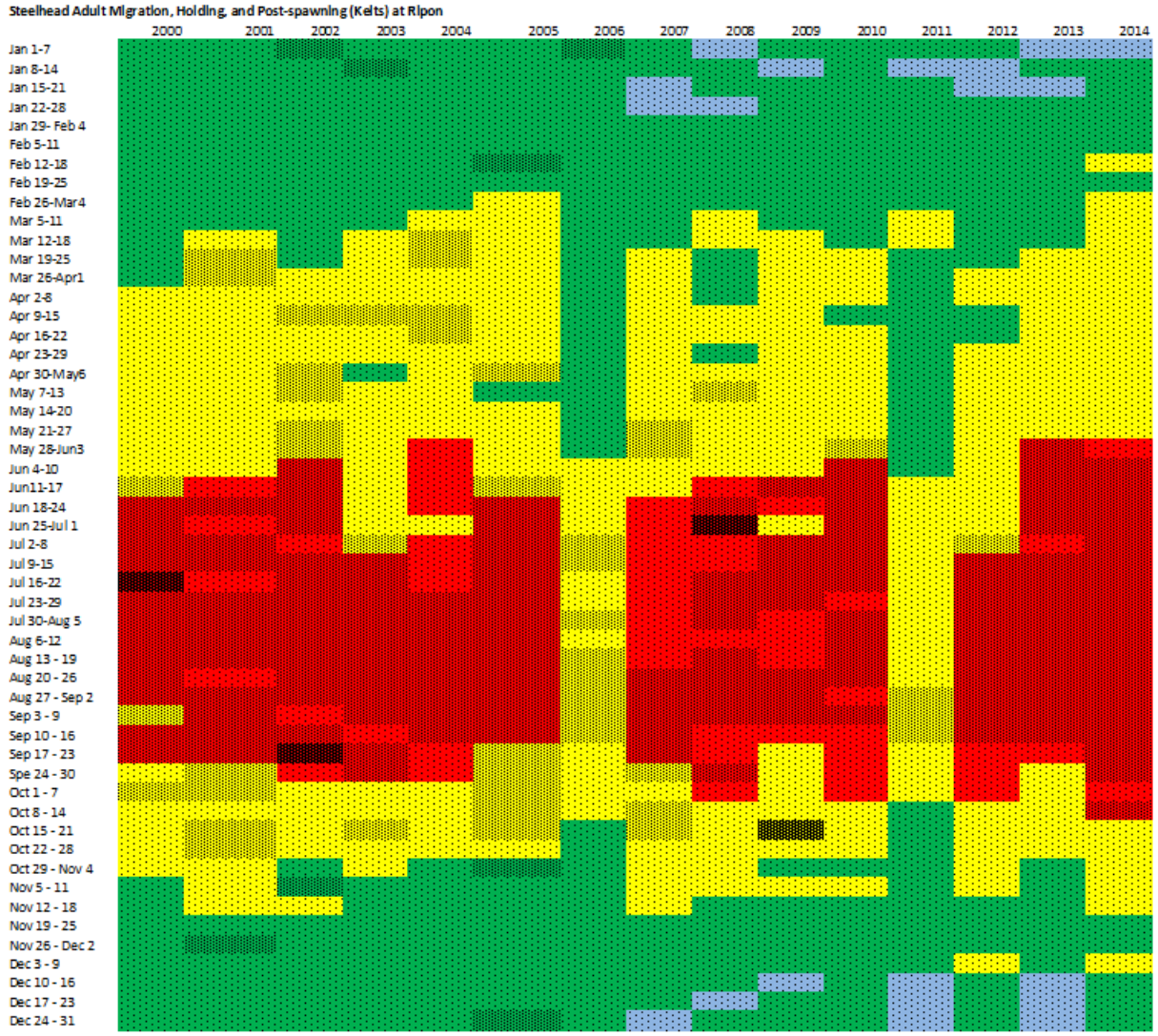
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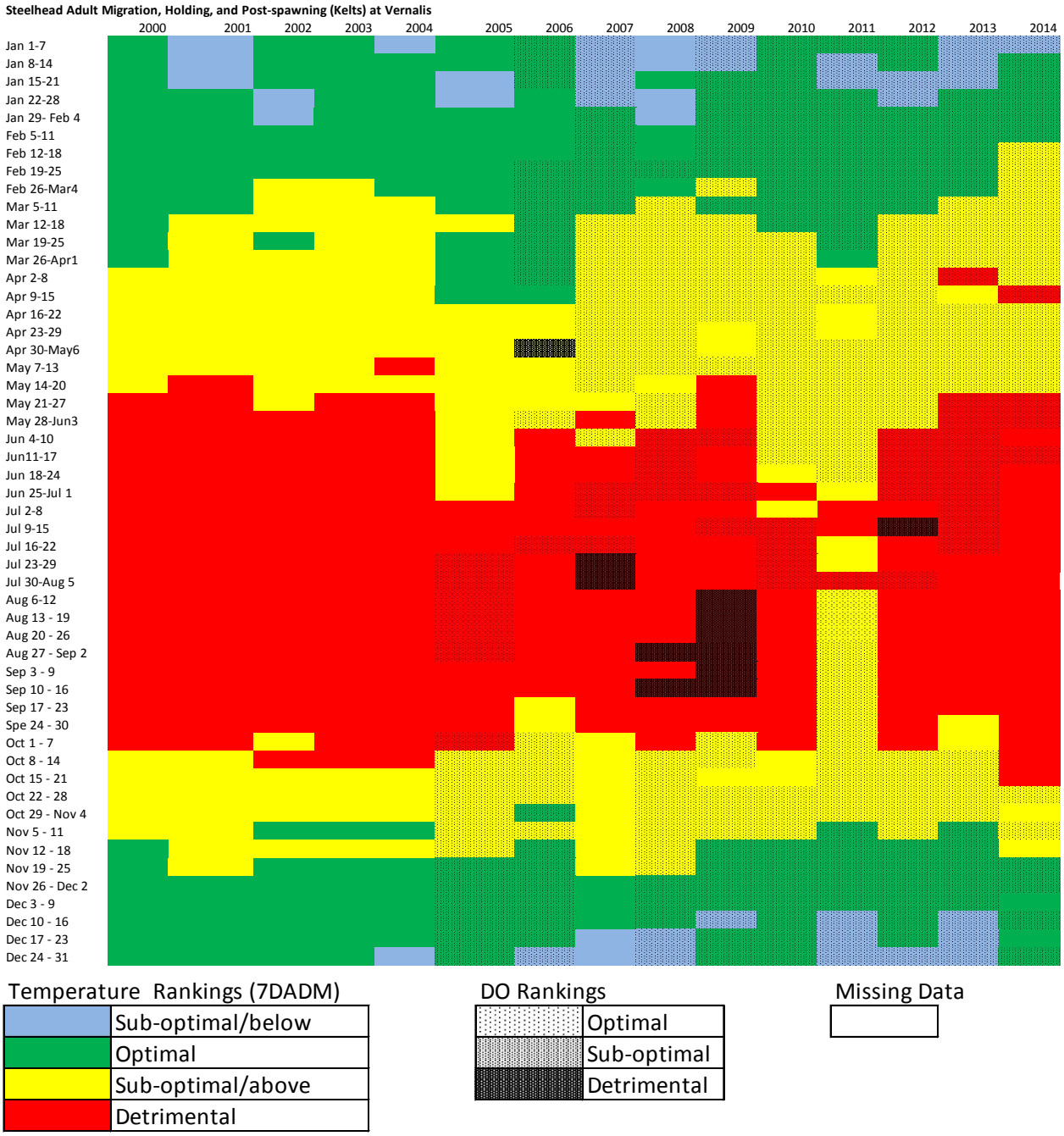


Figure 14

Steelhead Adult Migration, Holding, and Post-spawning (Kelts)

Notes:
Temperature and DO rankings are based on observed data during periods of adult migration and holding. Time periods with rankings of sub-optimal or detrimental provide evidence for the potential for barriers to migration and/or reduced egg viability. Rankings reflect the Environmental Objectives for temperature and DO (Section 7). Data are from the California Data Exchange Center for each location.

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8.2.3 Stress: Indirect Mortality (e.g., Disease Outbreaks) and Sub-lethal Negative Effects (Adult Migration)

Salmon and steelhead may suffer indirect lethal or sub-lethal negative effects following exposure to sub-optimal or detrimental environmental conditions during migration. These effects include death due to disease or lack of energy reserves, either as fish migrate or in subsequent life history stages (indirect mortality), and reduced fertility (negative sub-lethal effects). Disease outbreaks are very rare in the Stanislaus River currently (Wikert, pers. obs.) but may not be detected if they occur below the salmon counting weir on the Stanislaus River. In addition, disease outbreaks and agonistic interactions with other salmon are more likely when density of migrating adults is high; high densities among adult migrants have not occurred frequently in the recent past but would be expected to occur more frequently under restoration in the near term and especially in the long term. Reduction in gamete viability (if any) is unmeasured currently; however, productivity of returning spawners as measured by fry production at Oakdale is very low in many years (Appendix A), suggesting that adult fecundity or egg viability may be compromised during adult migration.

8.2.3.1 Fall-run Chinook Salmon

Reduced spawning success of fall-run Chinook salmon as an indirect lethal or sub-lethal result of poor environmental conditions during adult migration was scored as a "medium" magnitude stress with a "medium" degree of certainty in the near term (Table 52). Magnitude is "medium" because multiple factors contribute to this stress, each stressor is expected to exacerbate the others (i.e., synergies exist among high temperature, low DO, and high contaminant loads), and most of the migration season is characterized by sub-optimal or detrimental conditions for these variables. Certainty of sub-lethal effects is "medium" because the degree and duration of adverse conditions to which fish are exposed are well understood and the effect of that exposure (e.g., quantification of the response to stressful conditions) is moderately well documented (see Environmental Objectives for Adult Migration, Section 7.2.1) and predictable.

Without corrective action, reduced success of Stanislaus-bound fall-run Chinook salmon as an indirect or sub-lethal result of poor environmental conditions during adult migration is expected to become a high magnitude stress over the long term because temperatures and

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density of migrating salmon are expected to increase, and both would contribute to increased magnitude of stress (Table 52). Certainty of this stress will remain "medium" in the long term; certainty is not expected to decline because temperature increases in the San Joaquin watershed and increasing density of fishes will tend to exacerbate stress that already exists.

Cumulatively, numerous conditions experienced by a large fraction of migrating adult fall-run Chinook salmon are consistent with those known to result in indirect mortality and/or sub-lethal effects, such as reduced fecundity. Thus, a sustained minor population-level impact to productivity is expected with "medium" certainty. Fall-run Chinook salmon migrating towards or through the Stanislaus River currently experience multiple sub-optimal or detrimental conditions during most of their migration period (Table 52). Arrival of adults in the Stanislaus River closely corresponds to the schedule of fall pulse flows (Figure 13), and these flows currently occur in the second or third week of October. Adults that arrive in the Delta or lower San Joaquin River prior to the onset of pulse flows are exposed to inhospitable conditions. Sub-optimal DO conditions persist in the Stockton DWSC through mid October in most years into early October at Vernalis and as far upstream as Ripon (Figure 12). In addition, at least half of the migrating population is currently exposed to sub-optimal temperatures in almost every year at Vernalis and in most years at Ripon (Figure 13; Figure 12). Sub-optimal temperatures persist into mid October in most years as far upstream as Orange Blossom Bridge. Exposure to toxins during the upstream migration may also cause migration delays, energetic expense, and exacerbate susceptibility to pathogens and poor water quality conditions. Passable barriers, including low water levels and dense pockets of submerged aquatic vegetation, may increase the drain on energy reserves required to complete migration—both are responses to highly variable ecosystem processes or other external factors, so the certainty of their impacts is minimal. Increased study of the viability of eggs produced by female Chinook salmon that migrate into the Stanislaus River is called for in the SEP Biological Objectives pertaining to egg viability (Section 6.2.5.4.2).

In the future, water temperatures during the fall migration season are expected to increase in response to regional warming patterns. This will increase the magnitude of the temperature and DO stressors and their synergistic effect on the toxin stressor. If these conditions occur in the long term, and pulse flows are not scheduled in a way that leads to earlier migration through the lower San Joaquin River corridor, then the magnitude of this stress is expected

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to become high (i.e., a sustained major population-level effect). Certainty will remain "medium"—improved monitoring of the temporal pattern of adult salmon migration and study of indirect mortality and sub-lethal negative effects would increase the certainty surrounding this stress and could change the magnitude score as well.

8.2.3.2 Spring-run Chinook Salmon

Reduced spawning success of spring-run Chinook salmon as an indirect lethal result of poor environmental conditions during adult migration was scored as a "medium" magnitude stress with a "low" degree of certainty in the near term (Table 53). Unlike the fall-run, the sub-lethal negative effects of damage to developing gametes was not included in the stress experienced by up-migrating spring-run Chinook salmon adults because these fish are expected to develop gametes during their holding period, not during adult migration. Reduced energetic reserves needed to produce gametes (during the holding period) is a sub-lethal negative effect on spring-run Chinook salmon. Certainty is low because although there is high understanding of the extent of adverse conditions, predictability of the effect of those conditions is low for the most important indirect lethal outcomes (disease outbreaks) for spring-run resulting from this stress. Disease outbreaks are affected by the density of migrating fish, which may vary within and among years. Similarly, the negative sub-lethal effect of stress on the energy reserves holding salmon need in order to produce gametes is uncertain because it relies, in part, on the duration of the holding period and the energetic status of fish returning from the ocean.

Without corrective action, indirect mortality and/or reduced fecundity of Stanislaus-bound spring-run Chinook as a result of poor environmental conditions during adult migration will become a high magnitude stress over the long term (Table 53). Two of the main environmental conditions that cause the stress (temperature and density of returning migrants) are expected to increase in the future; this increases the potential frequency and extent of disease outbreaks and/or reduced fecundity due to energetic stress on this run. Certainty of this stress will remain low in the long term for the same reasons it is low in the near term.

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Adult spring-run salmon migrating during the late winter and spring are exposed to multiple stressors, each of which exacerbates the others (i.e., synergies exist among high temperature, low DO, and high contaminant loads), and most of the migration season is characterized by sub-optimal or detrimental conditions for these variables. Taken together, multiple stressors during the spring-run migration period are likely to have minor population-level effects in the short term and sustained minor and/or periodic major population effects in the long term. Both indirect lethal and sub-lethal effects will be responsive to variability in ecosystem conditions, particularly the density, timing, and condition of spring-run adults returning from the ocean. Sub-optimal DO conditions prevail in the Stockton DWSC through most of the migration window, although optimal DO conditions occur most of the time at Vernalis and upstream. Temperatures are sub-optimal or detrimental through most of the migration window in most years as far upstream as Ripon (Figure 13). Furthermore, spring-run Chinook migrants are exposed to multiple contaminant stressors in the lower San Joaquin River up to Ripon on the Stanislaus River; USGS monitoring of the San Joaquin River at Vernalis detected a minimum of six (and up to 14) pesticides in each sample (Orlando et al. 2014). Monitoring data coincide with model results, indicating high frequency of benchmark exceedances that could lead to indirect mortality during migration or in later life stages.

In the long term, increasing density of adult spring-run migrants combined with expected increases in water temperature (and corresponding declines in DO and the effect of toxins) lead to an increase in the potential magnitude of sub-lethal and indirect lethal effects during adult migration (or during holding as a result of conditions experienced while migrating); the current timing of spring-pulse flows will not alleviate these impacts on adult migrants that arrive early (March) or later in the migration window (late May though June). Long-term certainty of such impacts is "low." In both the near term and the long term, increased monitoring and studies of migrating and holding adult spring-run Chinook salmon would increase certainty regarding this stress.

8.2.3.3 Steelhead

Reduced spawning success of steelhead as an indirect or sub-lethal result of poor environmental conditions during adult migration was scored as a "medium" magnitude stress

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with minimal certainty in the near term (Table 54). Magnitude is "medium" because, although only a small fraction of the migration season is characterized by sub-optimal or detrimental conditions for temperature and DO, contaminant loads may be harmful early and late in the migration season. Certainty is minimal because the temporal distribution of adult steelhead migrations (and its overlap with impaired migration conditions) is not well documented.

Unless corrective actions are taken, the indirect effects of poor environmental conditions on migrating steelhead adults will remain "medium" in the long term. Certainty will remain minimal (Table 54).

Periodically high temperatures, low DO levels, and episodic high toxic loads downstream of the Stanislaus-San Joaquin confluence during the early fall steelhead migration period (late September) and downstream of Ripon during the spring migration period indicate that a "medium" magnitude negative effect on steelhead productivity may result from poor environmental conditions during upstream migration. The current timing and frequency of managed pulse flows to attract adult steelhead to the Stanislaus River do not cover most of the steelhead migration season; low flows that persist in the absence of short-term, scheduled pulse flows are not adequate to ensure optimal migration of adult steelhead to their holding and spawning habitats. The certainty surrounding this stress is minimal because the SEP Group's understanding of the precise response of migrating steelhead to poor environmental conditions is limited, the temporal distribution of adult migrants is virtually unknown, and some of the negative outcomes are sensitive to environmental conditions such as the density of migrating adults. Migrating steelhead adults would experience poor DO conditions in many years through the first several weeks of their migration season as far upstream as Ripon. Temperatures are generally sub-optimal through mid November and March through April at Vernalis and through mid October at Ripon. Toxic contaminants are elevated during September and March through May downstream of Ripon and in March through May in the lower San Joaquin downstream of its confluence with the Stanislaus River (Hoogeweg et al. 2011; Appendix C); migrants may also be exposed to a high frequency of pesticide exposures, which may significantly impair successful migration. Steelhead are unlikely to be impaired to a great extent by low water levels or dense patches of invasive vegetation. Increased study of migrating steelhead in the Stanislaus River—including their temporal and spatial

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distribution in the river, survival prior to spawning, and the viability of their eggs—would increase the certainty surrounding the magnitude of this stress.

8.2.4 Stress: Limited Early Access to River (Relative to Migration Window) due to Impassable or Unsuitable Conditions (Adult Migration)

Biological Objectives include time windows in which target populations are expected to be able to complete each of their freshwater life stages. These time windows represent the potential for salmonids to express the diverse life history strategies that:

- Enhance population stability in the face of adverse conditions (in freshwater or marine environments), and
- Promote population resilience when suitable environmental conditions return.

Failure to provide environmental conditions that allow for expression of the full range of life history diversity in each life stage may also have the effect of limiting the portfolio of life history strategies that emerge in subsequent life history stages. For example, constraints on the adult migration window can exacerbate limited diversity in the timing of spawning and incubation and, in turn, the size and temporal distribution of outmigrating juvenile salmonids. Recent research demonstrates a limited portfolio of life histories among fall-run Chinook salmon emigrating from the Stanislaus River, including relatively low proportions of smolt-sized migrants (Zeug et al. 2014; Sturrock et al. 2015). Limited access of fall-run Chinook salmon to their Stanislaus River spawning grounds affects the expression of different adult life history strategies and the potential timing, diversity, and success of subsequent life stages. This stress is scored only for fall-run Chinook salmon. Delayed migration among spring-run Chinook salmon has little effect on subsequent spawning timing because there is a holding period between migration and spawning and is most likely to result in mortality or straying because migration conditions become worse as the spring-run adult season progresses, and is thus captured under the heading "failure to reach holding or spawning habitat in the natal stream due to direct action of stressors" see Section 8.2.2.2). Delayed migration is not considered as a stress for steelhead.

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8.2.4.1 Fall-run Chinook Salmon

In the near term, asymmetrical access to the spawning grounds for adult fall-run Chinook salmon as a result of delayed migration is a "medium" magnitude stress. Certainty surrounding this effect is "low" (Table 52).

Without corrective action, in the long term, late access to the spawning grounds will remain a "medium" magnitude stress, and certainty will remain "low" because better documentation is needed for the relationship between delayed migration and loss of diversity in adult migration phenotypes (i.e., selection) and effects in subsequent life history stages (Table 52).

Delayed migration of fall-run Chinook salmon can be attributed to high temperatures and low DO levels in their migration corridor (Figure 12), particularly in the lower San Joaquin River. In addition, the timing of fall attraction flows leads to a peak migration that occurs in mid to late October (Figure 13). Salmon that arrive prior to the pulse flow are likely to experience deleterious conditions and expend additional energy reaching the spawning grounds; thus, these fish are most likely to experience reduced fecundity or pre-spawning mortality. Truncation of the migration period for fall-run fish is likely to select against early migrating phenotypes; this can reduce population diversity, resilience, and viability even if there is no genetic basis for the phenotypes. In addition, late migration may result in a truncated spawning period and subsequent constriction of diversity in subsequent life history strategies (e.g., timing of emigration and size of juveniles). All of these potential effects suggest the need for additional research on the population-level effects of, and potential to alleviate, persistent delays in migration of adult fall-run Chinook salmon.

8.2.5 Contributing Management Factors

The environmental factors that drive the failure to reach holding or spawning habitats are coupled and work synergistically. For example, temperature affects both DO concentration and fish demand for DO, and it modulates the impact of certain contaminants on migrating adult salmon. Similarly, residence time, nutrient concentration, and temperature all impact the degree of nutrient-related stressors (e.g., macrophyte density or low DO) in the river. Finally, flow rates also play a role in regulating water temperature, residence time, and contaminant/nutrient concentrations in the river.

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Reservoir operations, including releases and cold-water pool management, exert significant influence over these stressors. Reservoir cold-water pool levels and release rates determine, in part, temperatures along the river corridor from late spring through early fall. The timing and duration of attraction flows determine the extent to which adult salmonids are exposed to inhospitable water quality conditions in the lower San Joaquin River and Delta. In all but the wettest years (when uncontrolled runoff and flood prevention procedures lead to higher flows), reservoir releases determine the timing, duration, and magnitude of attraction flows for migrating adult salmonids in both fall and spring. Spring pulse flows in the Stanislaus and San Joaquin rivers are required by the WQC Plan (D-1641) in order to move juvenile Chinook salmon downstream—these flows may also provide migration cues to upmigrating adult spring-run Chinook salmon. However, the pulse flows are only scheduled to occur between late April and early May; adult fish migrating later in the migration period will generally experience base flows that are only a tiny fraction of the San Joaquin basin's unimpaired runoff (TBI 2014, unpublished data). It should also be noted that pulse flow and base flow standards are frequently weakened during consecutive dry or critically dry years (e.g., 2015 and 2016) below the reduced levels required in years with dry or critically dry hydrology. Such reductions affect both outmigrant juvenile fall-run and spring-run Chinook salmon and adult spring-run Chinook salmon attempting to migrate into the San Joaquin and Stanislaus rivers. Modification of flows in the lower San Joaquin River and Stanislaus River are necessary to achieve adequate migration opportunities distributed throughout the fall-run migration time window.

Non-flow management practices may exacerbate or alleviate stressors on adult migration. For example, the destruction of riparian habitat along the Stanislaus River has likely reduced the amount of shade in the river corridor; this can increase temperatures and primary productivity in the river. Groundwater depletions have likely reduced the hyporheic inputs that probably buffered the Stanislaus River against warm temperatures in late spring, summer, and early fall. Groundwater recharge programs may help to reestablish this benefit and reduce water temperatures in the river during critical months. Urban and agricultural developments in the watershed have increased contaminant loads to the river; adjustments to land use practices or the development of contaminant control programs may reduce contaminant loads and the stress they generate for migrating adult salmonids. Finally, the design and operation of the Stockton DWSC coupled with low flow and excessive BOD have

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exacerbated the low DO conditions and resulting migration stressors in the Delta (Gowdy and Grober 2005).

8.3 Stressors on Adult Holding

Adult holding occurs in the salmonid life cycle after immigration into freshwater, but before spawning. Fall-run Chinook salmon adults spend a relatively short period holding; the duration of their holding period is usually dependent on availability of water temperatures suitable for spawning, passage delays from physical barriers, and the presence of suitable mates. Spring-run Chinook adults hold over the summer months, generally without eating, awaiting water temperatures appropriate for spawning. *O. mykiss* adults may "hold" in the river throughout the year; however, unlike salmon, they are usually foraging and growing or recovering from spawning. Both spring-run Chinook and *O. mykiss* lack access to the high elevation habitats these populations used historically because passage to these habitats is now blocked by dams. Stressors on adult holding may result in direct mortality or injury, disease, and/or increased energy expenditure that can reduce fecundity. The degree of stress to the population associated with complete lack of access to high elevation habitat must be assessed in the context of the amount and quality of holding habitat still accessible.

The SEP Group evaluated two categories of stress in the near term and long term for adult salmonids holding into the Stanislaus River: lack of suitable holding habitat and loss of fecundity.

Stressors on the adult holding life stage (Tables 55 – 57) include the following:

- Water temperature;
- Loss of inputs to coarse sediment that drive macroinvertebrate production;
- Low DO;
- Unsuitable water velocity and depth;
- Lack of cover;
- Insufficient prey density;
- High predator density;
- Presence of contaminants;
- Disease; and

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- Poaching.

Measuring any of these effects presents challenges. Direct mortality of holding adults may go unnoticed, especially as holding usually occurs in deeper pools, and detecting reduced gamete viability generally requires directed studies of incubation success (e.g., in a hatchery; see Section 6.2.5.4.2).

Near-term stresses reflect those that would impede attainment of Environmental or Biological Objectives under current conditions. Evaluation of these stresses in the long term incorporated analysis of current conditions and assumed that adult salmon densities would increase substantially and that global and regional warming trends occur as anticipated (Cayan et al. 2008; Dettinger et al. 2004).

8.3.1 Current Holding Timing Patterns

Scoring of stress is based on the potential exposure to stressors across the full range of each population's adult holding timing window (see Figure 7). Current temporal distribution of fall-run Chinook salmon adult holding in the Stanislaus River occurs throughout the adult migration and spawning periods from late September through December. Spring-run Chinook salmon holding is assumed to begin soon after migration begins (March) and end with spawning (late August through October in other Central Valley populations; Williams 2006). *O. mykiss* holding is assumed to occur year-round as both resident and anadromous forms occur within the watershed (Zimmerman et al. 2008). Zimmerman et al. (2008) also found resident *O. mykiss* with steelhead mothers.

8.3.2 Stress: Lack of Suitable Holding Habitat (Adult Holding)

Historically, spring-run Chinook salmon and *O. mykiss* would have utilized sections of the river that are now blocked by dams. The valley floor remains accessible to all runs of Chinook salmon and *O. mykiss*. Reservoir operations and land use changes have modified the instream water temperatures in the remaining accessible habitat.

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8.3.2.1 Fall-run Chinook Salmon

In the near term, lack of suitable holding habitat for fall-run Chinook salmon in the Stanislaus River was scored as a "low" magnitude stress (Table 55) with a "medium" degree of certainty.

Without corrective action, lack of suitable holding habitat for fall-run Chinook salmon will increase to a "medium" magnitude stress (Table 55) over the long term, and certainty will remain "medium."

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Table 55

Holding Stressors for Fall-run Chinook Salmon

	Near Term		Long Term				Stressors																	
							Temperature		DO		Velocity		Depth		Cover		Predator Density		Contaminants		Coarse Sediment Input		Disease		Poaching	
Stress	M	C	M	C	Where	When	Near Term	Long Term	Near Term	Long Term	Near Term	Long Term	Near Term	Long Term	Near Term	Long Term	Near Term	Long Term	Near Term	Long Term	Near Term	Long Term	Near Term	Long Term	Near Term	Long Term
Lack of suitable holding habitat	2	3	3	3	Whole river	September through October	M: 2 C: 3	M: 3 C: 3	M: 1 C: 2	M: 1 C: 2	M: 1 C: 2	M: 1 C: 2	M: 1 C: 2	M: 1 C: 2	M: 2 C: 2	M: 2 C: 2	M: 2 C: 2	M: 2 C: 2	M: 2 C: 2	M: 2 C: 2	M: 1 C: 3	M: 1 C: 3	M: 2 C: 2	M: 3 C: 2	M: 1 C: 2	M: 2 C: 2
Loss of fecundity	2	2	3	2	Whole river	January through June	M: 2 C: 2	M: 3 C: 2	M: 1 C: 2	M: 1 C: 2	M: 1 C: 2	M: 1 C: 2	M: 1 C: 2	M: 1 C: 2					M: 2 C: 2	M: 2 C: 2						

Notes:
– Stress and stressors (i.e., contributing factors to a particular stress) for fall-run adult holding in the Stanislaus River for the near term (current conditions) and long term (assuming restored abundance goals and higher air temperatures). Scores for each stress were evaluated and assigned based on the scores for contributing stressors.
– M: Magnitude assesses the size or level of the impact from a stressor. Magnitude can be assigned using consideration of population or habitat effects, and higher scores require consideration of the scale or extent.
– C: Certainty describes the scientific basis for scoring the scale and magnitude of a particular stressor. Certainty considers both the predictability and understanding of linkages in the driver-linkage-outcome pathway from the stressor to the impact.
– Blank space denotes that stressor that is listed for the cell was not scored for the associated row because it is not believed to contribute to the stress identified in that row.
Scoring:
4 = High
3 = Medium
2 = Low
1 = Minimal

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The stressor that scored the highest for suitable holding habitat for adult fall-run Chinook salmon is water temperature. Temperatures are sub-optimal for holding at and downstream of Orange Blossom Bridge from the start of the fall-run Chinook salmon migration and holding period through mid October in most years (Figure 12). Temperatures are commonly in the optimal range for holding upstream of Knights Ferry, but sub-optimal temperatures have occurred even at this location (e.g., during September and early October of 2015; Wikert 2014, pers. comm.). Fall-run are expected to experience sub-optimal to detrimental contaminant conditions when holding between Orange Blossom Bridge and Riverbank and minor sub-optimal conditions when holding upstream of Orange Blossom Bridge. However, due to their short duration of holding and small proportion of population exposure, the magnitude of impact due to contaminants is expected to be "low."

Other stressors ranked "low" or "minimal," with the exception of disease, which is expected to increase in the long term to "medium" magnitude (Table 55) based on climate change models predicting warmer temperatures and higher concentration of adults after achieving population targets.

8.3.2.2 Spring-run Chinook Salmon

In the near term, lack of suitable holding habitat for spring-run Chinook salmon in the Stanislaus River was scored as a "medium" magnitude stress with a "high" degree of certainty (Table 56).

Without corrective action, lack of suitable holding habitat for spring-run Chinook salmon will increase to a "high" magnitude stress (Table 56) over the long term and certainty will remain "high."

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Table 56

Holding Stressors for Spring-run Chinook Salmon

	NT		LT		Stressors																	
					Temperature		DO		Velocity		Depth		Cover		Predator Density		Contaminants		Coarse Sediment Input		Disease		Poaching	
Stress	M	C	M	C	NT	LT	NT	LT	NT	LT	NT	LT	NT	LT	NT	LT	NT	LT	NT	LT	NT	LT	NT	LT
Lack of suitable holding habitat	3	4	4	4	M: 3 C: 4	M: 4 C: 4	M: 1 C: 2	M: 2 C: 2	M: 1 C: 2	M: 1 C: 2	M: 1 C: 2	M: 1 C: 2	M: 2 C: 2	M: 2 C: 2	M: 2 C: 2	M: 3 C: 2	M: 2 C: 2	M: 2 C: 2	M: 1 C: 3	M: 1 C: 3	M: 2 C: 2	M: 3 C: 2	M: 1 C: 2	M: 2 C: 2
Loss of fecundity	3	2	3	2	M: 2 C: 2	M: 3 C: 2	M: 1 C: 2	M: 1 C: 2	M: 1 C: 2	M: 1 C: 2	M: 1 C: 2	M: 1 C: 2					M: 3 C: 2	M: 3 C: 2						

Notes:
– Location: upstream of Ripon
– When: March through September
– Stress and stressors (i.e., contributing factors to a particular stress) for spring-run adult holding in the Stanislaus River for the near term (current conditions) and long term (assuming restored abundance goals and higher air temperatures). Scores for each stress were evaluated and assigned based on the scores for contributing stressors.
– M: Magnitude assesses the size or level of the impact from a stressor. Magnitude can be assigned using consideration of population or habitat effects, and higher scores require consideration of the scale or extent.
– C: Certainty describes the scientific basis for scoring the scale and magnitude of a particular stressor. Certainty considers both the predictability and understanding of linkages in the driver-linkage-outcome pathway from the stressor to the impact.
– Blank space denotes that stressor that is listed for the cell was not scored for the associated row because it is not believed to contribute to the stress identified in that row.
Scoring:
4 = High
3 = Medium
2 = Low
1 = Minimal
LT = long term
NT = near term

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Temperature is the main driver of this stress for spring-run Chinook salmon; holding habitat with suitable temperatures is currently constrained to the reach just downstream of Goodwin Dam in most years. Temperatures are sub-optimal for holding at and downstream of Orange Blossom Bridge from mid May through the end of the spring-run Chinook salmon holding period (September) in every year (Figure 13). Sub-optimal temperatures also occur frequently from July through September upstream at Knights Ferry, particularly during drought years (e.g., 2013 – 2015; Wikert 2014, pers. comm.). Unless corrective measures are taken, sub-optimal and detrimental temperatures may occur during the holding season throughout currently available habitat under prolonged drought sequences. Even though it is expected to be periodic, such impacts would present a severe constraint on attainment of objectives for the spring-run population in the long term. Spring-run are expected to experience sub-optimal contaminant conditions when holding from Orange Blossom Bridge to Knights Ferry; due to their long duration of exposure, it is expected that contaminants may contribute to spring-run mortality. Upstream of Knights Ferry, contaminants are not expected to be an issue for holding spring-run.

8.3.2.3 O. mykiss

In the near term, lack of suitable holding habitat for *O. mykiss* was scored as a "medium" magnitude stress with a "high" degree of certainty (Table 57).

Without corrective action, lack of suitable *O. mykiss* holding will become a "high" magnitude stress (Table 57) over the long term, and certainty will remain "high."

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Table 57

Holding Stressors for *O. mykiss*

Stress	Near Term M	Near Term C	Long Term M	Long Term C	Where	When	Stressors: Temperature Near Term	Temperature Long Term	DO Near Term	DO Long Term	Velocity Near Term	Velocity Long Term	Depth Near Term	Depth Long Term	Cover Near Term	Cover Long Term	Prey Density Near Term	Prey Density Long Term	Predator Density Near Term	Predator Density Long Term	Contaminants Near Term	Contaminants Long Tern	Coarse Sediment Input Near Term	Coarse Sediment Input Long Term	Disease Near Term	Disease Long Term
Lack of suitable holding habitat	3	4	4	4	Whole River	January through December	M: 3 C: 4	M: 4 C: 4	M: 1 C: 2	M: 1 C: 2	M: 1 C: 2	M: 1 C: 2	M: 1 C: 2	M: 1 C: 2	M: 2 C: 2	M: 2 C: 2	M: 2 C: 2	M: 2 C: 2	M: 2 C: 2	M: 2 C: 2	M: 3 C: 2	M: 3 C: 2	M: 3 C: 3	M: 3 C: 3	M: 2 C: 2	M: 2 C: 2

Notes:
– Stress and stressors (i.e., contributing factors to a particular stress) for *O. mykiss* adult holding in the Stanislaus River for the near term (current conditions) and long term (assuming restored abundance goals and higher air temperatures). Scores for each stress were evaluated and assigned based on the scores for contributing stressors.
– M: Magnitude assesses the size or level of the impact from a stressor. Magnitude can be assigned using consideration of population or habitat effects, and higher scores require consideration of the scale or extent.
– C: Certainty describes the scientific basis for scoring the scale and magnitude of a particular stressor. Certainty considers both the predictability and understanding of linkages in the driver-linkage-outcome pathway from the stressor to the impact.
– Blank space denotes that stressor that is listed for the cell was not scored for the associated row because it is not believed to contribute to the stress identified in that row.
Scoring:
4 = High
3 = Medium
2 = Low
1 = Minimal

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Temperature and loss of coarse sediment input are the main drivers of this high-magnitude stress for *O. mykiss*. Temperatures were largely sub-optimal in nearly every year from June through September at Orange Blossom Bridge and sub-optimal during some weeks between July and September during most years at Knights Ferry (Figure 14). Without corrective action, lethal water temperatures that accompany extended droughts and low reservoir storage could potentially extirpate the entire population of steelhead and resident rainbow trout. This is of particular concern in the long term.

Since adult *O. mykiss* feed in freshwater (especially recovering kelts), functioning alluvial coarse sediment is necessary to provide macroinvertebrate habitat to sustain the food chain, especially in the 4 miles of the canyon reach just below Goodwin Dam. With little to no off-channel habitat available for fish or for food production, food must come from in-channel sources or move downstream from the reservoir above. *O. mykiss* holding conditions are expected to get worse in the long term based on the assumption of higher water temperatures and increased numbers of *O. mykiss* competing for available spots, but this stress is rated as maximum magnitude, including in the near term. As such, the scoring system used here does not capture the deterioration of conditions in the future, in the absence of restoration actions. Contaminants will likely contribute to some mortality of *O. mykiss* as well as reduce the availability of food.

8.3.3 Stress: Loss of Fecundity (Adult Holding)

Exposure to sub-optimal or detrimental environmental conditions while holding may result in lower egg viability, pre-spawn mortality, or partial-spawn mortality (some, eggs remain in the female after death). Reduction in gamete viability (if any) is unmeasured currently; however, productivity of returning spawners as measured by fry production at Oakdale is very low (Appendix A), suggesting that adult fecundity or egg viability may be compromised during adult migration or holding.

8.3.3.1 Fall-run Chinook Salmon

In the near term, reduced fecundity for fall-run Chinook salmon that experience poor environmental conditions during holding was scored as a “low” magnitude stress with a “medium” degree of certainty (Table 55).

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Without corrective action, reduced fecundity will increase to a "medium" magnitude stress over the long term for fall-run, and certainty will remain "medium" (Table 55).

The SEP Group expects that this stress currently has a sustained effect limited to a small fraction of the fall-run Chinook salmon population as these fish exhibit minimal holding behavior. Holding among fall-run is thought to happen mostly while adults are either waiting for temperatures in the spawning reach to cool sufficiently or seeking a suitable spawning partner. The short duration of holding for fall-run will limit the impacts from exposures to contaminants. In the long term, higher temperatures predicted by climate models are likely to increase the magnitude of this stress.

8.3.3.2 Spring-run Chinook Salmon

In the near term, reduced fecundity for spring-run Chinook salmon as a result of conditions during the holding period is expected to be a "low" magnitude stress, but certainty is "low" as well (Table 56).

Without corrective action, reduced fecundity for spring-run Chinook salmon will increase to a "medium" magnitude stress over the long term, and certainty will remain "low" (Table 56).

Spring-run Chinook salmon adults hold in river from March through September, generally in deeper pool areas. Currently, these are distributed throughout the river either in deep mine pits or in Goodwin Canyon. Temperatures are usually optimal in the upstream areas when reservoir storage is sufficient to retain cold water through the summer (e.g., temperatures below Goodwin Dam; Figure 14). However, during prolonged drought, the temperature of water released from Goodwin Dam can exceed sub-optimal levels for extended periods (e.g., more than 16°C [60.8°F] at approximately RM 57.5 on July 8 and 23, 2015; Wikert 2014, pers. comm., and this would be expected to result in reduced fecundity for holding spring-run Chinook salmon.

8.3.3.3 O. mykiss

O. mykiss are not expected to experience a reduction in fecundity as a result of conditions during the holding period from any of the existing or future stressors analyzed in this report.

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8.3.4 Contributing Management Factors

Dams block access to historic high-elevation holding habitats, particularly for spring-run Chinook salmon and *O. mykiss*. The holding behavior for fish in these populations is restricted to warmer, lower elevation tailwaters below Goodwin Dam. Availability of holding habitat is expected to deteriorate in the long term.

Reservoir operation is a major driver of the environmental factors that control the impact of stressors on adult salmonids during their pre-spawn holding period and that may lead to post-migration mortality or sub-optimal gamete production among adult salmonids. For example, flow rates and cold-water pool management regulate water temperature and residence time in the river. In addition, the volume of water released from the reservoir will affect dilution of contaminant discharges to the river. The environmental factors that drive the failure to attain holding habitat Environmental Objectives, post-migration mortality, or negative sub-lethal effects are often coupled and work synergistically (e.g., temperature affects both DO concentration and fish demand for DO). Furthermore, residence time, nutrient concentration, and temperature all impact the degree of nutrient-related stressors (e.g., macrophyte density or low DO) in the river.

Other non-flow management practices may exacerbate or alleviate stressors on adult holding. For example, the destruction of riparian habitat along the Stanislaus River has likely reduced the amount of shade in the river corridor; this can increase temperatures and primary productivity in the river. Groundwater depletion has likely terminated the hyporheic inputs that likely buffered the Stanislaus River against warm temperatures in late spring, summer, and early fall. Groundwater recharge programs may help to reestablish this benefit and reduce water temperatures in the river during critical months. Creation of gravel bars and alluvial in-channel islands offer the opportunity to create thermal complexity and provide cold-water refuges during peak temperature times (Ock and Kondolf 2012).

Urban and agricultural developments in the watershed have increased contaminant loads to the Stanislaus River. Adjustments to land use practices or the development of contaminant control programs may reduce contaminant loads and the stress they generate for migrating adult salmonids.

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8.4 Stressors on Spawning

Spawning is a short life stage, lasting hours for Chinook salmon (Berejikian et al. 2000a) and an average of 3 days for *O. mykiss* (Briggs 1953; Shapovalov and Taft 1954; Hannon et al. 2003). Despite its brevity, spawning is an important transitional link from one generation of salmonids to the next. Physiological conditions in fish trigger the onset of spawning at specific times of the year for different species. Spawning salmonids require adequate space, correctly sized gravel, appropriate river depth and velocities, nearby cover (especially for *O. mykiss*), and clean water (e.g., devoid of disruptive contaminants) to spawn successfully. In addition, avoiding interbreeding is also an important component of spawning success that supports the Biological Objectives.

Stresses are potential negative outcomes that prevent attainment of Environmental and/or Biological Objectives. The following three stresses were evaluated for spawning salmonids in the Stanislaus River:

- Inadequate availability of high quality spawning habitat segregated from other runs,
- Interbreeding/introgression, and
- Compression of the spawning window due to delayed spawning.

Stressors are variables that contribute to stress, alone or in combination. River temperatures, DO, velocity, depth, cover, contaminants, predation, poaching, amount of available spawning habitat segregated from that used by other populations (necessary to prevent interbreeding or red superimposition by one population that reduces productivity of another population), disease, and impacts from hatchery operations were individually considered to assess their relative contribution to population stresses during the spawning life stage.

Near-term stresses reflect those that would impede attainment of Environmental or Biological Objectives currently. Evaluation of these stresses in the long term incorporated analysis of current conditions and assumed that adult salmon densities would increase substantially and that global and regional warming trends occur as anticipated (Dettinger et al. 2004; Cayan et al. 2006).

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8.4.1 Current Spawning Timing

Scoring of stress and contributing stressors was based on the potential exposure to conditions across the full range of each population's spawning timing window as compared to the expected timing window and spatial extent of spawning in the Stanislaus River (Figure 7). Spring-run Chinook salmon and Central Valley steelhead spawning are not well monitored at this time, so the current timing of spawning for these two populations is based on the timing for runs observed in other Central Valley watersheds. Spring-run spawning timing was considered to be late August through March (Figure 7). Spawning timing for *O. mykiss* was considered to be between December and April (McEwan 2001; Williams 2006; Figure 7).

8.4.2 Current Spawning Extent

Current spawning area is limited to the area above RM 34 (6 miles downstream of the Oakdale RST), although the majority of redds (mean 90%; Giudice, CDFW; personal communication) are observed upstream of the Oakdale RST. Spawning is observed throughout the river upstream of Oakdale to the base of Goodwin Dam.

8.4.3 Stress: Inadequate Availability of High-quality Habitat (Spawning)

Attainment of goals and objectives for Chinook salmon and *O. mykiss* will require sufficient high quality habitat, as described in the SEP Group's Environmental Objectives for spawning (Section 7.2.3). High-quality habitat includes adequate amounts of spawning gravel (correctly sized sediments) that is inundated to adequate river depth, at adequate velocity, and by water of adequate quality. To attain SEP Biological Objectives for productivity of each population, high-quality spawning habitat for each population must also be spatially or temporally segregated from other runs or species. Spatial or temporal segregation is intended to prevent redd superimposition, which destroys some or all of the incubating eggs or alevins, and genetic introgression between runs (i.e., spring-run and fall-run) or between hatchery and naturally produced individuals, which is hypothesized to reduce diversity and/or fitness. However, interactions between runs and between hatchery and naturally produced fish are discussed in Section 8.4.4.

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8.4.3.1 Fall-run Chinook Salmon

Inadequate availability of high-quality spawning habitat for fall-run in the near term was rated a "low" magnitude stress with expected minor effect on the population; certainty of this stress was "medium" (Table 58).

Over the long term, this stress will increase to "high" magnitude. The certainty will remain "medium" (Table 58).

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Table 58

Spawning Stressors for Fall-run Chinook Salmon in Spawning Reach, October through December

Fall-run Stressor in Spawning Reach, October-December	NT		LT		Stressors																					
					Temperature		DO		Velocity		Depth		Coarse Sediment Input		Cover		Predator density		Contaminants		Habitat Distribution		Disease		Poaching		Hatchery Operations		Run Segregation	
	M	C	M	C	NT	LT	NT	LT	NT	LT	NT	LT	NT	LT	NT	LT	NT	LT	NT	LT	NT	LT	NT	LT	NT	LT	NT	LT	NT	LT
Inadequate availability of high-quality habitat	2	3	4	3	M: 2 C: 3	M: 4 C: 3	M: 1 C: 2	M: 2 C: 1	M: 1 C: 2	M: 1 C: 2	M: 3 C: 3	M: 3 C: 3	M: 2 C: 2	M: 3 C: 2	M: 1 C: 2	M: 1 C: 2	M: 1 C: 1	M: 1 C: 1	M: 2 C: 2	M: 3 C: 2	M: 1 C: 4	M: 3 C: 3	M: 1 C: 2	M: 2 C: 2	M: 1 C: 2	M: 2 C: 2				
Interactions with hatchery fish and other runs	4	4	4	3																							M: 4 C: 4	M: 4 C: 3	M: 1 C: 4	M: 4 C: 3
Compression of the spawning window due to delayed spawning	2	2	4	2	M: 3 C: 2	M: 4 C: 2	M: 1 C: 2	M: 2 C: 1																						

Notes:
– Stress and stressors (i.e., contributing factors to a particular stress) for fall-run spawning in the Stanislaus River for the near term (current conditions) and long term (assuming restored abundance goals and higher air temperatures). Scores for each stress were evaluated and assigned based on the scores for contributing stressors.
– M: Magnitude assesses the size or level of the impact from a stressor. Magnitude can be assigned using consideration of population or habitat effects, and higher scores require consideration of the scale or extent.
– C: Certainty describes the scientific basis for scoring the scale and magnitude of a particular stressor. Certainty considers both the predictability and understanding of linkages in the driver-linkage-outcome pathway from the stressor to the impact.
– Blank space denotes that stressor that is listed for the cell was not scored for the associated row because it is not believed to contribute to the stress identified in that row.
Scoring:
4 = High
3 = Medium
2 = Low
1 = Minimal
LT = long term
NT = near term

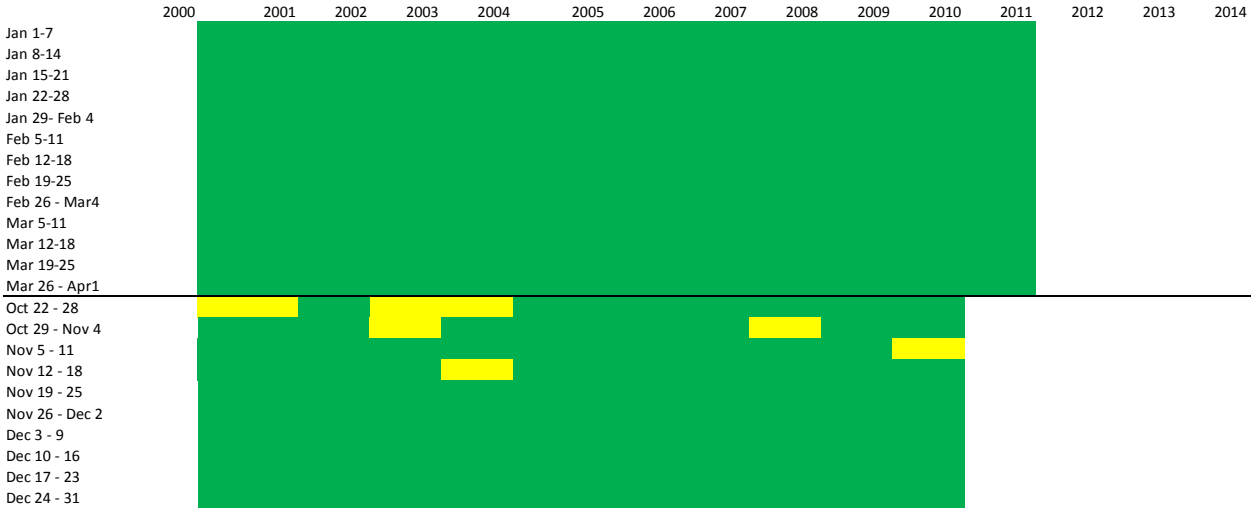
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Currently, the amount of spawning habitat in the Stanislaus River is sufficient for returning fall-run spawners (but see Section 8.4.4). Magnitude for this stress was considered "low" in the near term largely due to adequate availability of spawning habitat with appropriate depth, velocity, substrate, and temperature criteria during the core-spawning period. Other habitat components, such as DO, water velocity, water depth, cover, disease, contaminants, predator density, poaching, and habitat distribution (the distribution of spawning habitats throughout the river), were all rated as "minimal" or "low" magnitude stressors. Competition for spawning habitat space and negative effects from redd superimposition are not expected to be stressors because an estimated 25 to 27 acres of spawning habitat in wet and dry years, respectively, are available on the Stanislaus River (CVPIA Science Integration Team 2016). This is more than estimated 14.7 acres needed to support "wild" adult spawners and reach target juvenile numbers (Appendix B, Table B-3).

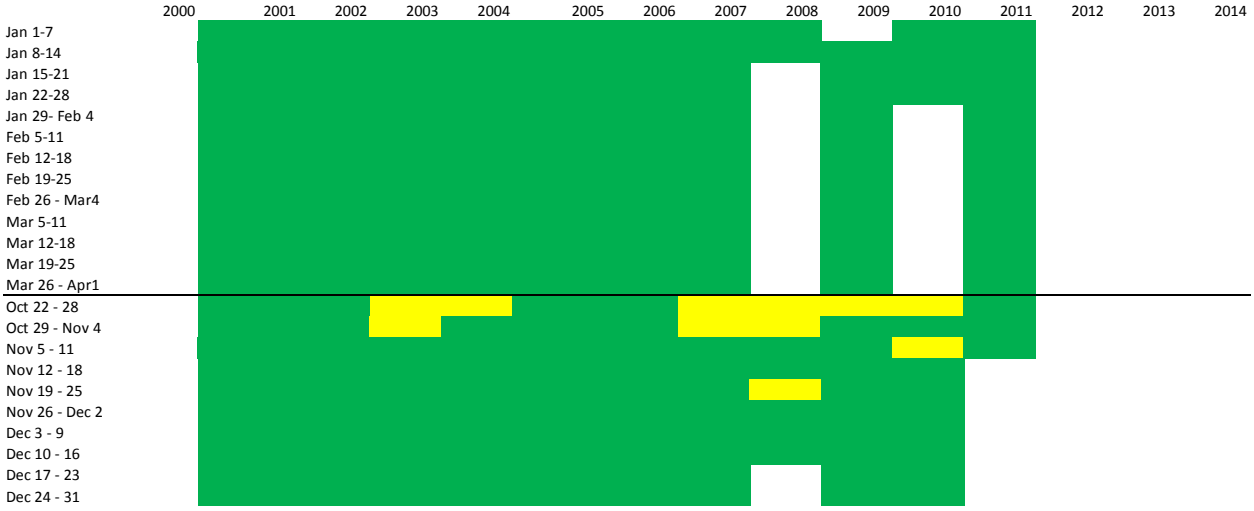
Certainty for the stress associated with amount of available habitat was considered to be "medium." Understanding is "high" with regard to temperatures during the spawning season and spawning habitat availability on the Stanislaus (Figure 15; CVPIA Science Integration Team 2016). However, information on DO, contaminants, and predation and poaching in the spawning reach of the river was based largely on professional judgement rather than Stanislaus River-specific studies. There is insufficient information regarding large classes of contaminants and potential impacts in the upstream reaches. The only data for DO are from a gage located at Ripon, which is far from the current spawning area. Spawning surveys conducted by CDFW suggest little sign of pre-spawn mortalities and egg retention in females in the spawning reach (Giudice 2014, pers. comm.); however, there is little information on viability of spawned eggs. Additionally, although the temperature data for current conditions came from long-term data from California Data Exchange Center (CDEC) gages (at Goodwin Dam, Knights Ferry, and Orange Blossom Bridge), there are no studies indicating whether poor temperature conditions are contributing to spawning delays.

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Fall-run Spawning and Egg Incubation below Goodwin Dam



Fall-run Spawning and Egg Incubation at Knights Ferry



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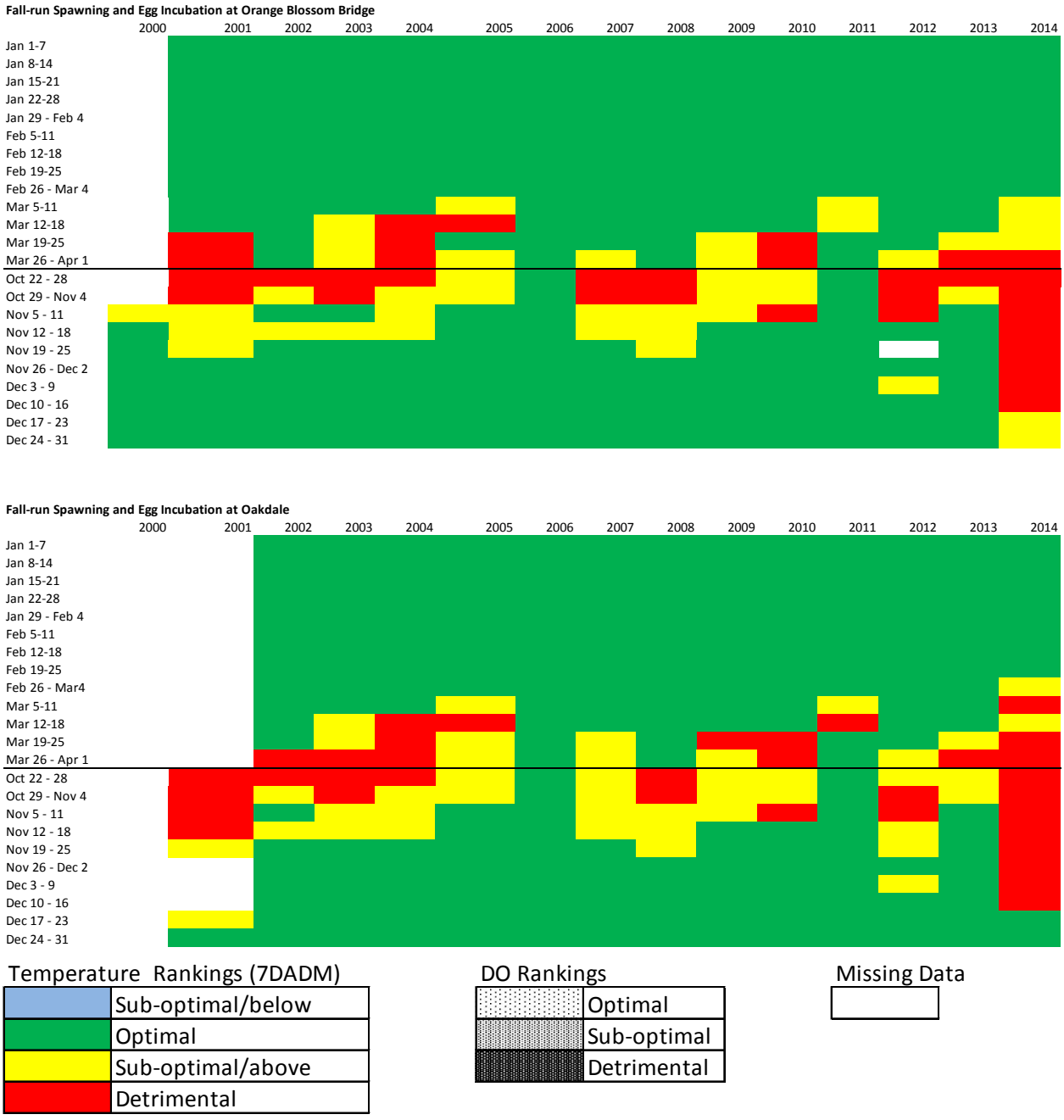


Figure 15

Fall-run Chinook Salmon Spawning and Egg Incubation

Notes:
Temperature and DO rankings based on observed data during periods of spawning. Time periods with rankings of sub-optimal or detrimental provide evidence for the potential for delayed spawning, increased pre-spawn mortality, and/or reduced egg viability. Rankings reflect the Environmental Objectives for temperature and DO (Section 7). Data are from CDEC for each location.

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In the long term, the lack of high quality habitat will increase to a "high" magnitude stress (major population-level effect) due to several factors. Increases in the expected number of returning spawners will require additional habitat area. Climate change scenarios project more rain, less snow, and warmer water temperatures in the future, which will exacerbate current sub-optimal temperature conditions for spawners (Dettinger et al. 2004; Cayan et al. 2008). Negative effects from DO may increase in magnitude in the long term with the expected increase in suboptimal temperatures. Finally, as is typical in rivers blocked by dams, the Stanislaus River lacks the ability to replenish gravel and sustain habitat through natural geomorphic processes. In the long term, there will not be enough habitat for adult spawners unless substantial efforts are made to restore this habitat.

The certainty for this stress in the long term remains "medium." There is substantial evidence for the following: the need for additional spawning habitat space as spawning populations increase; predicted increases in temperature over time; and the presence of dams leading to eventual decreased availability of spawning gravels and increased bed armoring. It can be reasonably assumed that, without corrective action, warmer temperature conditions predicted by climate models will contribute to spawning delays and/or failure to spawn.

8.4.3.2 Spring-run Chinook Salmon

Inadequate availability of high-quality spawning habitat for spring-run in the near term was rated a "medium" magnitude stress with an expected minor effect on the population; certainty of this stress was "medium" (Table 59).

Over the long term, this stress will increase to "high" in magnitude. The certainty will remain "medium" (Table 59).

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Table 59

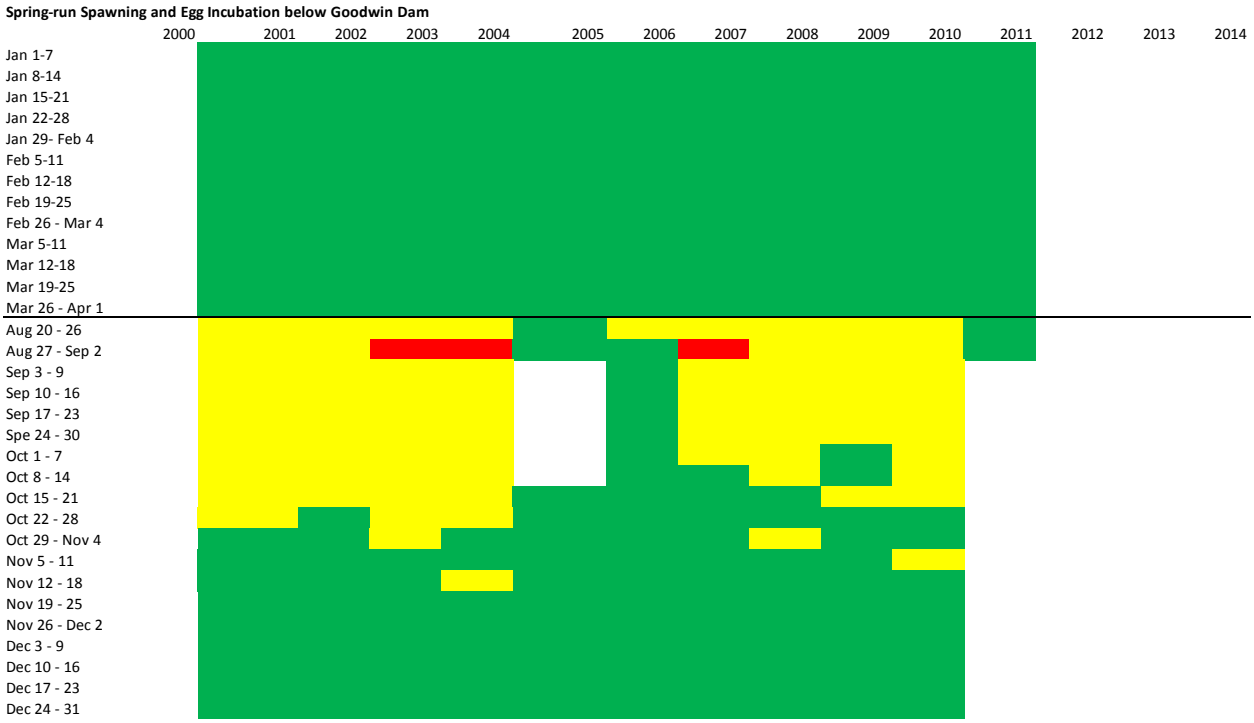
Spawning Stressors for Spring-run Chinook Salmon

Spring-run Stressor, Spawning Reach, late August-October	NT		LT		Stressors																					
					Temperature		DO		Velocity		Depth		Coarse Sediment Input		Cover		Predator density		Contaminants		Habitat Distribution		Disease		Poaching		Hatchery Operations		Run Segregation	
	M	C	M	C	NT	LT	NT	LT	NT	LT	NT	LT	NT	LT	NT	LT	NT	LT	NT	LT	NT	LT	NT	LT	NT	LT	NT	LT	NT	LT
Inadequate availability of high-quality habitat	3	3	4	3	M: 3 C: 3	M: 4 C: 3	M: 1 C: 2	M: 2 C: 1	M: 1 C: 2	M: 1 C: 2	M: 1 C: 2	M: 1 C: 2	M: 1 C: 3	M: 3 C: 3	M: 1 C: 2	M: 1 C: 2	M: 1 C: 2	M: 1 C: 2	M: 2 C: 2	M: 3 C: 2	M: 3 C: 3	M: 4 C: 3	M: 1 C: 2	M: 2 C: 2	M: 1 C: 2	M: 1 C: 2				
Interactions with hatchery fish and other runs	4	4	4	3																					M: 2 C: 3	M: 4 C: 3	M: 4 C: 4	M: 4 C: 3
Compression of the spawning window due to delayed spawning	3	2	4	2	M: 3 C: 3	M: 4 C: 2	M: 2 C: 1	M: 2 C: 1																						

Notes:
– Stress and stressors (i.e., contributing factors to a particular stress) for spring-run spawning in the Stanislaus River for the near term (current conditions) and long term (assuming restored abundance goals and higher air temperatures). Scores for each stress were evaluated and assigned based on the scores for contributing stressors.
– Location: Spawning Reach; When: late August through October
– M: Magnitude assesses the size or level of the impact from a stressor. Magnitude can be assigned using consideration of population or habitat effects, and higher scores require consideration of the scale or extent.
– C: Certainty describes the scientific basis for scoring the scale and magnitude of a particular stressor. Certainty considers both the predictability and understanding of linkages in the driver-linkage-outcome pathway from the stressor to the impact.
– Blank space denotes that stressor that is listed for the cell was not scored for the associated row because it is not believed to contribute to the stress identified in that row.
Scoring:
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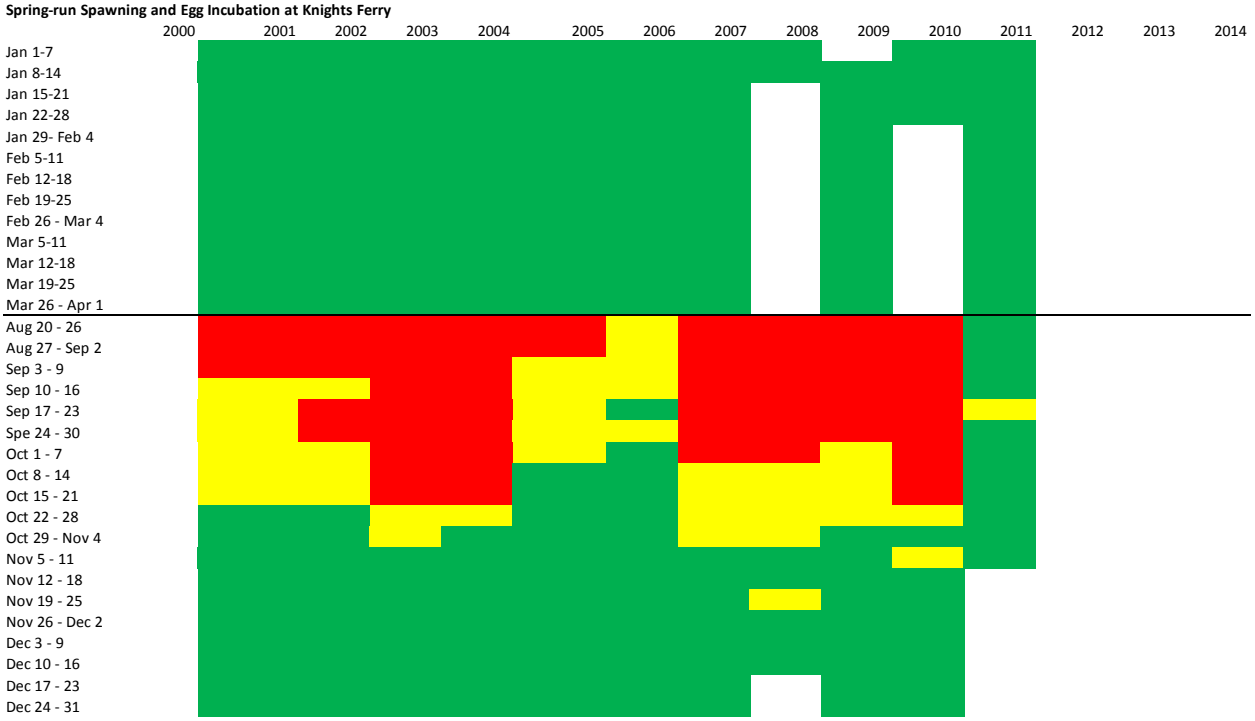
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Magnitude for the inadequate availability of high-quality habitat stress was considered "medium" in the near term as a result of habitat component stressors such as temperature and extent of appropriately sized gravel. Temperatures are potentially detrimental or suboptimal throughout the spawning reach from Orange Blossom Bridge to Goodwin Dam during late August to early November (Figure 16). Similar to fall-run, spring-run would require 14.7 acres of high quality spawning habitat to support returning adult spawners and juvenile productivity objectives that are required to achieve restoration goals. Although sufficient spawning habitat exists to support current numbers of spawning spring-run, spawning habitat is not segregated from fall-run. Lack of spatial and temporal segregation between fall-run and spring-run will likely result in red superimposition for spring-run. Together, the many stressors combine to make the inadequate availability of habitat a "medium" magnitude stress.



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Spring-run Spawning and Egg Incubation at Knights Ferry



Spring-run Spawning and Egg Incubation at Orange Blossom Bridge



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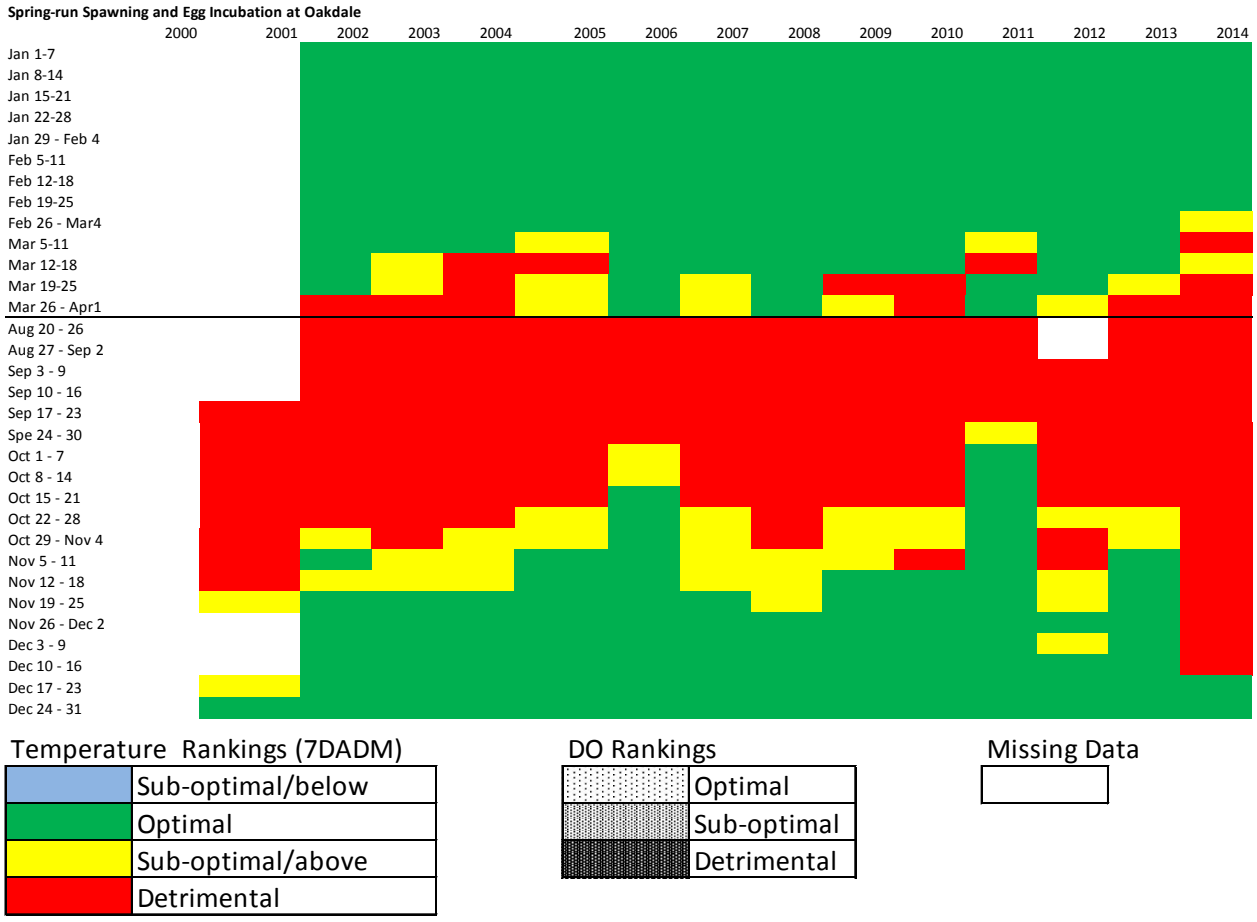


Figure 16

Spring-run Chinook Salmon Spawning and Egg Incubation

Notes:
Temperature and DO rankings based on observed data during periods of spawning. Time periods with rankings of sub-optimal or detrimental provide evidence for the potential for delayed spawning, increased pre-spawn mortality, and/or reduced egg viability. Rankings reflect the Environmental Objectives for temperature and DO (Section 7). Data are from CDEC for each location.

Certainty for the aggregate stress, amount of available habitat, was considered to be "medium." Similar to fall-run Chinook salmon, understanding is "medium" with regard to temperatures during the spawning season and spawning habitat availability on the Stanislaus River (Figure 16; CVPIA Science Integration Team 2016). However, information on DO, contaminants, and predation and poaching in the Stanislaus River was based largely on professional judgement rather than Stanislaus River-specific studies. Insufficient information exists regarding large classes of contaminants, and potential impacts in the upstream reaches are unknown. The only data for DO are from a gage located at Ripon, far

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from the current spawning area. Personnel communication from CDFW indicates there is little information regarding spring-run spawners in the system. Additionally, although the temperature data for current conditions came from long-term CDEC gages, there is no information as to whether poor temperature conditions are contributing to spawning delays.

Without corrective measures, the lack of high quality habitat will increase to a "high" magnitude stress (major population-level effect) in the long term due several factors. Similar to fall-run Chinook salmon, climate change scenarios predicting warmer water temperatures in the future will exacerbate current sub-optimal temperature conditions for spawners (Dettinger et al. 2004; Cayan et al. 2008). Negative effects from DO may also increase in magnitude in the long term as temperatures rise. Increased numbers of fall-run Chinook will continue to impact spring-run redds due to redd superimposition. Finally, over the long term, there will not be enough habitat to accommodate increased numbers of adult spawners due to the increased expected number of spawners and the gradual loss of spawning gravel downstream of the dam.

The certainty for this stress in the long term remains "medium." There is substantial evidence for increased temperatures in the future and for the lack of suitable physical habitat spawning as the number of spawners increase and the dam continues to block replenishment of spawning gravels.

8.4.3.3 Central Valley O. mykiss

Inadequate availability of high-quality spawning habitat for *O. mykiss* in the near term was rated a "low" magnitude stress with an expected minor effect on the population; certainty of this stress was "low" (Table 60).

Over the long term, this stress will increase to "medium" in magnitude. The certainty will remain "low" (Table 60).

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Table 60

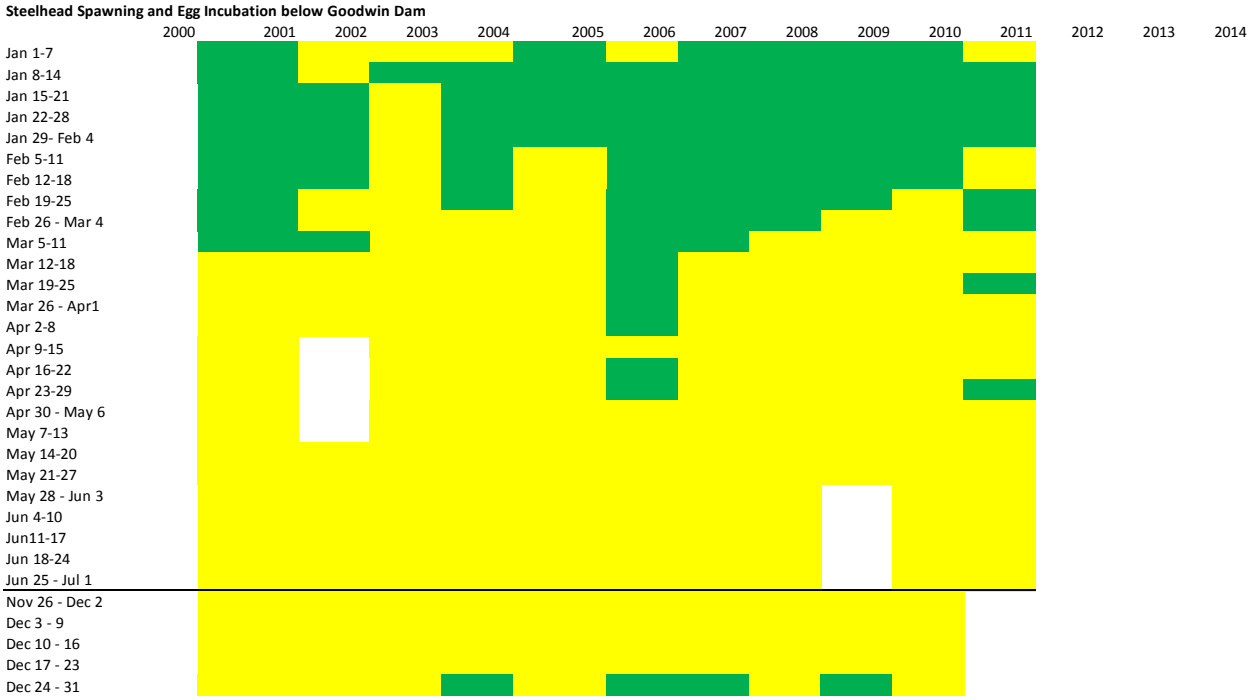
Spawning Stressors for *O. mykiss*

O. mykiss Stressor, Spawning Reach, December – April	NT		LT		Spawning																					
					Temperature		DO		Velocity		Depth		Coarse Sediment Input		Cover		Predator density		Contaminants		Habitat Distribution		Disease		Poaching		Hatchery Operations	
	M	C	M	C	NT	LT	NT	LT	NT	LT	NT	LT	NT	LT	NT	LT	NT	LT	NT	LT	NT	LT	NT	LT	NT	LT
Inadequate availability of high-quality habitat	2	2	3	2	M: 2 C: 2	M: 3 C: 2	M: 1 C: 3	M: 2 C: 3	M: 1 C: 2	M: 1 C: 2	M: 1 C: 2	M: 1 C: 2	M: 2 C: 2	M: 2 C: 2	M: 1 C: 2	M: 1 C: 2	M: 2 C: 2	M: 2 C: 2	M: 2 C: 2	M: 3 C: 2	M: 1 C: 1	M: 3 C: 2	M: 1 C: 2	M: 2 C: 2	M: 1 C: 2	M: 1 C: 2		
Interactions with hatchery fish and other runs	3	2	3	2																					M: 4 C: 4	M: 4 C: 3
Compression of the spawning window due to delayed spawning	2	1	3	1	M: 2 C: 1	M: 3 C: 1	M: 2 C: 1	M: 2 C: 1																		

Notes:
– Stress and stressors (i.e., contributing factors to a particular stress) for *O. mykiss* spawning in the Stanislaus River for the near term (current conditions) and long term (assuming restored abundance goals and higher air temperatures). Scores for each stress were evaluated and assigned based on the scores for contributing stressors.
– Location: Spawning Reach; When: late August through October
– M: Magnitude assesses the size or level of the impact from a stressor. Magnitude can be assigned using consideration of population or habitat effects, and higher scores require consideration of the scale or extent.
– C: Certainty describes the scientific basis for scoring the scale and magnitude of a particular stressor. Certainty considers both the predictability and understanding of linkages in the driver-linkage-outcome pathway from the stressor to the impact.
– Blank space denotes that stressor that is listed for the cell was not scored for the associated row because it is not believed to contribute to the stress identified in that row.
Scoring:
4 = High
3 = Medium
2 = Low
1 = Minimal
LT = long term
NT = near term

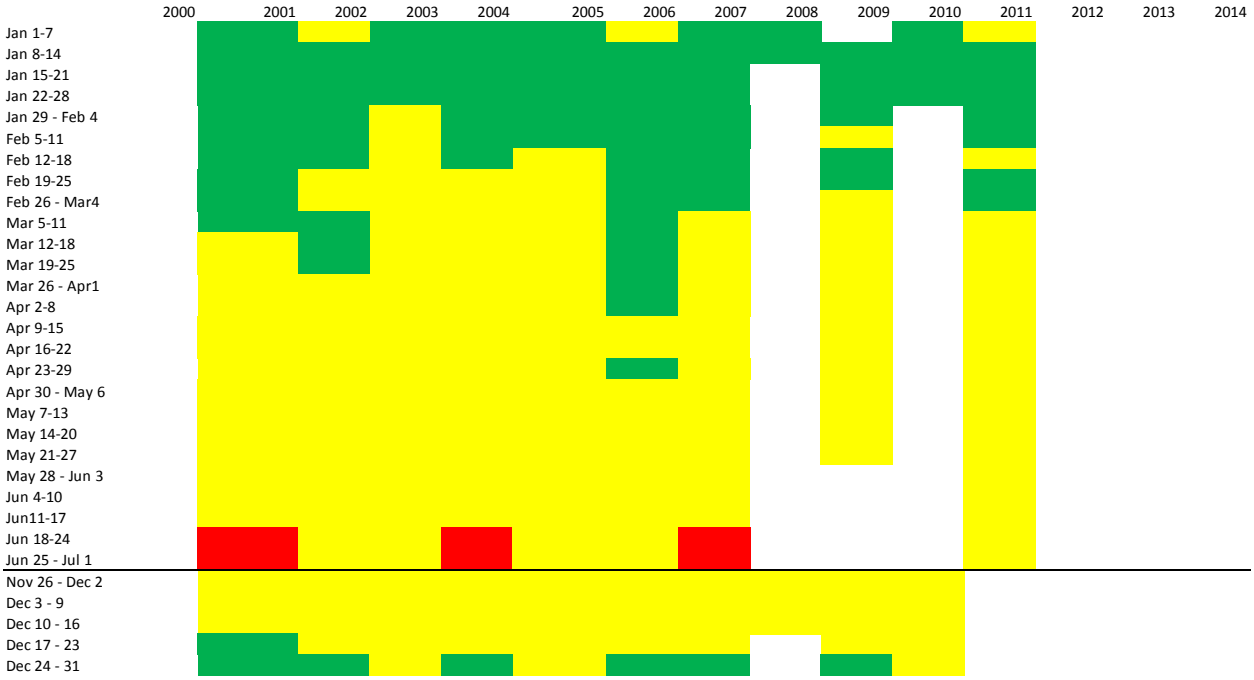
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Magnitude for the inadequate availability of high-quality habitat stress was considered "low" in the near term because an evaluation of the habitat component stressors revealed that temperature was the only concern, and it was rated as a "medium" magnitude stressor. Temperatures are potentially suboptimal throughout the spawning reach upstream of Orange Blossom Bridge during at least part of the October to June spawning season (Figure 17). The downstream extent of currently available spawning habitat (near Orange Blossom Bridge) is expected to have higher temperatures than the upper reaches near Goodwin Dam during early and late spawning (fall and late spring). Spawning may frequently be restricted by unsuitable temperatures early (October to November) and later (March to June) in the spawning season. The certainty is "low" for this stressor because of the complex life history of *O. mykiss*, the lack of information on steelhead spawning success in the Stanislaus River, and the lack of spatially explicit temperature data in the spawning reach. Lack of segregation from fall-run is not expected to adversely affect most *O. mykiss*, as the peak spawning season is expected to begin in December when most fall-run have spawned. Additionally, *O. mykiss* preferentially use slightly smaller gravel size, so redd superimposition is expected to be minimal. Contaminants were rated as a "low" magnitude stressor. Together, the many stressors combine to make the availability of habitat a "low" magnitude stress.

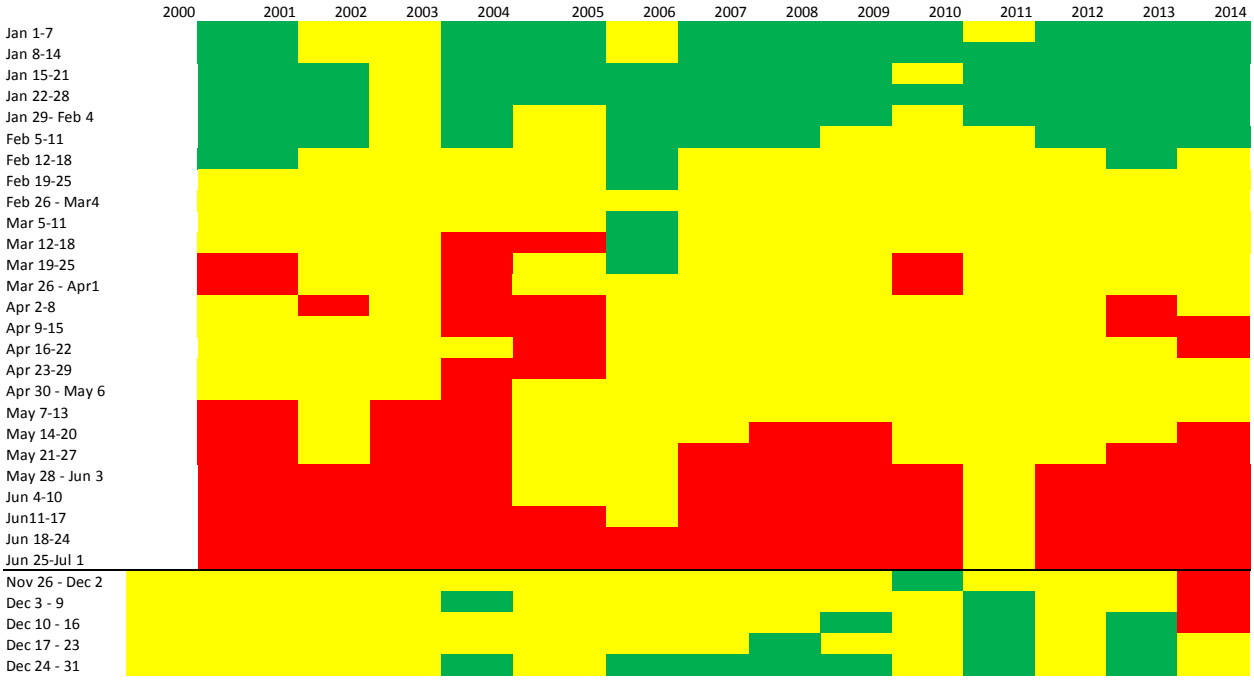


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Steelhead Spawning and Egg Incubation at Knights Ferry



Steelhead Spawning and Egg Incubation at Orange Blossom Bridge



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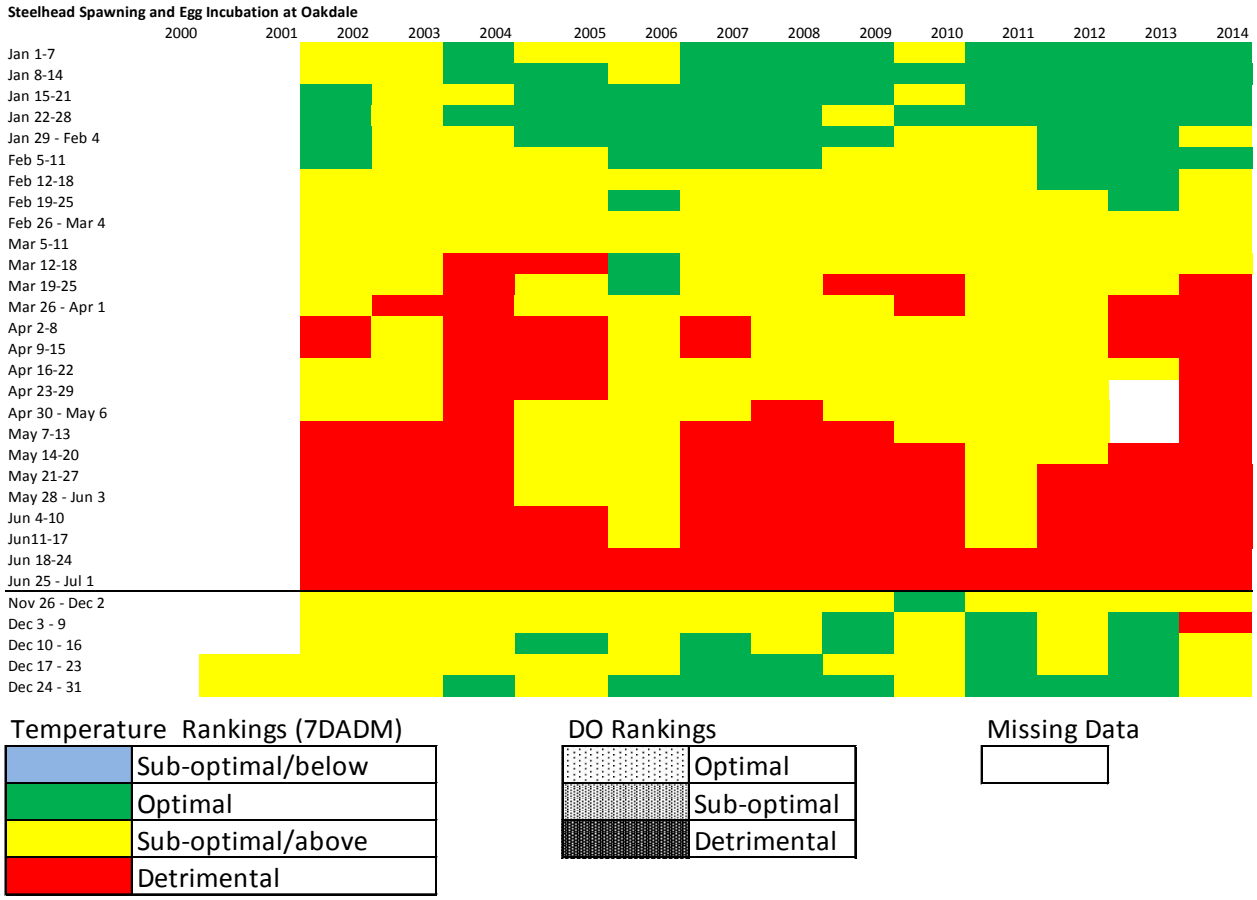


Figure 17

***O. mykiss* Spawning and Egg Incubation**

Notes:
Temperature and DO rankings are based on observed data during periods of spawning. Time periods with rankings of sub-optimal or detrimental provide evidence for the potential for delayed spawning, increased pre-spawn mortality, and/or reduced egg viability. Rankings reflect the Environmental Objectives for temperature and DO (Section 7). Data are from CDEC for each location.

Certainty for the aggregate stress, the amount of available habitat, was considered to be "low." Similar to Chinook salmon, understanding is "high" with regard to temperatures during the spawning season (Figure 17); it is "medium" for *O. mykiss* requirements and spawning habitat availability on the Stanislaus River because spawning habitat availability has only been estimated for Chinook (CVPIA Science Integration Team 2016). Information on DO, contaminants, and predation and poaching in the Stanislaus River was based largely on professional judgment rather than Stanislaus River-specific studies. Insufficient information exists regarding large classes of contaminants, and potential impacts in the upstream reaches are unknown. The only data for DO are from a gage located at Ripon,

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which is far from the current spawning area. Personnel communication from CDFW indicates there is little information regarding *O. mykiss* spawners in the system. Additionally, although the temperature data for current conditions came from long-term data from CDEC gages (Figure 17), there is no information as to whether poor temperature conditions are contributing to spawning delays or failure to spawn.

Without corrective action, the lack of high-quality habitat will likely increase to a "medium" magnitude stress (minor population-level effect) in the long term due to several factors. Similar to fall-run Chinook salmon, climate change scenarios predicting warmer water temperatures in the future will likely result in sub-optimal temperature conditions for spawners (Dettinger et al. 2004; Cayan et al. 2008). Negative effects from DO are expected to increase in magnitude in the long term with increases in temperature. Increased numbers of fall-run Chinook salmon may impact *O. mykiss* redds through superimposition. In the long term, there will likely not be enough habitat for spawning adults due to the increased number of spawners and lack of spawning gravel replenishment downstream of the dam.

The certainty for this stress in the long term remains "low." There is substantial evidence for increased temperatures in the future and the lack of spawning gravel replenishment downstream of dams.

8.4.4 Stress: Interactions with Hatchery Fish and Other Runs (Spawning)

Introgression between ESUs or between hatchery-spawned and naturally produced salmon can have negative impacts on life history adaptation and population viability from reduced fitness (Section 3.2). To attain SEP Biological Objectives for genetic integrity of each population, high-quality spawning habitat for each population must be spatially or temporally segregated from other runs or species to prevent introgression and support local adaptation.

8.4.4.1 Fall-run Chinook Salmon

Interbreeding stress was scored as "high" magnitude with "high" certainty in the near term, during October through December, within the spawning reach (Table 58).

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In the long term, without aggressive hatchery management and segregation from spring-run fish, this stress will remain "high" in magnitude. The certainty will become "medium" because the outcome is dependent on future management actions (Table 58).

There is no spatial segregation of habitat to prevent naturally produced fall-run Chinook salmon from interbreeding with hatchery strays and spring-run Chinook salmon. Near-term "high" magnitude rankings, indicating major population effect, are based on evidence that hatchery fish negatively impact wild Chinook salmon populations and the large proportion of hatchery fish that reproduce in the Stanislaus River. In addition, reducing introgression between fall-run and spring-run salmon ESUs is a major goal for the maintenance and restoration of fall-run Chinook salmon in the Central Valley (Sections 3.2 and 6.2.2). The certainty is "high" for this stress because of the recent robust data on the prevalence of hatchery-spawned adults returning to spawn in the Stanislaus River (Kormos et al. 2012; Palmer-Zwalen and Kormos 2013). Although no site-specific studies have verified negative population-level effects from hatchery fish on the Stanislaus River, introgression is considered a major stressor system-wide (Section 3.2). Additionally, fall-run and spring-run ESUs are currently restricted to roughly the same spawning areas due to Goodwin Dam.

Without intervention, this stressor will remain "high" magnitude in the long term because hatchery and wild fish and spring-run and fall-run fish will interbreed unless physical or temporal barriers to reproduction are established. Increased numbers of spring-run spawners will increase interbreeding among ESUs and cause additional interbreeding stress (Section 6.2.2). The certainty decreases to "medium" because the outcome is dependent on many variables for which the SEP Group had no a priori expectation such as hatchery practices, land use conditions that may change available habitat, and future management actions.

8.4.4.2 Spring-run Chinook Salmon

Interbreeding stress was scored as "high" magnitude and "high" certainty in the near term, during late August to October, within the spawning reach (Table 59).

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In the long term, without access to spawning habitat above Goodwin Dam or segregation from fall-run fish, this stress will remain "high" in magnitude. The certainty will become "low" because the outcome is highly dependent on future management actions (Table 59).

Near-term "high" magnitude rankings, indicating a major population effect, are based on the lack of spatial segregation for spring-run spawning habitat that would prevent interbreeding with fall-run Chinook salmon. The certainty is "high" for this stressor for the following reasons:

- Recent studies verifying negative population-level effects from interbreeding of ESUs system-wide (Section 3.2), and
- Hybridization and introgression among Central Valley runs, resulting from dam construction and hatchery management practices, is well known (e.g., Smith et al. 1995).

Lack of spatial and temporal segregation between spring-run and fall-run Chinook salmon will also lead to high rates of redd superimposition for spring-run, which spawn earlier than fall-run.

In the long term, this stress will remain "high" magnitude because as numbers of fall-run and spring-run adults increase, interbreeding among ESUs is likely to increase. The certainty decreases to "medium" because the outcome is dependent on uncertain variables such as future hatchery practices, land use conditions that may change available habitat, and future management actions on the Stanislaus River that could include passage around Goodwin Dam or segregation weirs.

8.4.4.3 O. mykiss

Interbreeding stress was scored as "medium" magnitude and "low" certainty in the near term, during October through June, within the spawning reach (Table 60).

In the long term, this stress will remain "medium" in magnitude. The certainty will remain "low" because little is known about *O. mykiss* reproduction on the Stanislaus River (Table 60).

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In many Central Valley rivers, the steelhead form of *O. mykiss* is dominated by hatchery fish (Garza and Pearse 2008), and the negative effects on fitness of interbreeding between wild and hatchery fish are well studied and can be genetically based (Hansen 2002; Araki et al. 2007). In 3 of the last 5 years of weir operation on the Stanislaus River, more than 50% of the steelhead counted were classified as hatchery origin, indicating potential for substantial introgression with hatchery-origin stock (Johnson, pers. comm.). However, gene flow from hatchery fish in steelhead populations can be buffered by wild resident rainbow trout populations with better fitness (Christie et al. 2011). The certainty is "low" for this stress in the near term because of the complex life history strategies of *O. mykiss* and the lack of information on population-level effects of this stress on Stanislaus River *O. mykiss*.

In the long term, this stress will remain a "medium" magnitude stress because, even with increased numbers of wild-spawned *O. mykiss*, current hatchery management practices are likely to contribute to introgression. The certainty remains "low" for the same reasons as described for the near term.

8.4.5 Stress: Compression of the Spawning Window due to Delayed Spawning

Ensuring opportunities for full expression of potential life history traits by salmonids is an important consideration in the SEP's diversity objectives (Section 3.2). Compression of the life history cycle resulting from delayed spawning was evaluated for Chinook salmon and *O. mykiss* as a potential stress related to the diversity objectives.

8.4.5.1 Fall-run Chinook Salmon

Compression of the spawning window due to delayed spawning was scored as a "low" magnitude and "low" certainty stress in the near term, primarily due to sub-optimal temperatures (Table 58).

In the long term, this stress will increase to "high" in magnitude due to climate change model projections of increasing water temperature. The certainty will remain "low" for reasons similar to the near term (Table 58).

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Near-term "low" magnitude rankings are based on detrimental and suboptimal conditions that occur regularly at the beginning of the fall-run spawning season throughout the current spawning reach. The downstream extent of currently available spawning habitat (near Orange Blossom Bridge) is restricted by unsuitable temperatures early in the spawning season (late October to early November; Figure 15). Unsuitable temperatures may contribute to delayed spawning or failure to spawn (Section 8.5). Although the effects of temperatures on Chinook salmon are well studied and temperature data are available from robust long-term datasets within the current spawning reach (i.e., CDEC gages at Goodwin Dam, Knights Ferry, and Orange Blossom Bridge), the certainty is "low" for this stressor because the nature of the outcome is not predictable. The effect of delayed spawning on the time available for subsequent development of a portfolio of life history types among juvenile outmigrants is attenuated by conditions in the egg incubation and juvenile rearing life stages. Thus, even though the spawning season for fall-run Chinook salmon is potentially constrained, conditions during incubation and juvenile rearing stages still influence the timing and size (life history) distribution of the subsequent cohort of outmigrating juveniles.

In the long term, this stressor will increase to "high" magnitude because projected climate change scenarios show more rain, less snow, and warmer water temperatures in the future, which will exacerbate current temperature conditions. The certainty remains "low" for similar reasons as described for the near term. However, there is an established, well-understood trend suggesting that near-term temperature conditions are likely to continue or increase over the next 20 years (Dettinger et al. 2004; Cayan et al. 2008).

8.4.5.2 Spring-run Chinook Salmon

Compression of the freshwater life cycle due to delayed spawning was scored as a "medium" magnitude, "low" certainty stress in the near term during late August through October within the spawning reach (Table 59)

In the long term, this stress will become "high" in magnitude. The certainty will remain "low" for reasons similar to those in the near term (Table 59).

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Near-term "medium" magnitude rankings are due to observed temperatures that are often detrimental or suboptimal upstream of Orange Blossom Bridge during late August to early November (Figure 16). The downstream extent of currently available spawning habitat (near Orange Blossom Bridge) is restricted by unsuitable temperatures early and late in the spawning season (late August to early November and late March). Goodwin Dam blocks higher elevation spawning habitat historically used by spring-run. Although the effects of temperatures on Chinook salmon are well studied and temperature data is available from robust long-term datasets within the current spawning reach (CDEC gages at Goodwin Dam, Knights Ferry, and Orange Blossom Bridge), the certainty is "low" for this stressor because the nature of the outcome can be attenuated by conditions during the egg incubation and rearing life stages.

In the long term, this stressor will increase to "high" magnitude because projected climate change scenarios show more rain, less snow, and warmer water temperatures in the future that will exacerbate current conditions. The certainty remains "low" for reasons described for the near term. However, there is an established, well understood trend suggesting that the near-term temperature conditions are likely to continue or increase over the next 20 years (Dettinger et al. 2004; Cayan et al. 2008).

8.4.5.3 O. mykiss

Compression of the freshwater life cycle due to delayed spawning was rated a "low" magnitude stress and a "minimal" certainty in the near term during the main spawning window, December through April, within the spawning reach (Table 60).

Over the long term, without corrective action, the magnitude will increase to "medium" magnitude; certainty will remain "minimal." Not much is known about the potential for delayed spawning on the Stanislaus River; however, evidence from other streams does not suggest that delayed spawning would have significant population-level effects for *O. mykiss* (Table 60).

Near-term "low" magnitude rankings, indicating periodic population effects, are based primarily on temperatures. Temperatures are usually sub-optimal upstream of Orange

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Blossom Bridge in early fall and late spring (Figure 17). The downstream extent of currently available spawning habitat (near Orange Blossom Bridge) is frequently restricted by unsuitable temperatures early (October to November) and later (March to June) in the spawning season. Temperatures at Goodwin Dam can be sub-optimal throughout the spawning season, with the exception of January when temperatures are generally optimal. The certainty is "minimal" for this stressor because of the complex life history form and lack of information on *O. mykiss* spawning success in the Stanislaus River. In the long term, this stress will become "medium" magnitude because increased temperatures may restrict spawning in some or most months. The certainty remains "minimal" for similar reasons to those described for the near term.

8.4.6 Contributing Management Factors

Resolution of negative interactions among salmonid populations during the spawning period may include some mix of changes to hatchery operations, river management practices, and potential implementation of actions to create physical reproductive barriers among target populations. These issues will require a basin-wide (or perhaps, Central Valley-wide) response.

Dams block access to historic high elevation spawning habitats, particularly for spring-run Chinook salmon and *O. mykiss*. Thus, spawning for all salmonids is currently restricted to warmer, lower elevation tailwaters below Goodwin Dam. This not only reduces the total area of available spawning habitat but forces the different salmonid populations (spring-run, fall-run, and *O. mykiss*) to utilize the same area, which may increase impacts due to redd superimposition. In addition, dams limit recruitment of spawning gravel from upstream and high-volume flows that produce geomorphic work; without continuing gravel amendments and actions to modify/or maintain riverbed and riverbank habitat elements, the dams cause a gradual decline of available spawning habitat

Reservoir operations are also a major driver of the environmental factors that control stressors on spawning adult salmonids. For example, flow rates and cold-water pool management regulate water temperature, water depth, water velocity, and DO levels—critical elements of spawning habitat. In addition, high temperatures that inhibit the onset

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of spawning by spring-run Chinook salmon tend to increase the temporal overlap between spring-run and fall-run spawning periods. The environmental factors that drive availability of spawning habitat are often coupled and work synergistically (e.g., temperature affects both DO concentration and fish demand for DO).

Other non-flow management practices may exacerbate or alleviate stressors on adult spawning. Gravel augmentation and bank modifications may increase available spawning habitat, at least in the short term. Also, land use modifications and sediment control activities can affect the ability of available spawning gravel to support spawning and incubation. Destruction of riparian habitat along the Stanislaus River has likely reduced the amount of shade in the river corridor; this can increase temperatures. Groundwater depletion has likely affected hyporheic inputs that probably buffered the Stanislaus River against warm temperatures in late spring, summer, and early fall. Groundwater recharge programs may help to reestablish this benefit and reduce water temperatures in the river during critical months.

8.5 Stressors on Egg Incubation

The egg incubation stage—which includes the time period between when a female salmonid deposits her eggs in a redd and when fry emerge from the gravel/sediment into the water column—represents the first stage of the salmonid life cycle. In general, salmonid populations are most vulnerable during the egg incubation life stage because all of the individuals in a year-class are in a relatively small area, and they cannot move in order to avoid a stressor (e.g., warm water temperatures). Stressors during egg incubation of salmonids may result in direct mortality, impacted rates of development, and disease or physical alterations that may be critical to the development of subsequent life stages. The SEP Group evaluated one type of stress during the egg incubation phase: inadequate incubation conditions (i.e., that result in egg or larval mortality).

Physical stressors that can negatively impact populations during egg incubation were evaluated in the near term and long term for the following: water temperature, DO, contaminants, fine sediment, flow fluctuations, and trampling or disturbance. Trampling or disturbance by anglers or other river users was not expected to be a significant stressor and

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thus was not further considered. Flow fluctuation is a multifaceted stressor because unusually high flows could cause redd scour, whereas decreased flows during the spawning or incubation period could cause redd dewatering. Pesticides and metalloids (i.e., mercury and selenium) were analyzed as contaminants that could potentially impact target populations at this life stage. Evaluation of near-term stressors analyzed those that would impede attainment of Environmental or Biological Objectives under current conditions; evaluation of these stressors in the long term assumed that global and regional warming trends occur as anticipated and that more fish of each target population would be spawning in the Stanislaus River.

8.5.1 Current Egg Incubation Timing Patterns

Egg incubation in the Stanislaus River generally occurs from late October through March for fall-run Chinook salmon and from December through June for *O. mykiss*. For spring-run Chinook salmon in the Sacramento River basin, egg incubation generally occurs from September through March; SEP objectives for spring-run Chinook salmon in the Stanislaus River include successful spawning throughout this time period. Monitoring that directly examines success of incubating eggs does not currently occur on the Stanislaus River. Some monitoring related to the emergence of salmonids on the Stanislaus River occurs via snorkel surveys, spawning surveys, beach seining, and the operation of RSTs near Caswell and Oakdale. However, direct measurement of egg mortality is challenging because it is difficult to observe the number of eggs deposited by individual females or the number of fry that emerge from a redd without affecting incubation conditions.

8.5.2 Stress: Inadequate Incubation Conditions

Salmonid egg mortality rates can have a strong influence on population growth rates; in general, salmon display high rates of investment in their eggs, a strategy associated with relatively high incubation success (Winemiller and Rose 1992). Thus, even small changes in survival of incubating eggs can represent significant changes in return on parental investment, producing substantial population-level effects. Gravel augmentation projects have been implemented on the Stanislaus River in order to improve the availability of high-quality spawning and incubation habitat.

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Various factors, acting alone and in combination, may make incubation conditions unsuitable and lead to elevated rates of egg and/or alevin mortality. The SEP Group assessed water temperature, DO, pesticides, mercury and selenium levels, fine sediments, and redd dewatering and scour as stressors that may lead to inadequate incubation conditions for target salmonid populations incubating in the Stanislaus River.

8.5.2.1 Fall-run Chinook Salmon

Inadequate incubation conditions were judged to cause a "medium" level of stress (sustained minor population-level effect) with a "high" degree of certainty in the near term (Table 61).

Unless measures are taken to improve egg incubation conditions, the stress of inadequate conditions was estimated to become a "high" stress on the population in the long term; certainty will remain "high" (Table 61).

Table 61

Egg Incubation Stressors for Fall-run Chinook Salmon

					Stressors													
	NT		LT		Temperature		DO		Pesticides		Contaminants: Mercury, Selenium		Fine Sediments		Flow Fluctuation: Redd Dewatering		Flow Fluctuation: Redd Scour	
Stress	M	C	M	C	NT	LT	NT	LT	NT	LT	NT	LT	NT	LT	NT	LT	NT	LT
Inadequate Incubation Conditions	3	4	4	4	M: 2 C: 4	M: 3 C: 4	M: 1 C: 4	M: 1 C: 4	M: 2 C: 2	M: 2 C: 2	M: 1 C: 4	M: 1 C: 4	M: 2 C: 2	M: 2 C: 1	M: 1 C: 3	M: 1 C: 3	M: 2 C: 2	M: 2 C: 1

Notes:
– Stress and stressors (i.e., contributing factors to a particular stress) for fall-run egg incubation in the Stanislaus River for the near term (current conditions) and long term (assuming restored abundance goals and higher air temperatures). Scores for each stress were evaluated and assigned based on the scores for contributing stressors.
– Location: Oakdale to Riverbank; When: early in incubation season (October)
– M: Magnitude assesses the size or level of the impact from a stressor. Magnitude can be assigned using consideration of population or habitat effects, and higher scores require consideration of the scale or extent.
– C: Certainty describes the scientific basis for scoring the scale and magnitude of a particular stressor. Certainty considers both the predictability and understanding of linkages in the driver-linkage-outcome pathway from the stressor to the impact.
Scoring:
4 = High
3 = Medium
2 = Low
1 = Minimal
LT = long term
NT = near term

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The near-term stress score synthesizes the effect of numerous egg incubation stressors, some of which act synergistically to increase the level of impact. Water temperatures represent a low magnitude stressor in the near term. The effect on egg survival of exposure to different temperatures has been extensively described in the scientific literature (Appendix C), reflecting a high scientific understanding of this effect. Comparison of Stanislaus River water temperatures to the SEP Group's Environmental Objectives indicates that conditions for fall-run Chinook salmon egg incubation generally are optimal for most of the incubation period in most years at and upstream of Knights Ferry. However, conditions for fall-run Chinook salmon egg incubation deteriorate downstream at Orange Blossom Bridge and Oakdale, where sub-optimal and detrimental temperatures occur in the early weeks of the incubation period in most years (Figure 15). Given that the relationship between salmon egg survival and temperature is highly understood and predictable and that temperature monitoring near current spawning grounds on the Stanislaus River is robust and ongoing, a "high" certainty score is justified. Modeling predictions indicate that temperatures are expected to increase in the southern Sierra in the long term (i.e., climate change; Cayan et al. 2008; Dettinger et al. 2004). Thus, the effect of temperature on egg incubation in the Stanislaus River is expected to increase to a "medium" magnitude stressor in the long term, and the certainty of that characterization is expected to remain "high."

The overall stress on fall-run Chinook egg incubation in the Stanislaus River is elevated by the action of stressors in addition to high water temperature. The likelihood that the additional stressors would exacerbate temperature stress caused the SEP Group to raise the overall magnitude score to reflect "medium" stress on fall-run egg incubation in the near term and "high" stress in the long term.

The effect of pesticide-derived contaminants was scored as a "low" magnitude stressor with a "low" degree of certainty in the near term. Overall, eggs and alevins developing in the Stanislaus River will have low exposures to pesticides, except for portions of the populations that are developing late in the season or in the downstream end of the spawning distribution. Incubating eggs will be relatively unaffected by pesticides because the vitelline membrane, enveloping layer, and chorion provide defense from metals, pathogens, and xenobiotic chemicals (Finn 2007). However, exposure to toxic compounds is of some concern for fall-run alevins developing between Riverbank and Oakdale between December to March, when

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winter storms can produce runoff that may have high (potentially detrimental) concentrations of toxins. The SEP Group's analysis of pesticide impacts relied on pesticide modeling developed using pesticide use data; however, for any one pesticide exceedance, the frequency of exceedance is estimated and does not consider additional impacts from multiple pesticides occurring simultaneously (i.e., cumulative pesticide effects were not analyzed; Appendix C).

The conditions were estimated from qualitative assessments of model outputs. However, quantitative values of pesticide concentrations could be calculated from numerical model outputs if necessary in the future. In addition, the degree of adverse impact to egg incubation and alevin development assumes that there is an analogous adverse impact, as during rearing. There is a high probability that contaminants will elicit a physiological or behavior response; however, there is uncertainty whether these will result in development impairments (e.g., deformities or reduced growth) or mortality. Limitations of monitoring pesticide concentrations in the Stanislaus River as well as limited information on the effect of pesticides on incubating salmonid eggs result in a low degree of certainty regarding the impacts of this stressor. The group found no reason that magnitude or certainty of pesticide impacts would change in the long term.

As with pesticide concentrations, the effect of fine sediment on egg incubation was scored to be a "low" magnitude and "low" certainty stressor on fall-run egg incubation when considered in isolation; however, the action of this stressor contributed to the overall stress score. The Knights Ferry Gravel Replenishment Project Phase II report states the following:

> "The egg survival studies also suggest that egg survival in the downstream reaches may have been reduced by the combined effects of near lethal water temperatures that fluctuated greatly in early November, excessive fines that reduce dissolved oxygen concentrations, and intragravel turbidity that presumably coated the eggs with clay-sized particles that reduced the egg's abilities to absorb oxygen. (Carl Mesick Consultants and KDH Environmental Services 2009, introduction at v)

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The Carl Mesick Consultants and KDH Environmental Services (2009) study's implication is that negative impacts of excessive fines are limited to a small fraction of the population, which, in this case, would be the eggs in the most downstream reaches. However, the certainty for the magnitude of this stressor is "low" because it is primarily based on non-peer-reviewed research within the Stanislaus River. In the future, the effect of fine sediment on salmonid egg incubation in the Stanislaus River is expected to remain a "low" magnitude stressor, but the certainty of that characterization decreases to "minimal."

The effect of high flows that may scour redds was scored as a "low" magnitude stressor with a "low" degree of certainty in the near term. A Stanislaus Riverbed mobility analysis described in Kondolf et al. (2001) found that flows around 5,000 to 8,000 cfs are necessary to mobilize the D_{50} of the channel bed material. Therefore, for the purposes of the SEP stressor analysis, 5,000 cfs was assumed to represent a minimum flow for which redd scour may begin to be a problem. The SEP Group evaluated the frequency of flows below Goodwin Dam that were greater than 5,000 cfs during the period January 2000 to September 2014. Flows below Goodwin Dam exceeded the 5,000 cfs threshold for just two events during this period. One of those events occurred during the fall-run Chinook salmon egg incubation period (January 2006, maximum flow 6,300 cfs, duration 11 days). The other event occurred during the spring-run Chinook salmon incubation time period (April 2006, maximum flow 5,510 cfs, duration 14 days). Overall, only 1 of 14 year-classes of fall-run Chinook salmon and spring-run Chinook salmon were potentially impacted by redd scour due to high flows. Given the low frequency of flows that could scour salmon redds, this stressor is believed to have only a small effect on salmon populations. The overall certainty of this stressor in the near term is "low" due to a lack of information on the relationship in the Stanislaus River among flow, scour depth, egg burial depths, and egg survival. Presumably, egg survival at flows that just begin riverbed mobilization will be high relative to egg survival at much higher flows, but the specific relationship is not well understood.

In the long term, the effect of high flows that may scour redds is expected to remain a "low" magnitude stressor. Due to climate change, more variable precipitation is expected in the long term, with more frequent very wet periods and drought periods. Given the large storage capacity in the Stanislaus River, relative to the size of the watershed, it may be the case that the more frequent very wet periods will not result in an increase in the frequency

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of flows that can scour redds below New Melones and Goodwin dams. However, there is enough uncertainty involved to render the outcome certainty "minimal."

The SEP Group's analyses determined that several factors initially considered to be potential stressors on egg incubation success were likely to have "minimal" impact on successful egg incubation of fall-run Chinook salmon on the Stanislaus River. These included DO concentrations, mercury and selenium concentrations, and redd dewatering.

8.5.2.2 Spring-run Chinook Salmon

Inadequate conditions for incubation of spring-run Chinook salmon were judged to be a "high" magnitude stressor with a "high" degree of certainty in the near term (Table 62).

Unless measures are taken to improve egg incubation conditions, the stress of inadequate conditions will remain a sustained major impact on the spring-run Chinook salmon population in the long term; certainty will remain "high" (Table 62).

Table 62

Egg Incubation Stressors for Spring-run Chinook Salmon

					Stressors													
	NT		LT		Temperature		DO		Pesticides		Contaminants: Mercury, Selenium		Fine Sediments		Flow Fluctuation: Redd Dewatering		Flow Fluctuation: Redd Scour	
Stress	M	C	M	C	NT	LT	NT	LT	NT	LT	NT	LT	NT	LT	NT	LT	NT	LT
Inadequate Incubation Conditions	3	4	4	4	M: 3 C: 4	M: 4 C: 4	M: 1 C: 4	M: 1 C: 4	M: 2 C: 2	M: 2 C: 2	M: 1 C: 4	M: 1 C: 4	M: 2 C: 2	M: 2 C: 1	M: 1 C: 3	M: 1 C: 3	M: 2 C: 2	M: 2 C: 1

Notes:

– Stress and stressors (i.e., contributing factors to a particular stress) for spring-run egg incubation in the Stanislaus River for the near term (current conditions) and long term (assuming restored abundance goals and higher air temperatures). Scores for each stress were evaluated and assigned based on the scores for contributing stressors.

– Location: downstream of Knights Ferry; When: early in spawning season (September – October)

– M: Magnitude assesses the size or level of the impact from a stressor. Magnitude can be assigned using consideration of population or habitat effects, and higher scores require consideration of the scale or extent.

– C: Certainty describes the scientific basis for scoring the scale and magnitude of a particular stressor. Certainty considers both the predictability and understanding of linkages in the driver-linkage-outcome pathway from the stressor to the impact.

Scoring:

4 = High

3 = Medium

2 = Low

1 = Minimal

LT = long term

NT = near term

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The near-term stress score synthesizes the effect of numerous egg incubation stressors, some of which act synergistically to increase the level of impact. The effect of adverse water temperature conditions on the egg incubation stage of spring-run Chinook salmon was scored as a "medium" magnitude stressor with a "high" degree of certainty in the near term. Stanislaus River water temperatures are high relative to the SEP Group's Environmental Objectives (Figure 16). A sustained minor population effect is expected because of repeated impacts to eggs deposited at and downstream of Knights Ferry. The effect on egg survival of exposing salmonid eggs to different temperatures has been extensively described in the scientific literature, and the water temperature objectives reflect a high scientific understanding. Given that the relationship between salmon egg survival and temperature is highly understood and predictable, a "high" certainty score is justified. Modeling predictions associated with climate change indicate elevated temperatures in the long term; thus, the effect of temperature on egg incubation in the Stanislaus River is expected to increase to a "high" magnitude stressor, and the certainty of that effect is expected to remain "high" in the future.

The overall stress on spring-run Chinook egg incubation in the Stanislaus River is elevated by the operation of other stressors in addition to that caused by temperatures. Although each of the other stressors had lower certainty scores than the temperature stressor, the likelihood that they would exacerbate temperature stress caused the SEP Group to raise the overall magnitude score to reflect high stress on spring-run egg incubation during the near term.

The effect of pesticide-derived contaminants was scored as a "low" magnitude stressor with a "low" degree of certainty in the near term. Overall, eggs and alevins developing in the Stanislaus River will have low exposures to pesticides, except for portions of the populations that are developing late in the season or in the downstream end of the spawning distribution. Exposure to toxic compounds is of some concern for spring-run alevins developing between Knights Ferry and Riverbank between August and September. Upstream of Knights Ferry and during months other than August and September, there should be minimal impacts to alevins. See description of fall-run pesticide effects in Section 8.5.2.1 for an overview of how pesticide impacts were modeled.

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The effect of fine sediment on spring-run egg incubation was scored as a "low" magnitude and "low" certainty stressor when considered in isolation; however, the action of this stressor contributed to the overall stress score. In the future, the effect of fine sediment on spring-run salmon egg incubation in the Stanislaus River is expected to remain a "low" magnitude stressor, but the certainty of that characterization decreases to "minimal." See description of fine sediment effects on fall-run incubation success, in Section 8.5.2.1, for an overview of how fine sediment effects were determined.

The effect of high flows that may scour spring-run Chinook salmon redds was scored as a "low" magnitude stressor with a "low" degree of certainty in the near term. The overall certainty of this stressor in the near term is low because there is a lack of information on the relationship in the Stanislaus River among flow, scour depth, egg burial depths, and egg survival. See description of redd scour effects on fall-run incubation success, in Section 8.5.2.1, for an overview of how scour effects were determined. The magnitude of this effect on spring-run Chinook salmon incubation is expected to remain "low" in the long term, but certainty of the effect declines to "minimal."

The SEP Group's analyses determined that several factors initially thought to be potential stressors on egg incubation success were likely to have "minimal" impact on successful egg incubation of spring-run Chinook salmon on the Stanislaus River. These included DO concentrations, mercury and selenium concentrations, and redd dewatering.

8.5.2.3 O. mykiss

Inadequate incubation conditions for *O. mykiss* were judged to be a "high" magnitude stressor with a "high" degree of certainty in the near term (Table 63).

Unless measures are taken to improve egg incubation conditions, the stress of inadequate conditions will remain a sustained major impact on the *O. mykiss* population in the long term; certainty will remain "high" (Table 63).

Table 63

Egg Incubation Stressors for *O. mykiss*

					Stressors													
	NT		LT		Temperature		DO		Pesticides		Contaminants: Mercury, Selenium		Fine Sediments		Flow Fluctuation: Redd Dewatering		Flow Fluctuation: Redd Scour	
Stress	M	C	M	C	NT	LT	NT	LT	NT	LT	NT	LT	NT	LT	NT	LT	NT	LT
Inadequate Incubation Conditions	3	4	4	4	M: 3 C: 4	M: 4 C: 4	M: 1 C: 4	M: 1 C: 4	M: 2 C: 2	M: 2 C: 2	M: 1 C: 4	M: 1 C: 4	M: 2 C: 2	M: 2 C: 1	M: 1 C: 3	M: 1 C: 3	M: 2 C: 2	M: 2 C: 1

Notes:
– Stress and stressors (i.e., contributing factors to a particular stress) for *O. mykiss* egg incubation in the Stanislaus River for the near term (current conditions) and long term (assuming restored abundance goals and higher air temperatures). Scores for each stress were evaluated and assigned based on the scores for contributing stressors.
– Location: downstream of Knights Ferry; When: after March
– M: Magnitude assesses the size or level of the impact from a stressor. Magnitude can be assigned using consideration of population or habitat effects, and higher scores require consideration of the scale or extent.
– C: Certainty describes the scientific basis for scoring the scale and magnitude of a particular stressor. Certainty considers both the predictability and understanding of linkages in the driver-linkage-outcome pathway from the stressor to the impact.
Scoring:
4 = High
3 = Medium
2 = Low
1 = Minimal
LT = long term
NT = near term

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The near-term stress score synthesizes the effect of numerous egg incubation stressors, some of which act synergistically to increase the level of impact. The effect of adverse water temperature conditions on the egg incubation stage of *O. mykiss* was scored as a "medium" magnitude stressor with a "high" degree of certainty in the near term. The comparison of Stanislaus River water temperatures to the Environmental Objectives indicates that conditions for *O. mykiss* egg incubation are primarily sub-optimal (and, in some cases, detrimental) throughout much of the lower Stanislaus River from March through August (Figure 17). Given that temperatures are expected to be sub-optimal or detrimental over a large portion of the *O. mykiss* spawning habitat in the lower river throughout most of the egg incubation period, a sustained minor population effect is expected. The effect on egg survival of exposing *O. mykiss* eggs to different temperatures has been extensively described in the scientific literature (Section 7.2.4.1), and the water temperature objectives reflect a high degree of scientific understanding justifying a high certainty score. Given modeling predictions associated with climate change, the effect of temperature on egg incubation in the Stanislaus River is expected to increase to a "high" magnitude stress. A sustained major population effect is expected as temperature increases are likely to result in detrimental water temperatures for egg incubation throughout most of the life stage and most, if not all, of the lower Stanislaus River spawning habitat. The certainty of that major population effect occurring in the long term is "high."

The overall stress on *O. mykiss* egg incubation in the Stanislaus River is elevated by the operation of other stressors in addition to that caused by temperatures. Although each of the other stressors had lower certainty scores than the temperature stressor, the likelihood that they would exacerbate temperature stress caused the SEP Group to raise the overall magnitude score to reflect "high" stress on *O. mykiss* egg incubation during the near term.

The effect of pesticide-derived contaminants was scored as a "low" magnitude stressor with a "low" degree of certainty in the near term. *O. mykiss* alevins will be exposed to detrimental pesticide concentrations during March to August from Riverbank to Oakdale (Appendix C); this may adversely impact alevins that are still developing. The river between Oakdale and Knight's Ferry experiences sub-optimal conditions from December to April, but they become detrimental from May to August. See description of fall-run pesticide effects, in Section 8.5.2.1, for an overview of how pesticide impacts were modeled.

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The effect of fine sediment on *O. mykiss* egg incubation was scored as a "low" magnitude and "low" certainty stressor when considered in isolation; however, the action of this stressor increased the overall stress score. In the future, the effect of fine sediment on spring-run salmon egg incubation in the Stanislaus River is expected to remain a "low" magnitude stressor, but the certainty of its effect decreases to "minimal." See description of fine sediment effects on fall-run incubation success, in Section 8.5.2.1, for an overview of how fine sediment effects were determined.

The effect of high flows that may scour redds during the *O. mykiss* egg incubation stage was scored as a "low" magnitude stressor with a "low" degree of certainty in the near term. Only 1 *O. mykiss* year-class out of 14 was potentially impacted by redd scour due to high flows. The overall certainty of this stressor in the near term is "low" because there is a lack of information on the relationship in the Stanislaus River among flow, scour depth, egg burial depths, and egg survival. See the description of red scour effects on fall-run incubation success, in Section 8.5.2.1, for an overview of how fine sediment effects were determined. The magnitude of this effect on *O. mykiss* incubation is expected to remain "low" in the long term, but certainty of the effect declines to "minimal."

The SEP Group's analyses determined that several factors initially considered to be potential stressors on egg incubation success were likely to have a "minimal" impact on successful egg incubation of Stanislaus River *O. mykiss* . These included DO concentrations, mercury and selenium concentrations, and redd dewatering.

8.5.3 Contributing Management Factors

Dams blocking access to high-elevation incubation habitats is a major factor contributing to stressors on the egg incubation process by limiting access to cold-water habitat. This effect is particularly evident for spring-run Chinook salmon and *O. mykiss*, which historically migrated to habitats beyond existing dams to spawn.

Reservoir operation is a major driver of the environmental factors that control the impact of stressors that may lead to mortality during the egg incubation life stage of salmonids. For example, flow rates and cold-water pool management regulate water temperature. In

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addition, the volume of water released from the reservoir will regulate sediment loads and the dilution of contaminant discharges to the river. The environmental factors that drive the failure of eggs to develop into emergent fry are coupled and work synergistically (e.g., temperature affects both DO concentration and egg/alevin demand for DO; temperature also modulates the impact of certain contaminants on developing eggs and alevin.). Additionally, flows (and fluctuations in flows) determine the availability of incubation habitat even within the area where temperatures are acceptable (e.g., scour and dewatering).

Other non-flow management practices may exacerbate or alleviate stressors on egg incubation. For example, the destruction of riparian habitat along the Stanislaus River has likely reduced the amount of shade in the river corridor; this can increase temperatures and primary productivity in the river. Urban and agricultural developments in the watershed have increased contaminant loads to the river and periodic fine sediment inputs. Adjustments to land use practices or the development of contaminant control programs may reduce contaminant and sediment inputs and the stress they generate on eggs and alevin. Groundwater depletions have likely terminated the hyporheic inputs that probably supplemented Stanislaus River surface flows and buffered the river against warm temperatures in late spring, summer, and early fall. Groundwater recharge programs may help to reestablish this benefit and reduce water temperatures in the Stanislaus River during critical months.

8.6 Stressors on Juvenile Rearing and Migration

Juvenile rearing occurs in the salmonid life cycle after emergence from the redd and lasts until the fish leaves freshwater. Juvenile migration occurs over the same period as rearing and consists of the fish moving downstream towards the marine environment. Central Valley salmonids evolved in river systems with vast wetland habitats, including floodplains and tidal marshes that inundated during high flows in spring and summer, providing highly complex shallow-water habitats for juvenile rearing and migration (Williams 2006). These habitats have nearly all been lost in the Stanislaus River and lower San Joaquin River corridor due to changes in the hydrograph, sediment availability, and channel modification resulting from the construction of dams and levees.

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The SEP Group evaluated the following six categories of stress in the near term and long term for juvenile salmonids rearing and migrating in the Stanislaus River:

- Compression of rearing and migration time window;
- Lack of suitable rearing habitat;
- Lack of suitable migratory conditions;
- Lack of suitable migratory cues;
- Lack of suitable over-summering habitat; and
- Lack of fitness/ genetic maladaptation.

Stressors to juvenile rearing include sub-optimal or detrimental ranges of water temperature, DO, flow volume, flow velocity, depth, cover, prey density, predator density, contaminants, coarse sediment input, hatchery straying, and disease. Inadequate distribution of suitable rearing habitats (i.e., along the river corridor) may also stress salmonid populations on the Stanislaus River.

Near-term stresses reflect those that would impede attainment of Environmental or Biological Objectives under current conditions. Evaluation of these stresses in the long term incorporated analysis of current conditions and assumed that juvenile salmon densities would increase substantially and that global and regional warming trends occur as anticipated (Cayan et al. 2008; Dettinger et al. 2004).

8.6.1 Current Rearing and Migration Timing Patterns

Scoring of stress is based on the potential exposure to stressors across the full range of each population's rearing and migration timing window (Figure 7). Current temporal distribution of fall-run Chinook juveniles in the Stanislaus River occurs after incubation is completed—from the end of January through June (Figure 7)—until water temperatures warm sufficiently to prevent smoltification, which usually occurs between May and July for Chinook salmon (see Figure 18). Spring-run Chinook salmon begin rearing and migration in winter, though some are known to rear longer and outmigrate the following fall, winter, or spring (Williams 2006). Spring-run are also unable to successfully migrate when water temperatures in the migratory corridor become unsuitable. For *O. mykiss*, rearing occurs year-round and includes a robust population of resident rainbow trout, which are a source

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population for threatened Central Valley steelhead. *O. mykiss* juveniles generally migrate during the same temporal windows as Chinook salmon. However, the anadromous steelhead life form displays tremendous behavioral plasticity that extends to migration timing (Moyle 2002; Doctor et al. 2014; Kendall et al. 2014). Because of their low population numbers and ESA listing status, little monitoring of steelhead rearing and migration has occurred on the Stanislaus River with the exception of incidental collection in RSTs and some snorkel survey observations.

8.6.2 Stress: Compression of Rearing and Migration Time Window (Juvenile Rearing and Migration)

Rearing and migration opportunities for juvenile salmonids are limited on the Stanislaus River by the deterioration of conditions in spring. This may limit the life history diversity (e.g., the timing of and body size at entry into subsequent environments) present in each annual cohort. In particular, production of larger fish and those that migrate later in the season may be limited by deteriorating conditions as the spring progresses (e.g., Zeug et al. 2014; Sturrock et al. 2015).

8.6.2.1 Fall-run Chinook Salmon

Rearing and migration opportunities for juvenile fall-run Chinook salmon are constrained by deteriorating conditions in spring. The stress on the population was rated "high" magnitude with "high" certainty in the near term (Table 64).

Without corrective action, temporally constrained rearing and migration opportunities will remain a "high" magnitude stress with "high" certainty over the long term (Table 64).

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Table 64

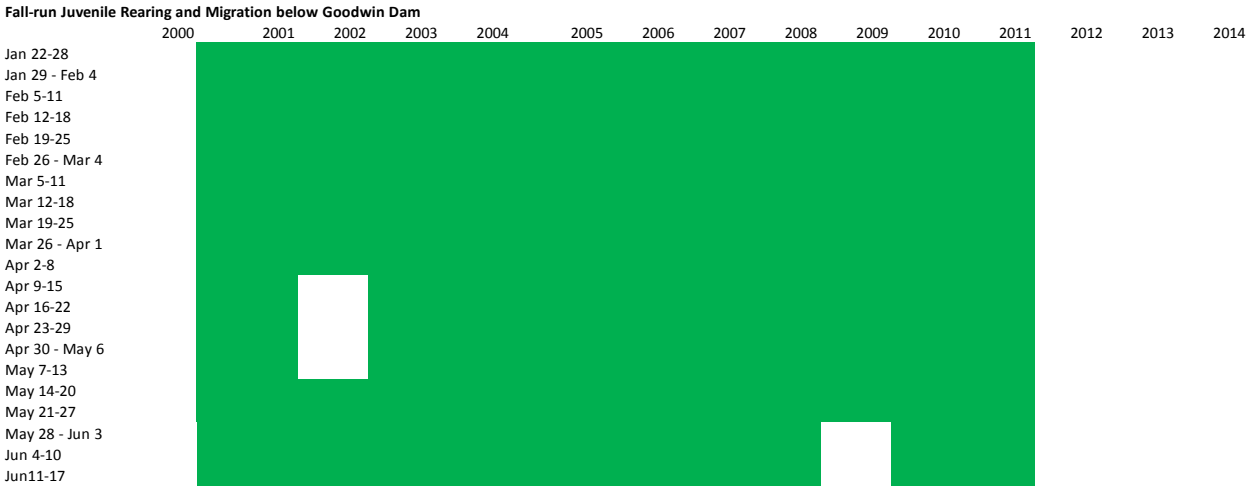
Scoring Stressors for Juvenile Rearing and Migration of Fall-run Chinook Salmon

						Stressors																							
	NT		LT		When	Temperature		DO		Flow Volume		Velocity		Turbidity		Depth		Cover		Prey Density		Predator Density		Contaminants		Coarse Sediment Input		Hatchery Straying		Disease		Habitat Distribution	
Stress	M	C	M	C		NT	LT	NT	LT	NT	LT	NT	LT	NT	LT	NT	LT	NT	LT	NT	LT	NT	LT	NT	LT	NT	LT	NT	LT	NT	LT	NT	LT
Compression of rearing and migration time window	4	4	4	4	Apr-July	M: 4 C: 4	M: 4 C: 4	M: 2 C: 3	M: 3 C: 3																								
Lack of suitable rearing habitat	4	4	4	4	Jan-Jun	M: 3 C: 4	M: 4 C: 4	M: 1 C: 2	M: 1 C: 2	M: 4 C: 3	M: 4 C: 4	M: 2 C: 2	M: 2 C: 2	M: 2 C: 2	M: 2 C: 2	M: 3 C: 3	M: 3 C: 3	M: 3 C: 3	M: 3 C: 3	M: 2 C: 2	M: 3 C: 2	M: 3 C: 2	M: 3 C: 2	M: 4 C: 3	M: 4 C: 3	M: 4 C: 4	M: 4 C: 4			M: 2 C: 2	M: 3 C: 2	M: 3 C: 2	M: 4 C: 2
Lack of suitable migratory conditions	4	4	4	4	Jan-Jun	M: 3 C: 4	M: 4 C: 4	M: 1 C: 2	M: 1 C: 2	M: 4 C: 3	M: 4 C: 4	M: 3 C: 2	M: 3 C: 2	M: 2 C: 2	M: 2 C: 2	M: 3 C: 3	M: 3 C: 2	M: 3 C: 2	M: 3 C: 2	M: 2 C: 2	M: 3 C: 2	M: 3 C: 1	M: 3 C: 1	M: 2 C: 3	M: 2 C: 3	M: 4 C: 2	M: 4 C: 2						
Lack of suitable migratory cues	4	3	4	3	Jan-Jun	M: 3 C: 2	M: 4 C: 2	M: 1 C: 1	M: 1 C: 1	M: 4 C: 3	M: 4 C: 3	M: 4 C: 3	M: 4 C: 3	M: 3 C: 2	M: 2 C: 2					M: 2 C: 2	M: 3 C: 2												
Lack of suitable over-summering habitat	1	3	2	3	May-Sep	M: 1 C: 3	M: 2 C: 3	M: 1 C: 1	M: 1 C: 1	M: 1 C: 2	M: 2 C: 2	M: 1 C: 2	M: 2 C: 2	M: 1 C: 1	M: 1 C: 1	M: 1 C: 1	M: 1 C: 1	M: 2 C: 1	M: 2 C: 1	M: 2 C: 2	M: 3 C: 2	M: 2 C: 2	M: 2 C: 2	M: 1 C: 2	M: 1 C: 2								
Lack of fitness/ genetic maladaptation	4	3	4	3	Jan-Jun																							M: 4 C: 4	M: 4 C: 3				

Notes:
– Stress and stressors (i.e., contributing factors to a particular stress) for fall-run juvenile migration and rearing in the Stanislaus River for the near term (current conditions) and long term (assuming restored abundance goals and higher air temperatures). Scores for each stress were evaluated and assigned based on the scores for contributing stressors.
– Location: Whole river
– M: Magnitude assesses the size or level of the impact from a stressor. Magnitude can be assigned using consideration of population or habitat effects, and higher scores require consideration of the scale or extent.
– C: Certainty describes the scientific basis for scoring the scale and magnitude of a particular stressor. Certainty considers both the predictability and understanding of linkages in the driver-linkage-outcome pathway from the stressor to the impact.
Scoring:
4 = High
3 = Medium
2 = Low
1 = Minimal
LT = long term
NT = near term

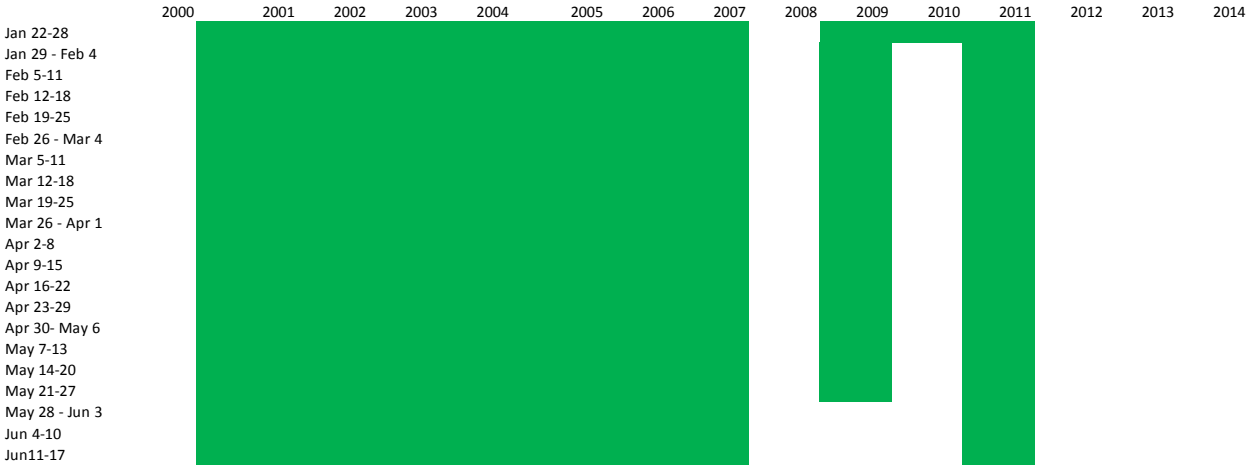
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The residence time in freshwater of fall-run Chinook salmon migrating from the Stanislaus River is constrained by water temperature. Warm water temperatures in spring and early summer can prevent smoltification (e.g., Marine and Cech, 2004; Section 7.2.5.1.2), truncating the time in freshwater. Although, larger juveniles are typically better able to avoid predators, recent studies on the Stanislaus River show parr-sized juvenile outmigrants had a higher rate of return as adults than either fry- or smolt-sized outmigrants (Sturrock et al. 2015). It is believed that smolt-sized fish from the Stanislaus die at a higher rate because they are unable to physiologically adapt to salt water (smoltify) due to high water temperatures (Appendix C, Table C-2). Sub-optimal temperatures for smoltification (17°C to 20°C 7DADM [62.6°F to 68°F]) are common during June at Orange Blossom Bridge and points downstream, and they begin to occur in March at Ripon and downstream (Figure 18). Detrimental temperatures are common starting in June at Ripon and by mid to late May at Vernalis. Adding to the stress caused by high temperatures, migrating fall-run Chinook salmon are also negatively affected by sub-optimal DO levels at Ripon and Vernalis that become more frequent later in the spring (Figure 18).

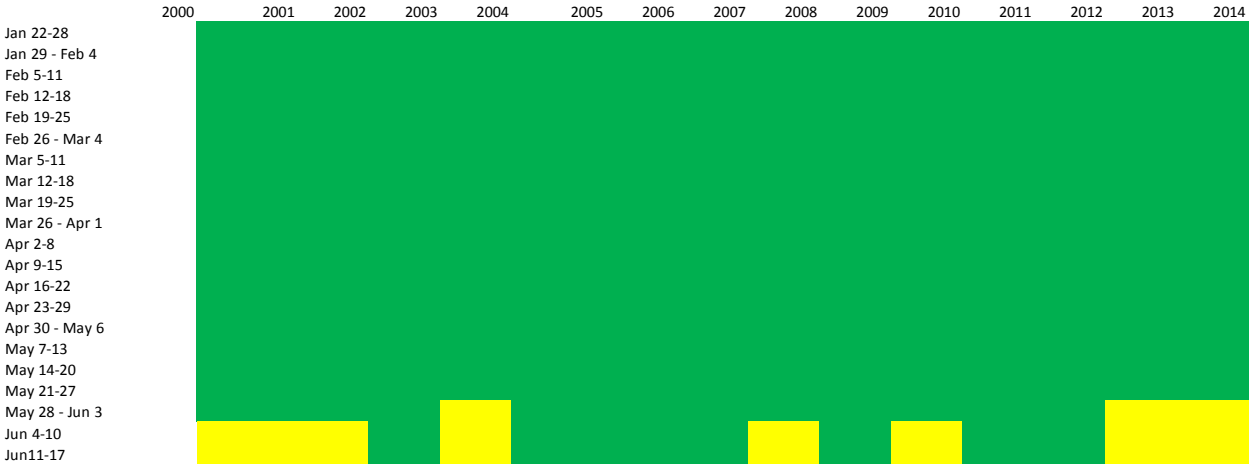


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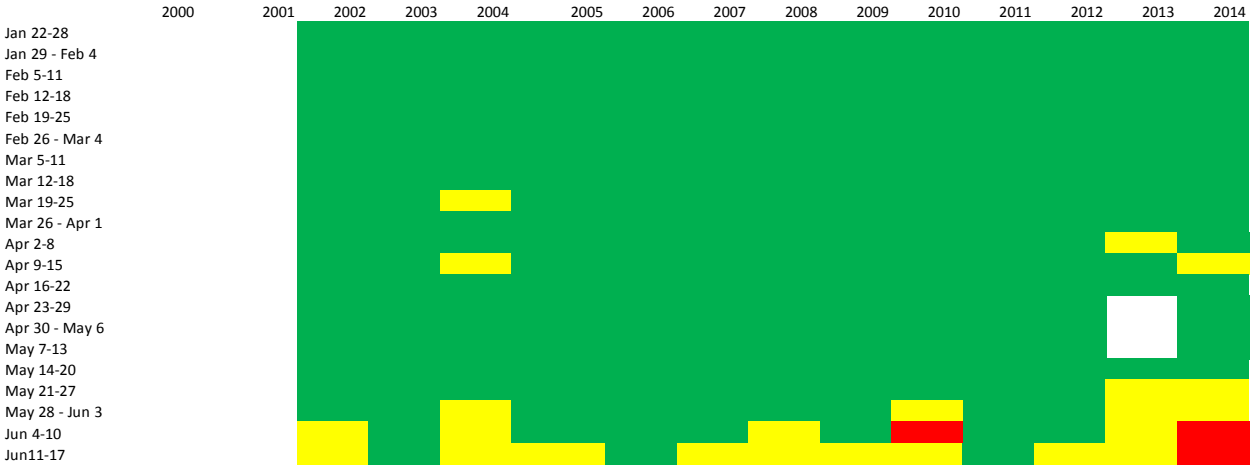
Fall-run Juvenile Rearing and Migration at Knights Ferry



Fall-run Juvenile Rearing and Migration at Orange Blossom Bridge



Fall-run Juvenile Rearing and Migration at Oakdale



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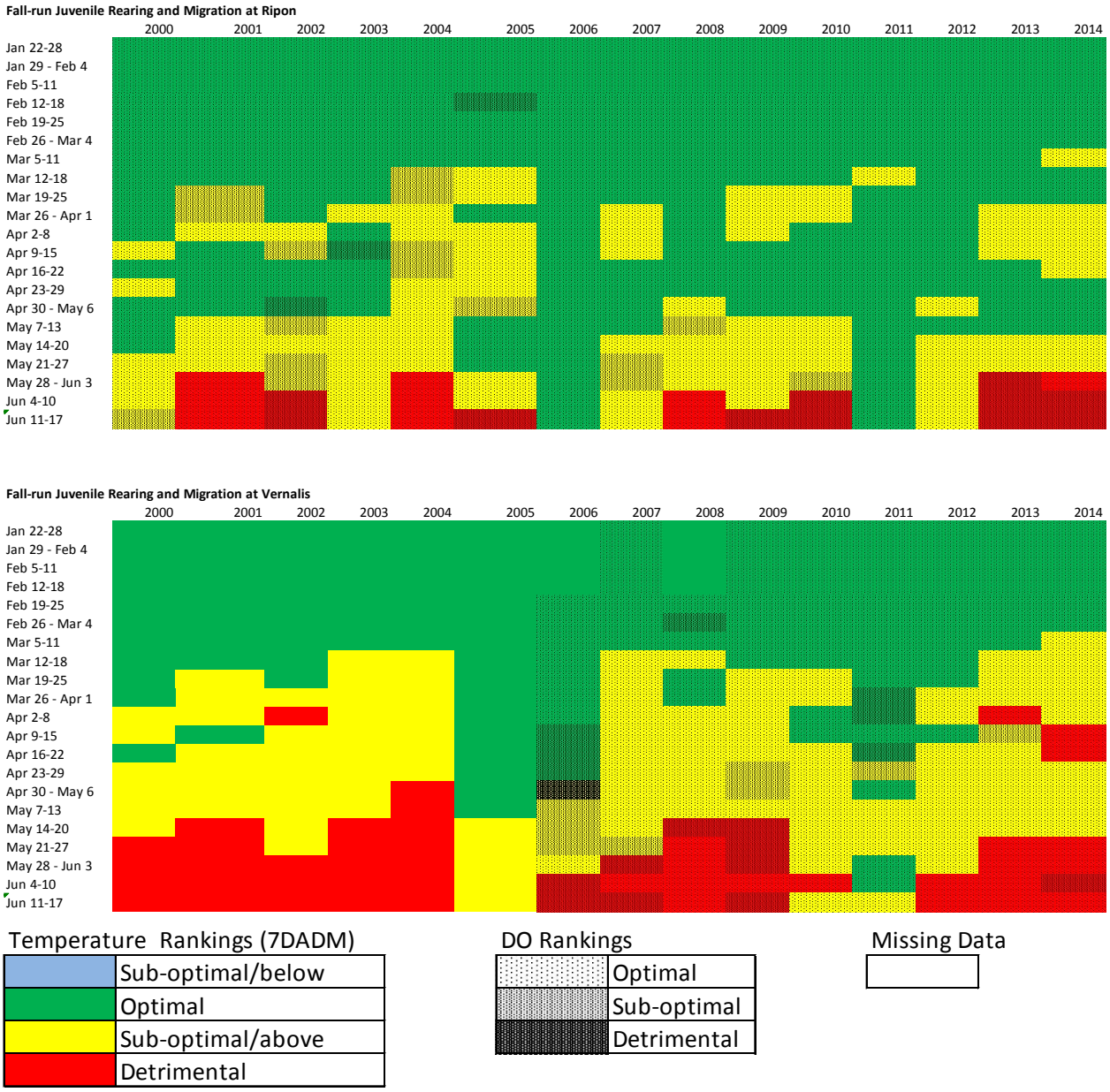


Figure 18

Juvenile Rearing and Migration for Fall-run Chinook Salmon

Notes:
Temperature and DO rankings based on observed data during periods of juvenile rearing and migration. Rankings reflect the Environmental Objectives for temperature and DO (Section 7). Data are from CDEC for each location.

In the near term, this truncation of the juvenile migration window represents a sustained, major population-level effect on life history diversity of outmigrants from the Stanislaus River. In the long term, warming associated with climate change is likely to

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maintain this stress as a result of increases in water temperature (Cayan et al. 2008; Dettinger et al. 2004) and corresponding potential decreases in DO.

8.6.2.2 Spring-run Chinook Salmon

Rearing and migration opportunities for juvenile spring-run Chinook salmon are constrained by deteriorating conditions in the spring. The stress on the population was rated "medium" magnitude with "high" certainty in the near term (Table 65).

Without corrective action, temporally constrained rearing and migration opportunities will remain a "medium" magnitude stress with "high" certainty over the long term (Table 65).

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Table 65

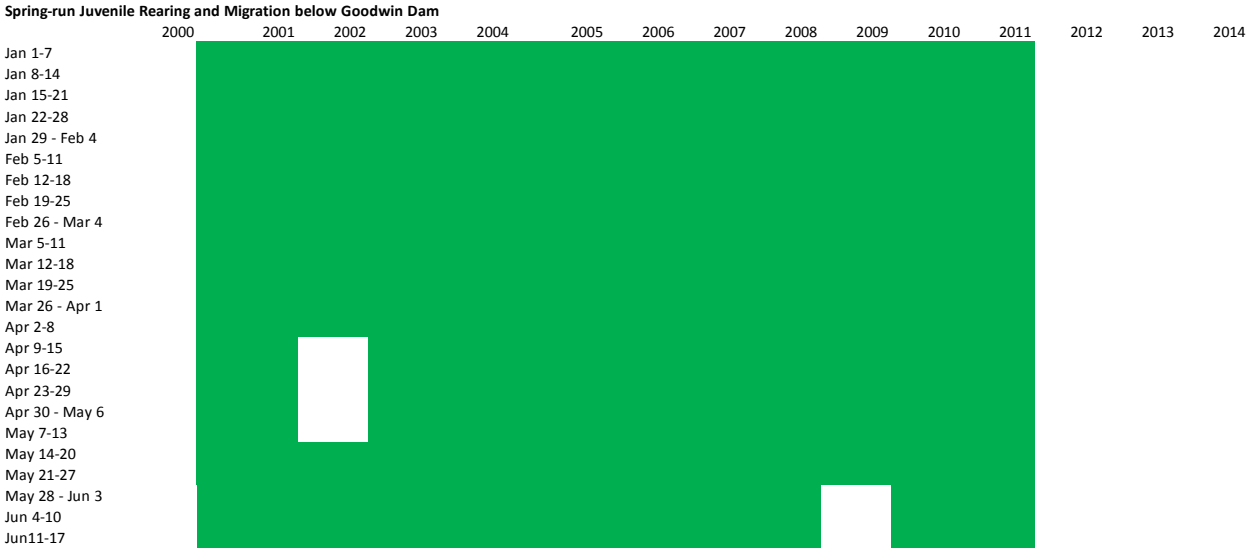
Scoring Stressors for Juvenile Rearing and Migration of Spring-run Chinook Salmon

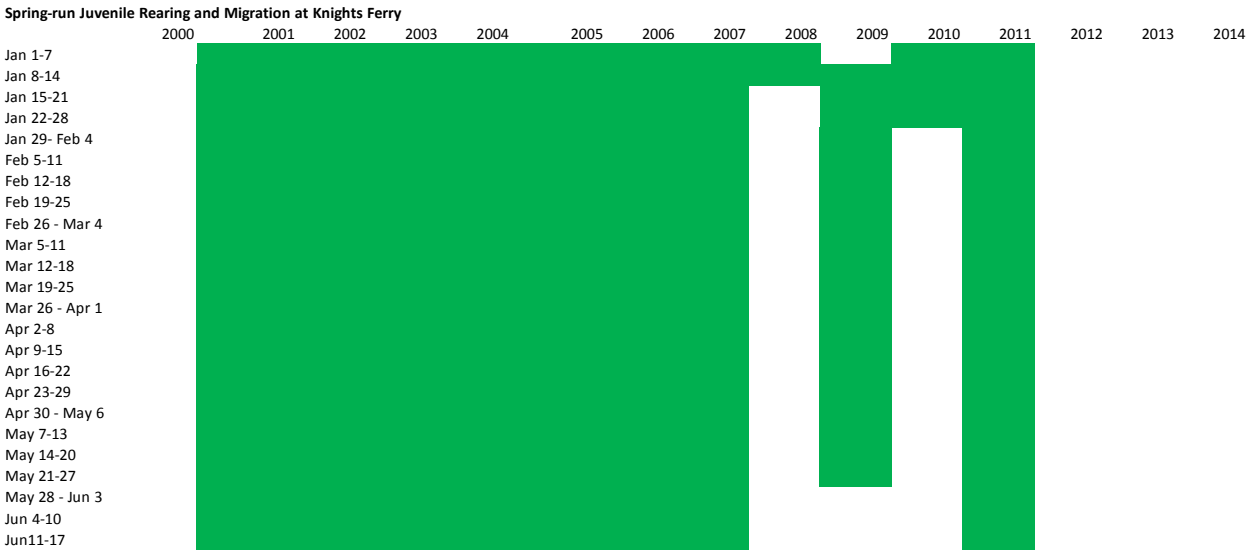
Stress	NT M	NT C	LT M	LT C	When	Stressors: Temperature NT	Temperature LT	DO NT	DO LT	Flow Volume NT	Flow Volume LT	Velocity NT	Velocity LT	Turbidity NT	Turbidity LT	Depth NT	Depth LT	Cover NT	Cover LT	Prey Density NT	Prey Density LT	Predator Density NT	Predator Density LT	Contaminants NT	Contaminants LT	Coarse Sediment Input NT	Coarse Sediment Input LT	Hatchery Straying NT	Hatchery Straying LT	Disease NT	Disease LT	Habitat Distribution NT	Habitat Distribution LT
Compression of rearing and migration time window	3	4	3	4	Apr-July	M: 3 C: 4	M: 3 C: 4	M: 1 C: 2	M: 1 C: 2																								
Lack of suitable rearing habitat	4	4	4	4	Jan-Jun	M: 3 C: 3	M: 4 C: 3	M: 1 C: 2	M: 1 C: 2	M: 4 C: 3	M: 4 C: 4	M: 2 C: 2	M: 2 C: 2	M: 2 C: 2	M: 2 C: 2	M: 3 C: 3	M: 3 C: 3	M: 3 C: 3	M: 3 C: 3	M: 2 C: 1	M: 2 C: 1	M: 3 C: 2	M: 3 C: 2	M: 4 C: 3	M: 4 C: 3	M: 4 C: 4	M: 4 C: 4			M: 2 C: 2	M: 3 C: 2	M: 3 C: 2	M: 4 C: 2
Lack of suitable migratory conditions	4	4	4	4	Jan-Jun	M: 3 C: 4	M: 4 C: 4	M: 1 C: 2	M: 1 C: 2	M: 4 C: 3	M: 4 C: 4	M: 3 C: 2	M: 3 C: 2	M: 2 C: 2	M: 2 C: 2	M: 3 C: 3	M: 3 C: 3	M: 3 C: 2	M: 3 C: 2	M: 2 C: 1	M: 2 C: 1	M: 3 C: 1	M: 3 C: 1	M: 2 C: 3	M: 2 C: 3	M: 4 C: 2	M: 4 C: 2						
Lack of suitable migratory cues	4	3	4	3	Jan-Jun	M: 4 C: 3	M: 4 C: 2	M: 1 C: 1	M: 1 C: 1	M: 4 C: 3	M: 4 C: 3	M: 4 C: 3	M: 4 C: 3	M: 3 C: 2	M: 2 C: 2																		
Lack of suitable over-summering habitat	1	3	3	3	May-Sep	M: 1 C: 3	M: 2 C: 3	M: 1 C: 1	M: 1 C: 1	M: 1 C: 2	M: 2 C: 2	M: 1 C: 2	M: 2 C: 2	M: 1 C: 1	M: 1 C: 1	M: 1 C: 1	M: 1 C: 1	M: 2 C: 1	M: 2 C: 1			M: 2 C: 2	M: 2 C: 2	M: 3 C: 3	M: 3 C: 3					M: 1 C: 1	M: 1 C: 1		
Lack of fitness/ genetic maladapt-ation	1	1	3	3	Jan-Jun	M: 1 C: 3	M: 3 C: 3	M: 1 C: 3	M: 1 C: 3																			M: 1 C: 1	M: 3 C: 3				

Notes:
– Stress and stressors (i.e., contributing factors to a particular stress) for spring-run juvenile rearing and migration in the Stanislaus River for the near term (current conditions) and long term (assuming restored abundance goals and higher air temperatures). Scores for each stress were evaluated and assigned based on the scores for contributing stressors.
– Location: Whole river
– M: Magnitude assesses the size or level of the impact from a stressor. Magnitude can be assigned using consideration of population or habitat effects, and higher scores require consideration of the scale or extent.
– C: Certainty describes the scientific basis for scoring the scale and magnitude of a particular stressor. Certainty considers both the predictability and understanding of linkages in the driver-linkage-outcome pathway from the stressor to the impact.
Scoring:
4 = High
3 = Medium
2 = Low
1 = Minimal
LT = long term; NT = near term

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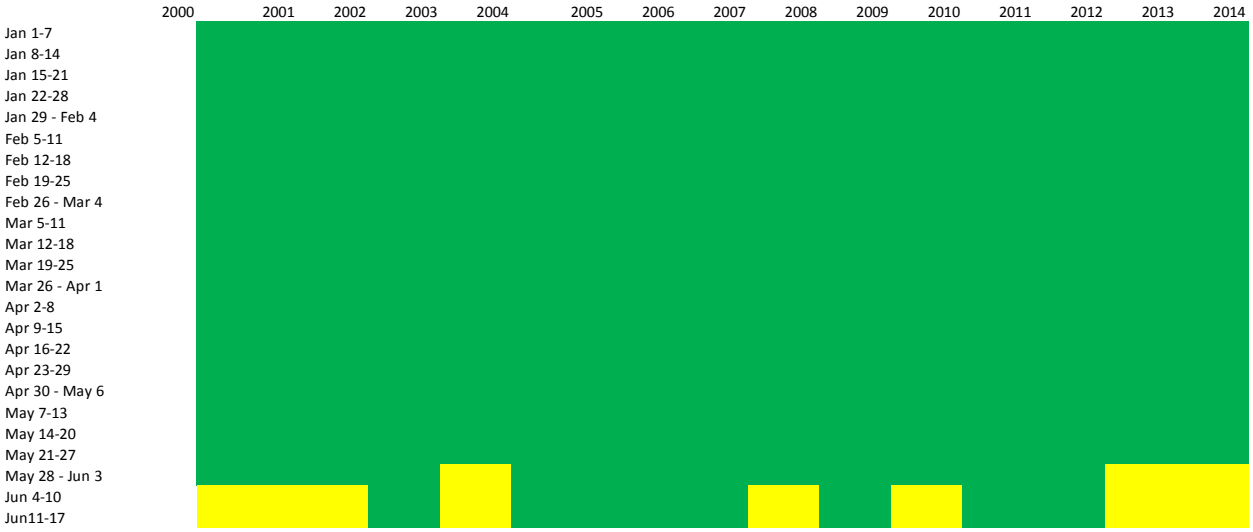
Similar to fall-run Chinook salmon, successful spring-run juvenile migration will be constrained by warm temperatures that impair or prevent smoltification in the near term (Figure 19). The magnitude of this stressor is expected to be less than that for fall-run, since spring-run smolts tend to migrate slightly earlier than fall-run (Moyle 2002; Williams 2006). The certainty of this stress is "high" based on the SEP Group's understanding of the impacts of high temperature and low DO on migrating juvenile Chinook salmon, robust temperature and DO data, and recent publications regarding impairment to late-outmigrating Chinook salmon on the Stanislaus River (Zeug et al. 2014; Sturrock et al. 2015).



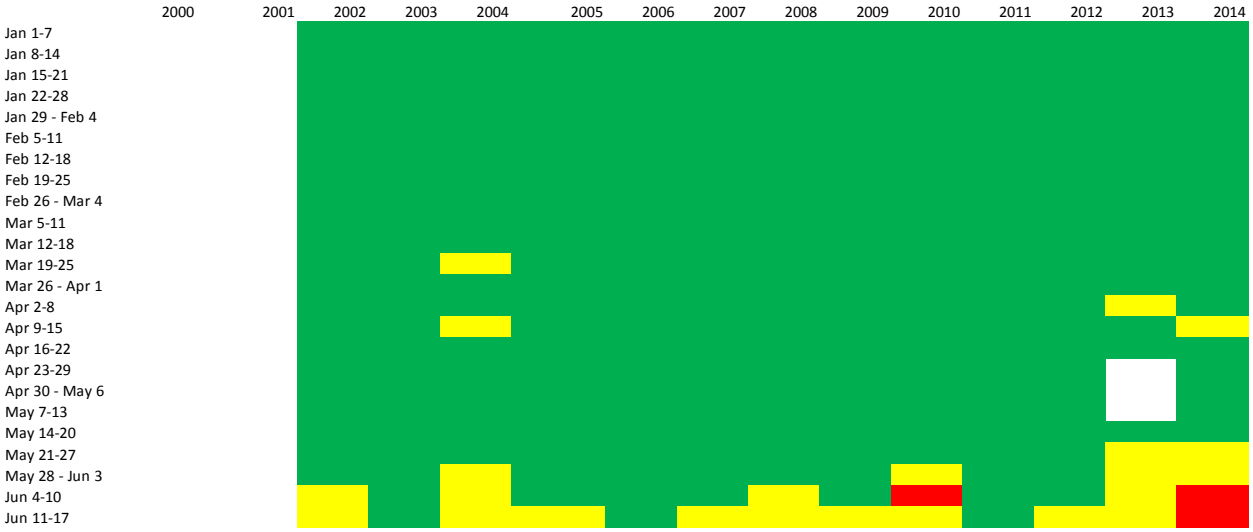


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Spring-run Juvenile Rearing and Migration at Orange Blossom Bridge



Spring-run Juvenile Rearing and Migration at Oakdale



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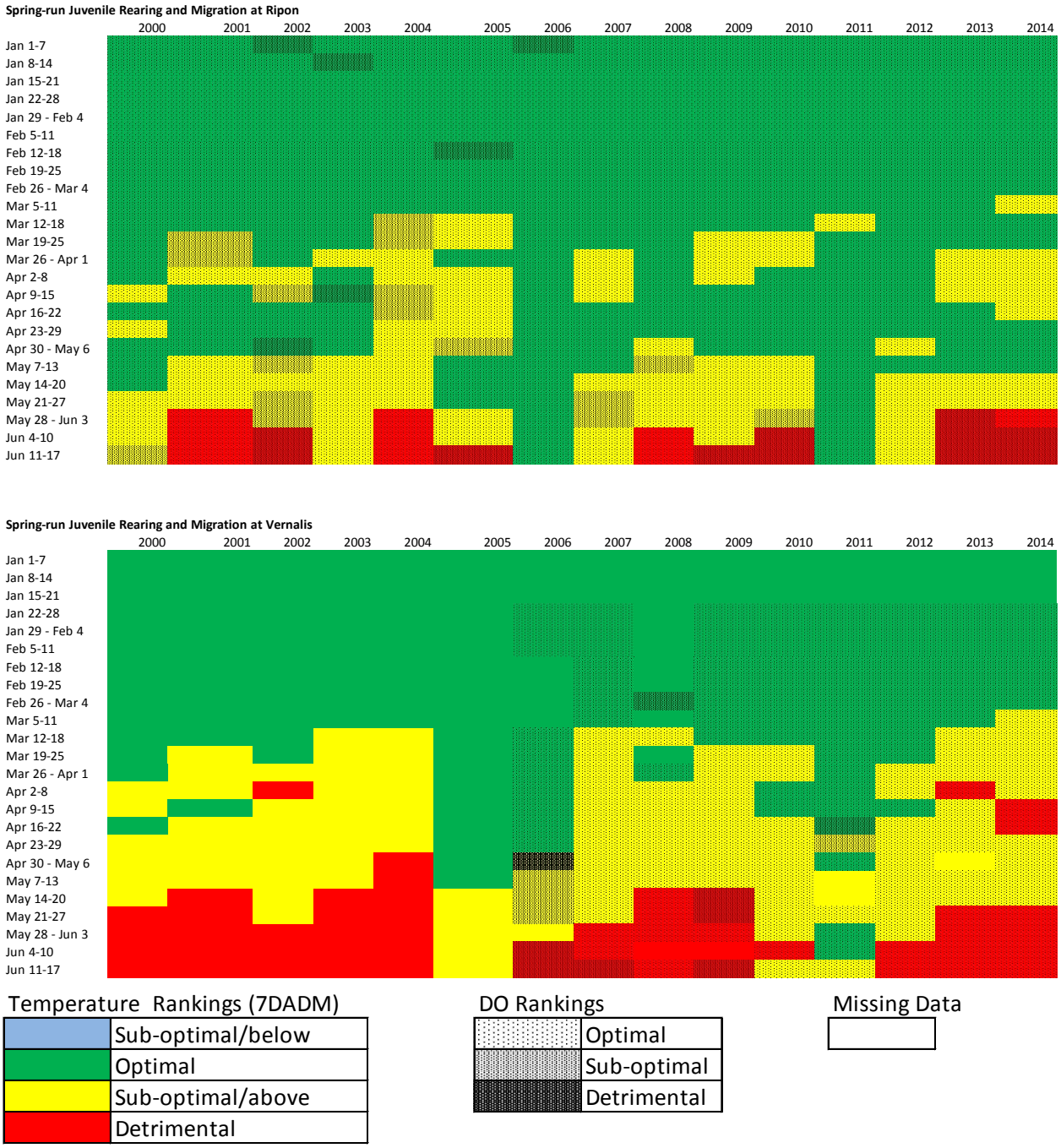


Figure 19

Juvenile Rearing and Migration for Spring-run Chinook Salmon

Notes:
Temperature and DO rankings based on observed data during periods of juvenile rearing and migration. Rankings reflect the Environmental Objectives for temperature and DO (Section 7). Data are from CDEC for each location.

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8.6.2.3 O. mykiss

Temperatures that impair smoltification in a way that compresses the time window available for migration were rated "low" magnitude with "low" certainty for *O. mykiss* in the near term (Table 66).

Without corrective actions, temporally constrained smoltification opportunities will remain a "medium" magnitude stress for *O. mykiss* in the long term; in addition, without better understanding of the timing and duration of exposure to low temperatures that are required to support smoltification, certainty will remain "Low" (Table 66).

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Table 66

Scoring Stressors for Juvenile Rearing and Migration of *O. mykiss*

Stress	NT M	NT C	LT M	LT C	When	Stressors: Temperature NT	Temperature LT	DO NT	DO LT	Flow Volume NT	Flow Volume LT	Velocity NT	Velocity LT	Turbidity NT	Turbidity LT	Depth NT	Depth LT	Cover NT	Cover LT	Prey Density NT	Prey Density LT	Predator Density NT	Predator Density LT	Contaminants NT	Contaminants LT	Coarse Sediment Input NT	Coarse Sediment Input LT	Hatchery Straying NT	Hatchery Straying LT	Disease NT	Disease LT
Compression of rearing and migration time window	2	2	2	2	Apr-July	M: 2 C: 2	M: 2 C: 2	M: 2 C: 2	M: 2 C: 2																						
Lack of suitable rearing habitat	4	4	4	4	Jan-Dec	M: 1 C: 4	M: 2 C: 4	M: 1 C: 2	M: 1 C: 2	M: 4 C: 3	M: 4 C: 4	M: 4 C: 3	M: 4 C: 4	M: 2 C: 2	M: 2 C: 2	M: 3 C: 3	M: 3 C: 3	M: 3 C: 3	M: 3 C: 3	M: 2 C: 1	M: 2 C: 1	M: 3 C: 2	M: 3 C: 2	M: 4 C: 3	M: 4 C: 3	M: 4 C: 4	M: 4 C: 4			M: 2 C: 2	M: 3 C: 2
Lack of suitable migratory conditions	4	4	4	4	Jan-Dec	M: 2 C: 4	M: 2 C: 4	M: 1 C: 2	M: 1 C: 2	M: 4 C: 3	M: 4 C: 4	M: 4 C: 3	M: 4 C: 4	M: 2 C: 2	M: 2 C: 2	M: 3 C: 3	M: 3 C: 3	M: 3 C: 2	M: 3 C: 2	M: 2 C: 1	M: 2 C: 1	M: 3 C: 1	M: 3 C: 1	M: 2 C: 3	M: 2 C: 3	M: 4 C: 2	M: 4 C: 2				
Lack of suitable migratory cues	4	3	4	3	Jan-Jun	M: 4 C: 2	M: 4 C: 2	M: 1 C: 1	M: 1 C: 1	M: 4 C: 3	M: 4 C: 3	M: 4 C: 3	M: 4 C: 3	M: 3 C: 2	M: 2 C: 2					M: 3 C: 1	M: 3 C: 1										
Lack of suitable over-summering habitat	1	4	1	4	May-Sep	M: 1 C: 4	M: 1 C: 4	M: 1 C: 1	M: 1 C: 1	M: 1 C: 2	M: 2 C: 2	M: 1 C: 2	M: 2 C: 2	M: 1 C: 1	M: 1 C: 1	M: 3 C: 2	M: 3 C: 2	M: 2 C: 1	M: 2 C: 1	M: 3 C: 1	M: 3 C: 1	M: 2 C: 2	M: 2 C: 2	M: 3 C: 3	M: 3 C: 3	M: 3 C: 1	M: 3 C: 1				
Lack of fitness/ genetic maladaptation	3	1	3	1	Jan-Dec																							M: 3 C: 1	M: 3 C: 1		

Notes:
– Stress and stressors (i.e., contributing factors to a particular stress) for *O. mykiss* juvenile rearing and migration in the Stanislaus River for the near term (current conditions) and long term (assuming restored abundance goals and higher air temperatures). Scores for each stress were evaluated and assigned based on the scores for contributing stressors.
– Location: Whole river
– M: Magnitude assesses the size or level of the impact from a stressor. Magnitude can be assigned using consideration of population or habitat effects, and higher scores require consideration of the scale or extent.
– C: Certainty describes the scientific basis for scoring the scale and magnitude of a particular stressor. Certainty considers both the predictability and understanding of linkages in the driver-linkage-outcome pathway from the stressor to the impact.
Scoring:
4 = High
3 = Medium
2 = Low
1 = Minimal
LT = long term
NT = near term

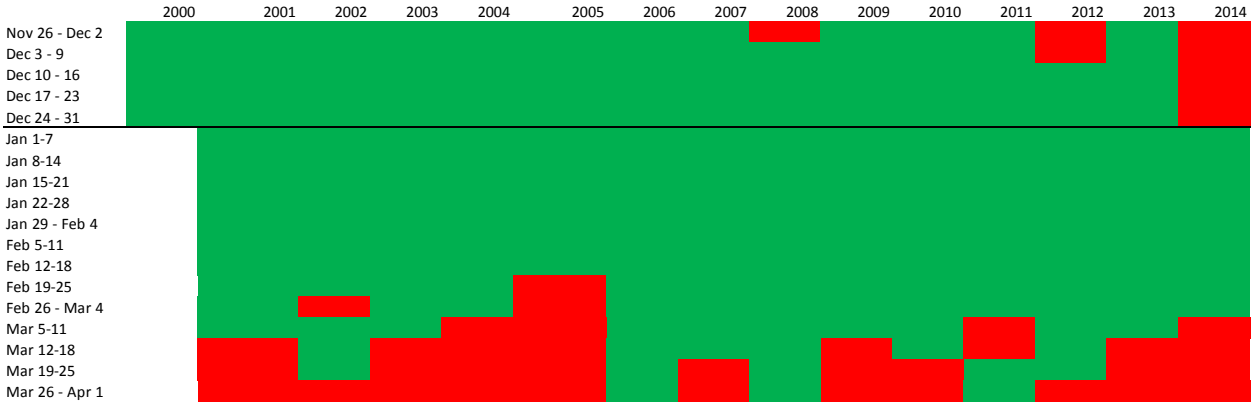
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Steelhead smoltification requires exposure to temperatures colder than those required by Chinook salmon (Appendix C, Table C-6); *O. mykiss* will not metamorphose into anadromous smolts unless they are exposed to temperatures less than 11°C (51.8°F) during the winter prior to outmigration (Myrick and Cech 2005). *O. mykiss* juveniles can tolerate substantially higher temperatures later in their migration phase (Appendix C, Table C-5). Temperatures that impair steelhead smoltification occur through most of March at Orange Blossom Bridge and are common after mid February at Ripon; *O. mykiss* in those areas of the river at those times are unlikely to smoltify, but fish may experience suitable temperatures to initiate smoltification upstream of Orange Blossom Bridge and at locations downstream earlier in winter (Figure 20). The literature is not clear regarding the precise duration and timing of exposure required to support subsequent smoltification among *O. mykiss*—thus, the certainty related to compression of the rearing and migration window is low. Research is needed to identify the necessary timing, duration, and location of exposure to temperatures that allow for smoltification among *O. mykiss*.

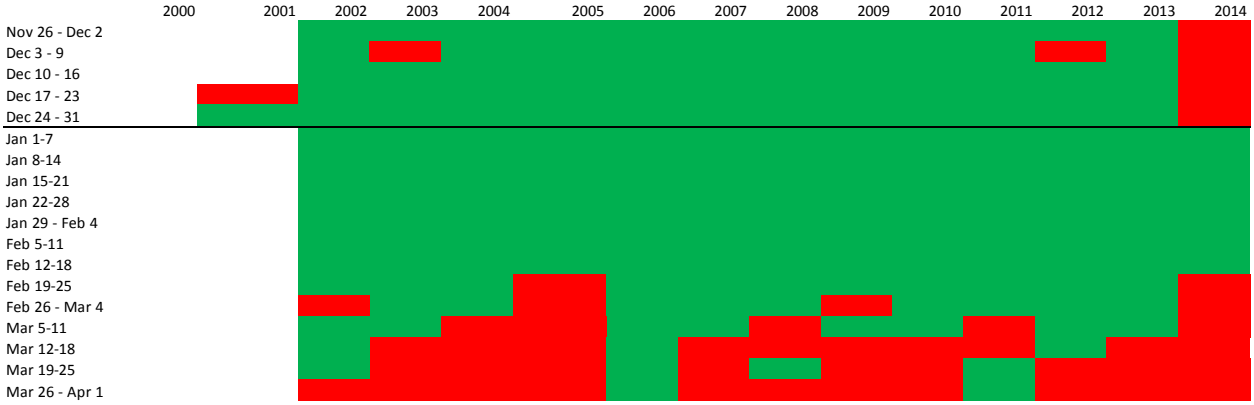


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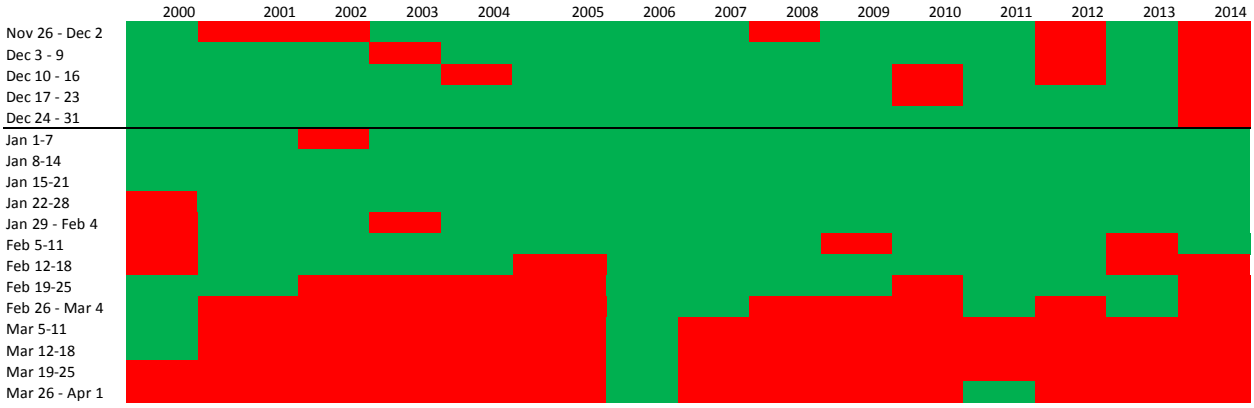
Steelhead Smoltification at Orange Blossom Bridge



Steelhead Smoltification at Oakdale



Steelhead Smoltification at Ripon



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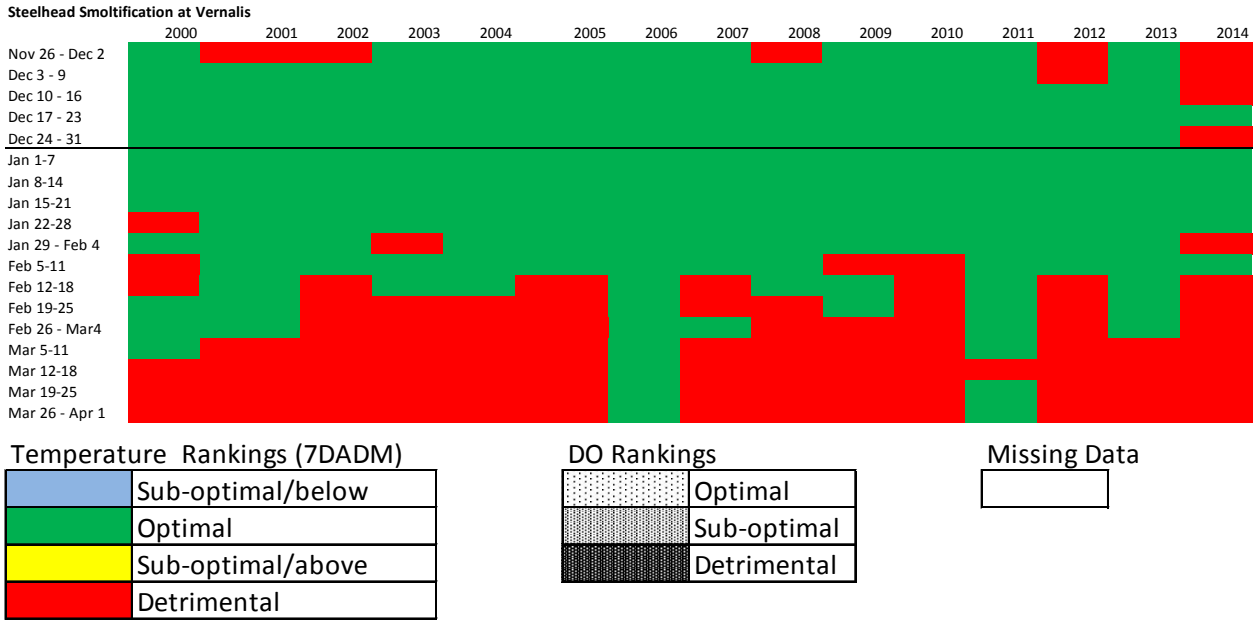


Figure 20

Steelhead Smoltification

Notes:
Temperature and DO rankings based on observed data during peak periods of steelhead smoltification. Rankings reflect the Environmental Objectives for temperature and DO (Section 7). Data are from CDEC for each location.

8.6.3 Stress: Lack of Suitable Rearing Habitat (Juvenile Rearing and Migration)

Inadequate rearing habitat can limit the productivity of salmonid populations. Historically, the Central Valley had extensive, seasonally inundated, shallow-water habitat that allowed for salmonid rearing (TBI 1998; Moyle 2002; Williams 2006). This habitat is associated with increased growth and survival of juvenile salmonids (e.g., Sommer et al. 2001b, 2004, 2005; Jeffres et al. 2008) as is shallow side channel habitat (Appendix A of NMFS 2014). Most of these historic shallow-water rearing habitats have been eliminated throughout the Central Valley. In the Stanislaus River, in particular, recent modeling suggests currently available wetted floodplain is a small fraction of the estimated acreage of functional inundated habitat the SEP Group estimates is necessary to support current or future populations (Section 7.2.5.5.6) and a small fraction of the area originally available in the watershed.

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8.6.3.1 Fall-run Chinook Salmon

Current estimates show that the Stanislaus River has a deficit of suitable rearing habitat even at current population levels. Therefore, lack of adequate space with suitable conditions for rearing along the Stanislaus River corridor is a "high" magnitude and "high" certainty stress in the near term (Table 64).

Without corrective action, factors that led to the current lack of rearing habitat will increase in intensity; in addition, the population of juveniles requiring rearing space is expected to increase. As a result, stress imposed by lack of suitable rearing space will remain "high" magnitude, with "high" certainty in the long term (Table 64).

Fall-run Chinook salmon lack access to suitable rearing habitat on the Stanislaus River. The SEP Group estimates that current fall-run Chinook salmon populations on the Stanislaus River require 69 acres of functional inundated habitat (Section 7.2.5.5). Applying a correction for habitat suitability developed for the San Joaquin River Restoration Program (SJRRP 2012), this translates into a need for 230 to 986 total wetted acres. Modeling by FlowWest indicates that currently available wetted floodplain is approximately 133 acres.[10] In other words, even if the percentage of suitable habitat per acre of wetted floodplain on the Stanislaus River were equivalent to the high end of the suitability range observed on the San Joaquin River (30%), the current acreage would still represent only approximately 58% of what is necessary to support current salmon populations. This strongly suggests that fall-run Chinook salmon juveniles lack adequate off-channel rearing habitat and survival rates in the Stanislaus River and downstream are negatively impacted by this lack of habitat.

Salmon populations are expected to grow in the near term and long term, and these larger populations will require more rearing habitat. SEP Group objectives call for 707 acres of functional inundated rearing habitat to support future populations; using the conversions developed by the SJRRP (2012), this suggests the need for between approximately 2,360 acres and 10,100 acres of actual inundated floodplain (Section 7.2.5.5). Currently available habitat

[10] FlowWest SRH2d Model, Available from: http://public.tableau.com/profile/mark.tompkins#!/vizhome/20160203_CVPIA_Floodplain/Floodplain

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is less than 6% of the habitat required, even under the best case for the relationship between wetted floodplain area and quality rearing habitat.

The frequency and extent of inundation of off-channel habitats have decreased substantially on the Stanislaus River as a result of several fundamental changes. Construction of dams on the Stanislaus River block the supply of alluvial sediment, resulting in scour of the main channel bed. Reservoir operations greatly reduced channel-forming flows, which led to steep armored banks. The combination of armored banks and an incised channel increased the volume of flow necessary to connect the river to riparian floodplains and side channels (Kondolf 1997; Furniss et al. 2004; Grant 2012). These effects, combined with levee construction and flattening of the hydrograph (i.e., limiting magnitude and variation in river flows), have disconnected the river and rearing salmonids from important floodplain and side channel habitats. Finally, there is inadequate distribution of shallow productive habitats along the river's course; most of the available habitats of this type are located upstream of Orange Blossom Bridge, resulting in very few rest areas, predator avoidance pathways, or rearing opportunities in the lower half of the Stanislaus River and in the lower San Joaquin River downstream of its confluence with the Stanislaus River.

In-stream rearing habitat has also been degraded by channel modifications (e.g., former gravel pits), flow modifications, and lack of cover (i.e., structure and turbidity). Disconnection of the channel from the floodplain also increases the percentage of fine sediments (i.e., sand and silt) in gravel beds. This degrades in-channel rearing opportunities, as preferred food items (drifting macroinvertebrates) are replaced by less favorable, sand-dwelling species. Loss of high-quality in-channel and off-channel habitats has left juveniles vulnerable to predators in most years.

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How the SEP Group Addressed Predation Stress on Juvenile Salmonids

In recent forums where management of Central Valley fishes are considered and in the media, much attention has focused on the need to reduce "predation" on native fishes, including salmonids. These discussions have focused on what are perceived to be high rates of predation on native fishes, especially by a suite of non-native predatory fishes (e.g., striped bass and species in the family centrarchidae; Lindley and Mohr 2003; Cavallo et al. 2012; for a review, see Grossman et al. 2013).

Predation is a natural process. In natural populations, more juveniles are produced than can survive, and predation eliminates many less fit individuals (Darwin 1861). In the absence of large egg or fish kills caused by disease and/or lethal water quality conditions, predation is almost always the proximate mechanism for juvenile salmon mortality (and, by extension, for natural selection). The observation that predation rates are "too high" in a river is really the same as saying that survival is "too low" to achieve some Biological Objective. Therefore, the SEP Group's productivity objectives (i.e., improvements in survival rates) are intimately tied to creating conditions that will reduce predation; specifically, the Environmental Objectives describe habitat conditions that favor juvenile salmon survival over predator success.

Predation is the interaction of the following:

- "Predation susceptibility," which is a function of factors including:
  - Juvenile salmon size,
  - Juvenile salmon condition,
  - Juvenile salmon abundance,
  - Life history diversity across the population,
  - Habitat conditions that expose juveniles to predators, and
  - Habitat conditions that support evolutionarily-developed predator avoidance mechanisms of juvenile salmon
- "Predation pressure", which is a function of factors including:
  - Predator density
  - Predator activity/metabolic rates
  - Habitat conditions that drive activity/metabolic rates (e.g., temperature)

In general (and not coincidentally), environmental conditions that favor juvenile salmon survival tend to reduce rates of predation; this occurs because optimal habitat conditions reduce both predation susceptibility and pressure. The SEP Group's Environmental Objectives define optimal, sub-optimal, and detrimental habitat conditions for each target population in ways that account for the effect of habitat conditions on predator susceptibility and on the predators themselves. For example, optimal temperatures for Chinook salmon are those that also tend to suppress predator metabolism, particularly for non-native, warm-water predators (e.g., fish in the family centrarchidae). Thus, attaining optimal levels of environmental conditions will create habitats that reduce predation susceptibility and predation pressure.

The SEP Group included "predator density" in its stressor rankings for juvenile rearing because there is no Environmental Objective for "predator density." Theoretically, such an objective could be set using bioenergetic models and assumptions regarding habitat conditions (e.g., temperature, turbidity) in each reach, but stressor reduction would still require progress towards meeting the other habitat objectives. It should be noted that progress towards attaining all the Environmental Objectives relevant to juvenile rearing and migration will naturally reduce predator density over time (i.e., less predation equals reduced biomass of predators). Nevertheless, the SEP Group scored predator density levels as a stressor because there are other, more immediate means of reducing predator density (e.g., removal of unnatural structures where predators tend to aggregate, direct predator removal, expansion of habitat area) that may be proposed as conservation measures to benefit salmon migration and rearing on the Stanislaus River.

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Contaminants are also a major stressor on habitat quality for migrating and rearing fall-run Chinook salmon. Pesticides and herbicides can disrupt the salmonid food web through direct mortality of plants and invertebrates, reducing growth of juvenile fish. Pesticides and herbicides may also reduce feeding efficiency and disrupt salmon olfaction and, as a result, the ability of surviving outmigrants to return to natal waters as adults (Appendix C, Section 1.3.3.1). Metabolic costs of detoxifying contaminants can retard growth rates. Cumulative pesticide exposure of salmon in the Stanislaus River (Hoogeweg et al. 2011) is sub-optimal throughout the year between Knights Ferry and Caswell State Park (and likely further downstream); exposure reaches levels that are detrimental (primarily through their effect on juvenile olfaction) by March at Knights Ferry and points downstream (Appendix C, Figure C-1 and Table C-13).

High temperatures currently impact fall-run Chinook salmon rearing. Chinook salmon tolerate and can even benefit from temperatures up to approximately 25°C (77°F) in off-channel habitat with high food production. In the absence of habitats with slow moving water and high prey densities, temperatures close to 25°C (77°F) are detrimental to rearing fish (Section 7.2.5.1). As shown on Figure 18, temperatures become sub-optimal for rearing and migrating fall-run Chinook salmon by June at Orange Blossom Bridge and points downstream; temperatures are sub-optimal in April of most years at Ripon and by late March at Vernalis. Temperatures become detrimental to rearing and migrating salmon by late May at Ripon. Unless shallow, slow-moving, and prey-dense habitats (in which salmon can tolerate higher temperatures) are created, these conditions will be exacerbated by regional warming trends in the long term.

As part of the stressor evaluation and prioritization process, the SEP Group assumed that habitat extent in the future would permit fall-run Chinook salmon populations to increase to levels associated with larger planning goals, such as CVPIA/AFRP production targets. Attainment of those targets is not a Biological Objective for the Stanislaus River because attainment relies on changes to habitat conditions beyond the Stanislaus; however, provision of habitat space necessary to support those production levels is an Environmental Objective for the Stanislaus River (Section 7.2.5.5). Producing the number of juveniles that would be consistent with Central Valley Goals and Objectives for the Stanislaus River would generate increased demand for quality juvenile rearing habitat. Thus, there is high certainty that

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habitat limitations will persist in the future unless management actions to increase habitat availability are implemented.

8.6.3.2 Spring-run Chinook Salmon

Lack of rearing habitat for juvenile spring-run Chinook salmon is a "high" magnitude, "high" certainty stress to recovering spring-run Chinook salmon populations in the near term (Table 65).

Without corrective action, lack of rearing habitat will remain a "high" magnitude stress with "high" certainty in the long term (Table 65).

All of the same stressors limiting availability of suitable rearing habitat described for fall-run Chinook salmon apply to spring-run. Spring-run juveniles are expected to begin migrating earlier than fall-run, and thus, some fraction of their population may avoid the most severe impacts of stressors like high temperature and pesticide concentrations. However, the current limits on high-quality rearing habitat space and the increased demand for that space in the future will create stress that impedes the recovery of spring-run Chinook salmon on the Stanislaus River.

8.6.3.3 O. mykiss

Lack of rearing habitat for juvenile *O. mykiss* is a "high" magnitude, "high" certainty stress to recovering steelhead populations in the near term (Table 66).

Without corrective action, lack of rearing habitat will remain a "high" magnitude stress with "high" certainty in the long term (Table 66).

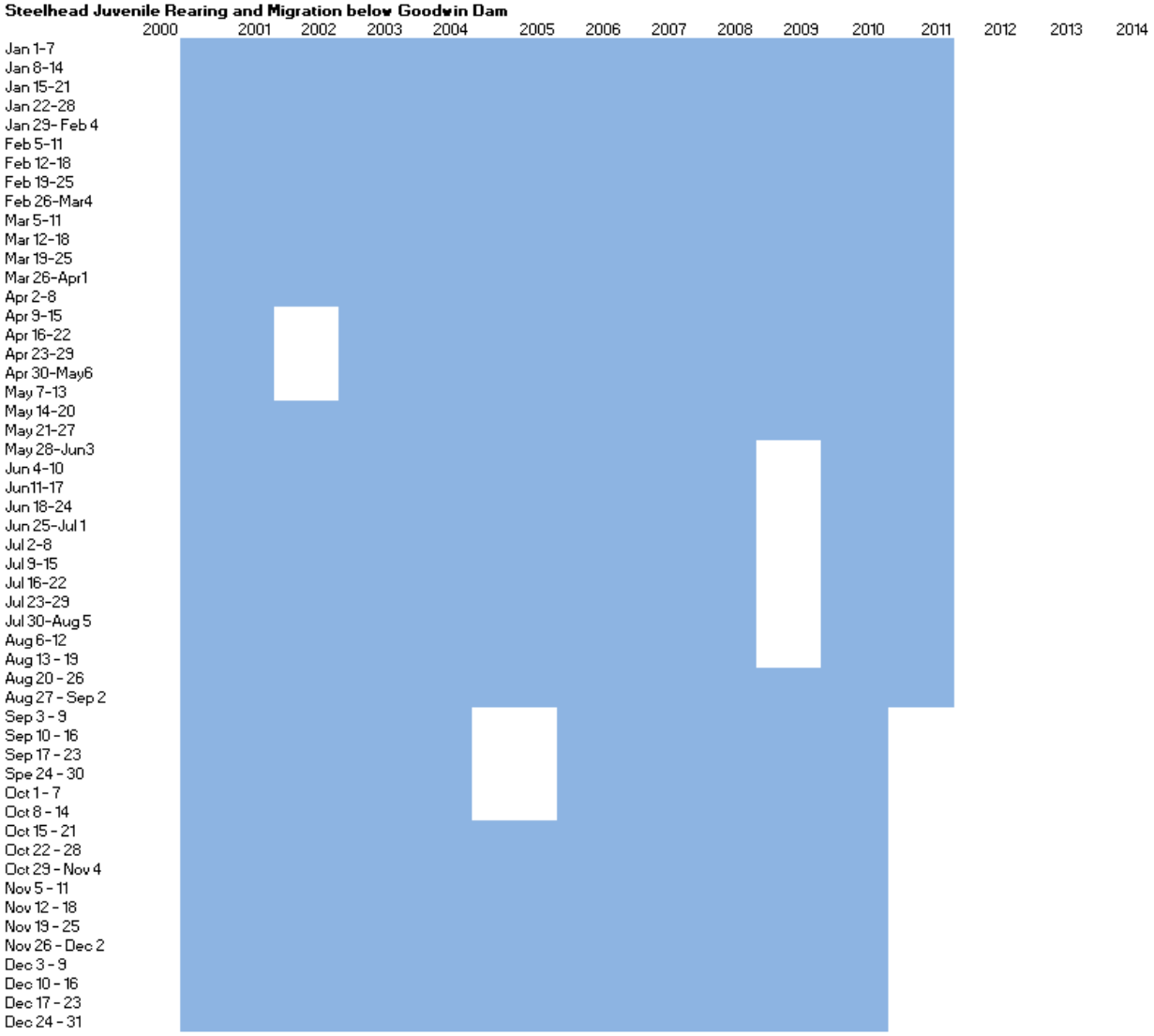
Production of anadromous phenotypes in the local *O. mykiss* population is likely to be discouraged by a lack of adequate food resources to promote rapid somatic growth. The degree of anadromy in *O. mykiss* populations is dependent on juvenile growth rates; faster individual growth rates are associated with greater anadromy (Satterthwaite et al. 2010; Kendall et al. 2014). Factors that limit inundation of shallow habitats (e.g., floodplains, side channels, riparian margins)—which export productivity to in-channel habitats; formation

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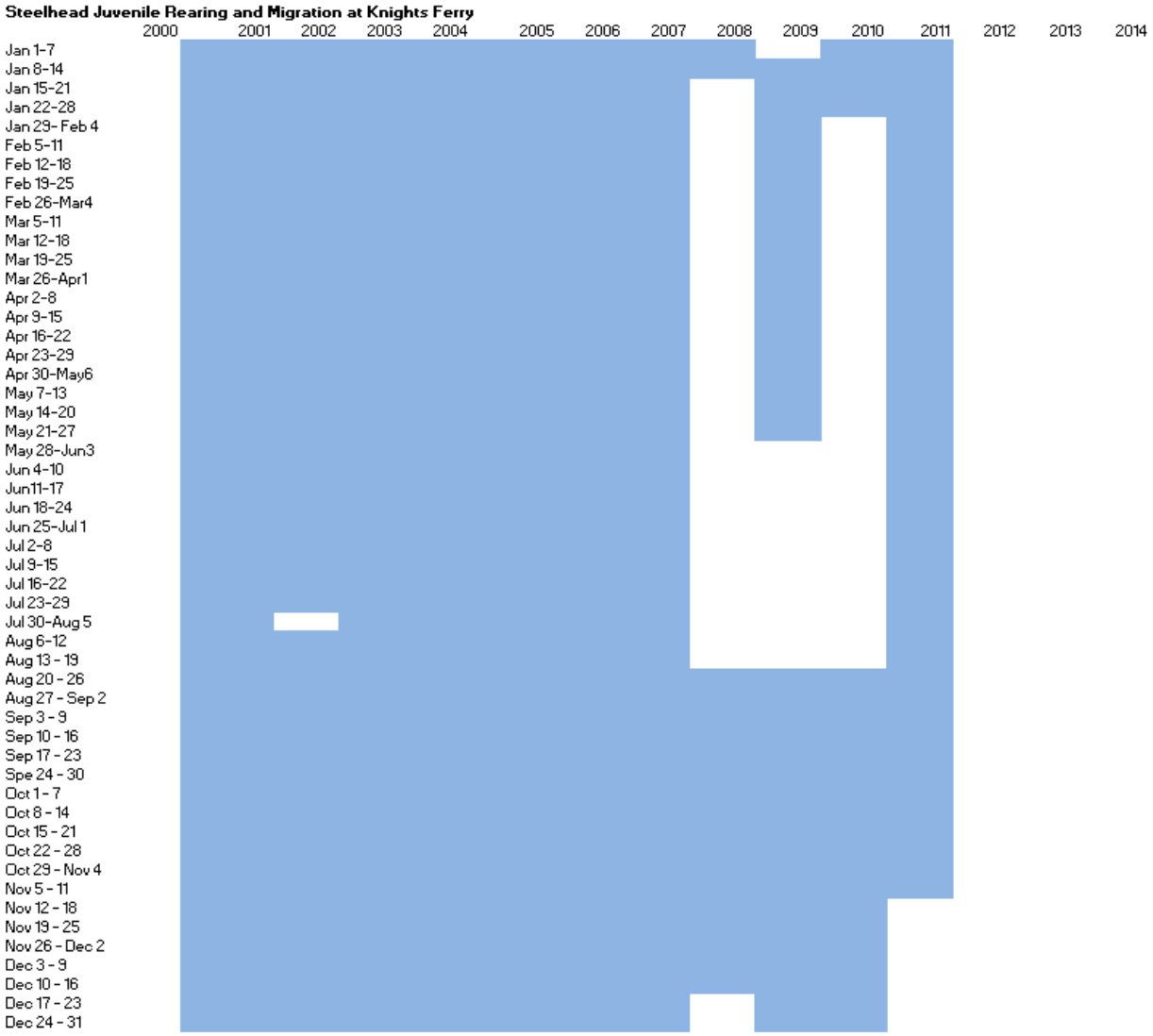
and maintenance of in-channel bars; and limited in-channel productivity (lack of coarse sediment input, pesticides and other contaminants)—reduce availability of and access to dense food supplies. Similarly, throughout half the year, pesticide concentrations are high enough to impair juvenile olfactory abilities at levels that would be detrimental to population growth rates; they are sub-optimal in the other 6 months of the year (Hoogeweg et al. 2011; see Appendix B, Section 1.3.3.1, Figure B-1, and Table B-13).

In contrast to Chinook salmon, temperatures in the Stanislaus River are optimal for rearing and migrating *O. mykiss*, at least between Orange Blossom Bridge and Oakdale (and probably several RMs on either side of those gage locations) from mid May to early October (Figure 21). Previously, we described the onset of temperatures that may limit smoltification in steelhead (greater than 11°C (51.8°F) from December through March; Section 8.6.2); however, (prior to or after smoltifying) rearing and migrating *O. mykiss* can experience optimal conditions at higher temperatures than Chinook salmon. Temperatures rarely exceed the *O. mykiss* rearing and migration optimal threshold at Oakdale or upstream; indeed, the persistence of temperatures lower than the *O. mykiss* optimum may represent a lack of an important migration cue (Migration cues are discussed in Section 8.6.5.)

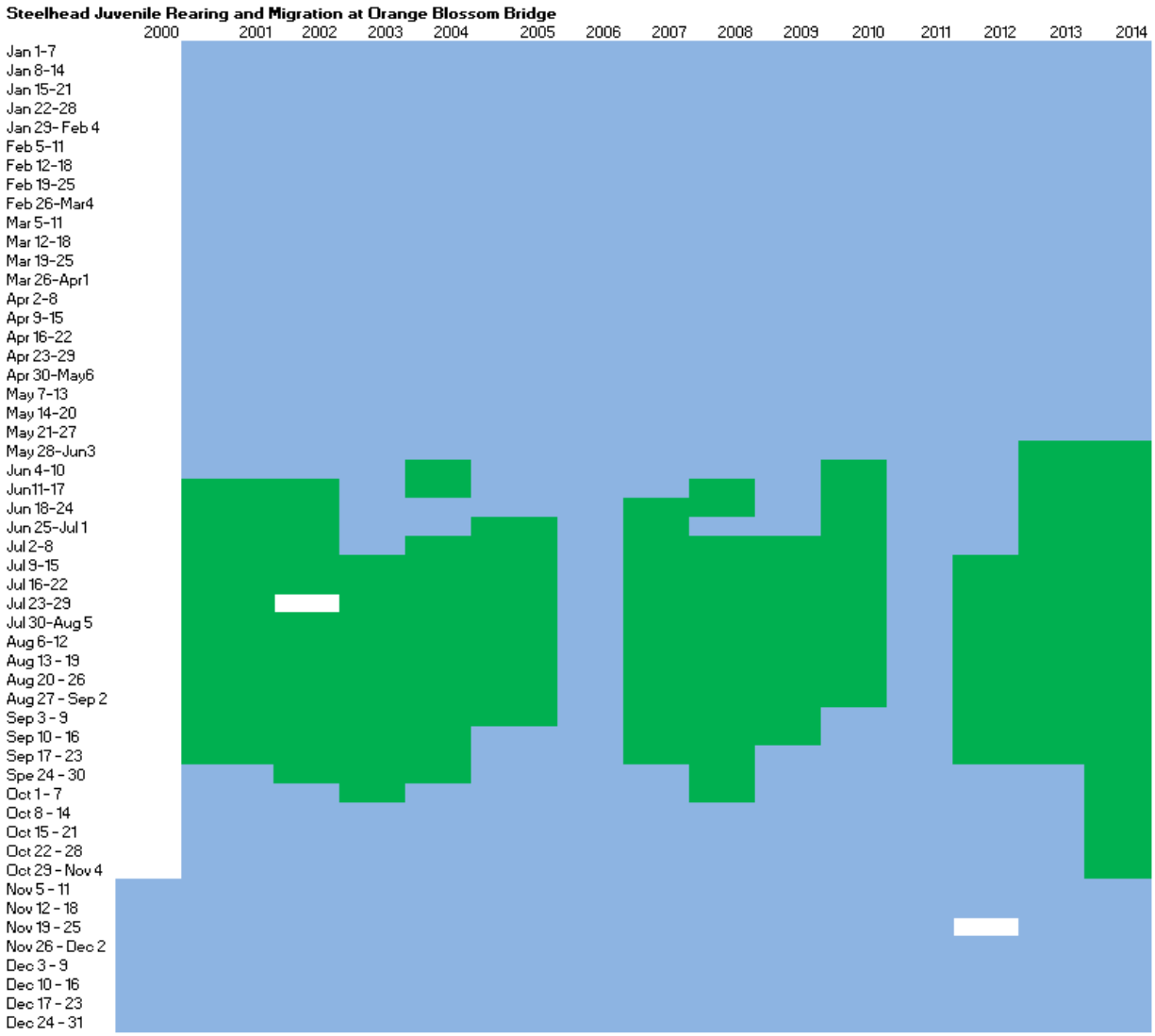
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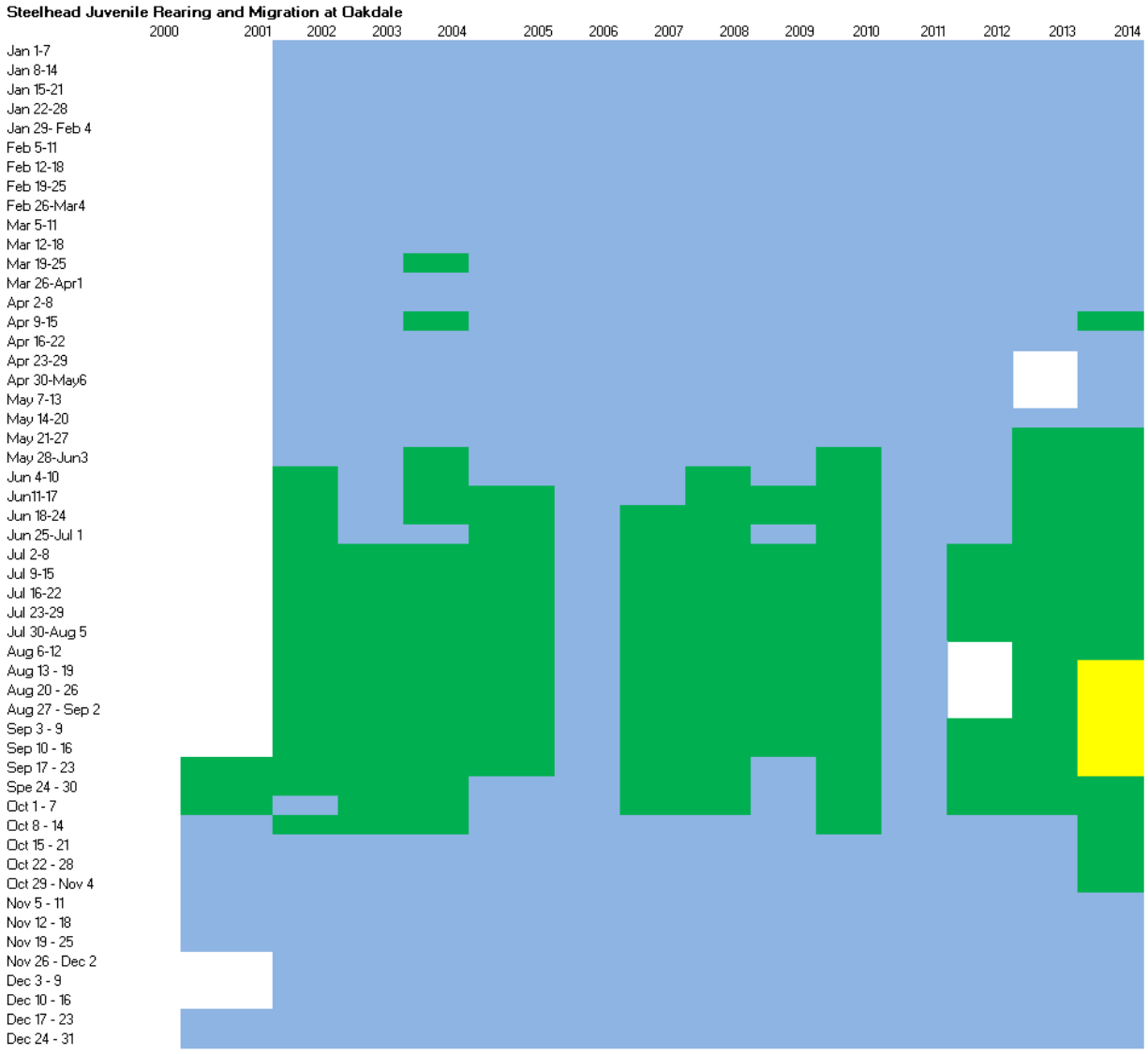
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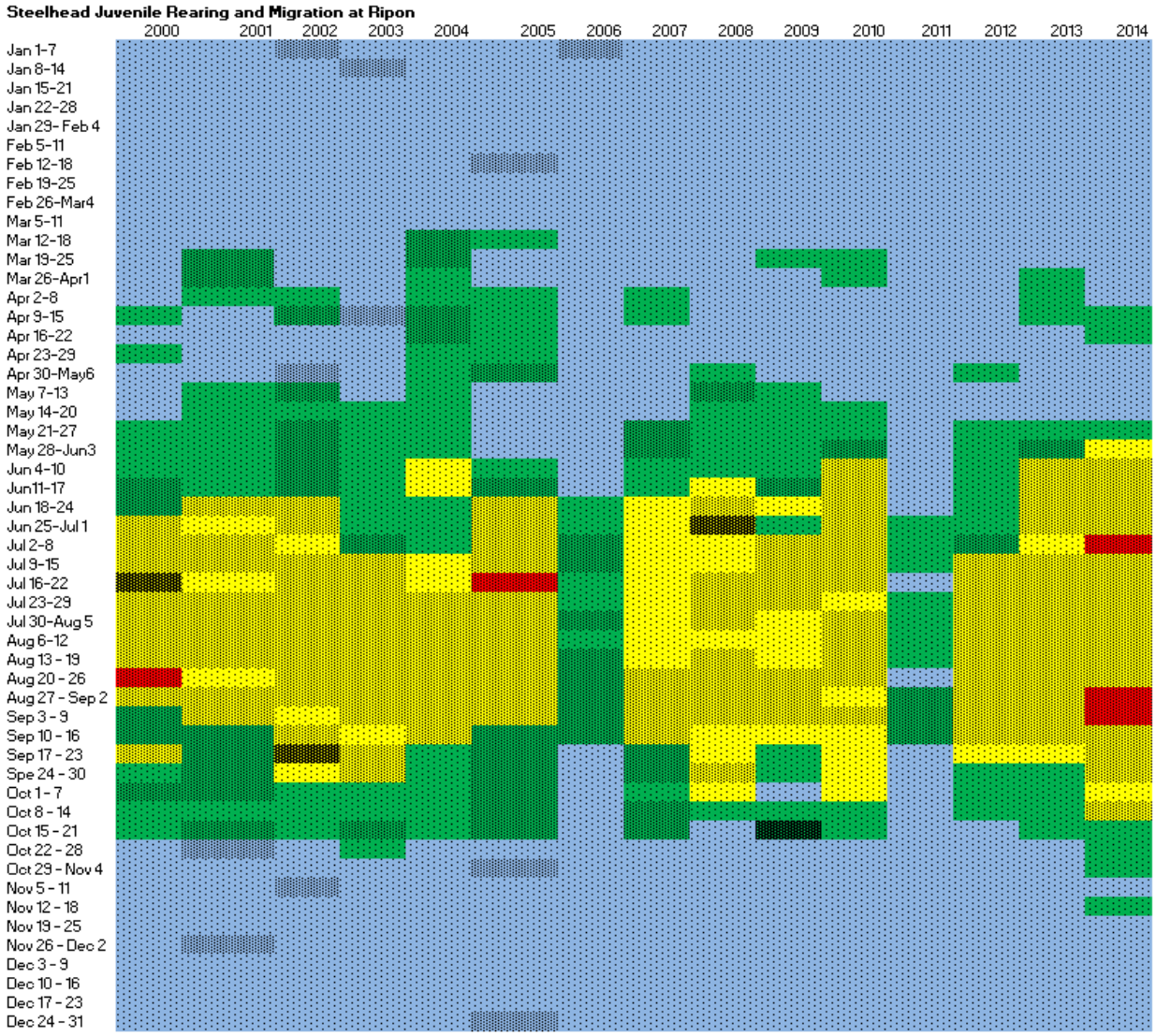
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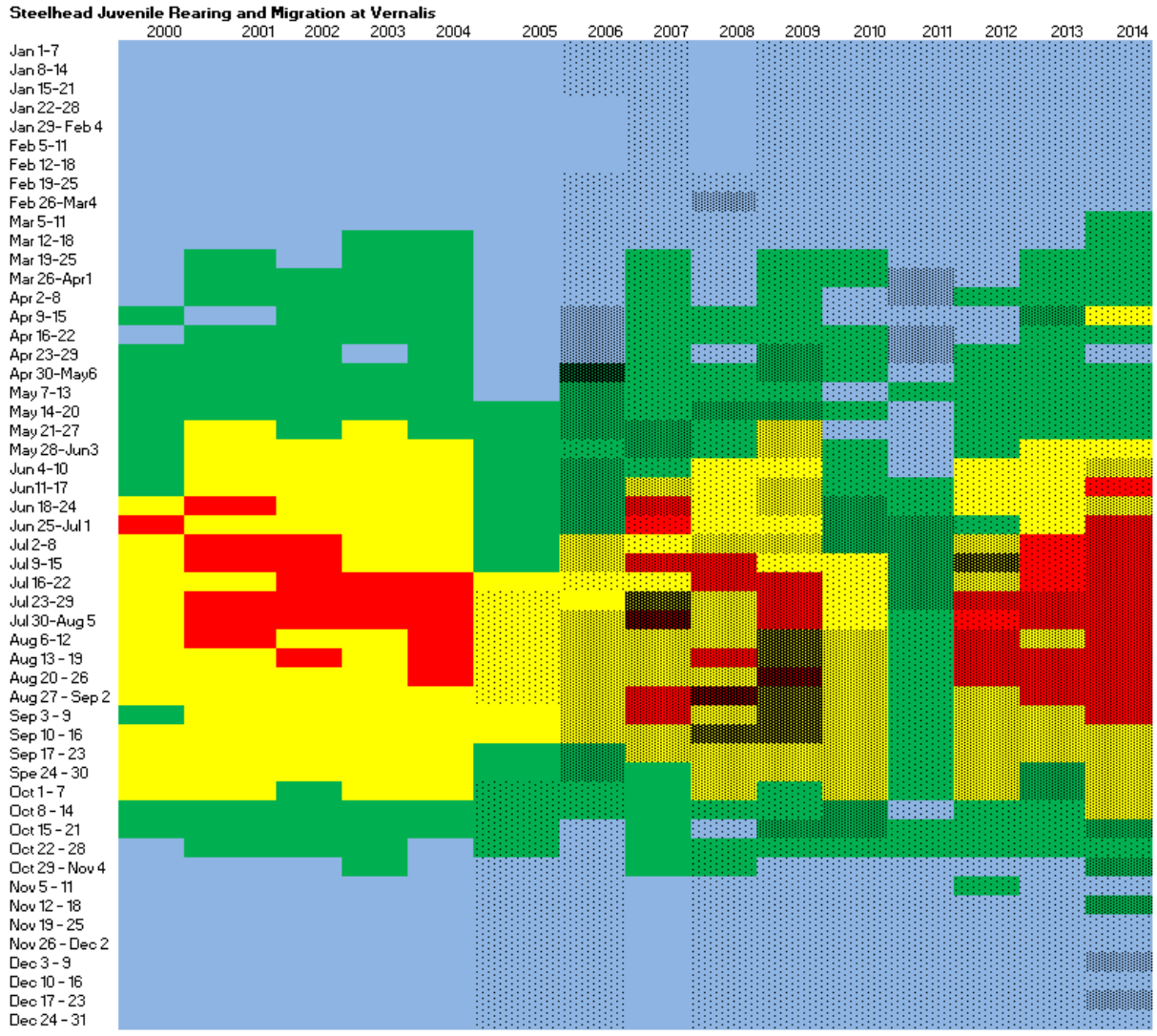
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Temperature Rankings (7DADM)	
	Sub-optimal/below
	Optimal
	Sub-optimal/above
	Detrimental

DO Rankings	
	Optimal
	Sub-optimal
	Detrimental

Missing Data

Figure 21

Steelhead Juvenile Rearing and Migration for all Weeks of Year

Notes:
Temperature and DO rankings based on observed data during periods of steelhead juvenile rearing and migration. Rankings reflect the Environmental Objectives for temperature and DO (Section 7). Data are from CDEC for each location.

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8.6.4 Stress: Lack of Suitable Migratory Conditions (Juvenile Rearing and Migration)

All anadromous fish must have suitable conditions, during the proper season, to allow juveniles to migrate out of the river environment of the Stanislaus and lower San Joaquin rivers into the tidal environment of the Delta on their way to the marine environment of the Pacific Ocean. A variety of water quality and physical habitat conditions must be in suitable ranges to allow for successful migration.

8.6.4.1 Fall-run Chinook Salmon

Fall-run Chinook salmon juveniles encounter inhospitable migratory conditions along the Stanislaus River corridor. This is a "high" magnitude and "high" certainty stress in the near term (Table 64).

Without corrective action, several of the stressors that lead to inhospitable migratory conditions will increase in intensity, meaning that this stress will remain "high" magnitude with "high" certainty in the long term (Table 64).

Changes in the hydrograph attributable to dam construction, water diversion, and disconnection of functional riparian habitats (described in greater detail in Section 8.6.8) have contributed to deterioration in migratory conditions for fall-run Chinook salmon juveniles. Flow volume and channel geometry are insufficient over most of the Stanislaus River's course to provide suitably complex, shallow-water habitats that migrating salmon use for cover, resting, and feeding.[11] Higher flows would also provide increased access to currents that can significantly reduce the energetic expenditure of downstream migration for juvenile salmonids. Additionally, in-channel habitats have been deepened and simplified through dredging, channel scour, and removal of large woody debris (to improve navigation), creating deep, low-velocity pools that are excellent habitat for salmon predators, but that require significant energy expenditure for juvenile salmon attempting to transit.

[11] FlowWest SRH2d Model, Available from: http://public.tableau.com/profile/mark.tompkins#!/vizhome/20160203_CVPIA_Floodplain/Floodplain

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Contaminants in agricultural runoff can also harm migrating juveniles. Pesticide runoff impairs salmonid olfaction to an extent that is considered detrimental to the population (Hoogeweg et al. 2011; Appendix C, Section 1.3.3.1, Figure C-1, and Table C-13) and can impair predator-avoidance behavior. Nutrients from runoff and agricultural water returns to the Stanislaus River can stimulate non-native aquatic macrophytes that harbor predators. The magnitude of effect of contaminants on migrating salmon was lower than for rearing salmon as food-web impacts of contaminants were incorporated in the score for rearing salmon, but not migrating salmon. In addition, to the extent that migration and rearing are distinct behaviors, the duration of exposure during migration activities is expected to be less than the exposure duration for rearing fish.

Temperature conditions in late spring to early summer constrict access to in-stream migratory habitat, especially in lower reaches of the Stanislaus and the lower San Joaquin rivers (Figure 18). Temperatures regularly exceed sub-optimal and detrimental levels during the spring.

8.6.4.2 Spring-run Chinook Salmon

Lack of suitable migratory conditions for juvenile spring-run Chinook salmon is a "high" magnitude, "high" certainty stress to recovering spring-run Chinook salmon populations in the near term (Table 65).

Without corrective action, lack of suitable conditions during migration will remain a "high" magnitude stress with "high" certainty in the long term (Table 65).

All of the same stressors on suitable migratory conditions described for fall-run Chinook salmon (Section 8.6.4.1) apply to spring-run Chinook salmon.

8.6.4.3 Steelhead

Lack of suitable migratory conditions for juvenile steelhead is a "high" magnitude, "high" certainty stress to recovering steelhead populations in the near term (Table 66).

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Without corrective action, lack of rearing habitat will remain a "high" magnitude stress with "high" certainty in the long term (Table 66).

Most of the stressors on suitable migratory conditions described for fall-run Chinook salmon also apply to steelhead. An exception is that temperatures required for rearing and migrating *O. mykiss* are optimal throughout most of the spring in both the Stanislaus and lower San Joaquin rivers (Figure 21). Temperatures become sub-optimal in the lower Stanislaus River (at and around Ripon) during the summer months when the fraction of steelhead migrating is likely to be very small relative to the total annual outmigrant cohort. Similarly, temperatures at Vernalis become sub-optimal (and detrimental) from late spring through the summer, but this is not expected to affect most of the outmigrant class. In addition, steelhead that experience inhospitable migration conditions may not be lost (as would be the case for migrating Chinook salmon) because *O. mykiss* are facultative anadromous, and it may be possible for them to delay an anadromous migration (or even reverse it) when migration is not possible.

8.6.5 Stress: Lack of Suitable Migratory Cues (Juvenile Rearing and Migration)

Several factors may trigger or facilitate onset of migration among juvenile salmonids. Variability in flow can trigger juveniles to leave off-channel habitat and proceed downstream in the main channel (Zeug et al. 2014). Outmigration of juvenile fall-run Chinook salmon often coincides with large increases in flow associated with rain events and spring and summer snowmelt in the Stanislaus River (Melgo et al. 2015 and earlier Caswell RST Reports[12]). Høgåsen (1998) as cited in Williams (2006) found that rainfall and increased flow and turbidity influenced the onset of migration for juvenile Chinook salmon. In unimpaired systems, runoff from spring rain events adds complexity to the seasonal snowmelt hydrograph. Rain runoff pulses, when added to the base flows provided by snowmelt, offer triggers to stimulate outmigration and assist outmigrants by providing higher velocities to speed migration and higher turbidity to provide visual cover from predators (Gregory 1993;

[12] Available from https://www.fws.gov/cno/fisheries/CAMP/Documents-Reports/

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Gregory and Levings 1998). Removal or storage of large volumes of water from the Stanislaus River alters its hydrograph in ways that hamper outmigration, including through loss of inundation of off-channel resting areas in most years and through reduced turbidity.

8.6.5.1 Fall-run Chinook Salmon

Lack of suitable migratory cues for fall-run Chinook salmon juveniles is a "high" magnitude and "medium" certainty stress in the near term (Table 64).

Without corrective action, this stress will remain "high" magnitude, with "medium" certainty in the long term (Table 64).

Changes in the hydrograph attributable to dam construction, water diversion, and management of dam releases have greatly reduced both the volume of water and the variability in flow that help to trigger outmigration in fall-run Chinook salmon (Zeug et al. 2014). Flow pulses are scheduled in the lower San Joaquin River as part of the WQC Plan, but the planned flow pulses are often inadequate to provide sufficient outmigration cues or support for successful migration (SWRCB 2010; CDFG 2010). Furthermore, pulse flows called for the in the WQC Plan have been reduced, under "temporary urgency changes" during recent drought years, meaning little or no migratory cues were provided for entire year-classes of migrating juvenile fall-run Chinook salmon. Finally, pulse flows required under the WQC Plan are scheduled for the same calendar period, ending in mid May every year; such calendar-based flow scheduling may undermine life history diversity (e.g., migration timing) in ways that severely impair run viability (McElhany et al. 2000; Satterthwaite et al. 2014; Zeug et al. 2014; Sturrock et al. 2015). Until recently, fluctuations in flow volume that cue juvenile migration have been largely absent from the hydrograph; yet current efforts to manage reservoir releases to mimic natural variability may be inadequate because release of water from reservoirs may not provide sufficient turbidity, and mismatches with scheduled releases and natural storm events may limit the success of these attempts (Wikert 2014, pers. comm.).

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8.6.5.2 Spring-run Chinook Salmon

Lack of suitable migratory cues for juvenile spring-run Chinook salmon is a "high" magnitude and "medium" certainty stress to recovering spring-run Chinook salmon populations in the near term (Table 65).

In the future, lack of suitable cues to stimulate migration will remain a "high" magnitude stress with "medium" certainty in the long term (Table 65).

All of the same stressors on suitable migratory cues described for fall-run Chinook salmon (Section 8.6.5.1) apply to spring-run Chinook salmon.

8.6.5.3 Steelhead

Lack of suitable migratory cues for juvenile steelhead is a "high" magnitude and "low" certainty stress to recovering steelhead populations in the near term (Table 66).

In the long term, lack of rearing habitat will become a "medium" magnitude stress with "low" certainty in the long term (Table 66).

The factors that trigger anadromy in *O. mykiss* populations are somewhat uncertain. As Kendall et al. (2014) wrote:

> Anadromy and residency appear to reflect interactions among genetics, individual condition, and environmental influences. … [p]atterns in anadromy and residency among and within populations suggested a wide range of possible environmental influences at different life stages… [Abstract].

The following environmental influences have been correlated with and shown to potentially driving anadromy (Kendall et al. (2014); see citations in Kendall et al. 2014):

- Water temperature (higher temperatures generally related to greater proportions of anadromous fish);
- Food availability (higher food availability associated with lower proportions of anadromous fish);

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- Stream flow and flow variability (anadromy most common in streams with greatest flow and greatest flow variability); and
- Density dependence (higher density related to greater proportion of anadromous fish).

These correlations, though reported from various studies, were characterized as uncertain with regard to mechanism by Kendall et al. (2014) and were acknowledged to be in a context of scant data on the extent of residency and anadromy across populations of *O. mykiss*.

Given this overview, it is most likely that low temperatures (i.e., generally in the optimal range for *O. mykiss* or lower; Figure 21), generally low flows, low variance in flow velocity during much of the year, and relatively low density of *O. mykiss* contribute to low rates of anadromy among the Stanislaus River's *O. mykiss* population. Each of these factors has a low certainty (and the rate of anadromy seems likely to be responsive to numerous ecosystem processes, in addition to unknowns such as the genetic makeup of the population) and should probably be the subject of research on *O. mykiss* populations of each tributary to the San Joaquin River.

8.6.6 Stress: Lack of Suitable Over-summering Habitat (Juvenile Rearing and Migration)

Some fraction of fall-run and spring-run Chinook salmon over-summer in their natal streams as juveniles and are thus affected by conditions in the Stanislaus River through the summer and fall months. Spring-run Chinook salmon show a greater predisposition to this over-summering behavior, and spring-run Chinook populations typically produce a small, but measureable percentage of "yearling" migrants each year (Healey 1991; Moyle 2002). Steelhead (and resident rainbow trout) can spend several years (or even their entire life) in freshwater, so over-summering habitat is vitally important. Water temperature plays the largest role in this stress.

8.6.6.1 Fall-run Chinook Salmon

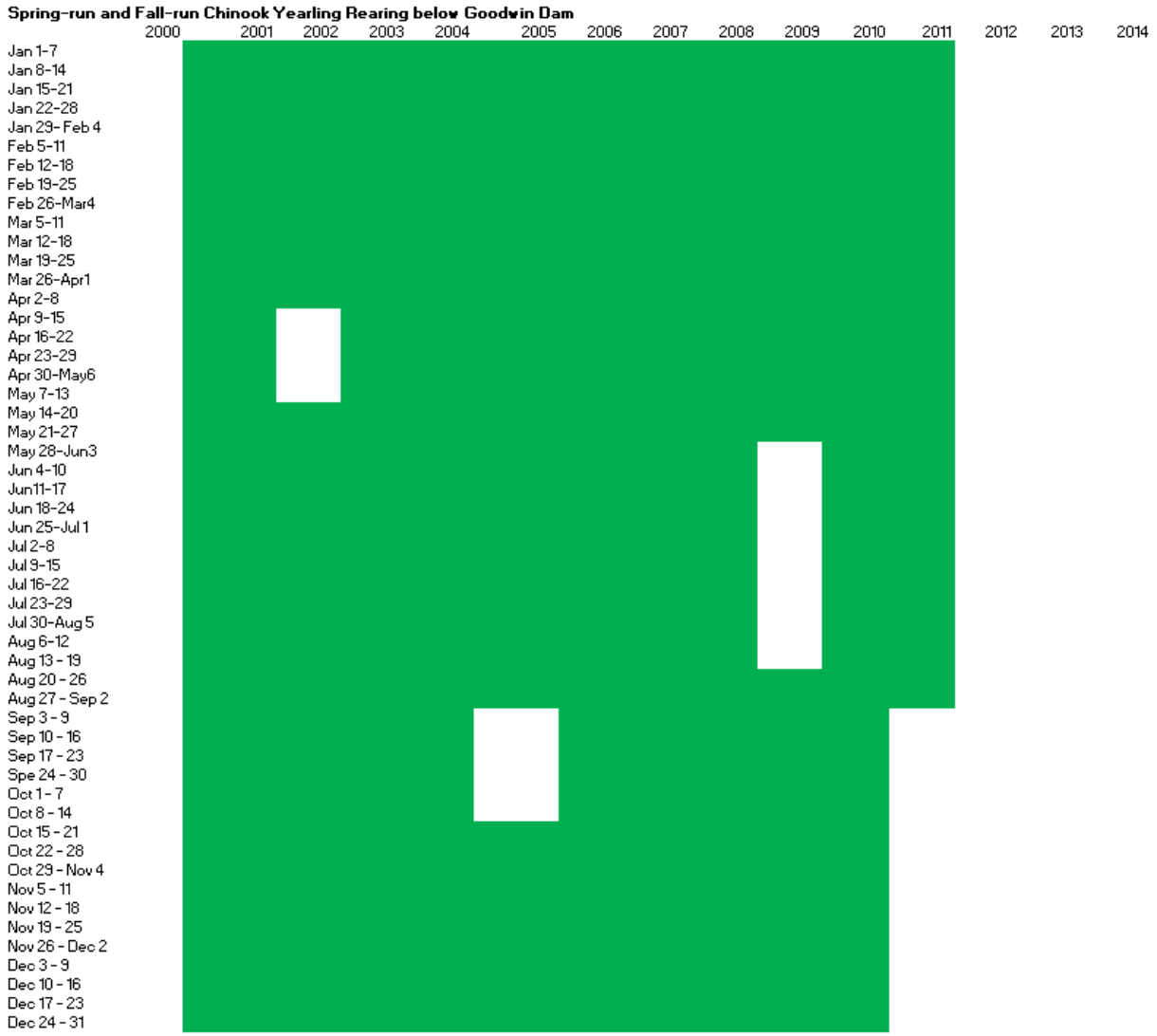
Lack of habitat in which fall-run Chinook salmon juveniles can rear over the summer is a "minimal" magnitude stress with "medium" certainty in the near term (Table 64).

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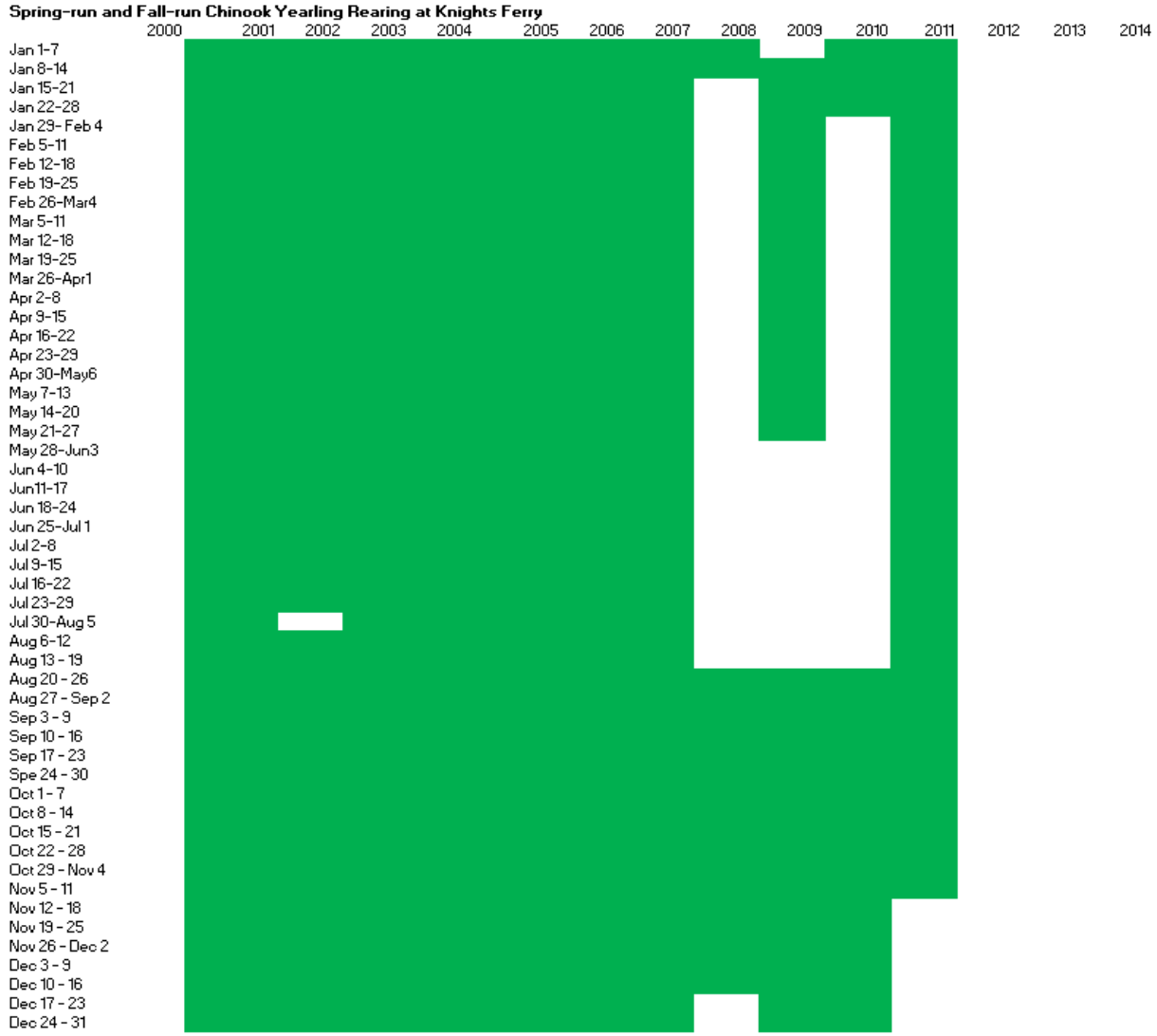
This stress is likely to remain "minimal" magnitude in the long term because only a small fraction of the fall-run population is expected to display this behavior; certainty remains "medium" (Table 64).

The amount of habitat available for over-summering is largely a function of temperature. As water temperatures warm, suitable habitat contracts in an upstream direction (Figure 22). Only a small portion of the fall-run juvenile production is thought to over-summer. Evidence for this behavior comes from RST sampling in which salmon substantially larger than expected outmigrate in early spring. There is uncertainty as to which run (fall, late-fall or spring) these large outmigrants belong. The SEP Group assumed this behavior was infrequent among fall-run, but, because larger fish are better able to avoid the traps, this assumption is uncertain. Limitations of the extent of habitat are likely to increase in the future with larger fish populations and warmer water temperatures projected by climate change models. Contaminants could be a large stressor if the over-summering population was larger or water temperatures allowed over-summering in the lower river where substantial urban, industrial, and agricultural runoff occurs.

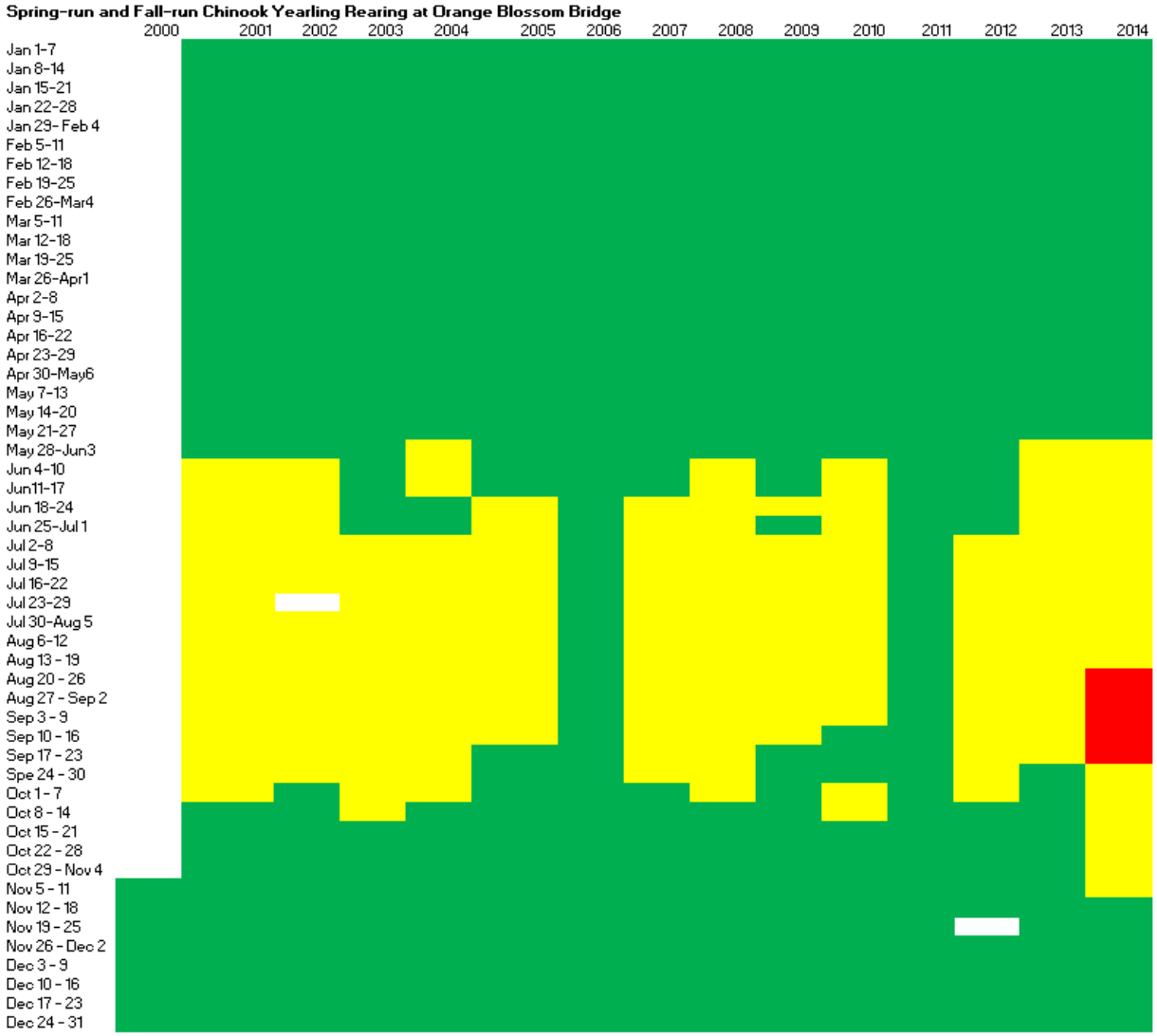
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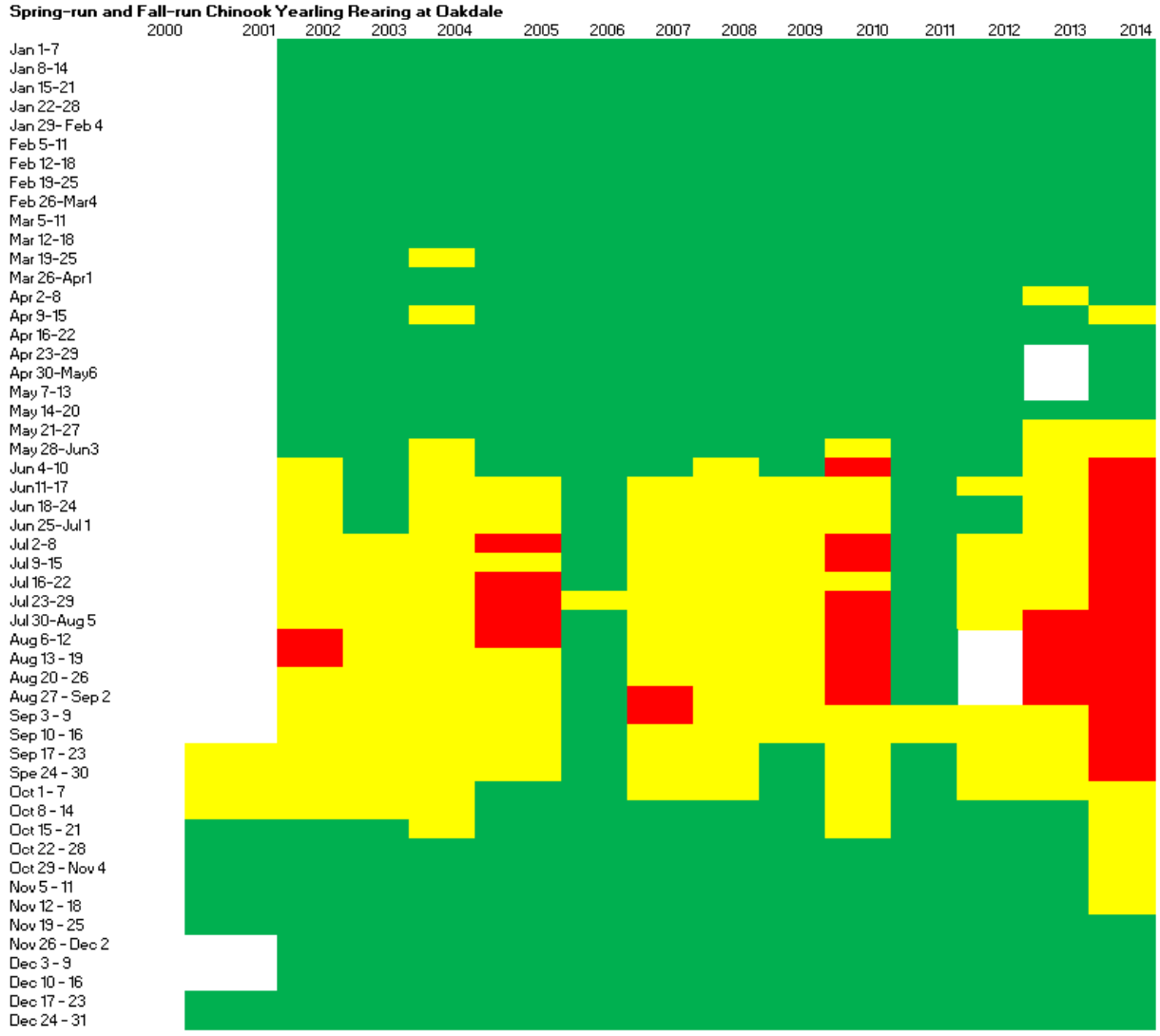
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Temperature Rankings (7DADM)	
	Sub-optimal/below
	Optimal
	Sub-optimal/above
	Detrimental

DO Rankings	
	Optimal
	Sub-optimal
	Detrimental

Missing Data

Figure 22

Spring-run and Fall-run Chinook Yearling Rearing

Notes:
Temperature and DO rankings based on observed data during periods of yearling rearing. Rankings reflect the Environmental Objectives for temperature and DO (Section 7). Data are from CDEC for each location.

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8.6.6.2 Spring-run Chinook Salmon

Lack of habitat in which juvenile spring-run Chinook salmon can rear over summer months is a "minimal" magnitude stress in the near term with "medium" certainty (Table 65).

In the long term, lack of over-summer habitat will increase to a "medium" magnitude stress with "medium" certainty (Table 65). Over-summering of a portion of the spring-run Chinook salmon population is essential to production of a key life history type (yearlings) that are characteristic of successful spring-run Chinook salmon populations.

All of the same stressors on lack of suitable over-summering habitat described for fall-run Chinook salmon (Section 8.6.6.1) apply to spring-run Chinook salmon (Figure 22). However, the fraction of the population affected by poor over-summering conditions is expected to be larger for spring-run Chinook salmon than it is for fall-run Chinook salmon. Additionally, the yearling life history strategy is expected to be a key element of spring-run life history diversity on the Stanislaus River (as it is elsewhere in the Central Valley; Moyle 2002; Williams 2006). Thus, although there appears to be adequate over-summering habitat for spring-run Chinook salmon in the near term (i.e., a "minimal" magnitude stress), over the long term, as temperatures rise and the number of spring-run Chinook salmon in the Stanislaus River (and the number of yearling fish) increases dramatically (both of which are assumptions of this stressor-ranking exercise), the magnitude of this stress is expected to increase. Loss of over-summering habitat in the long term (e.g., during drought cycles when reservoir cold-water storage is low) would represent a significant impact to an important life history strategy for the spring-run population. The SEP Group notes that there may be synergies between efforts to provide for over-summer holding habitat for adult spring-run Chinook salmon and efforts to provide suitable over-summer habitat for rearing yearling Chinook salmon.

8.6.6.3 Steelhead

Lack of suitable habitat for juvenile steelhead to rear over the summer is a "minimal" magnitude stress to recovering steelhead populations in the near term with "high" certainty (Table 66).

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In the long term, lack of summer rearing habitat will remain a "minimal" magnitude stress with "high" certainty (Table 66).

As described above in Figure 21, temperatures appear to be optimal for rearing *O. mykiss* between Oakdale and Orange Blossom Bridge throughout the summer of most years. At other times of year in and upstream of this area, temperatures are cooler than optimal for rearing *O. mykiss*. Thus, there does not appear to be a lack of over-summering habitat for juvenile *O. mykiss* and it seems unlikely that there will be significant loss of *O. mykiss* rearing habitat due to regional warming that may occur over the next 25 years (i.e., the "long term" in this exercise). It is possible that in the long term, sub-optimal over-summer temperatures could occasionally prevail throughout the river corridor below Goodwin Dam in the later years of a prolonged drought, but this seems unlikely to result in lasting damage to the *O. mykiss* population.

8.6.7 Stress: Lack of Fitness/Genetic Maladaptation (Juvenile Rearing and Migration)

Hatchery practices within the Central Valley have resulted in a large amount of straying of adult salmonids. Numerous studies have found negative fitness consequences when hatchery-origin adults reproduce with either other hatchery-origin adults or natural-origin adults in the wild (Araki et al. 2007; Heath et al. 2003; Christie et al. 2015). Traits that have been selected for in the hatchery environment can be passed to offspring, resulting in changes in behavior that are maladaptive. High straying rates that persist through time may lead to a wild population that is unable to adapt to the local conditions. Conversely, when the local population is very small, straying from hatchery sources can provide an opportunity to establish a local spawning population.

8.6.7.1 Fall-run Chinook Salmon

Lack of juvenile fitness due to continued influence of hatchery-selected genotypes is a "high" magnitude and "medium" certainty stress in the near term (Table 64).

Without corrective action, this stress will remain "high" magnitude, with "medium" certainty in the long term (Table 64).

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High rates of straying prevent the Stanislaus River population of fall-run Chinook salmon from adapting to local conditions. The proportion of hatchery-origin fall-run Chinook salmon in the Stanislaus River escapement has been moderate to high. Sturrock et al. (2015) found 18% and 51% hatchery origin in 2000 and 2003, respectively. Constant fractional marking reports compiled by CDFW found 50% hatchery-origin fall-run Chinook in the 2010 escapement (Kormos et al. 2012), 83% in 2011 (Palmer-Zwahlen and Kormos 2013), and 83% in 2012 (Palmer-Zwahlen and Kormos 2015). These straying rates are well above the Hatchery Scientific Review Group's recommendations for managing an integrated (hatchery- and natural-origin fish are managed as a single population) salmon population (HSRG 2014).

8.6.7.2 Spring-run Chinook Salmon

Hatchery influence on the genetics of natural-origin spring-run Chinook salmon is believed to be a "minimal" magnitude stress in the near term; however, certainty of this stress is "minimal" as well (Table 65).

In the future, genetic influence on the fitness of spring-run Chinook salmon will become a "medium" magnitude stress with "medium" certainty in the long term (Table 65) unless corrective actions are implemented.

In the near term, reestablishment of spring-run Chinook salmon may benefit from straying of hatchery-origin and/or natural-origin spring-run produced elsewhere in the Central Valley. Straying Chinook salmon with genotypes needed to produce the spring-run phenotype can help to establish populations in non-natal watersheds. However, in the long term, after a substantial spring-run population has been established on the Stanislaus River, introgression of natural-spawned spring-run Chinook salmon with hatchery-origin spring-run, natural-origin fall-run, or hatchery-origin fall-run Chinook salmon is expected to become a problem that limits adaptation of spring-run Chinook salmon to conditions on the Stanislaus River along with the resulting production of juveniles that are maladapted to the local environment.

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8.6.7.3 Steelhead

The genetic influence of hatcheries on juvenile steelhead is a "medium" magnitude stress in the near term, but certainty regarding this magnitude is "minimal" (Table 66).

In the long term, stress on the steelhead population associated with continuing input of hatchery genotypes will remain a "medium" magnitude stress. Without additional research into this issue, certainty will remain "minimal" certainty (Table 66).

Evaluation of steelhead genetics is complicated by the fact that resident and anadromous forms can freely interbreed. The Stanislaus River currently supports a robust resident population augmented with small numbers of returning adults. Weir monitoring for fall-run Chinook salmon adults has occasionally been extended into other months. In the 5 years that weir monitoring has occurred (2011 – 2015), 0 to 32 steelhead up-migrants have been observed (mean is 8.2, median is 5). The weir data also revealed that in 3 of 5 years, the percentage of adipose fin-clipped (hatchery-origin) steelhead exceeded 50% (annual percentages: 61.5%, 57.1%, 34.6%, 12.5%, and 80.0%). Because of these high numbers, it is assumed that the genetic influence of hatchery-origin fish on the Stanislaus River population is high. Introduction of a larger fraction of anadromous genes into the mostly resident population may help to increase anadromy, though possibly at the expense of local adaptation. With a larger anadromous population assumed for the future, the stress of hatchery-origin immigrants is expected to remain "medium."

8.6.8 Contributing Management Factors

Contributing management factors for each stressor on juvenile rearing and migration are provided in Sections 8.6.8.1 through 8.6.8.5.

8.6.8.1 Compression of the Rearing and Migration Time Window

Changes in the hydrograph attributable to dam construction, reservoir operations, and water diversion have reduced the duration of suitable temperature conditions required for successful salmonid smoltification. Large reservoirs and their current operations have changed the timing of natural river flows. Large snowmelt pulses in the unimpaired hydrograph are captured by reservoirs in the spring rather than providing suitable conditions

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and cues for migration. Dams block sediment transport and greatly attenuate flood flows, resulting in the following (Ock and Kondolf 2012):

- Scoured and armored channels,
- Disconnected floodplains and side channels,
- Reduced recruitment of riparian trees (which would provide local cooling), and
- Reduction of thermal refugia created by slower passage of water through gravel bars and islands.

In addition, destruction of functional riparian and inundated floodplain habitats along the Stanislaus River limits growth opportunities that might allow juvenile salmonids to attain sufficient size and growth rates that would support earlier smoltification (i.e., earlier in the season when temperatures would still support smoltification and successful migration).

8.6.8.2 Lack of Suitable Rearing Habitat and Migratory Conditions

Reservoir operation is a major driver of the environmental factors that control the impact of stressors that may lead to rearing failure among juvenile salmonids. Flow volume directly controls the amount of floodplain and side channel inundation as well as maintenance of gravel quality through sediment transport dynamics. Relatively high flow volume positively impacts the migratory speed of juveniles leaving the system as well as increased turbidity, which can increase visual cover for migrants. High flow volumes also dilute contaminants and moderate warmer temperatures in late spring or early summer. Lack of channel-forming flows has allowed willows to armor banks and resulted in loss of channel elevation—disconnecting the river from floodplains and side channels—leaving migrants in homogenous, in-channel habitats largely devoid of cover. Long-term management will need to ensure that cold water is available for temperature management during prolonged droughts. Conveyance of spring-run Chinook salmon to habitats upstream of currently impassable dams is a possible solution to this (and other) stressors. Providing groundwater recharge in proximity to the river and promoting development of riparian forests may also offer some respite from higher temperatures. Habitat restoration in the form of gravel augmentation could improve food resources and provide thermal refugia.

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Other non-flow management practices may exacerbate or alleviate stressors on juvenile rearing. For example, levees (especially in the lower portions of the river) limit spatial distribution and overall access to large areas of periodically inundated floodplain habitat that would support faster growth of salmon and would export prey items to the main-channel habitats of *O. mykiss* (leading to greater anadromy in the latter population). This lack of habitat constrains the overall carrying capacity for salmonid populations in the Stanislaus River.

Inundated floodplains also reduce predation rates on migrating salmonids (Sommer et al. 2001b, 2004). Fabricated structures have been found to provide predation hotspots where migrating juveniles have a much higher risk of being preyed upon (Sabal et al. 2016). These areas could be restored to provide safer migration pathways and discourage predators through habitat modification.

The destruction of riparian habitat along the Stanislaus River has likely reduced the amount of shade in the river corridor; this can increase temperatures in the river. Urban and agricultural developments in the watershed have increased contaminant loads to the river. Adjustments to land-use practices or development of contaminant-control programs may reduce contaminant loads and the stress they generate for rearing juvenile salmonids. Groundwater depletions have likely terminated the hyporheic inputs that probably supplemented Stanislaus River surface flows and buffered the river against warm temperatures in late spring, summer, and early fall. Groundwater recharge programs may help to reestablish this benefit and reduce water temperatures in the river during critical months.

8.6.8.3 Lack of Suitable Migratory Cues

The major drivers of this stress include the presence of dams on the system, altering the natural hydrograph and its associated flow variability, and the disconnection of in-stream and off-channel habitats. Water managers are attempting to provide a more natural hydrograph, which includes simulated runoff events (NMFS 2009b, 2009c, Action III.1.3). However, the release of water from reservoirs may not provide sufficient turbidity, and mismatches with scheduled releases and natural storm events may limit the success of these

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attempts. Whenever possible, the Stanislaus Operations Group recommends timing release pulses to augment natural storm events so that peak flows coincide with periods of cloud cover and changes in barometric pressure that may contribute to migratory success (Wikert 2014, pers. comm.). Habitat modification to allow more frequent inundation, followed by rapid dewatering of temporarily inundated habitats, will likely help to cue juveniles to migrate.

8.6.8.4 Lack of Suitable Over-summering Habitat

Reservoir operation is the largest management factor for insulating salmonids from the lack of suitable over-summering habitat. Long-term management must include ensuring that cold water is available for temperature management during prolonged droughts. Conveyance of spring-run Chinook salmon to habitats upstream of currently impassable dams is a possible solution to this (and other) stressors. Providing groundwater recharge in proximity to the Stanislaus River and promoting development of riparian forests may also offer respite from higher temperatures. Additionally, habitat restoration in the form of gravel augmentation could improve food resources and provide thermal refugia.

8.6.8.5 Lack of Fitness/Genetic Maladaptation

The main drivers of lack of fitness/genetic maladaptation are current hatchery management practices combined with failure to provide suitable flows and environmental conditions needed to attract returning hatchery-origin adults into the watersheds where they were produced. Hatchery straying is largely a result of the following three factors (Marston et al. 2012):

- Large scale production of hatchery fish (dwarfing natural production);
- Trucking fish (trucked juveniles lose the olfactory record needed to find their natal streams); and
- Failure of many hatchery systems to provide sufficient flow to guide fish home (including massive water exports in the Delta).

Failure to provide an easily detectable mark on 100% of hatchery-origin fish prevents any opportunity to manage hatchery and natural populations separately.

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8.7 Summary and Prioritization of Stressors and Stressor Responses

This section summarizes the results of stressor analyses for each target species across life history stages. As discussed at the beginning of Section 8, stressor priorities were assigned for individual life history stages based on the combination of magnitude and certainty scores. Because scores in these categories were applied consistently using the adapted DRERIP methodology, specific stressor scores are comparable across life history stages for a given species. With this in mind, stressor priorities have been presented in Section 8, summarized across life history stages for fall-run Chinook salmon, spring-run Chinook salmon, and steelhead, respectively.

All of the stressors considered for the different species/life history stages are deemed to be significant and of concern to the species/life history stage to which they have been assigned. However, to facilitate the application of the stressor analysis to development and sequencing of conservation measures to alleviate stressors, the stressors have been prioritized and grouped according to a suite of combined magnitude and certainty score-based stressor responses in the categories of actions, research, and monitoring.

Stressors with both a high magnitude and certainty are considered the highest priority for response, in the form of Conservation Action(s) that will resolve the stressors and support attainment of Environmental Objectives (Figure 10). Low priority actions are defined as those with a lower magnitude, and a high degree of certainty. Stressors with a high magnitude, but low degree of certainty, are considered the highest priority for research, with other research priorities decreasing based on their relative magnitude scores. Low magnitude stressors are prioritized under baseline monitoring needs, where higher certainty indicates a higher priority for monitoring, principally to ensure that the magnitude does not increase.

8.7.1 Stressor Prioritization Tables

Stressor prioritization summary tables are presented for each species for coarse scale stresses (e.g., lack of suitable rearing habitat; Figures 23, 24, and 25) and fine scale stressors (e.g., lack of suitable rearing habitat as a function of temperature; Figures 26, 27, and 28). Each table is subdivided based on three prioritized groups of stressor response types: actions, research, and

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monitoring. The three response type groups are staggered relative to one another to present their relative priority based on magnitude and certainty scores. For example, Priority 1 Research has the same relative priority as Priority 2 Actions. A total of four figures and tables—1) coarse and 2) fine scale priorities for both 3) near-term and 4) long-term populations—are presented for each of the three focal species (Figures 23 through 28 provide near term; long term is provided in Appendix E).

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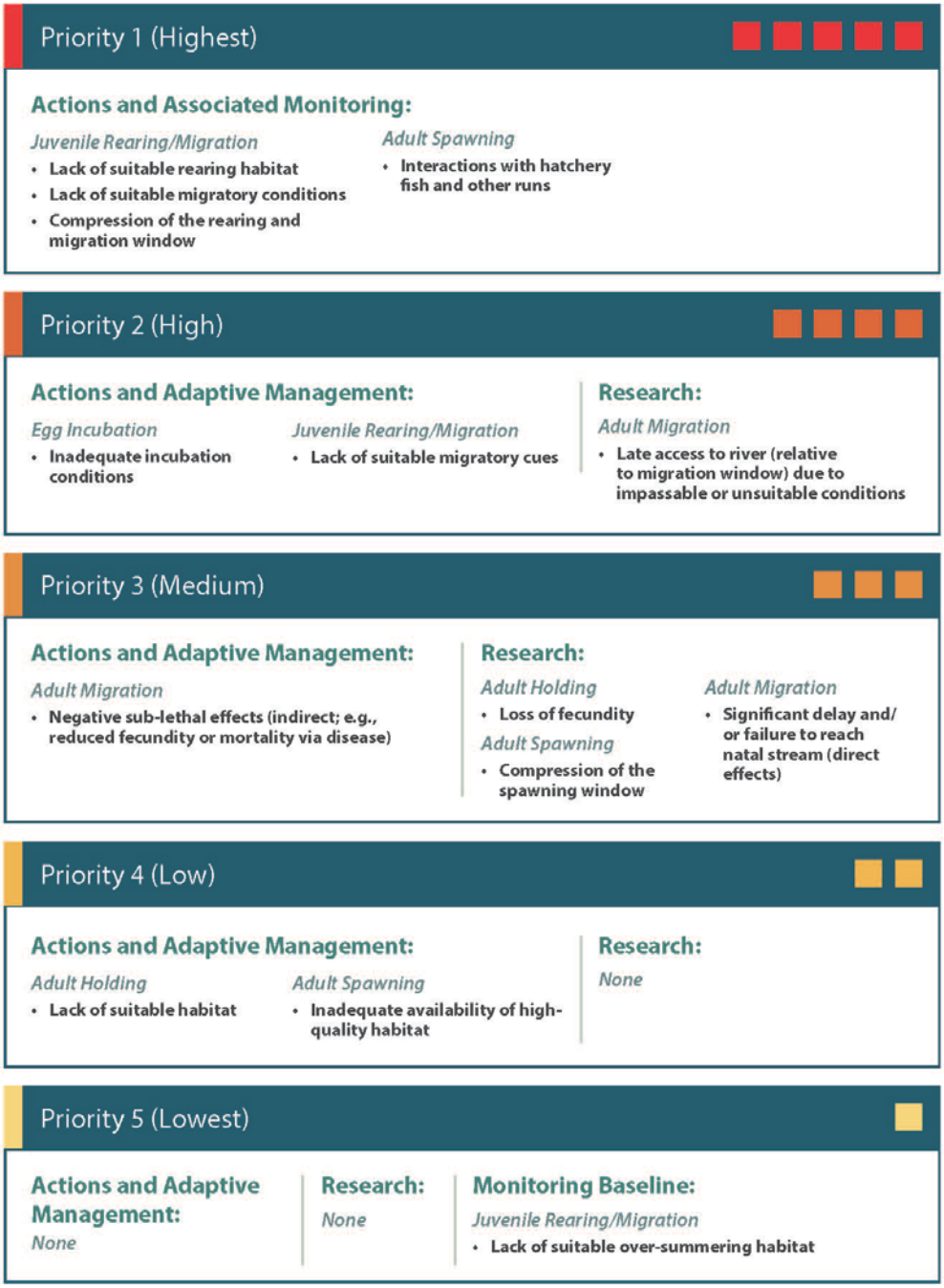


Figure 23

Fall-run Chinook Salmon – Stressor Response Prioritization (Near Term/Coarse Scale)

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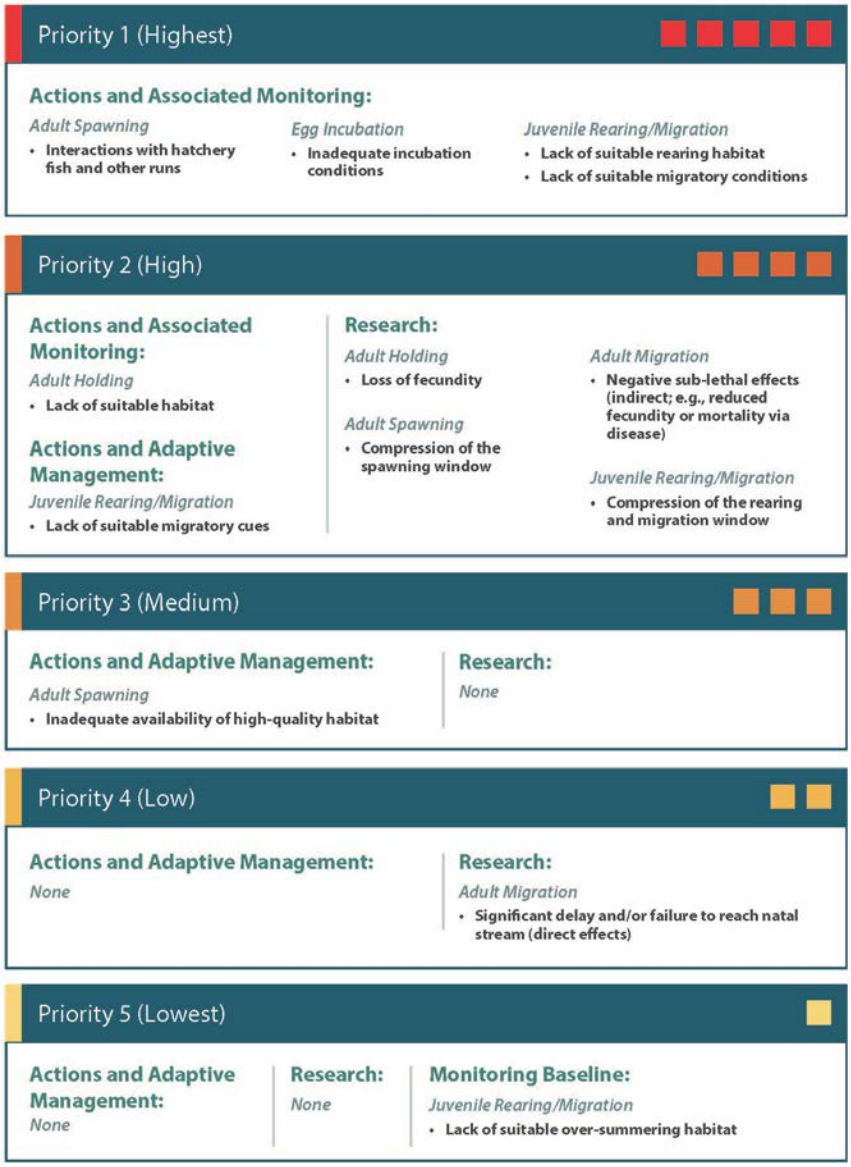


Figure 24

Spring-run Chinook Salmon – Stressor Response Prioritization (Near Term/Coarse Scale)

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Figure 25

Steelhead – Stressor Response Prioritization (Near Term/Coarse Scale)

Priority 1 (Highest)

Actions and Associated Monitoring:

Adult Spawning

- Interactions with hatchery fish and other runs – Hatchery

Juvenile Rearing/Migration

- Compression of the rearing and migration window – Temperature

Priority 2 (High)

Actions and Adaptive Management:

Juvenile Rearing/Migration

- Lack of fitness/genetic maladaptation – Hatchery introgression
- Lack of suitable migratory cues – Velocity
- Lack of suitable rearing habitat – Contaminants/toxins

Actions and Associated Monitoring:

Juvenile Rearing/Migration

- Coarse sediment input
- Lack of suitable migratory conditions – Temperature

Research to Inform Action Design:

Adult Migration

- Late access to river (relative to migration window) due to impassable or unsuitable conditions – Temperature, contaminants/attraction flow, DO
- Negative sub-lethal effects (indirect; e.g., reduced fecundity or mortality via disease) – Attraction flow, contaminants/toxins, DO

Juvenile Rearing/Migration

- Lack of suitable migratory conditions – Cover, velocity, habitat distribution
- Lack of suitable migratory cues – Temperature, turbidity

Adult Spawning

- Compression of the spawning window – Temperature

Priority 3 (Medium)

Actions and Adaptive Management:

Adult Migration

- Negative sub-lethal effects (indirect; e.g., reduced fecundity or mortality via disease) – Temperature

Juvenile Rearing/Migration

- Lack of suitable migratory conditions – Depth
- Lack of suitable rearing habitat – Cover, depth, temperature

Actions and Associated Monitoring:

Egg Incubation

- Inadequate incubation conditions – Temperature

Research to Inform Action Design:

Adult Holding

- Disease
- Lack of suitable habitat – Contaminants, cover
- Loss of fecundity – Contaminants, temperature
- Predator density

Adult Spawning

- Inadequate availability of high-quality habitat – Contaminants
- Coarse sediment input

Egg Incubation

- Inadequate incubation conditions – Fine sediments, flow fluctuation, redd scour, pesticides

Juvenile Rearing/Migration

- Disease
- Lack of suitable migratory conditions – Turbidity
- Lack of suitable rearing habitat – Turbidity, velocity

Research to Confirm Need for Action:

Adult Migration

- Late access to river (relative to migration window) due to impassable or unsuitable conditions – Contaminants/ toxins
- Significant delay and/or failure to reach natal stream (direct effects) – Attraction flow

Juvenile Rearing/Migration

- Lack of suitable migratory conditions – Prey density
- Predator density

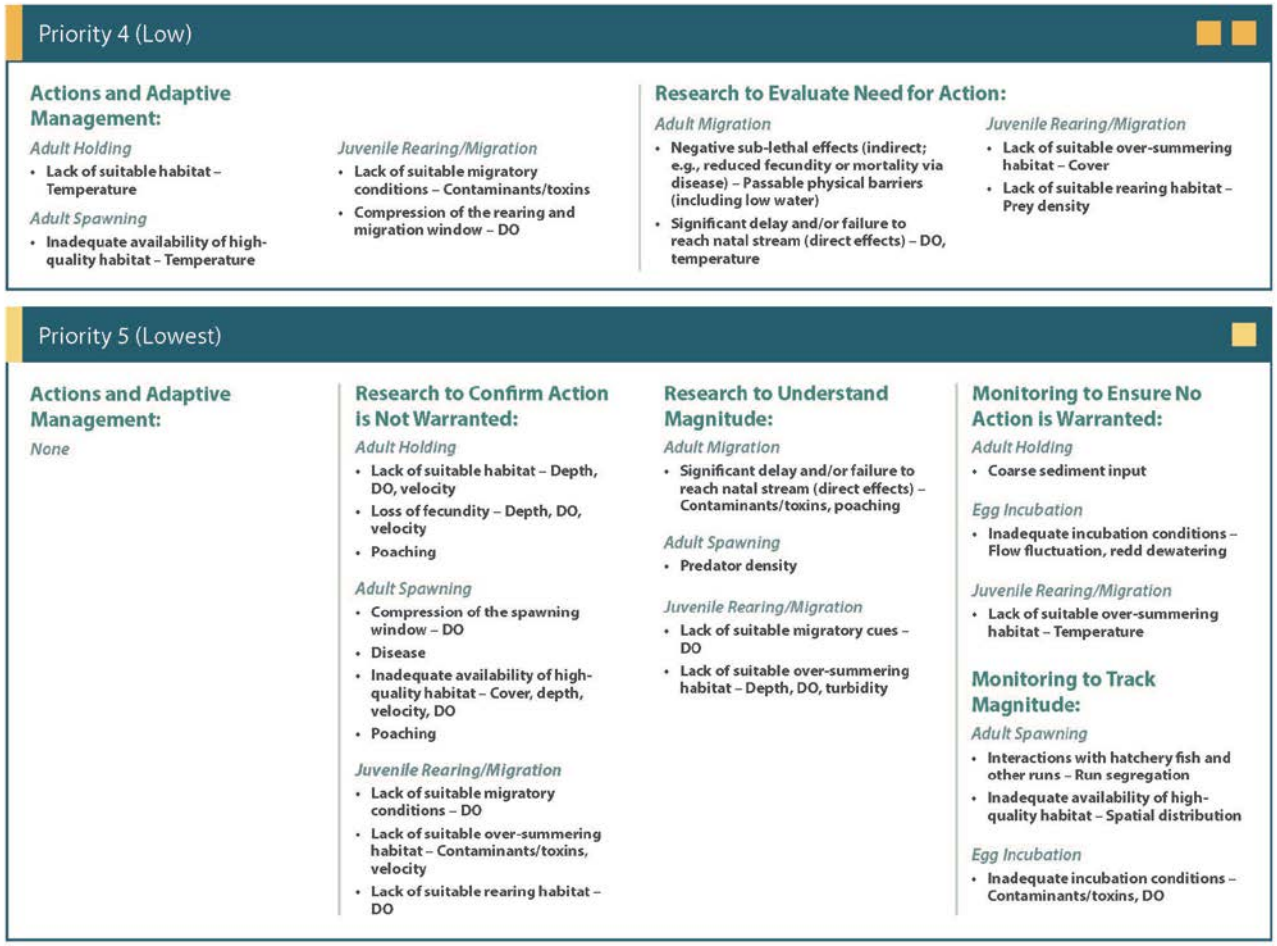
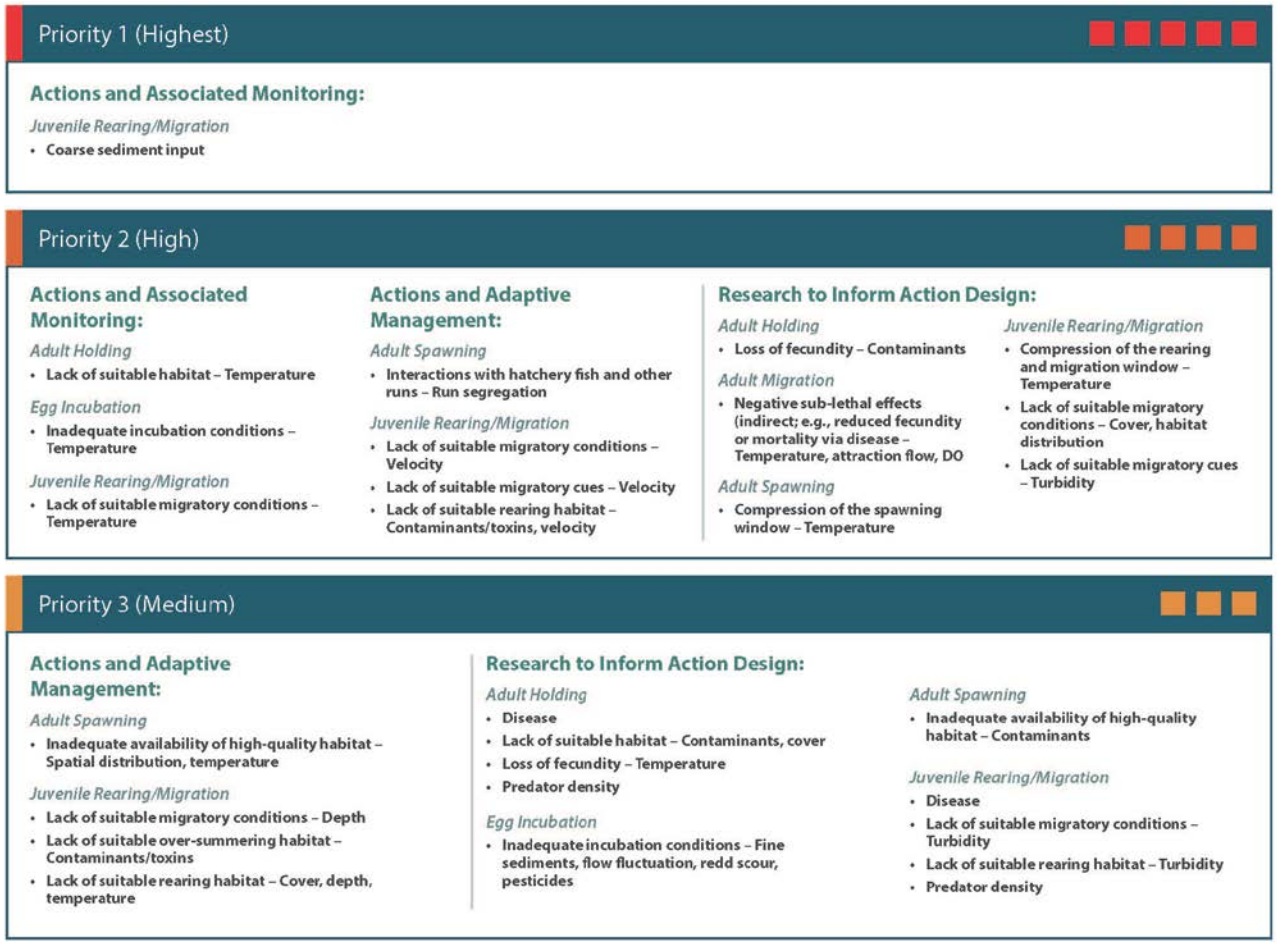


Figure 26

Fall-run Chinook Salmon – Stressor Response Prioritization (Near Term/Fine Scale)


Priority 1 (Highest)
Actions and Associated Monitoring:
Juvenile Rearing/Migration
• Coarse sediment input
Priority 2 (High)
Actions and Associated Monitoring:
Adult Holding
• Lack of suitable habitat – Temperature
Egg Incubation
• Inadequate incubation conditions – Temperature
Juvenile Rearing/Migration
• Lack of suitable migratory conditions – Temperature
Actions and Adaptive Management:
Adult Spawning
• Interactions with hatchery fish and other runs – Run segregation
Juvenile Rearing/Migration
• Lack of suitable migratory conditions – Velocity
• Lack of suitable migratory cues – Velocity
• Lack of suitable rearing habitat – Contaminants/toxins, velocity
Research to Inform Action Design:
Adult Holding
• Loss of fecundity – Contaminants
Adult Migration
• Negative sub-lethal effects (indirect; e.g., reduced fecundity or mortality via disease – Temperature, attraction flow, DO
Adult Spawning
• Compression of the spawning window – Temperature
Juvenile Rearing/Migration
• Compression of the rearing and migration window – Temperature
• Lack of suitable migratory conditions – Cover, habitat distribution
• Lack of suitable migratory cues – Turbidity
Priority 3 (Medium)
Actions and Adaptive Management:
Adult Spawning
• Inadequate availability of high-quality habitat – Spatial distribution, temperature
Juvenile Rearing/Migration
• Lack of suitable migratory conditions – Depth
• Lack of suitable over-summering habitat – Contaminants/toxins
• Lack of suitable rearing habitat – Cover, depth, temperature
Research to Inform Action Design:
Adult Holding
• Disease
• Lack of suitable habitat – Contaminants, cover
• Loss of fecundity – Temperature
• Predator density
Egg Incubation
• Inadequate incubation conditions – Fine sediments, flow fluctuation, redd scour, pesticides
Adult Spawning
• Inadequate availability of high-quality habitat – Contaminants
Juvenile Rearing/Migration
• Disease
• Lack of suitable migratory conditions – Turbidity
• Lack of suitable rearing habitat – Turbidity
• Predator density

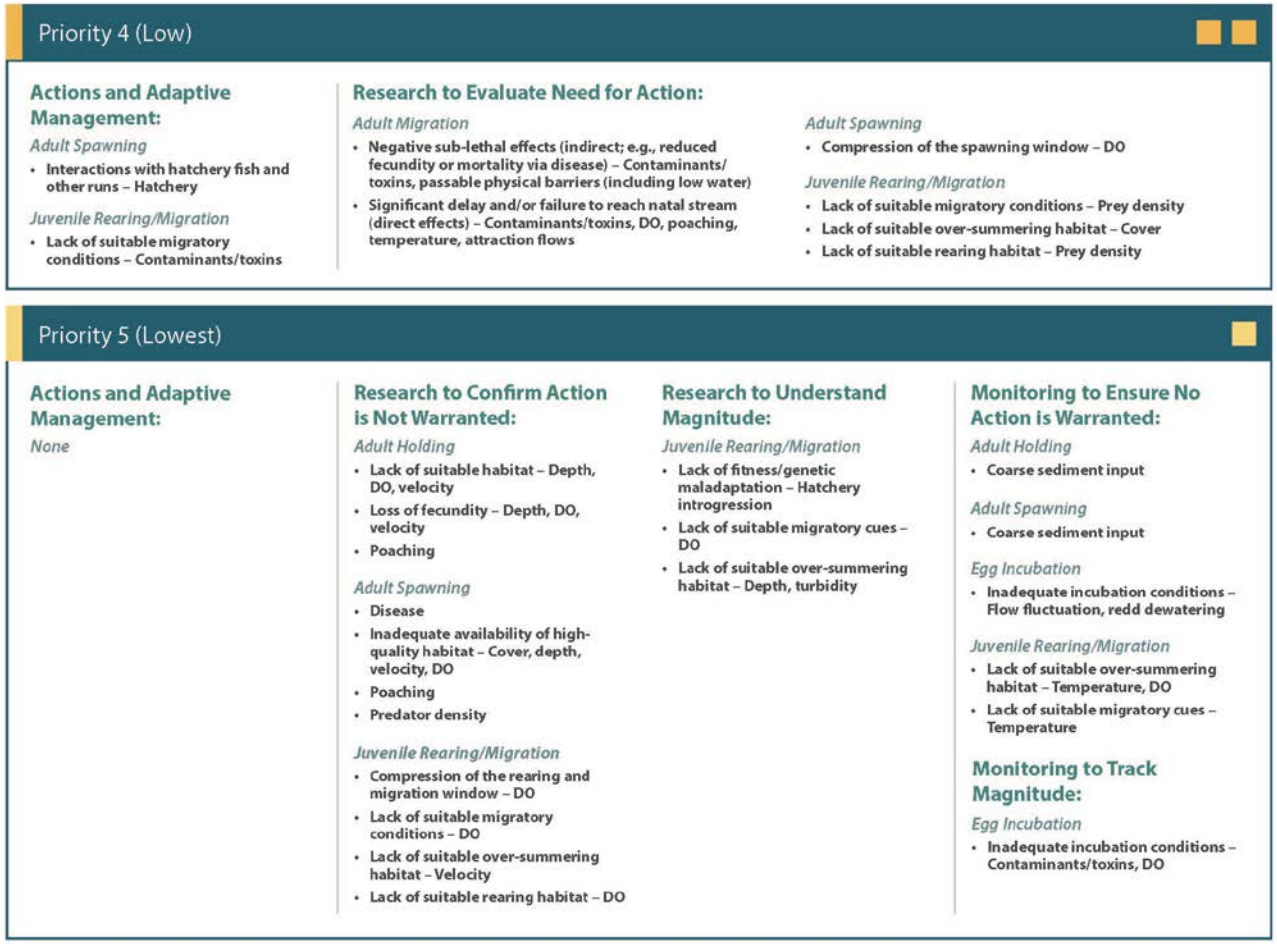
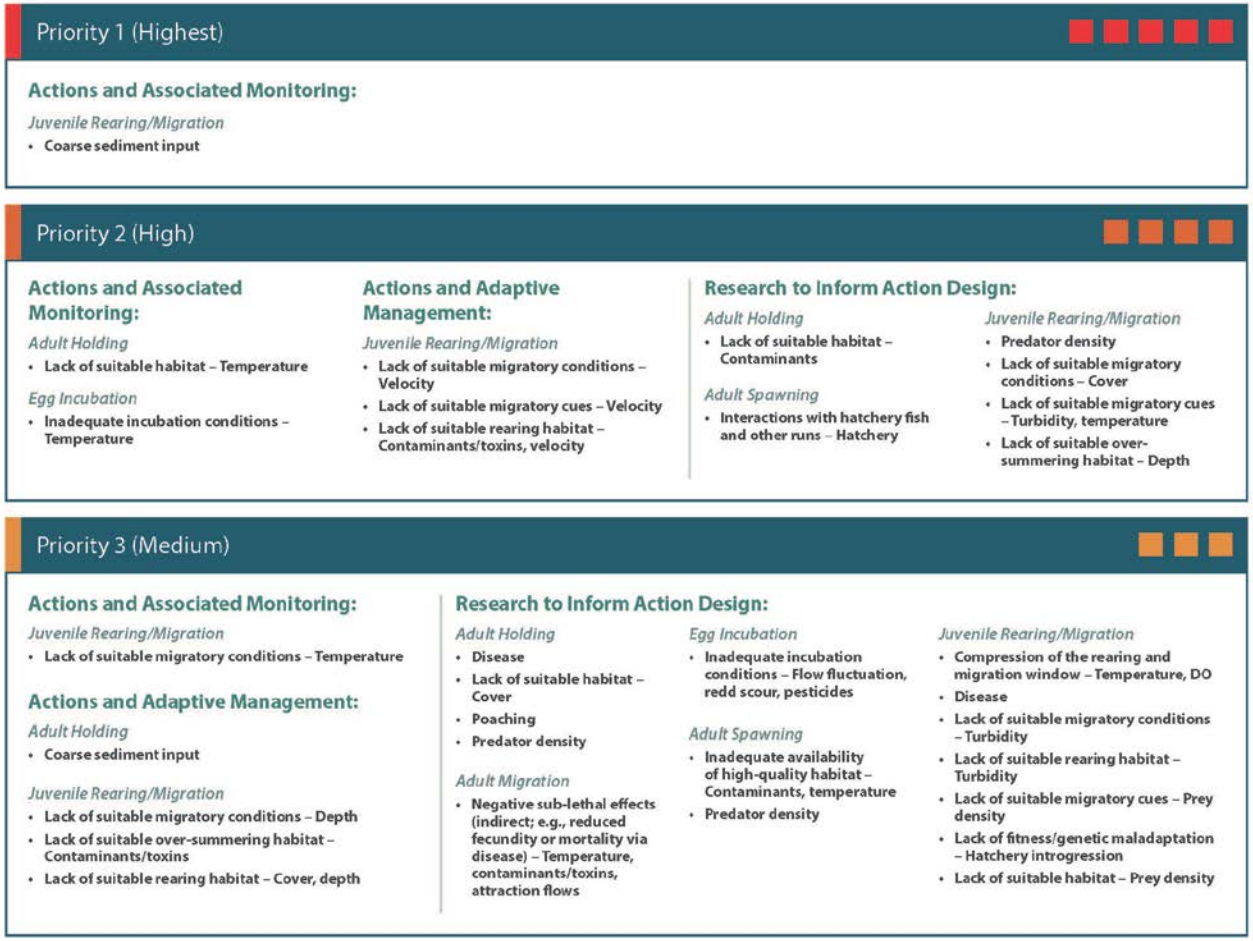


Figure 27

Spring-run Chinook Salmon – Stressor Response Prioritization (Near Term/Fine Scale)


Priority 1 (Highest)
Actions and Associated Monitoring:
Juvenile Rearing/Migration
• Coarse sediment input
Priority 2 (High)
Actions and Associated Monitoring:
Adult Holding
• Lack of suitable habitat – Temperature
Egg Incubation
• Inadequate incubation conditions – Temperature
Actions and Adaptive Management:
Juvenile Rearing/Migration
• Lack of suitable migratory conditions – Velocity
• Lack of suitable migratory cues – Velocity
• Lack of suitable rearing habitat – Contaminants/toxins, velocity
Research to Inform Action Design:
Adult Holding
• Lack of suitable habitat – Contaminants
Adult Spawning
• Interactions with hatchery fish and other runs – Hatchery
Juvenile Rearing/Migration
• Predator density
• Lack of suitable migratory conditions – Cover
• Lack of suitable migratory cues – Turbidity, temperature
• Lack of suitable over-summering habitat – Depth
Priority 3 (Medium)
Actions and Associated Monitoring:
Juvenile Rearing/Migration
• Lack of suitable migratory conditions – Temperature
Actions and Adaptive Management:
Adult Holding
• Coarse sediment input
Juvenile Rearing/Migration
• Lack of suitable migratory conditions – Depth
• Lack of suitable over-summering habitat – Contaminants/toxins
• Lack of suitable rearing habitat – Cover, depth
Research to Inform Action Design:
Adult Holding
• Disease
• Lack of suitable habitat – Cover
• Poaching
• Predator density
Adult Migration
• Negative sub-lethal effects (indirect; e.g., reduced fecundity or mortality via disease) – Temperature, contaminants/toxins, attraction flows
Egg Incubation
• Inadequate incubation conditions – Flow fluctuation, redd scour, pesticides
Adult Spawning
• Inadequate availability of high-quality habitat – Contaminants, temperature
• Predator density
Juvenile Rearing/Migration
• Compression of the rearing and migration window – Temperature, DO
• Disease
• Lack of suitable migratory conditions – Turbidity
• Lack of suitable rearing habitat – Turbidity
• Lack of suitable migratory cues – Prey density
• Lack of fitness/genetic maladaptation – Hatchery introgression
• Lack of suitable habitat – Prey density

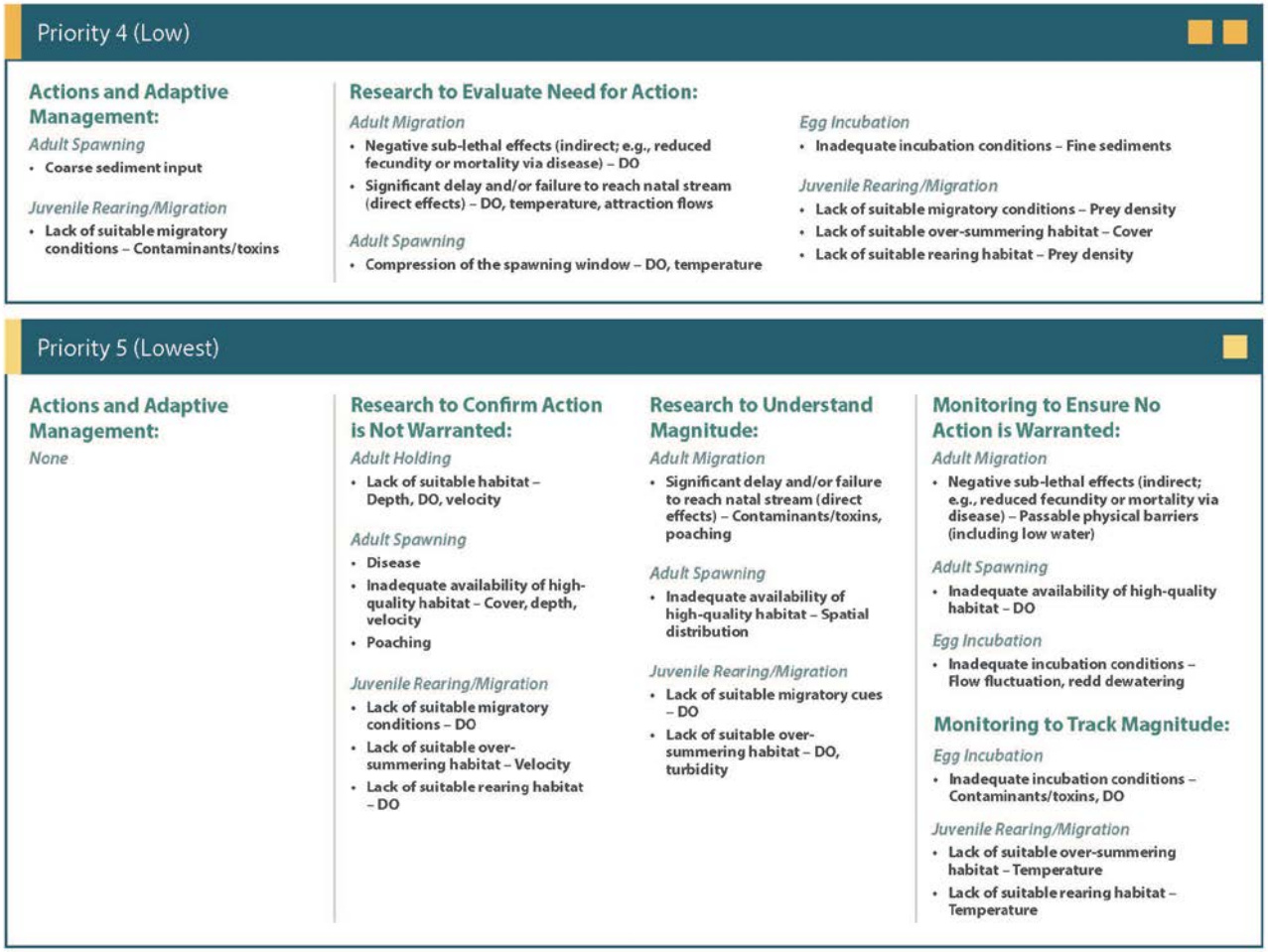


Figure 28

Steelhead – Stressor Response Prioritization (Near Term/Fine Scale)

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While the stressor response prioritization figures and tables prioritize stresses (by life stage), this is not meant to imply that stressor responses need to be carried out in the presented sequence in order to be effective. Stressor responses of different priorities can be addressed simultaneously. Additionally, the potential suite of actions necessary to resolve a single stressor may partially or completely resolve other stressors. There may also be a number of non-biological considerations (e.g., physical, political, and financial) that influence the timing and sequence with which conservation measures are implemented as stressor responses. However, the stressor response prioritization figures and tables are designed to provide guidance for the following:

- Which stressors are of greatest biological impact to the species;
- How conservation measures should be optimally sequenced for greatest biological benefit when not all stressors can be addressed simultaneously; and
- What the complete suite of stressor responses necessary to achieve Biological Objectives looks like.

The coarse scale stressor figures (Figures 23 through 25) and tables in Appendix E are designed to provide a high-level sense of the critical issues facing each species and the broad categories of responses necessary to achieve Biological and Environmental Objectives. The fine scale stressor figures (Figures 26 through 28) and tables in Appendix E detail the specific attributes of environmental conditions where objectives are not being met to help guide targeted remediation actions. Both the stress and stressor prioritization and response figures and tables are further subdivided based on near-term responses (current and recovering population; Figures 23 through 28) and long-term responses (target population; Appendix E). Changes in stressor magnitude from the near term to the long term are principally driven by higher fish population size, long-term forcing factors (e.g., climate change), or the hypothesized effect of current trends carried out over time (e.g., climate-driven warming). In order to highlight what is most immediately relevant for the development of conservation measures, the stressor prioritization discussion below focuses on near-term priorities for each of the three species.

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8.7.2 Priority Stressors and Responses – Fall-run Chinook Salmon

8.7.2.1 Actions

For fall-run Chinook salmon in the Stanislaus River, the stressor analysis indicates that the juvenile life history stage is stressed to the greatest extent. At the coarse scale, stresses to juveniles necessitating high priority actions in the short term include lack of suitable rearing habitat, lack of suitable migratory conditions, compressions of the rearing and migration window, and lack of suitable migratory cues (Figure 23). Fine-scale stressors for juveniles driving coarse scale stress include compression of the migration window in response to unsuitable temperatures and temperature for migration (in both the main channel and off-channel/floodplain). The availability of high-quality rearing habitat is limited by contaminants and toxins present in the Stanislaus River during the rearing and migration windows; suitable migratory cues are limited by low velocity; and coarse sediment input is impacting rearing and migration conditions. A lack of fitness/genetic maladaptation is limited by hatchery introgression. Though to a lesser degree than the presence of contaminants and toxins, the availability of high-quality rearing habitat is also limited by suitable depth, cover, and temperature, and the availability of high-quality migratory conditions is limited by suitable depth (Figure 26).

High-priority actions in the near term are necessary to address stresses for spawning adults; to reduce interactions and introgression from hatchery stocks; and for eggs to improve incubation conditions in the area of temperature, as well as a number of other parameters for which the extent of limitation is still not well understood (Section 8.7.2.2). Also requiring near-term action, but at a slightly lower priority, are the negative sub-lethal effects on migrating adults from unsuitable temperature.

8.7.2.2 Research and Monitoring

Stressors for fall-run Chinook salmon that are the highest priority for research to inform actions relate to delay and the effects of potentially late access to spawning grounds for migrating adults. Of particular concern for migrating adults are the effects of reduced attraction flow, low DO levels, high contaminant levels, and unsuitable temperatures during the migration and spawning windows. Additional stressors that are a high priority for research are as follows: rearing habitat distribution, cover, and velocity as

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they relate to the in-channel migratory conditions for juveniles; and juvenile migratory cues related to temperature and turbidity (Figures 23 and 26).

8.7.3 Priority Stressors and Responses – Spring-run Chinook Salmon

8.7.3.1 Actions

For spring-run Chinook salmon in the Stanislaus River, the stressor analysis indicates that high-priority stressors affect almost all life history stages. Coarse-scale stress to juvenile spring-run Chinook salmon necessitating high priority actions in the near term include lack of suitable rearing habitat and lack of suitable migratory conditions (Figure 24). Fine-scale stressors driving these coarse scale stresses and in need of near-term remediation include lack of coarse sediment and substrate, temperature and velocity conditions throughout the migratory corridor (in both the main channel and off-channel), contaminant levels and velocity in rearing habitat, and lack of sufficient velocity to cue and support juvenile migration (Figure 27).

High-priority actions in the near term are also necessary to alleviate stressors for spawning adults, including interactions with hatchery fish and habitat segregation for salmon runs. Lack of suitable holding habitat for adults is also a high priority for action at the coarse scale, with unsuitable temperatures being the primary issue. Conditions for incubating eggs are also a high priority for spring-run, with temperature being the primary factor in need of remediation through action (Figure 27).

8.7.3.2 Research and Monitoring

Based on the stressor analysis, stresses for spring-run Chinook salmon that are the highest priority for research related to negative sub-lethal effects during adult migration, loss of fecundity in holding fish, and compressions of the spawning window. Specific concerns related to adult migration, holding, and spawning life history stages are principally related to lack of attraction flow (migration), unsuitable temperatures (migration and spawning), unsuitable DO levels (migration), and high contaminant levels (holding). Additional stressors that are a high priority for research include compression of the juvenile rearing and migration window as a result of unsuitable temperatures; suitable migratory conditions related to cover and habitat distribution for juveniles; and suitable

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migratory cues related to turbidity. Lower priority stressors that are important for research in the near term include the following (Figures 24 and 27):

- Inadequate egg incubation conditions as a function of contaminants and pesticides, redd scour due to flow fluctuation, and fine sediment impacts on egg survival;
- Impact of disease on adult holding and migrating and rearing juveniles;
- Contaminants present in adult holding and spawning areas;
- Loss of fecundity due to temperature conditions in holding areas;
- Predator density-driven predation in holding areas and on juvenile outmigrants; and
- Lack of suitable rearing habitat relative to turbidity.

8.7.4 Priority Stressors and Responses – Steelhead

8.7.4.1 Actions

For anadromous forms of *O. mykiss* in the Stanislaus River, high-priority stressors affect almost all life history stages. Lack of suitable rearing conditions, lack of migratory conditions, and lack of migratory cues are the highest priority stresses for juveniles. The lack of suitable holding habitat conditions for adults and inadequate incubation conditions for eggs and embryos also ranks among the highest priority. Fine-scale stressors driving the high priority for juvenile rearing include lack of coarse substrate, unsuitable (low) velocity (in channel), and high levels of contaminants and pesticides. For juvenile migration and migratory cues (Figure 26), lack of sufficient velocity and velocity variability are the most acute specific stressors in need of near-term remediation. Also in need of action to improve juvenile rearing and migration, though slightly lower priority, are suitability of depth and cover for in-channel habitat, temperature in the migratory corridor, and contaminants in over-summering habitat. For adult holding conditions and egg incubation conditions, temperature is the primary stressor driving the high priority for near-term action and, to a lesser extent, a lack of coarse sediment in holding areas (Figure 28).

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8.7.4.2 Research and Monitoring

Stressors for anadromous *O. mykiss* that are the highest priority for research include the following (Figure 28):

- Lack of suitable temperature conditions as migratory cues for juveniles or variable or unsuitable temperatures (to promote migration), especially during the summer months;
- Lack of turbidity and cover as a component of migratory conditions for juveniles;
- Lack of suitable over-summering habitat relative to depth; and
- Predator density-driven predation rates on juvenile outmigrants.

Also among the highest research priorities are the effects of contaminants and pesticides on adult holding conditions as well as the influence of hatchery introgression on adult spawning and reproductive success.

Additional stressors in need of research, though at a lower level of priority, include the following:

- Negative sub-lethal effects from lack of attraction flow, unsuitable temperatures, and contaminants and pesticide levels for migratory adults;
- Impacts to spawning habitat from the presence of contaminants, temperature, and predator density;
- Effects of disease, lack of cover, poaching, and predator density on adult holding conditions;
- Redd scour due to flow fluctuations and pesticide levels relative to egg incubation; and
- Limitations to juvenile rearing habitat quality resulting from low turbidity, low prey density, disease, lack of fitness from hatchery genetics, and temperature and DO effects on compressing the rearing and migration window.

8.7.5 Application of Stressors to Conservation Measure Development and Adaptive Management

When combined with the Biological and Environmental Objectives, the stressor analysis provides the basis for the following:

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- Prioritizing conservation measures (including habitat enhancement actions and research) for maximum biological benefit;
- Understanding the full range and extent of conservation measures necessary to support population recovery; and
- Setting expectations related to the extent of conservation measures required to see progress towards the Biological Objectives for a given life history stage based on the extent of the stress to that life history stage that has been resolved.

Stressors are the obstacles to achieving the desired conditions identified through the Environmental Objectives process and are necessary for the species to attain the target population conditions quantified in the Biological Objectives. For these reasons, for any given life history stage, progress towards the Biological Objectives can only be expected once the high-priority stressors have been addressed and Environmental Objectives largely achieved. The efficacy of conservation measures designed to reduce stressors should therefore be measured based on the extent that those measures advance or achieve Environmental Objectives. Once Environmental Objectives have been significantly advanced, or achieved via the resolution of priority stressors, Biological Objectives become the following:

- Metrics to measure species response to the actions, and
- Triggers for adaptive management in the case where Environmental Objectives do not result in the predicted biological response.

Although Environmental Objectives and stressors do not have a one-to-one relationship with Biological Objectives, there are several core relationships among them that, for a given life history stage, can serve to guide expectations around biological response to the attainment of Environmental Objectives.

Habitat Quality → Survival

Given the carrying capacity associated with a given spatial area of habitat, fish condition and survival are largely linked with habitat quality as defined by Environmental Objectives and stressors for a given life stage. Attainment of Environmental Objectives for habitat quality via resolution of high priority stressors for a given life history stage should therefore trigger response in biological metrics (and make progress towards

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objectives) related to survival rate for individuals of that life history stage, given the limits to carrying capacity. For example, attainment of the habitat quality objectives for egg incubation should be measurable in terms of progress towards Biological Objectives for egg survival.

Habitat Spatial Extent → Abundance

Given habitat quality and suitability, as quantified by the Environmental Objectives, and associated survival rates, increased spatial extent of suitable habitat increases carrying capacity for that life history stage. Increases in habitat spatial extent should therefore be measurable in biological metrics (and make progress towards objectives) related to abundance for that life history stage to the extent that abundance is constrained by carrying capacity. For example, attainment of the habitat quantity objectives for adult holding and spawning habitat should be measurable in terms of progress towards Biological Objectives for adult in-river/spawner abundance.

Habitat Temporal Extent → Diversity and Resilience

Given sufficient habitat quality and spatial extent, the temporal extent and availability of habitat increases the potential for a given life history stage to express diversity. The range of diversity expressions for each life history stage, across life history stages, comprise the resilience of the cohort. Similarly, the resilience of the individual cohorts, across multiple cohorts, comprise the resilience of the population. Attainment of Environmental Objectives for habitat temporal availability for a given life history stage should trigger a response in biological metrics (and make progress towards objectives) related to diversity in that life history stage or, across life history stages, resilience in the cohort and population. For example, attainment of the temporal extent objectives for juvenile rearing and migration should be measurable in terms of progress towards Biological Objectives for juvenile diversity.

Even when the primary stressors for a given life history stage have been addressed, certain Biological Objectives (e.g., population growth and abundance) require success across multiple or all life history stages. Therefore, it becomes necessary for the high priority stressors to be addressed and the Environmental Objectives to be achieved for all

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life story stages in order to see meaningful progress towards the full suite of Biological Objectives.

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9 MOVING FORWARD: DESIGN AND IMPLEMENTATION OF A CONSERVATION STRATEGY, MONITORING, AND ADAPTIVE MANAGEMENT

Good decisions are defined by the process in which they were generated and how the decision framework incorporates new information in order to reduce uncertainty and improve decision outcomes (Williams et al. 2012). The process of developing the SEP's objectives and stressor evaluations represents a significant advance in the application of science to improve understanding of restoration needs and challenges in the Stanislaus River and throughout the San Joaquin River basin. When the SEP began, participating organizations and agencies often had very different definitions of restoration success for the Stanislaus River, and those desired outcomes were often not clearly articulated. Similarly, many of the participating scientists entered the SEP with an internal (but unarticulated) conceptual model of the key problems and limits that prevented attainment of desired biological outcomes. The goals, objectives, and stressor rankings emerging from this process represent a new scientific consensus around a vision of what the Stanislaus River can be expected to attain with regard to salmon restoration, how this vision fits into the requirements of existing policy for the Central Valley as a whole, and a shared conceptual model regarding the numerous barriers to attainment of the vision generated by the current landscape and water management practices in the Stanislaus River.

There is no silver bullet for restoring populations of fall-run Chinook salmon, spring-run Chinook salmon, or *O. mykiss* on the Stanislaus River. The stressor evaluation presented in Section 8, which is based on comparisons of current conditions to the best available science regarding desired environmental conditions for salmonids, reveals that a comprehensive conservation strategy is needed, and that such a strategy must include a variety of actions to address a wide range of high priority barriers that occur throughout the freshwater life cycle of target salmonid populations. The SEP Group's products provide the essential framework for designing an effective and efficient conservation strategy that can produce desired outcomes on the Stanislaus River (Watershed-specific Goals) and ensure that this watershed is contributing to attainment of larger laws and policies regarding salmonid restoration throughout the Central Valley (i.e., Central Valley Goals and Objectives). These products will support the prioritization of restoration activities by allowing restoration planners to make good decisions based on the best available science and to avoid the misallocation of

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limited resources to actions or monitoring that are not part of the critical path to successful restoration outcomes.

9.1 Using SEP Products in Adaptive Management

Throughout this report, the SEP Group has described how the products developed in this report can serve in managing towards its vision of conservation success in an adaptive fashion; specific opportunities for adaptive management are identified in Section 8. Adaptive management is a systematic approach for improving resource management by learning and adapting from management outcomes through partnerships of managers, scientists, and other stakeholders who learn together how to create and maintain sustainable resource systems (Sexton et al. 1999). Three elements are necessary for a program to follow the USDOI adaptive management protocol (Williams et al. 2009). First, decisions must be recurrent to allow opportunities for learning to influence future decision-making. Second, decisions must be based on predictions that incorporate structural uncertainty; often this will be represented by two or more alternative models or hypotheses about system functionality. Third, there must be an objective-driven monitoring program. Programs that do not contain these essential elements are not, and properly should not be called "adaptive management." Where these elements are present, adaptive management is a critical component of resource management that allows implementation and improvement of conservation strategies in the face of uncertainty. These three elements either are described or are implicit in the framework, approach, and results presented in this report.

Each component of the SEP framework is essential to adaptively managing a comprehensive salmonid restoration strategy. Biological Objectives represent the minimum conditions necessary to achieve Watershed-specific Goals for the Stanislaus River and its contribution to Central Valley Goals and Objectives for anadromous fish restoration; all management activities must be oriented toward attainment of the Biological Objectives and modified over time, as necessary, to achieve those objectives. This means that, prior to selection and implementation of Conservation Actions, proposed actions must be evaluated based on their ability to support the Biological Objectives, and, following implementation, monitoring will be needed to assess whether the actions' expected benefits materialize. Because it is difficult to measure the direct effect of individual actions on phenomena described in the Biological

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Objectives, the Environmental Objectives provide the physical design criteria against which Conservation Actions (individually and collectively) can be evaluated. Environmental Objectives represent hypotheses of the environmental conditions needed to achieve the Biological Objectives. Stressors, and their relative magnitude and certainty scores, represent hypotheses regarding existing and expected future barriers to attainment of Environmental and/or Biological Objectives. Finally, Conservation Actions will represent hypotheses about the best way to ameliorate stressors and attain Environmental and Biological Objectives.

9.2 Next Steps for the Stanislaus River: Designing, Evaluating, Implementing, and Monitoring Conservation Actions

The next steps in developing a comprehensive conservation strategy for salmonids in the Stanislaus River will be the design of a suite of specific Conservation Actions, including the monitoring elements needed to evaluate the performance of actions individually and collectively. Such actions can and should be evaluated based on their ability to alleviate the priority stressors identified in Section 8 and to produce the Biological and Environmental Objectives described in Sections 6 and 7, respectively. Taken together, stressors and Environmental Objectives display, in practical terms, the scale of the problems that need to be solved. For instance, many off-channel habitat restoration projects will be required to fully alleviate the stress generated by "Lack of suitable rearing habitat" for juvenile Chinook salmon and anadromous *O. mykiss* (Section 8 and Figures 23, 24, and 25). Without explicitly defined objectives and prioritization of stressors, those who develop and/or evaluate Conservation Actions would not have an appropriate biological basis for comparing competing sets of habitat restoration proposals. In addition, they would have no benchmark to determine how the need for this kind of action changes as more projects are implemented (i.e., no way to know when habitat restoration actions are approaching a level where "lack of suitable rearing habitat" is no longer the highest priority stressor).

By articulating Watershed-specific Goals; expressing those goals in S.M.A.R.T. terms in the Biological and Environmental Objectives; and identifying, describing, evaluating, and prioritizing stressors, this report provides a clear vision of desired biological outcomes and makes transparent the linkage between that vision and subsequent Conservation Actions. Prior to selection and implementation of Conservation Actions, stakeholders, resource

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managers, and decision-makers can evaluate the specific contributions of different Conservation Actions (alone and together) to the Biological and Environmental Objectives. Following implementation of Conservation Actions, information developed through monitoring can be synthesized to allow measurement of an action's effects in terms of the environmental conditions (Stressors and Environmental Objectives) it was intended to modify. This comparison enables efficient adjustment of Conservation Actions and adaptation of the conservation strategy, as needed. If monitoring indicates that Conservation Actions are not performing as intended, changes to the actions or additional actions will be implemented to ensure that Environmental Objectives and Biological Objectives are reached. Conversely, if Biological Objectives are attained prior to implementing the full suite of Conservation Actions, then the conservation strategy can be modified.

Implementation of the Conservation Actions will require various levels of monitoring, including site-specific monitoring to document compliance and performance of specific measures and system-wide monitoring to evaluate overall effectiveness. Monitoring activities will need to produce data that is relevant to assessing progress at all levels of the "logic chain" structure (Figure 2). Monitoring results should inform managers whether progress is being made towards:

1. Intended performance of individual Conservation Actions
2. Stressor reduction/elimination
3. Environmental Objectives
4. Biological Objectives

Clearly, monitoring needed to assess performance of Conservation Actions can only be determined after the conservation strategy is described in detail. However, the monitoring needed to evaluate progress towards larger desired outcomes (items 2-4 in the list above) has been defined by the performance metrics presented in this report.

Measurability of Biological and Environmental Objectives was a key consideration in their design and expression. Indeed, established monitoring programs already provide information to track changes in biological and environmental conditions that are described in the objectives (Tables 67 and 68). These monitoring efforts may need to be refined or expanded in order to fully evaluate progress, but the long data series already established by these

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programs make them particularly valuable in evaluating changes in environmental conditions and biological responses to those conditions. For example, the duration and frequency of operation of RSTs and the salmon counting weir may need to be expanded and juvenile sampling at Mossdale may need to be refined. Where current monitoring in the Stanislaus and lower San Joaquin rivers does not directly address Biological Objectives, the SEP Group considered whether monitoring was possible (i.e., that all objectives are measureable) with currently available technology. Several new elements of a monitoring and assessment plan needed to track objectives and stressors developed by the SEP Group are identified in Tables 67 and 68, though the information in these tables is not comprehensive.

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Table 67

Current and Potential Monitoring that Could be Used to Measure Progress Towards SEP Biological Objectives

Biological Objective Type	Species	Life Stage	Specific Objective	Relevant Current Monitoring (Monitoring Agency)	Relevant Monitoring Needed
Productivity	All	Egg	Egg-emergence to Oakdale RST Survival	Adult escapement at counting weir (USFWS weir – Tri-Dam funds); life history investigations (e.g., escapement and carcass surveys; CDFW); Oakdale RST catch (Tri-Dam – currently not shared)	
Productivity	All	Egg	Viability	None	Requires incubation chamber (in hatchery or on site) measured by surrogates (e.g., egg trays) and/or as projected by monitoring of temperature, flow, sediment deposition, and scour
Productivity	All	Egg	Incubation success	None	Spawning surveys, redd mapping (superimposition), redd capping
Life History Diversity	Chinook salmon fall-run (FR) and spring-run (SR)	Adult migration	Migration timing	Adult Escapement at counting weir (USFWS weir – Tri-Dam funds); Life history investigations (e.g., escapement and carcass surveys; CDFW)	
Productivity	Chinook salmon FR-SR	Adult migration and spawning	Abundance	Adult Escapement at counting weir (USFWS weir – Tri-Dam funds); Life history investigations (e.g., escapement and carcass surveys; CDFW)	
Productivity	Chinook salmon FR-SR	Adult migration and holding	Survival	Adult Escapement at counting weir (USFWS weir – Tri-Dam funds); Life history investigations (e.g., escapement and carcass surveys; CDFW)	Include surveys for SR
Life History Diversity	Chinook salmon FR-SR	Adult migration and spawning	Spawning timing	Adult Escapement at counting weir (USFWS weir – Tri-Dam funds); Life history investigations (e.g., escapement and carcass surveys; CDFW)	Include surveys for SR
Productivity	Chinook salmon FR-SR	Adult migration and spawning	Prespawn mortality	Adult Escapement at counting weir (USFWS weir – Tri-Dam funds); Life history investigations (e.g., escapement and carcass surveys; CDFW)	Include surveys for SR
Productivity	Chinook salmon FR-SR	Juvenile emigration	in river (egg to delta) survival	Adult Escapement at counting weir (USFWS weir – Tri-Dam funds); Life history investigations (e.g., escapement and carcass surveys; CDFW); Caswell RST catch (USFWS); Mossdale trawl (CDFW)	Include surveys for SR; Add or modify surveys at Mossdale to more accurately/frequently survey migrating salmonids, and smaller fish in particular; Ototlith microchemistry to distinguish juveniles from different natal streams in the lower San Joaquin
Genetic	Chinook salmon FR-SR	Adult migration and spawning	Percentage of hatchery origin spawners	Adult Escapement at counting weir (USFWS weir – Tri-Dam funds); Life history investigations (e.g., escapement and carcass surveys; CDFW)	Include surveys for SR
Genetic	Chinook salmon FR-SR	Juvenile emigration	Percent introgression (SR-FR)	None	Genetic testing of outmigrating juveniles
Life History Diversity	Chinook salmon FR-SR	Juvenile emigration	Size, timing, and proportion of migrants; number of yearlings	Caswell RST catch (USFWS)	Include surveys for SR; Add or modify surveys at Mossdale to more accurately/frequently survey migrating salmonids, and smaller fish in particular; Otolith microchemistry to distinguish juveniles from different natal streams in the lower San Joaquin

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Biological Objective Type	Species	Life Stage	Specific Objective	Relevant Current Monitoring (Monitoring Agency)	Relevant Monitoring Needed
Productivity	*O. mykiss* (steelhead)	Juvenile emigration	Smolt survival down the river and size and proportion of smolt migrants	None	Inclined-screen traps and video cameras, Didson cameras (imaging sonar system), or mark-resight estimates based on PIT tagging (some data from RST)
Productivity	*O. mykiss* (steelhead)	Juvenile emigration	Number of smolts (> 150 mm) per female spawner and total number of smolts per female spawner	Adult escapement at counting weir (USFWS weir – Tri-Dam funds); Life history investigations (e.g., escapement and carcass surveys; CDFW); Caswell RST catch (USFWS)	Inclined-screen traps and video cameras, Didson cameras (imaging sonar system), or mark-resight estimates based on PIT tagging (some data from RST)
Productivity	*O. mykiss* (steelhead)	Juvenile rearing	Parr density	Snorkel surveys (USBR)	Electrofishing or other appropriate sampling
Productivity	*O. mykiss* (resident)	Juvenile rearing	Number of smolts (> 150 mm) per female spawner and total number of smolts per female spawner	Adult escapement at counting weir (USFWS weir – Tri-Dam funds); Life history investigations (e.g., escapement and carcass surveys; CDFW); Caswell RST catch (USFWS)	Inclined-screen traps and video cameras, Didson cameras (ARIS), or mark-resight estimates based on PIT tagging (some data from RST)
Productivity	*O. mykiss* (resident)	Juvenile rearing	Parr growth rates	None	Growth rates could either be measured by capturing, PIT tagging, and recaptured juvenile *O. mykiss* in the river or estimated by back calculating lengths at age from scales
Life History diversity	*O. mykiss*	Adults	Percentage of anadromous and resident adults	None	Resident: adult snorkel surveys or masks and recapture; Anadromous: weir counts, snorkel surveys, or redd surveys, otolith microchemistry
Life History diversity	*O. mykiss* (steelhead)	Juvenile rearing	Proportion of anadromous mothers	None	Otolith microchemistry
Life History diversity	*O. mykiss* (resident)	Adults	Minimum abundance of resident adults	None	Resident: adult snorkel surveys, mark and recapture, or electrofishing
Life History diversity	*O. mykiss* (steelhead)	Juvenile emigration	Detection of emigrating smolts	Caswell RST catch (USFWS); Oakdale RST catch (Tri-Dam – not currently shared); Mossdale trawl (CDFW)	Modifications to Mossdale trawl (CDFW) to detect juvenile-size ranges

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Table 68

Current and Possible New Monitoring that Could be Used to Measure Progress Towards SEP Environmental Objectives

Environmental Objective Type	Species	Life Stage	Specific Objective	Relevant Current Monitoring	Relevant Monitoring Needed
Temperature	All	All	Appropriate timing and ranges for all life stages through the corresponding river reaches	Current CDEC and USGS stations include Goodwin Canyon, Knights Ferry, Orange Blossom Bridge, Oakdale, Ripon, Vernalis, and numerous Delta locations.	Special studies may be necessary to measure temperatures in currently unmeasured habitats (e.g., floodplains, intra-gravel, and cold-water refugia).
DO	All	All	Appropriate timing and ranges of DO in the mainstem river, floodplain habitat, and gravels (eggs)	CDEC stations at Ripon, Vernalis, and Delta locations	DO monitoring is needed in the main channel upstream of Ripon, in floodplain habitats, and in spawning gravels.
Pesticides	All	All	Maximum frequency of pesticide levels that will elicit detrimental conditions (e.g., direct and indirect) throughout the watershed	Some historical pesticide monitoring data are available for the Caswell area, and some pesticide modeling has provided baseline condition information.	Pesticide monitoring must continue in the future, and existing monitoring must be expanded to include the upstream mainstem and other aquatic habitats. Optionally, pesticide modeling may be able to provide better spatial and temporal resolution to estimate the pesticide impacts to the river.
Mercury and Selenium	All	All	Maximum concentrations of mercury and selenium in fish tissue	None	Adult tissue mercury and selenium monitoring every 5 – 10 years to ensure conditions have not degraded. Female spawner concentrations can be used to estimate mercury and selenium maternal transfer to eggs. Multi-year special study to verify that juvenile, yearling, and resident *O. mykiss* bioaccumulation of mercury and selenium is not at levels that will cause harm. Then, juvenile tissue mercury and selenium monitoring every 5 – 10 years to ensure conditions have not degraded.
Nutrients	All	All	Maximum average concentrations of ammonia, nitrate, and nitrite to prevent direct toxicity	No comprehensive, long-term monitoring of these constituents exists in the Stanislaus River; however, the limited recent and historical data suggest that nutrient concentrations are in the optimal range for toxicity impacts.	Nutrients should be monitored at a set of locations along the river corridor every 3 – 5 years to ensure conditions have not degraded over time
Nutrients	All	All	Nutrient levels (minimum and maximum) that support ecological use	A recent CDFW aerial assessment of rivering macrophytes was performed; however, there is no comprehensive long-term monitoring of macrophytes in place. DO levels are also an indicator of ecological use.	Nutrient concentrations, benthic and sestonic chlorophyll levels, and other environmental conditions (e.g., DO) should be evaluated to determine if nutrient or other biostimulatory factors are contributing to sub-optimal conditions in the river.
Habitat	All	Adult migration	Minimum riffle depths	Routine river monitoring by CDFW and USFWS (e.g., float trips) could be used to identify when dramatic channel morphological changes might create conditions that could restrict migration.	To be determined

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Environmental Objective Type	Species	Life Stage	Specific Objective	Relevant Current Monitoring	Relevant Monitoring Needed
Habitat	Primarily Spring-run, but any holding species	Adult holding	Minimum water depth and maximum velocity	None	As the spring-run population approaches recovery, holding habitats should be identified and quantified to ensure adequate depths and velocities to fully support population recovery.
Habitat	All	Adult Spawning	Spawning habitat quantity and distribution	Spawning habitat quantity is an aggregate of multiple environmental objectives that define suitable spawning habitat. Many of these are already monitored (as listed in this table).	The monitoring for this objective requires the quantification of the acres of suitable spawning habitat. The required suitable habitat must be distributed spatially and temporally to prevent superimposition or introgression among species. This will require integration of monitoring for relevant objectives in a spatially explicit (GIS) format.
Habitat	All	Adult Spawning	Appropriate water depths and velocities for spawning	USBR and USFWS have a 2-dimensional (2D) habitat model and routinely conduct post-project mapping of gravel augmentation projects.	To be determined
Habitat	All	Adult Spawning	Appropriate sediment size distribution	Recent gravel augmentation projects actively monitor for appropriately sized gravel prior to/during augmentation activities.	To be determined
Habitat	All	Egg incubation	Maximum percentage of fine sediment (< 4.8 mm)	None	Fine sediment monitoring may be performed in conjunction with sediment size distribution surveys. However, additional monitoring may need to be conducted throughout the incubation period to ensure storm water inputs do not import large loads of fine sediment and degrade redd habitats.
Habitat	All	Juvenile rearing and migration	Spatial extent, distribution, and timing of rearing and migration habitat	Rearing and migration habitat quantity and distribution are aggregates of the environmental objectives that define the qualities of suitable habitat. Modeling of off-channel habitat inundation of various durations is available (FlowWest).	Field monitoring of timing, duration, annual frequency, quantity, and other physical characteristics of inundated habitat are needed to verify and calibrate model predictions under different flow regimes. Bioassessments may be necessary to ensure that primary and secondary production and export/transport is occurring as predicted in both shallow inundated and in-channel habitats.
Habitat	All	Juvenile rearing and migration	Appropriate water depths and velocities in floodplain habitats	Water depths and velocities, in part, define the quality and benefits of floodplain habitats for salmonids. Modeling of off-channel habitat inundation depths is available (FlowWest).	Site-specific modeling of water velocities in floodplain habitats will be needed (as part of project design) and field monitoring of both inundation depths and velocities will be needed to verify and calibrate models and ensure that an adequate area of suitable habitat is available under a range of flows.
Habitat	*O. mykiss* (steelhead)	Juvenile rearing and migration	In-channel flow variability	Unimpaired flow estimates are available from rim station dams (DWR and other agencies) in order to mimic natural hydrograph variability that would contribute to the expression of anadromy in *O. mykiss*.	Additional temperature monitoring at rim station dams may be necessary in order to model/mimic temperature variability that would contribute to the expression of anadromy in *O. mykiss*.
Habitat	All	Juvenile rearing and migration	Minimum cover, structure, and substrate metrics in floodplain and in-channel habitats	USFWS and USBR incorporate these habitat measures in their 2D model.	To be determined

Note:
FlowWest = FlowWest SRH2d Model, available from: http://public.tableau.com/profile/mark.tompkins#!/vizhome/20160203_CVPIA_Floodplain/Floodplain

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The SEP's goals, objectives, and stressors also encourage targeted and efficient monitoring of individual Conservation Actions. When Conservation Actions are developed, their projected effect on relevant stressors must be described along with their expected contribution towards attainment of Environmental Objectives. Proposed Conservation Actions should also describe appropriate monitoring and assessment protocols to track performance of the action with respect to Stressors and Environmental Objectives; the monitoring proposed should be specific to the problems that the Conservation Action is designed to address. In certain cases, the stressors addressed by a Conservation Action may transcend the effect of any particular physical or chemical environmental condition; actions that are designed to reduce predation pressure fall into this category. In such cases, monitoring plans that accompany the proposed action should be specific with regard to the way in which the action is expected to reduce the stress so that the effect of the action can be tracked by relevant monitoring.

9.3 Next Steps for the SEP Group

The SEP Group intends to move forward on two fronts. The first will be to develop goals and objectives and evaluate stressors for the San Joaquin River's other major tributaries (the Tuolumne River and Merced River) as well as for the lower mainstem San Joaquin River (downstream of its confluence with the Merced River). Restoring these waterways is critical to the attainment of Central Valley Goals and Objectives identified in this report; additionally, several of the challenges identified in restoring salmonid populations to the Stanislaus River (e.g., hatchery influence, migration of juvenile and adult salmon through the lower San Joaquin River corridor) are problems that require a basin-wide perspective.

The second avenue for the SEP involves an evaluation of the proposed Conservation Actions in relation to the comprehensive conservation strategies for salmonid restoration throughout the San Joaquin Basin. Panels of scientists and managers that evaluate proposed conservation strategies will consist of SEP participants (excluding any who were involved in developing the Conservation Actions that will be reviewed) and scientists with relevant experience who did not participate in the SEP Group. Scientific evaluations will rely on the SEP products developed in this report and will employ a structured assessment protocol similar to that

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developed for the DRERIP,[13] a multi-agency project to regulate salmonid restoration activities in the Central Valley Watershed.

[13] Available from http://www.dfg.ca.gov/erp/conceptual_models.asp)http://www.dfg.ca.gov/erp/conceptual_models.asp

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10 REFERENCES

Aceituno, M.E., 1990. *Habitat preference criteria for Chinook salmon of the Stanislaus River, California*. USDI Fish & Wildlife Service, Sacramento, California.

Aceituno, M.E., 1993. *The relationship between instream flow and physical habitat availability for Chinook salmon in the Stanislaus River, California*. Sacramento Field Office, Ecological Services Report. 93pp.

AFRP (Anadromous Fish Restoration Program), 2005. *Recommended stream flow schedules to meet the AFRP doubling goal in the San Joaquin River Basin.* September 27, 2005.

AFRP Working paper

Ahearn, D.S., J.H. Viers, J.F. Mount, and R.A. Dahlgren, 2006. Priming the productivity pump: flood pulse driven trends in suspended algal biomass distribution across a restored floodplain. *Freshwater Biology* 51(8):1417-1433.

Allen, K.R., 1969. Limitations on production in salmonid populations in streams. In *Symposium on salmon and trout in streams*, edited by T.G. Northcote. University of British Columbia, Vancouver, 3-18.

Araki, H., B. Cooper, and M.S. Blouin, 2007. Genetic effects of captive breeding causes a rapid, cumulative fitness decline in the wild. *Science* 318:100-103.

Ashbrook C., M. Mizell, and K. Warheit, 2010. Undated PowerPoint presentation based on unpublished data by Washington Department of Fish and Wildlife entitled "Hooking mortality & behavior of a Puget Sound population." Available from: http//wdfw.wa.gov.

Baker, P.F., T.P. Speed, and F.K. Ligon, 1995. Estimating the influence of temperature on the survival of Chinook salmon smolts (*Oncorhynchus tshawytscha*) migrating through the Sacramento-San Joaquin River Delta of California. *Canadian Journal of Fisheries and Aquatic Sciences* 52:855-863.

Baldwin, D., J. Spromberg, T. Collier, and N. Scholz, 2009. A fish of many scales: extrapolating sublethal pesticide exposures to the productivity of wild salmon populations. *Ecological Applications* 19(8):2004-2015.

20180129-5200 FERC PDF (Unofficial) 1/29/2018 1:21:54 PM

Banks, M.A., V.K. Rashbrook, M.J. Calavetta, C.A. Dean, and D. Hedgecock, 2000. Analysis of microsatellite DNA resolves genetic structure and diversity of Chinook salmon (*Oncorhynchus tshawytscha*) in California's Central Valley. *Canadian Journal of Fisheries and Aquatic Sciences* 57:915-927.

Barnhart, R.A., and J. Parsons, 1986. *Species profiles: 1ife histories and environmental requirements of coastal fishes and invertebrates (Pacific Southwest)—Steelhead*. U.S. Fish and Wildlife Service Biological Report 82(11.60). U.S. Army Corps of Engineers, TR EL-82-4. 21 pp

Beakes, M.P., W.H. Satterthwaite, E.M. Collins, D.R. Swank, J.E. Merz, R.G. Titus, S.M. Sogard, and M. Mangel, 2010. Smolt transformation in two California steelhead populations: effects of temporal variability in growth. *Transactions of the American Fisheries Society* 139:1263–1275.

Beechie, T., E. Buhle, M. Ruckelshaus, A. Fullerton, L. Holsinger, 2006. Hydrologic regime and the conservation of salmon life history diversity. *Biological Conservation* 130:560-572.

Bell, M.C., 1986. Fisheries Handbook of Engineering Requirements and Biological Criteria. U.S. Army Corps of Engineers, North Pacific Division, Portland Oregon.

Benjamin, J.R., P.J. Connolly, J.G. Romine, and R.W. Perry, 2013. Potential effects of changes in temperature and food resources on life history trajectories of juvenile *Oncorhynchus mykiss*. *Trans. Am. Fish. Soc.* 142(1): 208–220. doi:10.1080/00028487.2012.728162.

Berejikian, B.A., L.A. Campbell, and M.E. Moore, 2013. Large-scale freshwater habitat features influence the degree of anadromy in eight Hood Canal *Oncorhynchus mykiss* populations. *Can. J. Fish. Aquat. Sci.* 70(5): 756–765.

Berg, M., and M. Sutula, 2015. *Factors Affecting Growth of Cyanobacteria with Special Emphasis on the Sacramento-San Joaquin Delta*. Prepared for The Central Valley Regional Water Quality Control Board and the California Environmental Protection Agency State Water Resources Control Board. April 2015.

Bergman, P., D. Delaney, J. Merz, C. Watry, 2014. Memorandum to: Erwin Van Nieuwenhuyse, U.S. Bureau of Reclamation. Regarding: A Pilot Mark-Recapture

20180129-5200 FERC PDF (Unofficial) 1/29/2018 1:21:54 PM

Study using Spot Patterns of *Oncorhynchus mykiss* in the Stanislaus River, California. Cramer Fish Sciences. March 10, 2014.

Berman, C.H., 1990. *The effect of elevated holding temperatures on adult spring Chinook salmon reproductive success*. Master's Thesis, University of Washington: Seattle Washington.

Berman, C.H., and T.P. Quinn, 1990. The effect of elevated holding temperatures on adult spring Chinook salmon reproductive success. Submitted to TFW Cooperative Monitoring, Evaluation, and Research Committee, Center for Streamside Studies, Fisheries Research Institute, Seattle, Washington.

Beyers, D.W., J.A. Rice, W.H. Clements, and C.J. Henry, 1999. Estimating physiological cost of chemical exposure: integrating energetics and stress to quantify toxic effects in fish. *Can. J. Fish. Aquat. Sci.* 56: 814-822.

Bjornn, T., and D. Reiser, 1991. Habitat requirements of salmonids in streams. In: *Influences of Forest and Rangeland Management on Salmonids Fishes and Their Habitat*, edited by W. Meehan. American Fisheries Society Special Publication 19, 83-138.

Bolnick, D.I., P. Amarasekare, M.S. Araújo, R. Bürger, J. Levine, M. Novak, V.H. Rudolf, S. Schreiber, M. Urban, and D. Vasseur, 2011. Why intraspecific trait variation matters in community ecology. *Trends in Ecology and Evolution* 26(4):183-192.

Bond, M.H., S.A. Hayes, C.V. Hanson, and R.B. MacFarlane, 2008. Marine survival of steelhead (*Oncorhynchus mykiss*) enhanced by a seasonally closed estuary. *Canadian Journal of Fisheries and Aquatic Sciences* 65:2242–2252.

Börk, K.S., J.F. Krovoza, J.V. Katz, and P.B. Moyle, 2012. The Rebirth of California Fish & Game Code Section 5937: Water for Fish. *UC Davis Law Review* 45:809–913.

Bottom, D., K. Jones, C. Simenstad, and C. Smith, 2011. Reconnecting societal and ecological resilience in salmon ecosystems. In: Pathways to Resilience; Sustaining Salmon Ecosystems in a Changing World. Oregon Sea Grant Report ORESO-B-11-001, pages 3-39.

20180129-5200 FERC PDF (Unofficial) 1/29/2018 1:21:54 PM

Boulton, A.J., and L.N. Lloyd, 1992. Flooding frequency and invertebrate emergence from dry floodplain sediments of the River Murray, Australia. *Regulated Rivers: Research & Management* 72:137-151.

Bovee, K.D., 1978. *Probability-of-Use Criteria for the Family Salmonidae*. Instream Flow Information Paper 4. U.S. Fish and Wildlife Service. FWS/OBS-78/07.

Bowen, M.D., M. Gard, R. Hilldale, K. Zehfuss, and R. Sutton, 2012. *Stanislaus River discharge-habitat relationship for rearing salmonids*. Prepared for US Bureau of Reclamation, Folsom, California.

Boyer, K., and M. Sutula, 2015. Factors Controlling Submersed and Floating Macrophytes in the Sacramento-San Joaquin Delta. Prepared for The Central Valley Regional Water Quality Control Board and the California Environmental Protection Agency State Water Resources Control Board (Agreement Number 12-135-250). July 2015. Available from:

Bradford, M.J., and P.S. Higgins, 2001. Habitat-, season-, and size-specific variation in diel activity patterns of juvenile Chinook salmon (*Oncorhynchus tshawytscha*) and Steelhead trout (*Oncorhynchus mykiss*). *Canadian Journal of Fisheries and Aquatic Sciences* 58(2):365-374.

Bradford, M.J., 1995. Comparative review of Pacific salmon survival rates. *Canadian Journal of Fisheries and Aquatic Sciences* 52:327-1338.

Brander, S.M, K.M. Jeffries, B.J. Cole, B.M. Decourten, J.W. White, S. Hasenbein, N.A. Fangue, and R.E. Connon, 2016. Transcriptomic changes underlie altered egg protein production and reduced fecundity in an estuarine model fish exposed to bifenthrin. *Aquatic Toxicology 74: 247-260*.

Brandes,

Busby, P.J., T.C. Wainwright, G.J. Bryant, L.J. Lierheimer, R.S. Waples, F.W. Waknitz, and I.V. Lagomarsino, 1996. Status Review of west coast steelhead from Washington, Idaho, Oregon, and California. U.S. Department of Commerce, NOAA. NMFS-NWFSC-27. 261 pp.

20180129-5200 FERC PDF (Unofficial) 1/29/2018 1:21:54 PM

Brett, J.R., 1983. Life Energetics of Cockeye Salmon, *Oncorhynchus nerka*. In: *Behavioral energetics: The cost of survival in vertebrates*. Columbus: Ohio State University Press, 29-63.

Buchanan, R., 2013. *OCAP 2011 Tagging Study: Statistical Methods and Results*. Prepared for the U.S. Bureau of Reclamation, Bay Delta Office, Sacramento, California. August 9, 2013.

Buchanan, R., 2015. *OCAP 2012 Steelhead Tagging Study: Statistical Methods and Results*. Prepared for the U.S. Bureau of Reclamation, Bay Delta Office, Sacramento, California. December 18, 2014.

California Trout, Inc. v. State Water Resources Control Board ("CalTrout I"). 255 Cal. Rpt. 184. Court of Appeal of California. 1989.

Camargo, J.A., A. Alonso, and A. Salamanca, 2005. Nitrate toxicity to aquatic animals: a review with new data for freshwater invertebrates. *Chemosphere* 58: 1255-1267.

Carlson, S.M., and T.R. Seamons, 2008. A review of quantitative genetic components of fitness in salmonids: implications for adaptation to future change. *Evolutionary Applications* 1:222-238.

Carl Mesick Consultants and KDH Environmental Services, 2009. 2004 and 2005 Phase II Studies, Knights Ferry Gravel Replenishment Project. Prepared for Anadromous Fish Restoration Program, USFWS. January 2009.

Carlson, S.M., and W.H. Satterthwaite, 2011. Weakened portfolio effect in a collapsed salmon population complex. *Canadian Journal of Fisheries and Aquatic Sciences* 68:1579-1589.

Carter, K., 2005. *The Effects of Dissolved Oxygen on Steelhead Trout, Coho Salmon, and Chinook Salmon Biology and Function by Life Stage*. California Regional Water Quality Control Board North Coast Region.

Cavallo, B., J. Merz, and J. Setka, 2012. Effects of predator and flow manipulation on Chinook salmon (*Oncorhynchus tshawytscha*) survival in an imperiled estuary. *Environ Biol Fish.* DOI 10.1007/s10641-012-9993-5

Cayan, D.R., E.P. Mauer, M.D. Dettinger, and K. Hayhoe, 2008. Climate change scenarios for the California region. *Climate Change* 87(1):21-24.

20180129-5200 FERC PDF (Unofficial) 1/29/2018 1:21:54 PM

CDFG (California Department of Fish and Game), 1972. *Report to the California State Water Resources Control Board on effects of the New Melones Project on fish and wildlife resources of the Stanislaus River and Sacramento-San Joaquin Delta*. Sacramento: California Department of Fish and Game.

CDFG, 1987. The status of San Joaquin drainage Chinook salmon stocks, habitat conditions and natural production factors. Exhibit 15 (July 1987) to the State Water Resources Control Board Bay/Delta hearing process Phase I (September 1987).

CDFG, 1990. Status and management of spring-run Chinook salmon. *Report by Inland Fisheries Division to California Fish and Game Commission*. Sacramento: California Department of Fish and Game, 33.

CDFG, 1998. *Report to the Fish and Game Commission: A Status Review of the Spring-run Chinook Salmon (Oncorhynchus tshawytscha) in the Sacramento River Drainage*. Candidate Species Status Report 98 01. June 1998.

CDFG, 2010. *Quantifiable Biological Objectives and Flow Criteria for Aquatic and Terrestrial Species of Concern Dependent on the Delta.* Prepared pursuant to the Sacramento-San Joaquin Delta Reform Act of 2009. Sacramento: California Department of Fish and Game, 169.

CDFW (California Department of Fish and Wildlife), 2013. Standard Operating Procedure for Critical Riffle Analysis for Fish Passage in California, DFG-IFP-001, October 2012, updated February 2013. Prepared by: M.E. Woodard, Quality Assurance Research Group, Moss Landing Marine Laboratories.

CEDEN (California Environmental Data Exchange Network), 2014a. Water quality data from the California Environmental Data Exchange Network. Cited: June 26, 2014. Available from: www.ceden.org.

CEDEN, 2014b. Fish tissue data from the California Environmental Data Exchange Network. Cited: October 9, 2014. Available from: www.ceden.org.

CEDEN, 2014c. Fish tissue data from the California Environmental Data Exchange Network. Cited: December 17, 2014. Available from: www.ceden.org.

CEDEN, 2015. Water quality data from the California Environmental Data Exchange Network. Cited: January 30, 2015. Available from: www.ceden.org.

20180129-5200 FERC PDF (Unofficial) 1/29/2018 1:21:54 PM

Melgo, J., P. Colombano, K. Sellheim, T. Hinkelman, J. Anderson, and J. Merz, 2015. *Juvenile Salmonid Out-Migration Monitoring at Caswell Memorial State Park in the Stanislaus River, California 2014-2015 Annual Report.* Prepared for the U.S. Fish and Wildlife Service Comprehensive Assessment and Monitoring Program. October.

Chapman, D.W., 1966. Food and space as regulators of salmonid populations. *American Naturalist* 100: 345–357.

Christie M.R., M.L. Marine, and M.S. Blouin, 2011. Who are the missing parents? Grandparentage analysis identifies multiple sources of gene flow into a wild population. *Mol Ecol* 20:1263–1276.

Christie et al., 2015.

Coghlan Jr., S.M., and N.H. Ringler, 2005. Survival and bioenergetic responses of juvenile Atlantic salmon along a perturbation gradient in a natural stream. *Ecology of Freshwater Fish* 14:111-124.

Cramer, S.P., and N.K. Ackerman, 2009. Linking Stream Carrying Capacity for Salmonids to Habitat Features. In *American Fisheries Society*, Series Symposium 71, edited by E.E. Knudson and J.H. Michael, Jr. Bethesda, Maryland, 225–254.

Cramer, S.P., D.B. Lister, P.A. Monk, and K.L. Witty, 2003. A review of abundance trends, hatchery and wild fish interactions, and habitat features for the Middle Columbia Steelhead ESU. S.P. Cramer and Associates, Sandy, Oregon.

Cramer Fish Sciences

CVRWQCB (Central Valley Regional Water Quality Control Board), 2011. *The Water Quality Control Plan for the California Regional Water Quality Control Board Central Valley Region*, Fourth Edition, Revised October 2011.

CVRWQCB, 2014. *Amendments to the water quality control plan for the Sacramento and San Joaquin River Basins for the control of diazinon and chlorpyriphos discharges*. Draft Final Staff Report. Central Valley Regional Water Quality Control Board. Rancho Cordova, California. 232 pp.

CVRWQCB, 2015a. *The Water Quality Control Plan for the California Regional Water Quality Control Board Central Valley Region*, Fourth Edition, Revised June 2015.

20180129-5200 FERC PDF (Unofficial) 1/29/2018 1:21:54 PM

CVRWQCB, 2015b. *Proposed Amendments to the Water Quality Control Plan for the Sacramento River and San Joaquin River Basins for the Control of Pyrethroid Pesticides Discharges. Excerpt on Alternatives Considered and Recommendations for Water Quality Objectives Chapter 5 and Appendix C.* Central Valley Regional Water Quality Control Board. Sacramento, California. May 2015.

Dahlberg, M.L., D.L. Shumway, and P. Doudoroff, 1968. Influence of dissolved oxygen and carbon dioxide on swimming performance of largemouth bass and Coho salmon. *Journal of the Fisheries Research Board of Canada* 25(1):49-70.

Darwin, C.R., 1861. *On the origin of species by means of natural selection, or the preservation of favoured races in the struggle for life*. London: John Murray. Third edition.

Davis, J.A., J.R.M. Ross, S.N. Bezalel, J.A. Hunt, G. Ichikawa, A. Bonnema, W.A. Heim, D. Crane, S. Swenson, and C. Lamerdin, 2013. *Contaminants in Fish from California Rivers and Streams, 2011. A Report of the Surface Water Ambient Monitoring Program (SWAMP)*. California State Water Resources Control Board, Sacramento, California. May.

Davis, J.C., 1975. Minimal dissolved oxygen requirements of aquatic life with emphasis on Canadian species: a review. *Journal of the Fisheries Research Board of Canada* 32:2295- 2332.

Dettinger, M.D., D.R. Cayan, M.K. Meyer, and A.E. Jeton, 2004. Simulated hydrologic responses to climate variations and change in the Merced, Carson, and American River basins, Sierra Nevada, California, 1900-2099. *Climate Change* 62(1-3):283-317.

DFG, 2013. Standard Operating Procedure for Critical Riffle Analysis for Fish Passage in California, DFG-IFP-001, October 2012, updated February 2013. Prepared by M. Woodard, Quality Assurance Research Group, Moss Landing Marine Laboratories.

Doctor, K., B. Berejikian, J.J. Hard, and D. Van Doornik, 2014. Growth-mediated life history traits of Steelhead reveal phenotypic divergence and plastic response to temperature. *Trans. Am. Fish. Soc*. 143: 317–333. doi:10.1080/00028487.2013.849617.

Donohoe, C.J., P.B. Adams, and C.F. Royer, 2008. Influence of water chemistry and migratory distance on ability to distinguish progeny of sympatric resident and

20180129-5200 FERC PDF (Unofficial) 1/29/2018 1:21:54 PM

anadromous rainbow trout (*Oncorhynchus mykiss*). *Canadian Journal of Fisheries and Aquatic Sciences* 65:1060-1075.

Du Gas, L., 2008. *Current-Use Pesticides Affect Development of Early Life Stage and Timing of Alevin Emergence in Sockeye Salmon (Oncorhynchus nerka)*. Master's thesis, Simon Fraser University: Burnaby, British Columbia, Canada.

DWR (Department of Water Resources), DWR, and USBR (California Department of Water Resources and U.S. Bureau of Reclamation), 2000. Biological Assessment—Effects of the Central Valley Project and State Water Project on Steelhead and Spring-run Chinook Salmon. Appendices A through I. Sacramento, California.

DWR, 2010. Climate Change Characterization and Analysis in California Water Resources Planning Studies, Final Report.

Elson, P., L. Lauzier, and V. Zitko, 1972. A preliminary Study of Salmon Movements in a Polluted Estuary. In *Marine Pollution and Sea Life*, edited by Ruivoet et al. Fishing News (Books) Ltd. pp. 325-330.

Farrell, P., N.A. Fangue, C.E. Verhille, D.E. Cocherelle, and K.K. English, 2015. *Thermal Performance of Wild Juvenile Oncorhynchus mykiss in the Lower Tuolumne River: A Case for Local Adjustment to High River Temperature*. Draft Report prepared for Turlock Irrigation District – Turlock, California; Modesto Irrigation District – Modesto, California.

Feist, B., E. Buhle, P. Arnold, J. Davis, N. Scholz, 2011. Landscape Ecotoxicology of Coho Salmon Spawner Mortality in Urban Streams. PLoS ONE 6(8):e23424. doi:10.1371/journal.pone.0023424

Finn, R., 2007. The physiology and toxicology of salmonid eggs and larvae in relation to water quality criteria. *Aquatic Toxicology* 81:337-354.

FISHBIO. Unpublished data.

Fisher, F.W., 1992. *Chinook salmon, Oncorhynchus tshawytscha, growth and occurrence in the Sacramento-San Joaquin River System*. IFD Office Report. June 1992. California Department of Fish and Game. 45 p.

Fisher, F.W., 1994. Past and Present Status of Central Valley Chinook Salmon. *Conservation Biology* 8:870-873.

20180129-5200 FERC PDF (Unofficial) 1/29/2018 1:21:54 PM

Ford, M.J., 2002. Selection in captivity during supportive breeding may reduce fitness in the wild. *Conservation Biology* 16:815-825.

Franks, S., 2012. *Possibility of natural producing spring-run Chinook salmon in the Stanislaus and Tuolumne Rivers*. Internal Report to NMFS.

Frannen, J., C. Blais, M. Lapointe, F. Berube, N. Bergeron, and P. Magnan, 2012. Asphyxiation and entombment mechanisms in fines rich spawning substrates: experimental evidence with brook trout (*Salvelinus fontinalis*) embryos. *Canadian Journal of Fisheries and Aquatic Sciences* 69:587-599.

Fresh, K.L., W. Graeber, K.K. Bartz, J.R. Davies, M.D. Scheuerell, A.D. Haas, M.H. Ruckelshaus, and B.L. Sanderson, 2009. Incorporating spatial structure and diversity into recovery planning for anadromous Pacific salmonids. In *Pacific Salmon Environmental and Life History Models: Advancing Science for Sustainable Salmon in the Future*, edited by E.E. Knudsen and J.H. Michael, Jr. Bethesda, Maryland: American Fisheries Society, 403-428.

Fry, D.H., 1961. King Salmon Spawning Stocks of the California Central Valley, 1940-1959. *Calif. Fish and Game Volume* 47(1):55-71.

Fuller, A. (FISHBIO), 2013. Personal communication with the SEP Group. July 22, 2013.

Fullerton, A.H., S.T. Lindley, G.R. Pess, B.E. Feist, E.A. Steel, and P. McElhany, 2011. Human influence on the spatial structure of threatened Pacific salmon metapopulations. *Conservation Biology* 25(5):932-944.

Furniss et al., 2014.

Gard, M., 2006. Modeling Changes in Salmon Spawning and Rearing Habitat Associated with River Channel Restoration. *International Journal of River Basin Management* 4:201–211.

Garman, C.E., and T.R. McReynolds, 2008. *Butte and Big Chico creeks spring-run Chinook salmon, Oncoryhnchus tshawytscha life history investigation: 2006-2007*.

Garman, C.E., and T.R. McReynolds, 2009. *Butte and Big Chico Creeks Spring-run Chinook Salmon, Oncoryhnchus tshawytscha Life History Investigation: 2007-2008*.

20180129-5200 FERC PDF (Unofficial) 1/29/2018 1:21:54 PM

Giudice, D., 2014. Data from CDFW Fall-Run Chinook Salmon Escapement Survey 2009-2013. Special Report including both Redd and Female Carcass distribution by River Mile. 10p.

Gowdy, M., and L. Grober, 2005. Amendments to the water quality control plan for the Sacramento River and San Joaquin River basins for the control program for factors contributing to the dissolved oxygen impairment in the Stockton Deep Water Ship Channel. Rancho Cordova, California: Central Valley Regional Water Quality Control Board.

GrandTab, 2014. California Department of Fish and Wildlife, Fisheries Branch Anadromous Assessment. California Central Valley Chinook Population Report. April 22, 2014. Available: https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=84381&inline=1

Grant, J.W.A., and D.L. Kramer, 1990. Territory size as a predictor of the upper limit of population density of juvenile salmonids in streams. *Canadian Journal of Fisheries and Aquatic Sciences* 47:1724–1737.

Grant, 2012.

Grantham, T.E., and P.B. Moyle, 2014. Assessing flows for fish below dams: a systematic approach to evaluate compliance of California's dams with fish and Game Code Section 5937. Center for Watershed Sciences, Davis.

Greene, C.M., J. Hall, K. Guilbault, and T.P. Quinn, 2009. Improved viability of populations with diverse life history portfolios. *Biology Letters* 6(3):382-386.

Gregory, R.S., 1993. Effect of turbidity on the predator avoidance behaviour of juvenile Chinook salmon (*Oncorhynchus tshawytscha*). *Canadian Journal of Fisheries and Aquatic Sciences* 50(2), 241-246.

Gregory, R.S., and C.D. Levings, 1998. Turbidity reduces predation on migrating Pacific salmon. *Transactions of the American Fisheries Society* 127:275-285.

Gregory, R., D. Ohlson, and J. Arvai, 2006. Deconstructing adaptive management: criteria for applications to environmental management. *Ecological Applications* 16(6): 2411-2425.

20180129-5200 FERC PDF (Unofficial) 1/29/2018 1:21:54 PM

Greig, S.M., D.A. Sear, and P.A. Carling, 2005. The impact of fine sediment accumulation on the survival of incubating salmon progeny: Implications for sediment management. *Science of the Total Environment* 344:241-258.

Grosholz, E., and E. Gallo, 2006. The influence of flood cycle and fish predation on invertebrate production on a restored California floodplain. *Hydrobiologia* 568:91-109.

Grossman, G., T. Essington, B. Johnson, J. Miller, N. Monsen, and T. N. Pearsons, 2013. Effects of fish predation on salmonids in the Sacramento River – San Joaquin Delta and associated ecosystems. Panel Report produced for Delta Stewardship Council. Available at: http://deltacouncil.ca.gov/docs/effects-fish-predation-salmonids-sacramento-river-san-joaquin-delta-and-associated-ecosystems

Gutierrez, M., 2014. Personal communication between John Ferguson (Anchor QEA, LLC) and Monica Gutierrez (NOAA Fisheries), October 7, 2014; data based on VAKI RiverWatcher recordings of fish passing the Stanislaus River weir.

Haddon, M., 2001. *Modeling and quantitative methods in fisheries*. Chapman & Hall/CRC Press: Boca Raton.

Hallock, R.J., R.F. Elwell, and D.H. Fry, Jr., 1970. Migrations of adult King Salmon *Oncorhynchus tshawytscha* in San Joaquin Delta as demonstrated by the use of sonic tags. *California Department of Fish and Game Fish Bulletin: 151*.

Hampton, M., 1988. Development of habitat preference criteria for anadromous salmonids of the Trinity River. U.S. Fish and Wildlife Service, Division of Ecological Services.

Hannon, J., 2015. Personal communication with U.S. Bureau of Reclamation.

Hanrahan, T.P., D.D. Dauble, and D.R. Geist, 2004. An estimate of Chinook salmon (*Oncorhynchus tshawytscha*) spawning habitat and redd capacity upstream of a migration barrier in the upper Columbia River. *Can. J. Fish. Aquat. Sci.* 61: 23–33.

Hansen, J., J. Rose, R. Jenkins, K. Gerow, and H. Bergman, 1999. Chinook salmon (*Onchorhynchus tshawytcha*) and rainbow trout (*Oncorhynchus mykiss*) exposed to copper: Neurophysiological and histological effects on the olfactory system. *Environmental Toxicology and Chemistry* 18: 1979-1991.

Hanski, I., 1998. Metapopulation dynamics. *Nature* 396:41-49.

20180129-5200 FERC PDF (Unofficial) 1/29/2018 1:21:54 PM

Hanson, C., 2007. *Recommendations on Restoring Spring-run Chinook Salmon to the Upper San Joaquin River.* San Joaquin River Restoration Program Technical Advisory Committee. October 2007.

Hanson C. 2008. *Recommendations on Restoring Fall-run Chinook Salmon to the Upper San Joaquin River.* San Joaquin River Restoration Program Technical Advisory Committee. February 2008.

Healey, M.C., 1991. Life history of Chinook salmon (*Oncorhynchus tshawytscha*). In: *Pacific Salmon Life Histories*, edited by Groot et al., 311-394.

Heath et al., 2003.

Henery, R. (Trout Unlimited). Unpublished data.

Henery, R.E., T.R. Sommer, and C.R. Goldman, 2010. Growth and methylmercury accumulation in juvenile Chinook Salmon in the Sacramento River and its floodplain, the Yolo Bypass. *Transactions of the American Fisheries Society* 139:550-563.

Hicks, M. 2002. Evaluating Criteria for the Protection of Freshwater Aquatic Life in Washington's Surface Water Quality Standards - Dissolved Oxygen. Draft Discussion Paper and Literature Summary. Washington State Department of Ecology. Publication Number 00-10-071.

Hilborn, R., T.P. Quinn, D.E. Schindler, and D.E. Rogers, 2003. Biocomplexity and fisheries sustainability. *Proc. Nat. Acad. Sci.* 100:6564-6568.

Høgåsen, H.R., 1998. Physiological changes associated with the diadromous migration of salmonids. *Canadian Special Publication of Fisheries and Aquatic Sciences* 127.

Hodson, P., D. Spry, and B. Blunt, 1980. Effects on rainbow trout (*Salmo gairdneri*) of a chronic exposure to waterborne selenium. *Can. J. Fish. Aquat. Sci.* 34: 233-2401.

Hoogeweg, C.G., W.M. Williams, R. Breuer, D. Denton, B. Rook, and C. Watry, 2011. Spatial and Temporal Quantification of Pesticide Loadings to the Sacramento River, San Joaquin River, and Bay-Delta to Guide Risk Assessment for Sensitive Species. CALFED Science Grant No. 1055, 293 p.

Horn, C., S. Hanson, and L. McKay, 1994. *History of the U.S. EPA's River Reach File: A national hydrographic database available for ARC/INFO Applications*. Prepared for

20180129-5200 FERC PDF (Unofficial) 1/29/2018 1:21:54 PM

the Office of Wetlands Oceans, and Watersheds Office of Water, United States Environmental Protection Agency. 12 pp.

HSRG (Hatchery Scientific Review Group), 2012. *California Hatchery Review Statewide Report*. Prepared for the U.S. Fish and Wildlife Service and Pacific States Marine Fisheries Commission. April 2012.

HSRG, 2014. *On the Science of Hatcheries: An updated perspective on the role of hatcheries in salmon and steelhead management in the Pacific Northwest*. A. Appleby, H.L. Blankenship, D. Campton, K. Currens, T. Evelyn, D. Fast, T. Flagg, J. Gislason, P. Kline, C. Mahnken, B. Missildine, L. Mobrand, G. Nandor, P. Paquet, S. Patterson, L. Seeb, S. Smith, and K. Warheit. June 2014.

Jeffres, C., U.C. Davis Watershed Sciences. Unpublished data.

Jeffres, C.A., J.J. Opperman, and P.B. Moyle, 2008. Ephemeral floodplain habitats provide best growth conditions for juvenile Chinook Salmon in a California river. *Environmental Biology of Fishes* 83:449-458.

Jensen, D.W., E.A. Steel, A.H. Fullerton, and G.R. Pess, 2009. Impact of Fine Sediment on Egg-To-Fry Survival of Pacific Salmon: A Meta-Analysis of Published Studies. *Reviews in Fisheries Science* 17(3):348–359.

Johnson and Merrick, 2012. *Juvenile Salmonid Monitoring Using Rotary Screw Traps in Deer Creek and Mill Creek, Tehama County, California Summary Report: 1994 - 2010*. California Department of Fish and Wildlife, Red Bluff Fisheries Office Technical Report No. 04-2012.

Johnson, M., I. Werner, S. Teh, and F. Loge, 2010. *Evaluation of chemical, toxicological, and histopathologic data to determine their role in the pelagic organism decline*. Report prepared for the State Water Resources Control Board. April.

Johnson, R., 2013. Personal communication with NMFS Southwest Science Center.

Johnson, R.C., 2014. Personal communication with Julie Zimmerman (SEP Group).

Johnson, R.C., P.K. Weber, J.D. Wikert, M.L. Workman, and R.B. MacFarlane, 2012. Managed Metapopulations: Do Salmon Hatchery 'Sources' Lead to In-River 'Sinks' in Conservation? PLoS ONE 7(2).

20180129-5200 FERC PDF (Unofficial) 1/29/2018 1:21:54 PM

Johnston, T., R. Bodaly, M. Latif, R. Fudge, and N. Strange, 2001. Intra- and interpopulation variability in maternal transfer of mercury to eggs of walleye (*Stizostedion vitreum*). *Aquatic Toxicology* 52(1): 73-85.

Jonsson, B., and N. Jonsson, 1993. Partial migration: niche shift versus sexual maturation in fishes. *Reviews in Fish Biology and Fisheries* 3:348–365.

Junk, W.J., and K.M. Wantzen, 2004. The flood pulse concept: new aspects, approaches and applications-an update. In *Second International Symposium on the Management of Large Rivers for Fisheries*. Food and Agriculture Organization and Mekong River Commission, FAO Regional Office for Asia and the Pacific. 117-149.

Junk, W.J., P.B. Bayley, and R.E. Sparks, 1989. The flood pulse concept in river-floodplain systems. *Canadian Special Publication of Fisheries and Aquatic Sciences* 106:110-127.

Katz, J. (CalTrout). Unpublished data.

Katz, J., P.B. Moyle, R.M. Quiñones, J. Israel, and S. Purdy, 2012. Impending extinction of salmon, steelhead, and trout (Salmonidae) in California. *Environmental Biology of Fishes* 96(10-11):1169-1186.

KDH Environmental Services, 2008. *Lover's Leap Restoration Project. Salmon Habitat Restoration in the Lower Stanislaus River. Final Report*. July 16, 2008. Cited: June 17, 2009. Available from: http://www.fws.gov/stockton/afrp/documents/Final_Report_Lovers_Leap.pdf.

Keeley, E.R., 2003. An experimental analysis of self-thinning in juvenile Steelhead trout. *Oikos* 102: 543-550.

Keeley, E.R., and J.W. Grant, 2001. Prey size of salmonid fishes in streams, lakes, and oceans. *Canadian Journal of Fisheries and Aquatic Sciences* 58: 1122-1132.

Keeley, E.R., and P.A. Slaney, 1996. *Quantitative measures of rearing and spawning habitat characteristics for stream-dwelling salmonids: implications for habitat restoration*. Province of B.C. Ministry of Environment, Lands and Parks; Watershed Restoration Project Report 2:31 p.

Kendall, N.W., J.R. McMillan, M.R. Sloat, T.W. Buehrens, T.P. Quinn, G.R. Pess, and R.W. Zabel, 2014. Anadromy and residency in Steelhead and rainbow trout

20180129-5200 FERC PDF (Unofficial) 1/29/2018 1:21:54 PM

Oncorhynchus mykiss: a review of the processes and patterns. *Canadian Journal of Fisheries and Aquatic Sciences* 72:1-24.

Kennedy, T., 2008. Stanislaus River salmonid density and distribution survey report (2005-2007). Draft prepared by Fishery Foundation of California for the U.S. Bureau of Reclamation Central Valley Project Improvement Act, June 2008. 16 pp.

Kim, E., S. Yoo, H. Ro, H. Han, Y. Baek, I. Eom, H. Kim, P. Kim, and K. Choi, 2013. Aquatic Toxicity Assessment of Phosphate Compounds. *Environmental Health and Technology* 28: e2013002.

Kondolf, G.M., 1997. Hungry Water: Effects of Dams and Gravel Mining on River Channels. *Environmental Management* 21(4):533–551.

Kondolf, G.M., 2000. Assessing salmonid spawning gravel quality. *Trans. Amer. Fish. Soc.* 129:262–281.

Kondolf, G.M., and M.G. Wolman, 1993. The sizes of salmonid spawning gravels. *Water Resources Research* 29:2275–2285.

Kondolf, G.M., G. F. Cada, M. J. Sale, and T. Felando, 2001. Distribution and Stability of Potential Salmonid Spawning Gravels in Steep Boulder-bed Streams of the Eastern Sierra Nevada. *Transaction of the American Fisheries Society* 120:177-186.

Kormos, B., M. Palmer-Zwahlen, and A. Low, 2012. Recovery of coded-wire tags from Chinook salmon in California's Central Valley escapement and ocean harvest in 2010. California Department of Fish and Game. Fisheries Branch Administrative Report 2012-02.

Kozlowski, J.F., 2004. *Summer distribution, abundance, and movements of rainbow trout (Oncorhynchus mykiss) and other fishes in the lower Yuba River, California*. Master's thesis, University of California, Davis. 88 pages.

Langhans, S.D., 2006. *Riverine floodplain heterogeneity as a controller of organic matter dynamics and terrestrial invertebrate distribution*. Doctoral dissertation, Swiss Federal Institute of Technology Zurich.

Layton, D.E., G.M. Brown, and M.L. Plummer, 1999. *Valuing multiple programs to improve fish populations*. Report to the Washington State Department of Ecology.

20180129-5200 FERC PDF (Unofficial) 1/29/2018 1:21:54 PM

Ligon, F.K., W.E. Dietrich, and W.J. Trush, 1995. Downstream Ecological Effects of Dams. *BioScience* 45(3):183–192.

Limm, M.P., and M.P. Marchetti, 2009. Juvenile Chinook salmon (*Oncorhynchus tshawytscha*) growth in off-channel and main-channel habitats on the Sacramento River, CA using otolith increment widths. *Environmental Biology of Fishes* 85:141-151.

Lindley, S.T., and M. Mohr, 2003. Modeling the effect of striped bass (*Morone saxatilis*) on the population viability of Sacramento River winter-run Chinook salmon (*Oncorhynchus tshawytscha*). *Fish. Bull.* 101:321–331.

Lindley, S.T., R. Schick, B.P. May, J.J. Anderson, S. Greene, C. Hanson, A. Low, D. McEwan, R.B. MacFarlane, C. Swanson, and J.G. Williams, 2004. Population structure of threatened and endangered Chinook salmon ESUs in California's Central Valley basin. NOAA Technical Memorandum NOAA-TM-NMFS-SWFSC-360. April 2004.

Lindley, S.T., R.S. Schick, A. Agrawal., M. Goslin, T.E. Pearson, E. Mora, J.J. Anderson, B. May, S. Greene, C. Hanson, A. Low, D. McEwan, R.B. MacFarlane, C. Swanson, and J.G. Williams, 2006. Historical structure of Central Valley steelhead and its alteration by dams. San Francisco Estuary and Watershed Science 4:1. Available from: http://www.estuaryandwatershedscience.org/vol4/issue1/art2.

Lindley, S.T., R.S. Schick, E. Mora, P.B. Adams, J.J. Anderson, S. Greene, C. Hanson, B. May, D. McEwan, R.B. MacFarlane, C. Swanson, and J.G. Williams, 2007. Framework for assessing the viability of threatened and endangered Chinook salmon and steelhead in the Sacramento-San Joaquin Basin. *San Francisco Estuary and Watershed Sciences* 5:1. Available from: http://repositories.cdlib.org/jmie/sfews/vol5/iss1/art4.

Lindley, S.T., C.B. Grimes, M.S. Mohr, W. Peterson, J. Stein, J.T. Anderson, L.W. Botsford, D.L. Bottom, C.A. Busack, T.K. Collier, J. Ferguson, J.C. Garza, A.M. Grover, D.G. Hankin, R.G. Kope, P.W. Lawson, A. Low, R.B. MacFarlane, K. Moore, M. Palmer-Zwahlen, F.B. Schwing, J. Smith, C. Tracy, R. Webb, B.K. Wells, and T.H. Williams, 2009. What caused the Sacramento River fall Chinook stock collapse? Pre-publication report to the Pacific Fishery Management Council. March 18, 2009.

20180129-5200 FERC PDF (Unofficial) 1/29/2018 1:21:54 PM

Marine, K. R., and J.J. Cech, 2004. Effects of high water temperature on growth, smoltification, and predator avoidance in juvenile Sacramento River Chinook Salmon. *North American Journal of Fisheries Management* 24:198–210.

Marston, D., C. Mesick, A. Hubbard, D. Stanton, S. Formann-Roe, S. Tsae, and T. Heyne, 2012. Delta flow factors influencing stray rates of escaping adult San Joaquin River fall-run Chinook salmon (*Oncorhynchus tshawytscha*). *San Francisco Estuary and Watershed Science* 10(4).

McClure, M.M., S.M. Carlson, T.J. Beechie, G.R. Pess, J.C. Jorgensen, S.M. Sogard, and R.W. Carmichael, 2008. Evolutionary consequences of habitat loss for Pacific anadromous salmonids. *Evolutionary Applications* 1(2), 300-318.

McElhany, P., M. Ruckelshaus, M. Ford, T. Wainwright, and E. Bjorkstedt, 2000. *Viable salmonid populations and the recovery of evolutionarily significant units*. NOAA Technical Memorandum NMFS-NWFSC-42. 154 p. Available from: http://www.nwfsc.noaa.gov/publications/.

McEwan, D., and T.A. Jackson, 1996. *Steelhead Restoration and Management Plan for California*. California Department of Fish and Wildlife. 244 p.

McEwan, D., 2001. Central Valley Steelhead. In Brown, R.L. (ed.), Contributions to the Biology of Central Valley Salmonids, Volume 1, pages 1-44. *California Department of Fish and Wildlife, Fish Bulletin* 179:1-43.

McMahon, T.E., and G.F. Hartman, 1989. Influence of cover complexity and current velocity on winter habitat use by juvenile coho salmon (*Oncorhynchus kisutch*). Canadian Journal of Fisheries and Aquatic Sciences 46: 1551-1557.

McMillan, J.R., J. Dunham, G.H. Reeves, J.S. Mills, and C.E. Jordan, 2012. Individual condition and stream temperature influence early maturation of rainbow and Steelhead trout, *Oncorhynchus mykiss*. *Environ. Biol. Fishes* 93:343–355. doi:10.1007/s10641-011-9921-0.

McMillan, J.R., S.L. Katz, and G.R. Pess, 2007. Observational evidence of spatial and temporal structure in a sympatric anadromous (winter Steelhead) and resident rainbow trout mating system on the Olympic Peninsula. *Washington State. Trans. Am. Fish. Soc*. 136(3): 736–748. doi:10.1577/T06-016.1.

20180129-5200 FERC PDF (Unofficial) 1/29/2018 1:21:54 PM

McReynolds, T.R., C.E. Garman, P.D. Ward, and S.L. Plemons, 2006. Butte and Big Chico Creeks Spring-run Chinook Salmon, *Oncoryhnchus tshawytscha* life history investigation: 2004-2005.

McReynolds, T.R., C.E. Garman, P.D. Ward, and S.L. Plemons, 2007. Butte and Big Chico Creeks Spring-run Chinook Salmon, Oncoryhnchus tshawytscha life history investigation: 2005-2006.

Merz, J.E., D.G. Delaney, J.D. Setka, and M.L. Workman, 2015. Seasonal rearing habitat in a large Mediterranean-climate river: management implications at the southern extent of Pacific salmon (*Oncorhynchus* spp.). *River Research and Applications* 2015.

Merz, J.E., M. Workman, D. Threloff, and B. Cavallo, 2013. Salmon life cycle considerations to guide stream management: examples from California's Central Valley. *San Francisco Estuary and Watershed Science 11(2)*.

Mesa, M. G., Weiland, L. K., and Wagner, P., 2002. Effects of acute thermal stress on the survival, predator avoidance, and physiology of juvenile fall Chinook salmon. *Northwest Science* 76:118-128.

Mesick, C., 2001. Studies of spawning habitat for fall-run chinook salmon in the Stanislaus River between Goodwin Dam and riverbank from 1994 to 1997. In: Brown, R.I., editor. Contributions to the biology of Central Valley salmonids, Fish Bulletin 179(2):217-252.

Miller, J.A., A. Gray, and J. Merz, 2010. Quantifying the contribution of juvenile migratory phenotypes in a population of Chinook salmon *Oncorhynchus tshawytscha*. *Marine Ecology Progress Series* 408:227–240.

Mills, T.J., and E. Fisher, 1994. Central Valley anadromous sport fish annual run-size, harvest, and population estimates, 1967 through 1991. Inland Fisheries Technical Report, third draft. August 1994. California Department of Fish and Game. Red Bluff, California.

Moore, A., and C. Waring, 2001. The effects of a synthetic pyrethroid pesticide on some aspects of reproduction in Atlantic salmon (*Salmo salar L.*). *Aquatic Toxicology* 52:1-12.

20180129-5200 FERC PDF (Unofficial) 1/29/2018 1:21:54 PM

Moyle, P.B., 2002. *Inland Fishes of California*. Revised and expanded. Berkeley: University of California Press. 502 pp.

Moyle, P.B., R.M. Yoshiyama, J.E. Williams, and E.D. Wikramanayake, 1995. *Fish Species of Special Concern in California, Second Edition*. Final Report for Contract No. 2128IF. Prepared for CDFG, Inland Fisheries Division, Rancho Cordova.

Moyle, P.B., J.A. Israel, and S.E. Purdy, 2008. *Salmon, steelhead, and trout in California status of an emblematic fauna*. Center for Watershed Sciences, UC Davis.

Mullan, J.W., 1990. Session II: Stock status and carrying capacity. In Park, Donn L. 1990. Editor. *Status and future of spring Chinook salmon in the Columbia River Basin—conservation and enhancement*. U.S. Department of Commerce, NOAA Technical Memorandum. NMFS F/NWC-187. 130 p.

Müller-Solger, A.B., A.D. Jassby, and D.C. Müller-Navarra, 2002. Nutritional quality of food resources for zooplankton (Daphnia) in a tidal freshwater system (Sacramento-San Joaquin River Delta). *Limnology and Oceanography* 475:1468-1476.

Myrick, C.A., and J.J. Cech, Jr., 2001. Temperature effects on Chinook salmon and steelhead: a review focusing on California's Central Valley populations. Bay-Delta Modeling Forum Technical Publication 01-1.

Myrick, C.A., and J.J. Cech, 2004. Temperature effects on juvenile anadromous salmonids in California's central valley: what don't we know? *Reviews in Fish Biology and Fisheries* 14:113–123.

Myrick, C.A., and J.J. Cech, 2005. Effects of temperature on the growth, food consumption, and thermal tolerance of age-0 Nimbus-strain steelhead. *North American Journal of Aquaculture* 67:324–330.

Neuswanger, J., 2014. New 3-d video methods reveal novel territorial drift-feeding behaviors that help explain environmental correlates of Chena river Chinook salmon productivity. A Dissertation Presented to the Faculty of the University of Alaska Fairbanks. 183p.

NMFS (National Marine Fisheries Service), 2004. Biological Opinion on the Long-term Central Valley Project and State Water Project Operations Criteria and Plan. Prepared by National Marine Fisheries Service, Southwest Region.

20180129-5200 FERC PDF (Unofficial) 1/29/2018 1:21:54 PM

NMFS, 2008. Endangered Species Act Section 7 Consultation: Environmental Protection Agency registration of pesticides containing chlorpyriphos, diazinon, and malathion. Biological Opinion. Silver Spring, Maryland, U.S. Department of Commerce: 482 p.

NMFS, 2009a. Species of Concern Fact Sheet for the Fall-/Late fall-run Chinook Salmon Evolutionarily Significant Unit. Available from: http://www.westcoast.fisheries.noaa.gov/.

NMFS, 2009b. Biological Opinion and Conference Opinion on the Long-term Operations of the Central Valley Project and State Water Project. Southwest Region. June 4, 2009.

NMFS, 2009c. Endangered Species Act Section 7 Consultation: Biological opinion and conference opinion on the long-term operations of the Central Valley Project and State Water Project. National Marine Fisheries Service, Southwest Region. June 4, 2009.

NMFS, 2010. Endangered Species Act Section 7 Consultation: Environmental Protection Agency registration of pesticides containing azinphos methyl, bensulide, dimethoate, disulfoton, ethoprop, fenamiphos, naled, methamidophos, methidathion, methyl parathion, phorate, and phosmet. Biological Opinion. Silver Spring, Maryland, U.S. Department of Commerce: 1010 p.

NMFS, 2011a. 5-year Status Review: Summary and Evaluation of Central Valley Spring-run Chinook Salmon. Available from: http://www.westcoast.fisheries.noaa.gov/.

NMFS, 2011b. 5-year Status Review: Summary and Evaluation of Central Valley Steelhead. Available from: http://www.westcoast.fisheries.noaa.gov/.

NMFS, 2011c. Endangered Species Act Section 7 Consultation: Environmental Protection Agency registration of pesticides containing 2,4-D, triclopyr BEE, diuron, linuron, captan, and chlorothalonil. Biological Opinion. Silver Spring, Maryland, U.S. Department of Commerce: 1131 p.

NMFS, 2012a. Bay Delta Conservation Plan: Proposed Interim Delta Survival Objectives for Juvenile Salmonids. NOAA Fisheries, Southwest Region, Central Valley Office.

NMFS, 2012b. Endangered Species Act Section 7 Consultation: Environmental Protection Agency registration of pesticides containing oryzalin, pendimethaline, and trifluralin. Biological Opinion. Silver Spring, Maryland, U.S. Department of Commerce: 1094 p.

20180129-5200 FERC PDF (Unofficial) 1/29/2018 1:21:54 PM

NMFS, 2013a. Environmental Assessment for Nonessential Experimental Population Designation and 4(d) Take Provisions for Reintroduction of Central Valley Spring-run Chinook Salmon to the San Joaquin River Below Friant Dam. November 2013. Available from: http://www.westcoast.fisheries.noaa.gov/publications/Central_Valley/San%20Joaquin/san_joaquin_reintroduction_10j_final_environmental_assessment_123013.pdf.

NMFS, 2013b. Endangered Species Act Section 7 Consultation: Environmental Protection Agency registration of pesticides containing diflubenzuron, fentutatin oxide, and propargite. Draft Biological Opinion. Silver Spring, Maryland, U.S. Department of Commerce: 924 p.

NMFS, 2014. *Public Final Recovery Plan for the Evolutionary Significant Units of Sacramento River Winter-run Chinook Salmon and Central Valley Spring-run Chinook Salmon and the Distinct Population Segment of Central Valley Steelhead*. Sacramento Protected Resources Division. July 2014.

Noga, E.J., 1996. *Fish Diseases Diagnosis and Treatment*. Mosbey Year-Book, Inc.

NRC (National Research Council), 2004. *Endangered and Threatened Fishes in the Klamath River Basin: Causes of Decline and Strategies for Recovery*. Committee on Endangered and Threatened Fishes in the Klamath River Basin; Board on Environmental Studies and Toxicology; Division on Earth and Life Studies. National Academies Press: Washington D.C.

Ock, G., and G.M. Kondolf, 2012. *Assessment of ecological roles of gravel bar features restored by gravel augmentation and channel rehabilitation activities below Lewiston Dam in the Trinity River, California*. USBR Science and Technology Program Scoping Report.

Orcutt, D.R., B.R. Pulliam, and A. Arp, 1968. Characteristics of Steelhead Trout Redds in Idaho Streams. *Transactions of the American Fisheries Society* 97(1):42-45.

Orlando, J.L., M. McWayne, C. Sanders, M.L. Hladik, 2014. *Dissolved pesticide concentrations entering the Sacramento–San Joaquin Delta from the Sacramento and San Joaquin Rivers, California, 2012–13.* U.S. Geological Survey Data Series, p. 28.

20180129-5200 FERC PDF (Unofficial) 1/29/2018 1:21:54 PM

Palmer-Zwahlen, M.L., and B. Kormos, 2013. *Recovery of coded-wire-tags from Chinook salmon in California's Central Valley escapement and ocean harvest in 2011.* California Department of Fish and Game. Fisheries Branch Administrative Report 2013-02.

Palmer-Zwahlen, M.L., and B. Kormos, 2015. Recovery of Coded-Wire Tags from Chinook Salmon in California's Central Valley Escapement, Inland Harvest, and Ocean Harvest in 2012. California Department of Fish and Wildlife Fisheries Administrative Report 015-4. November 2015.

Pearsons, T.N., G.A. McMichael, E.L. Bartrand, M. Fisher, J.T. Monahan, S.A. Leider, G.R. Strom, and A.R. Murdoch, 1993. *Yakima species interactions study, 1992 annual report*. Washington Department of Fish and Wildlife.

Pearsons, T.N., G.M. Temple, A.L. Fritts, C.L. Johnson, and T.D. Webster, 2008. *Ecological interactions between non-target taxa of concern and hatchery supplemented salmon*, 2007 Annual Report Project number 1995-063-25. Washington Department of Fish and Wildlife.

Pess, G.R., T.P. Quinn, S.R. Gephard, and R. Saunders, 2014. Re-colonization of Atlantic and Pacific rivers by anadromous fishes: linkages between life history and the benefits of barrier removal. *Rev. Fish Biol. Fish.* 24 (3): 881–900. doi: 10.1007/s11160-013-9339-1.

Poff, N.L., B.D. Richter, A.H. Arthington, S.E. Bunn, R.J. Naiman, E. Kendy, M. Acreman, C. Apse, B.P. Bledsoe, and M.C. Freeman, 2010. The ecological limits of hydrologic alteration (ELOHA): A new framework for developing regional environmental flow standards. *Freshwater Biology* 55:147-170.

Potter, E., and P. Dare, 2003. *Research on migratory salmonids, eels, and freshwater fish stocks and fisheries*. Science Series Technical Report, CEFAS Lowestoft, 119: 64 pp.

Presser, T., and S. Luoma, 2013. Ecosystem-scale selenium model for the San Francisco Bay-Delta Regional Ecosystem Restoration Implementation Plan. *San Francisco Estuary and Watershed Science* 11(1).

Quinn, T.P., 2005. *The behavior and ecology of Pacific salmon and trout*. Seattle: University of Washington Press.

20180129-5200 FERC PDF (Unofficial) 1/29/2018 1:21:54 PM

Quinn, T.P., D.M. Eggers, J.H. Clark, and H.B. Rich, Jr., 2007. Density, climate, and the processes of prespawning mortality and egg retention in Pacific salmon (*Oncorhynchus* spp.). *Canadian Journal of Fisheries and Aquatic Sciences* 64:574-582.

Raleigh, R.F., W.J. Miller, and P.C. Nelson, 1986. *Habitat suitability index model and flow suitability curves: Chinook salmon*. National Ecology Center, Division of Wildlife and Contaminant Research, U.S. Fish and Wildlife Service, Biological Report 82 (10.122).

Reese, C.D., and B.C. Harvey, 2002. Temperature-dependent competition between juvenile steelhead and Sacramento pikeminnow. *Transactions of the American Fisheries Society* 131:599-606.

Reiser, D.W., and T.C. Bjornn, 1979. *Influence of forest and rangeland management on anadromous fish habitat in Western North America: Habitat requirements of anadromous salmonids*. U.S. Department of Agriculture, Forest Service, Pacific Northwest Research Station: 1-54.

Reynolds, F.L., T. Mills, R. Benthin, and A. Low, 1993. *Restoring Central Valley streams: a plan for action*. The Resources Agency, California State Department of Fish and Game, Sacramento, California.

Richter, A., and S.A. Kolmes, 2005. Maximum Temperature Limits for Chinook, Coho, and Chum Salmon, and Steelhead Trout in the Pacific Northwest. *Reviews in Fisheries Science* 13:23-49.

Riebe, C.S., L.S. Sklar, B.T. Overstreet, and J.K. Wooster, 2014. Optimal reproduction in salmon spawning substrates linked to grain size and fish length. *Water Resources Research* 50: 898-918

Roff, D.A., 1992. *The Evolution of Life Histories: Theory and Analysis*. Chapman and Hall, New York.

Roper, B.B., D.L. Scarnecchia, and T.J. La Marr, 1994. Summer distribution of and habitat use by Chinook Salmon and Steelhead within a major basin of the South Umpqua River, Oregon. *Transactions of the American Fisheries Society* 123(3):298-308.

Rosenfield, J.A., 2002. Pattern and process in the geographical ranges of freshwater fishes. *Global Ecology & Biogeography* 11:323–332.

20180129-5200 FERC PDF (Unofficial) 1/29/2018 1:21:54 PM

Ruckelshaus, M.H., P.S. Levin, J.B. Johnson, and P. Kareiva, 2002. The Pacific salmon wars: what science brings to the challenge of recovering species. *Annual Review of Ecology and Systematics* 33:665-706.

Rundio, D.E., T.H. Williams, D.E. Pearse, and S.T. Lindley, 2012. Male-biased sex ratio of nonanadromous *Oncorhynchus mykiss* in a partially migratory population in California. *Ecology of Freshwater Fish* 21:293–299.

Russo, R.C., C.E. Smith, and R.V. Thurston, 1974. Acute toxicity of nitrite to rainbow trout (*Salmo gairdneri*). *J. Fish Res. Board Can* 31: 1653-1655.

Sabal, M., S. Hayes, J. Merz, and J. Setka, 2016. Habitat Alterations and Nonnative Predator, the Striped Bass, Increase Native Chinook Salmon Mortality in the Central Valley, California. *North American Journal of Fisheries Management* 36(2):309-320.

Satterthwaite, W.H., M.P. Beakes, E. Collins, D.R. Swank, J.E. Merz, R.G. Titus, S.M. Sogard, and M. Mangel, 2010. State-dependent life history models in a changing (and regulated) environment: steelhead in the California Central Valley. *Evolutionary Applications* 3:221-243.

Satterthwaite, W.H., M.P. Beakes, E.M. Collins, D.R. Swank, J.E. Merz, R.G. Titus, S.M. Sogard, and M. Mangel, 2009. Steelhead life history on California's central coast: insights from a state-dependent model. *T. Am. Fish. Soc.* 138(3):532-548.

Satterthwaite, W.H., S.M. Carlson, S.D. Allen-Moran, S. Vincenzi, S. Bograd, and B.K. Wells, 2014. Match-mismatch dynamics and the relationship between ocean-entry timing and relative ocean recoveries of Central Valley fall-run Chinook salmon. *Marine Ecology Progress Series* 511:237-248.

Schemel, L.E., T.R. Sommer, A.B. Müller-Solger, and W.C. Harrell, 2004. Hydrologic variability, water chemistry, and phytoplankton biomass in a large floodplain of the Sacramento River, CA, USA. *Hydrobiologia* 513:129-139.

Schindler, D.E., R. Hilborn, B. Chasco, C.P. Boatright, T.P. Quinn, L.A. Rogers, and M.S. Webster, 2010. Population diversity and the portfolio effect in an exploited species. *Nature* 465:609-613.

20180129-5200 FERC PDF (Unofficial) 1/29/2018 1:21:54 PM

Schlegel, B., and J.L. Domalski, 2015. Riverine Nutrient Trends in the Sacramento and San Joaquin Basins, California: A Comparison to State and Regional Water Quality Policies. *San Francisco Estuary and Watershed Science* 13(4)

Scholz, N., M. Myers, S. McCarthy, J. Labenia, J. McIntyre, G.M. Ylitalo, L. D. Rhodes, C. A. Laetz, C. M. Stehr, B. L. French, B. McMillan, D. Wilson, L. Reed, K. D. Lynch, S. Damm, J.W. Davis, T. K. Collier, 2011. Recurrent Die-Offs of Adult Coho Salmon Returning to Spawn in Puget Sound Lowland Urban Streams. *PLoS ONE* 6(12).

Scholz, N., N. Truelove, B. French, B. Berejikian, T. Quinn, E. Casillas, and T. Collier, 2000. Diazinon disrupts antipredator and homing behavior in Chinook salmon (*Onchorhynchus tshawytscha*). *Canadian Journal of Fisheries and Aquatic Sciences* 57:1911-1918.

Scott, G., and K. Sloman, 2004. The effects of environmental pollutants on complex fish behavior: integrating behavior and physiological indicators of toxicity. *Aquatic Toxicology* 68: 369-392.

SDRWQCB (San Diego Regional Water Quality Control Board), 2006. Basin Plan Amendment and Final Technical Report for Total Nitrogen and Total Phosphorus Total Maximum Daily Loads For Rainbow Creek. California Water Quality Control Board, San Diego Region. San Diego, California.

Seelbach, P.W., 1993. Population biology of steelhead in a stable-flow, low-gradient tributary of Lake Michigan. *Transactions of the American Fisheries Society* 122:179-198.

Sellheim, K.L., C.B. Watry, B. Rook, S.C. Zeug, J. Hannon, J. Zimmerman, K. Dove, and J.E. Merz, 2015. Juvenile salmonid utilization of floodplain rearing habitat after gravel augmentation in a regulated river. *River Res. Applic*. DOI: 10.1002/rra.2876.

Sexton, W.T., A. Malk, R.C. Szaro, and N. Johnson (eds.), 1999. Ecological Stewardship: A Common Reference for Ecosystem Management, Volume 3: Values, Social Dimensions, Economic Dimensions, Information Tools. Elsevier Science, Oxford, UK.

SFWO (Stockton Fish and Wildlife Office), 2014. Stockton Fish and Wildlife Office Anadromous Fish Restoration Program. Available from: http://www.fws.gov/stockton/afrp/.

20180129-5200 FERC PDF (Unofficial) 1/29/2018 1:21:54 PM

Sharma, D., and A. Ansari, 2010. Effect of the synthetic pyrethroid deltamethrin and the neem-based pesticide anchook on the reproductive ability of zebrafish, *Danio rerio* (Cyprinidae). *Archives of Polish Fisheries* 18:157-161.

SJRRP (San Joaquin River Restoration Plan), 2010. Fisheries Management Plan, Exhibit A. Conceptual Models of Stressors and Limiting Factors for San Joaquin River Chinook Salmon. Available from: http://www.restoresjr.net/download/program-documents/program-docs-2010/FMPexhA2010Nov.pdf.

SJRRP, 2012. *Minimum Floodplain Habitat Area for Spring and Fall-run Chinook Salmon*. November 2012.

Slotton, D.G., S.M. Ayers, and R.D. Weyland, 2007. *CBDA Biosentinel Mercury Monitoring Program, Second Year Draft Data Report Covering Sampling Conducted February through December 2006*. May 29, 2007. Available from: http://www.sfei.org/cmr/fishmercury/DocumentsPage.htm

Smith, G.R., J.A. Rosenfield, and J. Porterfield, 1995. Processes of origin and criteria for preservation of fish species. Pages 44-57 in *Evolution and the Aquatic Ecosystem: Defining Unique Units in Population Conservation*. J.L. Nielsen, P. Brouha, and D. Powers, eds. American Fisheries Society special publication #17. Bethesda, MD.

Sogard, S.M., J.E. Merz, W.H. Satterthwaite, M.P. Beakes, D.R. Swank, E.M. Collins, R.G. Titus, and M. Mangel, 2012. Contrasts in habitat characteristics and life history patterns of *Oncorhynchus mykiss* in California's central coast and Central Valley. *Transactions of the American Fisheries Society* 141(3):747-760.

Sommer, T., B. Harrell, M. Nobriga, R. Brown, P. Moyle, W. Kimmerer, and L. Schemel, 2001a. California's Yolo Bypass: Evidence that flood control can be compatible with fisheries, wetlands, wildlife, and agriculture. *Fisheries* 26:6-16.

Sommer, T.R., M.L. Nobriga, W.C. Harrell, W. Batham, and W. J. Kimmerer, 2001b. Floodplain rearing of juvenile Chinook salmon: Evidence of enhanced growth and survival. *Canadian Journal of Fisheries and Aquatic Sciences* 58:325-333.

Sommer, T.R., W.C. Harrell, A.M. Solger, B. Tom, and W. Kimmerer, 2004. Effects of flow variation on channel and floodplain biota and habitats of the Sacramento River,

20180129-5200 FERC PDF (Unofficial) 1/29/2018 1:21:54 PM

California, USA. *Aquatic Conservation: Marine and Freshwater Ecosystems* 14:247-261.

Sommer, T.R., W.C. Harrell, and M.L. Nobriga, 2005. Habitat use and stranding risk of juvenile Chinook salmon on a seasonal floodplain. *North American Journal of Fisheries Management* 25:1493-1504.

Sommer, T., B. Harrell, M. Nobriga, R. Brown, P. Moyle, W. Kimmerer, and L. Schemel, 2001. California's Yolo Bypass: Evidence that flood control can be compatible with fisheries, wetlands, wildlife, and agriculture. *Fisheries* 26:6-16.

Spence, B.C., and J.D. Hall, 2010. Spatiotemporal patterns in migration timing of coho salmon (*Oncorhynchus kisutch*) smolts in North America. *Canadian Journal of Fisheries and Aquatic Sciences* 67(8):1316-1334.

Spurlock, F. and M. Lee, 2008. Synthetic pyrethroid use patterns, properties, and environmental effects. In *Synthetic Pyrethroids*, edited by Gan et al. ACS Symposium Series; American Chemical Society: Washington, D.C.

SRFG (Stanislaus River Fish Group), Carl Mesick Consultants, S.P. Cramer and Associates, Inc., and the California Rivers Restoration Fund, 2003. A Plan to Restore Anadromous Fish Habitat in the Lower Stanislaus River. Review Draft. Available from: http://www.sjbfish.com.

Stanislaus 2013

Stewart, R., S. Luoma, C. Schlekat, M. Doblin, and K. Hieb, 2004. Food web pathway determines how selenium affects aquatic ecosystems: A San Francisco Bay case study. *Environmental Science and Technology* 38: 4519-4526.

Stone, W., C. Crawford, and R. Gilliom, 2014. Watershed regressions for pesticides (WRP) models for predicting stream concentrations of multiple pesticides. *Journal of Environmental Quality* 42: 1838-1851.

Sturrock, A. personal communication

Sturrock, A. and R. Johnson, 2016. Unpublished data.

Sturrock, A., and R. Johnson, 2016. Personal communication with J. Rosenfeld. July 21, 2016.

20180129-5200 FERC PDF (Unofficial) 1/29/2018 1:21:54 PM

Sturrock, A.M., J.D. Wikert, T. Heyne, C. Mesick, A. Hubbard, T. Hinkelman, P.K. Weber, G. Whitman, J.J. Glessner, and R.C. Johnson, 2015. Reconstructing the migratory behavior and long-term survivorship of juvenile Chinook salmon under contrasting hydrologic regimes. *PLoS ONE* 10(5):e0122380.

Sutton, R., C. Morris, and R.Tisdale-Hein, 2006. Instream flow assessment: selected stream segments – John Day and Middle Fork John Day River Subbasins, Oregon. U.S. Bureau of Reclamation Report.

Swank, D., personal communication.

SWRCB (State Water Resources Control Board), 1975. Cal. Regulatory Notice Reg. 52.2 (Apr. 26, 1975). Today the regulation is found in CAL. CODE REGS. tit. 23, § 782 (1994).

SWRCB, 2006. Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary. State Water Resources Control Board Report. December 13, 2006.

SWRCB, 2010. *Final California Integrated Report* (303(d) List/305(b) Report). Staff Report. State Water Resources Control Board. Sacramento, California.

SWRCB, 2012. Policy for Toxicity Assessment and Control. Public Review Draft. State Water Resources Control Board. Sacramento, California. June.

Tappel, P.D., and T.C. Bjornn, 1983. A new method of relating size of spawning gravel to salmonid embryo survival. *North American Journal of Fisheries Management* 3:123-135.

Taylor, E.B., 1991. A review of local adaptation in Salmonidae, with particular reference to Pacific and Atlantic salmon. *Aquaculture* 98:185-207.

TBI (The Bay Institute), 2014. Unpublished data provided to the SEP Group. August 13, 2014.

TBI, 1998. *From the Sierra to the Sea: The Ecological History of the San Francisco Bay-Delta Watershed.* Available from: www.bay.org/publications/from -the-sierra-to-the-sea-the-ecological-history-of-the-san-francisco-bay-delta-waters.

20180129-5200 FERC PDF (Unofficial) 1/29/2018 1:21:54 PM

TBI and NRDC (Natural Resources Defense Council), 2010. EXHIBIT TBI-3 Before the State Water Resources Control Board. Written Testimony of Christina Swanson, Ph.D., Executive Director and Chief Scientist, The Bay Institute; John Cain, Director, California Flood Management, American Rivers; Jeff Opperman, Ph.D., Senior Advisor for Sustainable Hydropower, The Nature Conservancy; Mark Tompkins, Ph.D. Principal Engineering Geomorphologist, Newfields River Basin Services. Regarding flow criteria for the Delta necessary to protect public trust resources: Delta inflows. SWRCB Public Trust Flow Criteria Proceedings. February 16, 2010. Available from: http://thebayinstitute.blob.core.windows.net/assets/Bay-Delta%20Flow%20Criteria%20Exhibit%203.pdf

Tetra Tech, 2006. Technical Approach to Develop Nutrient Numeric Endpoints for California. Technical Report prepared for the U.S. EPA Region IX and California State Water Resources Control Board. Tetra Tech, Inc. Lafayette, California. 137 pp.

Thompson, K., 1972. Determining Stream Flow for Fish Life. Pacific Northwest River Basins Commission: Instream Flow Requirement Workshop. March 15-16, 1972.

Thorpe, J.E., M. Mangel, N.B. Metcalfe, and F.A. Huntingford, 1998. Modelling the proximate basis of salmonid life-history variation, with application to Atlantic salmon, *Salmo salar L. Evol. Ecol.* 12:581-599.

Titus, R.G., 1990. Territorial behavior and its role in population regulation of young brown trout (*Salmo trutta*): new perspectives. *Annales Zoologici Fennici* 27:119–130.

Tonina, D., and J.M. Buffington, 2009. A three-dimensional model for analyzing the effects of salmon redds on hyporheic exchange and egg pocket habitat. *Can. J. Fish. Aquat. Sci.* 66:2157–2173.

USEPA (U.S. Environmental Protection Agency), 1986. *Ambient Water Quality Criteria for Dissolved Oxygen*. Office of Water, Regulations and Standards Division. U.S. Environmental Protection Agency, Washington, D.C. EPA 440/5-86-003.

USEPA, 1999. *A review and synthesis of effects of alterations to the water temperature regime on freshwater life stages of salmonids, with special reference to Chinook salmon*. U.S. Environmental Protection Agency, Region 10.

20180129-5200 FERC PDF (Unofficial) 1/29/2018 1:21:54 PM

USEPA, 2000. *Nutrient Criteria Technical Guidance Manual Rivers and Streams.* U.S. Environmental Protection Agency. Washington D.C. EPA-822-B-00-002. 253 pp.

USEPA, 2001. *Salmonid Behavior and Water Temperature*. Issue Paper 1, Prepared as Part of EPA Region 10 Temperature Water Quality Criteria Guidance Development Project, by S.T. Sauter, J. McMillan, and J. Dunham. EPA-910-D-01-001. EPA Region 10.

USEPA, 2003. *EPA Region 10 guidance for Pacific Northwest state and tribal temperature water quality standards*. EPA 910-B-03-002. Environmental Protection Agency, Seattle, Washington.

USEPA, 2006. *Abandoned Mine Lands Case Study: Iron Mountain Mine, Success through planning, partnerships, and perseverance*. U.S. Environmental Protection Agency. San Francisco. March.

USEPA, 2011. *USEPA's final decision letter with enclosures and responsiveness summary for California's 2008-2010 list*. 35 pp.

USEPA, 2013. *Aquatic Life Ambient Water Quality Criteria for Ammonia – Freshwater 2013*. U.S. Environmental Protection Agency, Office of Water 4304T. EPA 822-R-13-001. April 2013.

USEPA, 2015. *Draft Aquatic Life Ambient Water Quality Criterion for Selenium - Freshwater 2015*. U.S. Environmental Protection Agency. Washington D.C. May.

USFWS (U.S. Fish and Wildlife Service), 1995. Working Paper on Restoration Needs: Habitat Restoration Actions to Double Natural Production of Anadromous Fish in the Central Valley of California. Volumes 1 to 3. Prepared for the U.S. Fish and Wildlife Services under the direction of the Anadromous Fish Restoration Program Core Group, Stockton, California.

USFWS, 2001. Final Restoration Plan for the Anadromous Fish Restoration Program; A Plan to Increase Natural Production of Anadromous Fish in the Central Valley California. Prepared for the Secretary of the Interior by the United States Fish and Wildlife Service with assistance from the Anadromous Fish Restoration Program Core Group under authority of the Central Valley Project Improvement Act. January 9, 2001.

20180129-5200 FERC PDF (Unofficial) 1/29/2018 1:21:54 PM

USFWS, 2008. Anadromous Fish Restoration Program Website. 2008. Stanislaus River – Watershed Information. Accessed: October 8, 2014. Available from: http://www.fws.gov/stockton/afrp/ws_stats.cfm?code=STANR.

USFWS, 2014. Compendium report of Red Bluff Diversion Dam rotary trap juvenile anadromous fish production indices for years 2001–2002. Prepared for the California Department of Fish and Wildlife Ecosystem Restoration Program and the U.S. Bureau of Reclamation. July 2014.

Viant, M., C. Pincetich, and R. Tjeerdema, 2006. Metabolic effects of dinoseb, diazinon, and esfenvalerate in eyed eggs and alevins of Chinook salmon (*Onchorhynchus tshawytscha*) determined by HNMR metabolics. *Aquatic Toxicology* 77:359-371.

Volkhardt, G.C., S.L. Johnson, B.A. Miller, T.E. Nickelson, and D.E. Selber, 2007. Rotary Screw Traps and Inclined Plane Screen Traps. In *Salmonid Field Handbook: Techniques for assessing status and trends in salmon and trout populations*, edited by Johnson et al. Bethesda: American Fisheries Society, 235-266.

Waples, R.S., 1991. Definition of "species" under the Endangered Species Act: application to Pacific salmon. U.S. Department of Commerce, NOAA Technical Memorandum. NMFS-F/NWC-194.

Ward, B.R., P.A. Slaney, A.R. Facchin, and R.W. Land, 1989. Size-biased survival in steelhead trout (*Oncorhynchus mykiss*): back-calculated lengths from adults' scales compared to migrating smolts at the Keogh River, British Columbia. *Canadian Journal of Fisheries and Aquatic Sciences* 46:1853–1858.

Ward, P.D., T.R. McReynolds, and C.E. Garman, 2004. Butte and Big Chico Creeks Spring-run Chinook Salmon, *Oncoryhnchus tshawytscha* life history investigation: 2002-2003.

Watry, C. B., A. Gray, R. Cuthbert, B. Pyper, and K. Arendt, 2007. Outmigrant abundance estimates and coded wire tagging pilot study for juvenile Chinook salmon at Caswell Memorial State Park in the Lower Stanislaus River, California. Annual Data Report to the U.S. Fish and Wildlife Service, Anadromous Fish Restoration Program.

WDFW (Washington Department of Fish & Wildlife) and WDOE (Washington Department of Ecology), 2004. Instream Flow Study Guidelines: Technical and Habitat Suitability

20180129-5200 FERC PDF (Unofficial) 1/29/2018 1:21:54 PM

Issues. Publication No. 04-11-007. Error correction update 2/12/2008. Olympia, Washington. 65 pp.

WDOE (Washington State Department of Ecology), 2002. *Evaluating Criteria for the Protection of Freshwater Aquatic Life in Washington's Surface Water Quality Standards: Dissolved Oxygen*. Draft Discussion Paper and Literature Summary. Publication Number 00-10-071. 90 pp.

Wickett, W.P., 1958. Review of certain environmental factors affecting the production of pink and chum salmon. *J. Fish Res. Bd. Can.* 15(5):1103-1126.

Wiener, J.G., and D.J. Spry, 1996. Toxicological Significance of Mercury in Freshwater Fish (Chapter 13). In Environmental Contaminants in Wildlife: Interpreting Tissue Concentrations, edited by W.N. Beyer, G.H. Heinz, and A.W. Redmon-Norwood. SETAC Special Publication. Boca Raton: CRC Press, Inc. 297-339.

Wikert, J.D. (U.S. Fish and Wildlife Service), 2014. Personal communication with the SEP Group. September 24, 2014.

Wikert, J.D., Personal observation

Williams 2008

Williams, B.K., R.C. Szaro, and C.D. Shapiro, 2009. Adaptive Management: The U.S. Department of the Interior Technical Guide. Adaptive Management Working Group, U.S. Department of the Interior, Washington, DC.

Williams, J.G., 2006. Central Valley Salmon: A Perspective on Chinook and Steelhead in the Central Valley of California. *San Francisco Estuary and Watershed Science* 4:416.

Winship, A.J., M.R. O'Farrell, and M. S. Mohr, 2013. Management strategy evaluation applied to the conservation of an endangered population subject to incidental take. *Biological Conservation* 158:155-166.

Yoshiyama R.M., E.R. Gerstung, F.W. Fisher, and P.B. Moyle, 1996. Historical and present distribution of Chinook salmon in the Central Valley drainage of California. In: *Sierra Nevada Ecosystem Project: Final Report to Congress, Volume III.* Centers for Water and Wildland Resources, University of California, Davis. Davis, CA. Pg. 309-361.

20180129-5200 FERC PDF (Unofficial) 1/29/2018 1:21:54 PM

Yoshiyama, R.M., E.R. Gerstung, F.W. Fisher, and P.B. Moyle, 2001. Historical and present distribution of Chinook salmon in the Central Valley drainage of California. In Brown, R.L. (ed.), Contributions to the Biology of Central Valley Salmonids, Volume 1, pages 71-176. *California Department of Fish and Wildlife, Fish Bulletin* 179(1):71-176.

Yoshiyama, R.M., F.W. Fisher, and P.B. Moyle, 1998. Historical Abundance and Decline of Chinook Salmon in the Central Valley Region of California. *North American Journal of Fisheries Management* 18:487-521.

Zeug, S.C., K. Sellheim, C. Watry, B. Rook, J. Hannon, J. Zimmerman, D. Cox, and J. Merz, 2013. Gravel Augmentation Increases Spawning Utilization by Anadromous Salmonids: A Case Study from California, USA. *River Res. Applic*. 30:707–718.

Zeug, S.C., K. Sellheim, C. Watry, J.D. Wikert, J. Merz, 2014. Response of juvenile Chinook salmon to managed flow: lessons learned from a population at the southern extent of their range in North America. *Fisheries Management and Ecology* 21(2):155-168.

Zimmerman et al., 2008.

Zimmerman, C.E., G.E. Edwards, and K. Perry, 2009. *Maternal origin and migratory history of steelhead and rainbow trout captured in rivers of the Central Valley, California.* Final Report. Prepared for California Department of Fish and Game Contract P0385300 6. March 2008.

Zimmerman, M.S., C. Kinsel, E. Beamer, E.J. Connor, and D.E. Pflug, 2015. Abundance, Survival, and Life History Strategies of Juvenile Chinook Salmon in the Skagit River, Washington. *Transactions of the American Fisheries Society* 144(3), 627-641.

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ATTACHMENT 4

Draft Biological and Environmental Objectives for Restoring Chinook Salmon and Steelhead in the Tuolumne River

Draft Biological Objectives
Chinook Salmon
Productivity and Genetic Diversity

Objective		Productivity			Productivity			Productivity		
Life History Stage		Juvenile^ (A)			Juvenile^ (A)			Juvenile^ (A)		
DESCRIPTION	Briefly	Juvenile survival rate consistent with population growth rate of 2x over 3 generations (CRR=1.26)			Juvenile survival rate consistent with population resilience (CRR=2.5)			Juvenile survival rate in freshwter typical of Chinook salmon populations across the Pacific Coast (10%)		
	Achieved By When?	Year 10			Year 15			Year 24		
	Measure What?	Survival from/to	Survival from/to	Survival Total	Survival from/to	Survival from/to	Survival Total	Survival from/to	Survival from/to	Survival Total
	Measured Where?	Spawning-to-[Confluence]	[Confluence]-Vernalis [1]	Freshwater [2]	Spawning-to-[Confluence] [1]	[Confluence]-Vernalis [1]	Freshwater [2]	Spawning-to-[Confluence] [1]	[Confluence]-Vernalis [1]	Freshwater [3]
Fall-Run	Wet	TBD			TBD			TBD		
	Median	TBD	TBD	2.13%	TBD	TBD	4.22%	TBD	TBD	10.00%
	Dry	TBD			TBD			TBD		
Spring-run	Wet	TBD			TBD			TBD		
	Median	TBD	TBD	2.13%	TBD	TBD	4.22%	TBD	TBD	10.00%
	Dry	TBD			TBD			TBD		

Draft Biological Objectives
Chinook Salmon
Productivity and Genetic Diversity

Notes

A Juvenile productivity and life history objectives refer only to those fish that migrate before temperatures in the mainstem San Joaquin reach 25^{o}C

1 Survival from Spawning-to-[Confluence] is premised on attainment of [Confluence]-Vernalis survival rate. If median [Confluence]-Vernalis survival rate is unattainable, or exceeded, the Spawning-to-[Confluence] survival rate objective will be adjusted accordingly

2 For reference purposes. Includes through-Delta survival. Conditions on the San Joaquin and its tribs affect Delta survival, however, responsibility of San Joaquin tributaries for through-delta survival outcomes is yet to be determined. Improvement in freshwater survival rates assumes river survival rates and Delta survival rates will improve

3 For reference purposes.Assumes through-Delta survival of 50% -- in this case the improvement in river and Delta environments is no longer proportionate as adherence to the proportionate improvement standard would require median survival of >50% in the Delta -- there was no consensus that survival rates of >50% in the Delta could be achieved

4 Currently, adult survival objectives are only developed for spring-run fish after they have migrated past [Confluence]. This reflects desired outcomes in the ability of spring-run to successfully "hold" in the river through the summer. Adult survival objectives may be developed (and potentially for fall run and steelhead) in the mainstem San joaquin; however those

5 This objective will be refined to include optimal egg-emergence survival. This is considered a base, applicsable in the near-term as a boundary to detrimental conditions.

Draft Biological Objectives
Chinook Salmon
Productivity and Genetic Diversity

Objective		Productivity			
Life History Stage		Adult			
DESCRIPTION	Briefly	Survival/reproductive success of adult migrants			
	Achieved By When?	***TBD***	***TBD***	***TBD***	***TBD***
	Measure What?	Survival from/to	Egg viability/Deposition	Redd viability	Egg-Emergence survival of surrogates
	Measured Where?	[Confluence] -- spawning grounds at onset of spawning [4]	Spawning Grounds	Spawning Grounds	Spawning Grounds
Fall-Run	Wet Median Dry	*TBD*	*TBD*	*TBD*	*TBD*
Spring-run	Wet Median Dry	≥ 90%	<10% of female carcasses retain ≥10% of eggs	≥ 90% remain intact through incubation period	(>35%)[5]

Draft Biological Objectives
Chinook Salmon
Productivity and Genetic Diversity

Notes

A

Juvenile productivity and life history objectives refer only to those fish that migrate before temperatures in the mainstem San Joaquin reach 25^{o}C

1 Survival from Spawning-to-[Confluence] is premised on attainment of [Confluence]-Vernalis survival rate. If median [Confluence]-Vernalis survival rate is unattainable, or exceeded, the Spawning-to-[Confluence] survival rate objective will be adjusted accordingly

2 For reference purposes. Includes through-Delta survival. Conditions on the San Joaquin and its tribs affect Delta survival, however, responsibility of San Joaquin tributaries for through-delta survival outcomes is yet to be determined. Improvement in freshwater survival rates assumes river survival rates and Delta survival rates will improve proportionately from current levels.

3 For reference purposes.Assumes through-Delta survival of 50% -- in this case the improvement in river and Delta environments is no longer proportionate as adherence to the proportionate improvement standard would require median survival of >50% in the Delta -- there was no consensus that survival rates of >50% in the Delta could be achieved

4 Currently, adult survival objectives are only developed for spring-run fish after they have migrated past [Confluence]. This reflects desired outcomes in the ability of spring-run to successfully "hold" in the river through the summer. Adult survival objectives may be developed (and potentially for fall run and steelhead) in the mainstem San joaquin; however those objectives would be part of basin-wide planning and may require adult migration

5 This objective will be refined to include optimal egg-emergence survival. This is considered a base, applicsable in the near-term as a boundary to detrimental conditions.

Draft Biological Objectives
Chinook Salmon
Productivity and Genetic Diversity

Objective		Genetic	
Life History Stage		Adult	Egg/Juvenile
DESCRIPTION	Briefly	Maintain wild run genetic integrity	
	Achieved By When?	***TBD***	Whenever spring-running fish are present
	Measure What?	Percentage Hatchery Origin Spawners	Introgression
	Measured Where?	Spawning Grounds	Spawning Grounds
Fall-Run	Wet	<20% of spawners	<2% inter-run mating
	Median		
	Dry		
Spring-run	Wet	NA	<2% inter-run mating
	Median		
	Dry		

Draft Biological Objectives
Chinook Salmon
Productivity and Genetic Diversity

Notes

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2 For reference purposes. Includes through-Delta survival. Conditions on the San Joaquin and its tribs affect Delta survival, however, responsibility of San Joaquin tributaries for through-delta survival outcomes is yet to be determined. Improvement in freshwater survival rates assumes river survival rates and Delta

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4 Currently, adult survival objectives are only developed for spring-run fish after they have migrated past [Confluence]. This reflects desired outcomes in the ability of spring-run to successfully "hold" in the river through the summer. Adult survival objectives may be developed (and potentially for fall run and

5 This objective will be refined to include optimal egg-emergence survival. This is considered a base, applicsable in the near-term as a boundary to detrimental conditions.

Draft Biological Objectives
Chinook Salmon
Life History Diversity

Objective		Life History Diversity (Migration Timing) [A]				Life History (Age Class Distribution Minima) [A]	
DESCRIPTION	Briefly	Support range of juvenile migration dates to maintain life-history diversity				Support range of sizes at juvenile migration dates to maintain life-history diversity	
	Achieved By When?	Year 10	Year 10	Year 10	Year 10	Year 12	Year 12
	Measure What?	Detection Every Week No Later Than…	Detection every week Through at Least…	Detection Every Week No Later Than	Detection every week Through at Least	Minimum % juvenile migrants annually (wetter years)	Minimum % juvenile migrants annually (drier years)
	Measured Where?	[Confluence]	[Confluence]	Mossdale RST	Mossdale RST	[Confluence]	[Confluence]
Fall-Run	Fry	Last week of January	2nd week of April	N/A	N/A	20%	20%
	Parr	1st week of February	Last week of May	2nd week of February	1st week of June	20%	30%
	Smolt	3rd week of February	1st week of June	Last week of February	2nd week of June	10%	20%
Spring run	Fry	1st week of January	2nd week of April	TBD	TBD	20%	20%
	Parr					20%	30%
	Smolt					10%	20%
	Yearling [5]	Detection in ≥50% weeks Oct-Jan	Detection in ≥50% weeks Feb-April	TBD	TBD	≥ 1.5 yearlings per 1,000 female spawners	

Notes

A Juvenile productivity and life history objectives refer only to those fish that migrate before temperatures in the mainstem San Joaquin reach 25°C.

5 The yearling life-history strategy is associated with spring-running adults (fall run adults may produce yearlings as well, but it is considered to be extremely rare). Production of some yearlings is expected whenever spring-run Chinook reproduce successfully, however, detection of yearlings is only required when sufficient numbers of spring-run salmon reproduce -- see tech memo for calculations and discussion re: when yearling detection is expected.

Draft Biological Objectives
Steelhead
Productivity and Genetic Diversity

Objective		Productivity							
Life History Stage		Juvenile							Adult
DESCRIPTION	Briefly	Smolt size (A) - Proportion of smolts (stage 5) observed should bethe size that promotes better survival.	Smolt Production (B) - Naturally produced smolts (stages 4 and 5) increase to levels consistent with other healthy steelhead populations.	Parr/Smolt Survival(C) - Juvenile parr and smolt survival rate consistent with _____			Monitoring Density (A) - Observe densities consistent with other healthy steelhead populations.	Monitoring Growth Rates (B) - Observe growth rates consistent with other healthy steelhead populations.	Egg survival consistent with _____.
	Achieved By When?	Year TBD	Year 5 of habitat restoration implementation	TBD			Year TBD	Year TBD	
	Measure What?	Smolt fork length	Number of smolts	Survival from/to			parr/km	Growth in mm/day	Egg survival
	Measured Where?	TBD	[Confluence]	Spawning-to-[Confluence] [1]	[Confluence]-Vernalis [1]	Freshwater [2]	Tuolumne River	TBD	
Steelhead		At least 90% of the smolts (stage 5) observed should be 150 mm FL or greater in length.	Naturally produced smolts (stages 4 and 5) emigrating from the river each year shall increase to a three-year running average of 82,000? with no year less than 30,000?.	> 90%	TBD	TBD	The density of age-0 (measured in the summer) O. mykiss shall increase over time to a minimum of one (1) individual on average, per square meter or TBD per river km, on average	Age-0 and age-1 *O. mykiss* increase over time to 0.60 mm/day (averaged over an entire season)	> 35%
	Forklength	150 mm	Three year running average	TBD					
	Percentage	90%							
	Year type	All years	Minimum	TBD					

Notes

[1] Survival from Spawning-to-[Confluence] for Chinook is premised on attainment of [Confluence]-Vernalis survival rate. If median [Confluence]-Vernalis survival rate is unattainable, or exceeded, the Spawning-to-[Confluence] survival rate objective will be adjusted accordingly. Steelhead needs to be discussed.

[2] For Chinook reference purposes. Includes through-Delta survival. Conditions on the San Joaquin and its tribs affect Delta survival, however, responsibility of San Joaquin tributaries for through-delta survival outcomes is yet to be determined. Improvement in freshwater survival rates assumes river survival rates and Delta survival rates will improve proportionately from current levels. Steelhead section notes that, "Current through Delta survival rates of steelhead are not well known, and have often been assumed to be low (e.g. 10% in NMFS 2012). However, recent acoustic tagging studies suggest that survival may be much higher, as results from the 6-Year OCAP Steelhead Study have estimated through-Delta survival rates at 52% in 2011 and 27% in 2012. "

Draft Biological Objectives
Steelhead
Productivity and Genetic Diversity

Objective		Life History Diversity (Anadromy)				
Life History Stage		Juvenile			Adult	
DESCRIPTION	Briefly	Anadromy - Smolts produced per female spawner indicative of healthy anadromous population.	Anadromy - Maternal origin Supports anadromy via a suffiicient proportion of anadromous *O. mykiss* mothers	Anadromy - Smolt Emigration Supports a range of outmigration dates for life history diversity	Anadromy - Adult Stage	Anadromy -Balance
	Achieved By When?					
	Measure What?	Smolts/ female spawner	Proportion of adult otiliths with ocean signature	Smolt (stage 4 and 5; at least 150 mm FL)Detection	Proportion of resident and anadromouns adult *O. mykiss*	Resident Adults Abundance
	Measured Where?	Spawning reach	Laboratory	[Confluence]		
Steelhead		Tracked on a brood year basis.			5-year running average/TBD	Age1+ fish superpopulation > 1,492 to 7,873
		Good Water Years > 300 Poor Water Years > 150	> 45%	Minimum of four months of the year	> 25% - Summer/Fall > 20% anadromous during spawning	3-9 age1+ fish per 100m2

Notes

[1] Survival from Spawning-to-[Confluence] for Chinook is premised on attainment of [Confluence]-Vernalis survival rate. If median [Confluence]-Vernalis survival rate is unattainable, or exceeded, the Spawning-to-[Confluence] survival rate objective will be adjusted accordingly. Steelhead needs to be discussed.

[2] For Chinook reference purposes. Includes through-Delta survival. Conditions on the San Joaquin and its tribs affect Delta survival, however, responsibility of San Joaquin tributaries for through-delta survival outcomes is yet to be determined. Improvement in freshwater survival rates assumes river survival rates and Delta survival rates will improve proportionately from current levels. Steelhead section notes that, "Current through Delta survival rates of steelhead are not well known, and have often been assumed to be low (e.g. 10% in NMFS 2012). However, recent acoustic tagging studies suggest that survival may be much higher, as results from the 6-Year OCAP Steelhead Study have estimated through-Delta survival rates at 52% in 2011 and 27% in 2012. "

Draft Environmental Objectives
Table 1
Timing of Environmental Objectives

Life Stage	Habitat Type	Species	Month											
			Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Egg and Emergence		**Fall Run**	x	x								x	x	x
		Spring Run	x								x	x	x	x
		Steelhead	x	x	x	x	x							
Juvenile Rearing	Short Innundation	**Fall Run**	x	x	x	x	x							
		Spring Run	x	x	x									
		Steelhead	x	x	x	x							x	x
	Long Innundation	**Fall Run**	x	x	x	x	x							
		Spring Run	x	x	x	x								
		Steelhead												
Juvenile Migration	In Channel	**Fall Run**	x	x	x	x	x	x						
		Spring Run	x	x	x	x	x							x
		Steelhead	x	x	x	x	x	x	x	x	x	x	x	x
Adult Migration		**Fall Run**									x	x	x	X
		Spring Run			x	x	x	x						
		Steelhead	x	x	x	x					x	x	x	x
Adult Holding		**Fall Run**									x			
		Spring Run			x	x	x	x	x	x				
		Steelhead									x	x	x	x
Adult Spawning	Upstream	**Fall Run**										x	x	x
		Spring Run								x	x	x		
		Steelhead	x	x	x	x								
	Downstream	**Fall Run**										x	x	x
		Spring Run								x	x	x		
		Steelhead	x	x	x	x								

Draft Environmental Objectives
Table 2
Spatial Distribution of Environmental Objectives

Life Stage	Habitat Type	Species	Reach						
			[River Miles]	[River Miles]	[River Miles]	[River Miles]	[River Miles]	[River Miles]	[River Miles]
Egg and Emergence	In channel	Fall Run	x	x	x	x			
		Spring Run	x	x	x	x			
		Steelhead	x	x	x	x			
Juvenile Rearing	Short Innundation	Fall Run	x	x	x	x			
		Spring Run	x	x	x	x			
		Steelhead	x	x	x	x			
	Long Inundation	Fall Run					x	x	x
		Spring Run					x	x	x
		Steelhead	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Juvenile Migration	In channel	Fall Run	x	x	x	x	x	x	x
		Spring Run	x	x	x	x	x	x	x
		Steelhead	x	x	x	x	x	x	x
Adult Migration	In channel	Fall Run	x	x	x	x	x	x	x
		Spring Run	x	x	x	x	x	x	x
		Steelhead	x	x	x	x	x	x	x
Adult Holding	In channel	Fall Run	x	x					
		Spring Run	x	x					
		Steelhead	x	x					
Adult Spawning	Upstream (In channel)	Fall Run	x	x					
		Spring Run	x	x					
		Steelhead	x	x					
	Downstream (in channel)	Fall Run			x	x			
		Spring Run			x	x			
		Steelhead			x	x			

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Draft Environmental Objectives
Table 3
Adult Upstream Migration

Desired Habitat Parameter	Physical Parameter	Units	Metric	All Reaches								
				Fall-Run Chinook			Spring-Run Chinook			Steelhead		
				Optimal	Sub-Optimal	Detrimental	Optimal	Sub-Optimal	Detrimental	Optimal	Sub-Optimal	Detrimental
Water Quality	Temperature [1,2,3]	°C (°F)	Daily Average	8 to 14 (46.4 to 57.2)	14 to 19 (57.2 to 66.2)	> 19 (66.2)	8 to 14 (46.4 to 57.2)	14 to 19 (57.2 to 66.2)	> 19 (66.2)	Less direct evidence; assume similar to Chinook salmon		
Water Quality	Temperature [1,2,3]	°C (°F)	7DADM	9.5 to 15.5 (49.1 to 59.9)	15.5 to 20.5 (59.9 to 68.9)	> 20.5 (68.9)	9.5 to 15.5 (49.1 to 59.9)	15.5 to 20.5 (59.9 to 68.9)	> 20.5 (68.9)	Less direct evidence; assume similar to Chinook salmon		
Water Quality	Temperature [1,2,3]	°C (°F)	Weekly Average			> 18 (64.4)			> 18 (64.4)	Less direct evidence; assume similar to Chinook salmon		
Water Quality	Temperature [1,2,3]	°C (°F)	Instantaneous			> 22 (71.6)			> 22 (71.6)	Less direct evidence; assume similar to Chinook salmon		
Water Quality	Dissolved Oxygen [4,5,6,7,8]	mg/L	Daily Minimum	> 8	6 to 8	< 6.0	> 8	6 to 8	< 6	Less direct evidence; assume similar to Chinook salmon		
Water Quantity/ Physical Habitat	Channel- Depth[9]	m (ft)		1. Shallowest riffle: The shallowest riffle in the migratory corridor (critical riffle) will have a depth of at least 0.3 meter (m) (1 foot [ft]), meaning that at least 10% of the entire length of the transect (perpendicular to flow) must be contiguous with depths ≥ 0.3 m (1 ft) and at least 25% of the entire transect must be ≥ 0.3 m (1 ft) (CDFW 2013). 2. Frequency of shallow riffles: 90% of the riffles in the migratory corridor must satisfy the requirements of the critical riffle for depths ≥0.46 m (1.5 ft) instead of ≥0.3 m (1.0 ft).								
Water Quality	Pestcides (including Copper)	Risk - Frequency of Benchmark Exceedances	Frequency of Exceedances	≤ 0.017	0.018 to 0.303	≥ 0.304	≤ 0.017	0.018 to 0.303	≥ 0.304	≤ 0.017	0.018 to 0.303	≥ 0.304
Water Quantity	Flow - Attraction	cfs -- % of Delta flow?		Basin-wide Environmental Objective needed: Flow from each tributary and SJR as a whole must be adequate to enable accurate orientation towards natal stream. This will likely take the form of both minimum flows and water quality parameters (e.g., temperature differentials between tributaries and mainstem can encourage straying) from each tributary and distribution of flows among tributaries.								
Water Quantity	Flow -- Base	cfs -- % of Delta flow?		At least the minimum necessary to provide target levels for each of the other water quality and physical habitat parameters identified here.								
Physical Habitat	Connectivity/ Unimpaired Passage / Window	Hours of Delay		0	< 24	> 24	0	< 24	> 24	0	< 24	> 24
Physical Habitat	Structure -- Hydraulic Refuge and Predation Cover	Suitable Area/River Mile		Basin-wide Environmental Objective needed: Hydraulic refuge/Predation Cover will be a function of returns expected from all rivers in the basin								

Notes

[1] Chinook optimal: Weekly average: 8 - 12 °C (Raleigh et al. 1986) to avoid egg impacts, daily average <17 °C (USEPA 2003)

[2] Chinook sub-optimal: Weekly average 14 - 17°C - disease rate elevated risk (USEPA 2001 and Richter and Kolmes 2005); Daily average 17 - 18°C (McCullough as cited in USEPA 2001); Instantaneous average 19°C (Williams 2006; Richter and Kolmes 2005)

[3] Chinook migration blocked/lethal: Instantaneous average 20 - 22°C (See Hicks 2000, as cited by Richter and Kolmes 2005; USEPA 1999, 2001, 2003)

[4] Detrimental/avoidance: <6 mg/L (WA DOE 2002a)

[5] Detrimental/distress: 6.0 mg/L (Davis 1975 and WA DOE 2002a)

[6] Sub-optimal/poor: <6.5 mg/L (USEPA 1986; WA DOE Water Quality Standards; and Canadian Council of Ministers of the Environment 1999)

[7] Sub-optimal [<8mg/L]: ≥7mg/L for all waterbodies other than bays and reservoirs (SWRCB 2001 Water Quality Control Plan, North Coast region TABLE 3-1. 10% reduction in swimming speed at 7mg/L [vs saturation]; See Davis 1963 as cited by WA DOE 2002b and Dahlberg 1968 as cited by British Columbia, Ministry of the Environment)

[8] Optimal: >8mg/L USEPA 1986 (no production impairment); 8-9mg/L WA DOE 2002b (swimming of fitness of salmonids maximized). 9 mg/L (at <10°C) or 13 mg/L (at >10°C) optimal (Raleigh et. al. 1986).

[9] DFG 2013.

°C = degrees Celsius

Draft Environmental Objectives
Table 4
Adult Holding Habitat

Desired Habitat Parameter	Physical Parameter	Units	Metric	[Reaches] Spring-Run Chinook & Steelhead		
				Optimal	Sub-Optimal	Detrimental
Water Quality	Temperature	°C(°F)	Daily Average	< 13 (55.4)	13 to 17 (55.4 to 62.6)	18 to 20 (64.4 to 68)
Water Quality	Temperature	°C(°F)	7DADM	< 14.5 (58.1)	14.5 to 18.5 (58.1 to 65.3)	
Water Quality	Temperature	°C(°F)	Prolonged Exposure			17 to 18 (62.6 to 64.4)
Water Quality	Dissolved Oxygen	mg/L	Daily Minimum	> 8	6 to 8	< 6
Physical Habitat	Water Depth	m (ft)	Minimum	≥ 1.5 (4.9)		
Physical Habitat	Velocity	m/s (ft/s)	Maximum	< 0.37 (1.2)		
Water Quality	Pesticides, including Copper	Risk - Frequency of Benchmark Exceedances	Frequency of Exceedances	≤ 0.017	0.018 to 0.303	≥ 0.304
Other Non-Physical Parameters	Predation (Anglers/Poachers)	% Mortality		0		
Physical Habitat	**Holding Area - Spatial Extent**	m3				

Notes:

[1] No holding is expected in reaches X, Y

Draft Environmental Objectives
Table 5
Spawning Habitat

Desired Habitat Parameter	Physical Parameter	Units	Metric	Fall-Run Chinook			Spring-Run Chinook			Steelhead		
				Optimal	Sub-Optimal	Detrimental	Optimal	Sub-Optimal	Detrimental	Optimal	Sub-Optimal	Detrimental
Water Quality	Temperature[1, 2]	°C (°F)	Daily Average	6 to 12 (42.8 to 53.6)	4 to 6 (39.2 to 42.8) 12 to 13.3 (53.6 to 55.9)	> 13.3 (55.9)	6 to 12 (42.8 to 53.6)	4 to 6 (39.2 to 42.8) 12 to 13.3 (53.6 to 55.9)	> 13.3 (55.9)	7 to 10 (44.6 to 50)	4 to 6.9 (39.2 to 44.4) 10 to 13.5 (50 to 56.3)	> 13.5 (56.3)
Water Quality	Temperature[1, 2]	°C (°F)	7DADM	< 12.5 (54.5)	12.5 to 13.8 (54.5 to 56.8)	> 13.8 (56.8)	< 12.5 to 13 (54.5 to 55.4)	12.5 to 13.8 (54.5 to 56.8)	> 13.8 (56.8)	10.5 (50.9)	10.5 to 14 (50.9 to 57.2)	> 14.0 (57.2)
Water Quality	Dissolved Oxygen	mg/L	Daily Minimum	> 8	6 to 8	< 6	> 8	6 to 8	< 6	> 8	6 to 8	< 6
Physical Habitat	Depth	m (ft)		0.3 to 0.76 (1 to 2.5) (HSI > 0.6)	0.15 to 0.3 (0.5 to 1) and 0.76 to 3.05 (2.5 to 10)	< 0.15 (0.5) or > 3.05 (10)	0.3 to 0.76 (1 to 2.5) (HSI > 0.6)	0.15 to 0.3 (0.5 to 1) and 0.76 to 3.05 (2.5 to 10)	< 0.15 (0.5) or > 3.05 (10)	0.15 to 0.61 (0.5 to 2)	0.5) and 0.61 to 1(2 to 3.3)	< 0.08 (0.26) or > 1 (3.3)
Physical Habitat	Velocity[4]	m/s (ft/s)		0.3 to 1.2 (1 to 4)	0.12 to 0.3 (0.4 to 1) and 1.2 to 1.5 (4 to 5)	< 0.12 (0.4) or > 1.5 (5)	0.3 to 1.2 (1 to 4)	0.12 to 0.3 (0.4 to 1) and 1.2 to 1.5 (4 to 5)	< 0.12 (0.4) or > 1.5 (5)	0.5 to 1.1 (1.6 to 3.6)	0.32 to 0.4 (1.1 to 1.3)	< 0.3 (< 0.98) or > 1.2 (4)
Water Quality	Pesticides, including Copper[3]	Risk - Frequency of Benchmark Exceedances	Frequency of Exceedances	≤ 0.017	0.018 to 0.303	≥ 0.304	≤ 0.017	0.018 to 0.303	≥ 0.304	≤ 0.017	0.018 to 0.303	≥ 0.304
Physical Habitat	Spawning Area - Sediment Size Distribution[6]	Gravel Size: D_{50} mm (in)	Majority Composition	55 to 25 (2.17 to 0.98)	80 to 56 (3.15 to 2.20) and 24 to 10 (0. 94 to 0.39)	Not spawning habitat <9 (0.35) or > 81 (3.19)	55 to 25 (2.17 to 0.98)	80 to 56 (3.15 to 2.20) and 24 to 10 (0. 94 to 0.39)	Not spawning habitat <9 (0.35) or > 81 (3.19)	30 to 15 (1.18 to 0.59)	50 to 30 (1.97 to 1.18) and 15 to 10 (0.59 to 0.39)	Not spawning habitat <9 (0.35 in) or > 51 (2)
Physical Habitat	Spawning Area - Sediment Quantity[5]	Acres	Entire Spawning Area	18.5			18.5			2.7		
Physical Habitat	Spawning Area - Habitat Heterogeneity			Geomorphic processes should be operating naturally so that there is a natural alternation of pools and riffles.			Geomorphic processes should be operating naturally so that there is a natural alternation of pools and riffles.			Spawning areas need to be adjacent to deep pools and cover.		
Physical Habitat	Spawning Area - Distribution			[Need to separate fall run spawning from spring run]								
Other Non-Physical Parameters	Predation (Anglers/Poachers)[7]			0			0			0		
Physical Habitat	**Spawning Area - Spatial Extent**	Acres										

Notes:

[1] Chinook Optimal: USEPA (2003) 4 to 12°C result in good egg survival and that a narrower range (6 to 10°C) is optimal, USFWS (1999 cited by Myrick and Cech 2004) concluded that temperature-related egg mortality in Chinook salmon increased at temperatures above 13.3°C (56°F), 6 and 12°C were optimal for Central

[2] Myrick and Cech (2004), Richter and Kolmes (2005) sees also McEwan and Jackson (1996)

[3] Hoogeweg et al. 2011

[4] Steelhead: Bovee 1978 as cited in McEwan and Jackson 1996

[5] 5 to 7 square yards/redd (Orcutt et al. 1968)

[6] 1/2" to 3" diameter (Orcutt et al. 1968); D_{50} of redds from smaller steelhead (65 - 68 cm) was about 0.5 in to 1.5 in (Kondolf and Wolman 1993) Orcutt et al. 1968, Kondolf and Wolman 1993: See calculation in notes for combination of anadromous/resident spawning

[7] Target of zero poaching; eventual target (successful restoration) would be increased fishing mortality as the population recovers and fishing pressure increases.

Draft Environmental Objectives
Table 6
Egg Incubation

Desired Habitat Parameter	Physical Parameter	Units	Metric	[Reaches] Fall-Run Chinook			[Reaches] Spring-Run Chinook			[Reaches] Steelhead		
				Optimal	Sub-Optimal	Detrimental	Optimal	Sub-Optimal	Detrimental	Optimal	Sub-Optimal	Detrimental
Water Quality	**Temperature**	°C (°F)	Daily Average	6 to 12 (42.8 to 53.6)	4 to 6 (39.2 to 42.8) 12 to 13.3 (53.6 to 55.9)	> 13.3 (55.9)	6 to 12 (42.8 to 53.6)	4 to 6 (39.2 to 42.8) 12 to 13.3 (53.6 to 55.9)	> 13.3 (55.9)	7 to 10 (44.6 to 50)	4 to 6.9 (39.2 to 44.4) 10 to 13.5 (50 to 56.3)	> 13.5 (56.3)
Water Quality	**Temperature**	°C (°F)	7DADM	< 12.5 (54.5)	12.5 to 13.8 (54.5 to 56.8)	> 13.8 (56.8)	< 12.5 (54.5)	12.5 to 13.8 (54.5 to 56.8)	> 13.8 (56.8)	< 10.5 (50.9)	10.5 to 14.0 (50.9 to 57.2)	> 14.0 (57.2)
Water Quality	**Dissolved Oxygen**	mg/L	Daily Minimum	> 8	6 to 8	< 6	> 8	6 to 8	< 6	> 8	6 to 8	< 6
Physical Habitat	**Water Depth**	m (ft)		0.3 to 0.76 (1 to 2.5) (HSI > 0.6)	0.15 to 0.3 (0.5 to 1) and 0.76 to 3.05 (2.5 to 10)	< 0.15 (0.5) or > 3.05 (10)	0.3 to 0.76 (1 to 2.5) (HSI > 0.6)	0.15 to 0.3 (0.5 to 1) and 0.76 to 3.05 (2.5 to 10)	< 0.15 (0.5) or > 3.05 (10)	0.15 to 0.61 (0.5 to 2)	0.08 to 0.15 (0.26 to 0.5) and 0.61 to 1(2 to 3.3)	< 0.08 (0.26) or > 1 (3.3)
Physical Habitat	**Velocity**	m/s (ft/s)		0.3 to 1.2 (1 to 4)	0.12 to 0.3 (0.4 to 1) and 1.2 to 1.5 (4 to 5)	< 0.12 (0.4) or > 1.5 (5)	0.3 to 1.2 (1 to 4)	0.12 to 0.3 (0.4 to 1) and 1.2 to 1.5 (4 to 5)	< 0.12 (0.4) or > 1.5 (5)	0.5 to 1.1 (1.6 to 3.6)	0.32 to 0.4 (1.1 to 1.3)	< 0.3 (< 0.98) or > 1.2 (3.9)
Water Quality	**Pesticides, including Copper**	Risk - Frequency of Benchmark Exceedances	Frequency of Exceedances	≤ 0.017	0.018 to 0.303	≥ 0.304	≤ 0.017	0.018 to 0.303	≥ 0.304	≤ 0.017	0.018 to 0.303	≥ 0.304
Water Quality	**Other Contaminants - Selenium**	mg/kg (d.w., tissue) µg/L (water)	Maximum Concentration	15.2 mg/kg (egg/ovary) 4.8 µg/L (water, lotic)			15.2 mg/kg (egg/ovary) 4.8 µg/L (water, lotic)			15.2 mg/kg (egg/ovary) 4.8 µg/L (water, lotic)		
Water Quality	**Other Contaminants - Mercury**	mg/kg (w.w., tissue, eggs/larvae)	Maximum Concentration	< 0.02	0.02 to 0.1	> 0.1	< 0.02	0.02 to 0.1	> 0.1	< 0.02	0.02 to 0.1	> 0.1
Physical Habitat	**Spawning Area - Gravel Quality - Fine Sediment**	Percent (%) of fines		< 5 smaller than 4.8 mm (0.189 in)	5 to 15 finer than 4.8 mm (0.189 in) or 5 to 10 finer than 0.85 mm (0.033 in)	> 15 smaller than 4.8 mm (0.189 in) or > 10 smaller than 0.85 mm (0.033 in)	< 5 smaller than 4.8 mm (0.189 in)	5 to 15 finer than 4.8 mm (0.189 in) or 5 to 10 finer than 0.85 mm (0.033 in)	> 15 smaller than 4.8 mm (0.189 in) or > 10 smaller than 0.85 mm (0.033 in)	< 5 smaller than 4.8 mm (0.189 in)	5 to 15 finer than 4.8 mm (0.189 in) or 5 to 10 finer than 0.85 mm (0.033 in)	> 15 smaller than 4.8 mm (0.189 in) or > 10 smaller than 0.85 mm (0.033 in)

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Draft Environmental Objectives
Table 7
Floodplain Rearing Habitat

Desired Habitat Parameter	Physical Parameter	Units	Metric	[Reaches]								
				Fall-Run Chinook			Spring-Run Chinook			Steelhead		
				Optimal	Sub-Optimal	Detrimental	Optimal	Sub-Optimal	Detrimental	Optimal	Sub-Optimal	Detrimental
Water Quality	Temperature	°C (°F)	7DADM	10 to 18 (50 to 64.4)	18 to 25 (64.4 to 77)	> 25 (77)	10 to 18 (50 to 64.4)	18 to 25 (64.4 to 77)	> 25 (77)	10 to 18 (50 to 64.4)	18 to 25 (64.4 to 77)	> 25 (77)
Water Quality	Dissolved Oxygen	mg/L	Daily Minimum	> 8[1]	6 to 8	< 6	> 8[1]	6 to 8	< 6	> 8[1]	6 to 8	< 6
Water Quantity	Water Depth	m (ft)	Averaged Spatially	0.15 to 1.22 (0.5 to 4)	1.23 to 2.13 (4 to 7)		0.15 to 1.22 (0.5 to 4)	1.23 to 2.13 (4 to 7)		0.15 to 1.22 (0.5 to 4)	1.23 to 2.13 (4 to 7)	
Water Quantity	Velocity	m/s (ft/s)		0 to 0.9 (0 to 3)	> 0.9 (3)		0 to 0.9 (0 to 3)	> 0.9 (3)		0 to 0.9 (0 to 3)	> 0.9 (3)	
Water Quality	Pesticides, including Copper[2]	Risk - Frequency of Benchmark Exceedances	Frequency of Exceedances	≤0.017	0.018 to 0.303	≥ 0.304	≤0.017	0.018 to 0.303	≥ 0.304	≤0.017	0.018 to 0.303	≥ 0.304
Water Quality	Other Contaminants - Selenium	mg/kg (d.w., tissue) µg/L (water)	Maximum Concentration	8.1 mg/kg (whole body) 11.8 mg/kg (muscle) 4.8 µg/L (water, lotic)			8.1 mg/kg (whole body) 11.8 mg/kg (muscle) 4.8 µg/L (water, lotic)			8.1 mg/kg (whole body) 11.8 mg/kg (muscle) 4.8 µg/L (water, lotic)		
Water Quality	Other Contaminants - Mercury	mg/kg (w.w., tissue, whole body, juvenile)	Maximum Concentration	< 0.2	0.2 to 1.0	> 1.0	< 0.2	0.2 to 1.0	> 1.0	< 0.2	0.2 to 1.0	> 1.0
Physical Habitat	Inundation	Wetted Acre-Days	Duration	10 to 21			10 to 21			10 to 21		
Physical Habitat	Inundation	events/year	Recurrence Interval (RI)	≥ 1 in 3 years; (minimum of 1 week drawdown to distinguish discrete event)			≥ 1 in 3 years; (minimum of 1 week drawdown to distinguish discrete event)			≥ 1 in 3 years; (minimum of 1 week drawdown to distinguish discrete event)		
Landform and Cover	Cover	% suitable; HSI score		Presence and diversity of suitable cover type(s); Average HSI score ≥ 0.5			Presence and diversity of suitable cover type(s); Average HSI score ≥ 0.5			Presence and diversity of suitable cover type(s); Average HSI score ≥ 0.5		
Landform and Cover	Substrate	grain size; % fines		> X% fines			> X% fines			> X% fines		
	Spatial Extent (Combined long and short innundation)	Acres	Total Need (ESHE - CVFPP) and Actual Need Based on % suitability	(Total Need: 810) 35% suitability= **2314**	(Total Need: 810) 20% suitability = **4050**	(Total Need: 810) 10% suitability = **8100**	(Total Need: 810) 35% suitability= **2314**	(Total Need: 810) 20% suitability = **4050**	(Total Need: 810) 10% suitability = **8100**	N/A	N/A	N/A
Landform and Cover	Spatial Extent and Distribution			[Reaches]: ≥ X% [Reaches]: ≥ X%			[Reaches]: ≥ X% [Reaches]: ≥ X%			[Reaches]: ≥ X% [Reaches]: ≥ X%		

Notes:
[1] Bell 1986
[2] Hoogeweg et al. 2011

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Draft Environmental Objectives
Table 8
Off-Channel Rearing Habitat

Desired Habitat Parameter	Physical Parameter	Units	Metric	[Reaches]								
				Fall-Run Chinook			Spring-Run Chinook			Steelhead		
				Optimal	Sub-Optimal	Detrimental	Optimal	Sub-Optimal	Detrimental	Optimal	Sub-Optimal	Detrimental
Water Quality	Temperature	°C (°F)	7DADM	10 to 18 (50 to 64.4)	18 to 20 (64.4 to 68)	> 20 (68)	10 to 18 (50 to 64.4)	18 to 20 (64.4 to 68)	> 20 (68)	10 to 18 (50 to 64.4)	18 to 20 (64.4 to 68)	> 20 (68)
Water Quality	Dissolved Oxygen	ppm	Daily Minimum	> 8[1]	6 to 8	< 6	> 8[1]	6 to 8	< 6	> 8[1]	6 to 8	< 6
Water Quantity	Water Depth	m (ft)	Averaged Spatially	0.15 to 1.22 (0.5 to 4)	1.23 to 2.13 (4 to 7)		0.15 to 1.22 (0.5 to 4)	1.23 to 2.13 (4 to 7)		0.15 to 1.22 (0.5 to 4)	1.23 to 2.13 (4 to 7)	
Water Quantity	Velocity	m/s (ft/s)		0 to 0.9 (0 to 3)	> 0.9 (3)		0 to 0.9 (0 to 3)	> 0.9 (3)		0 to 0.9 (0 to 3)	> 0.9 (3)	
Water Quality	Pesticides, including Copper[2]	Risk - Frequency of Benchmark Exceedances	Frequency of Exceedances	≤ 0.017	0.018 to 0.303	≥ 0.304	≤ 0.017	0.018 to 0.303	≥ 0.304	≤ 0.017	0.018 to 0.303	≥ 0.304
Water Quality	Other Contaminants - Selenium	mg/kg (d.w., tissue) µg/L (water)	Maximum Concentration	8.1 mg/kg (whole body) 11.8 mg/kg (muscle) 4.8 µg/L (water, lotic)			8.1 mg/kg (whole body) 11.8 mg/kg (muscle) 4.8 µg/L (water, lotic)			8.1 mg/kg (whole body) 11.8 mg/kg (muscle) 4.8 µg/L (water, lotic)		
Water Quality	Other Contaminants - Mercury	mg/kg (w.w., tissue, whole body, juvenile)	Maximum Concentration	< 0.2	0.2 to 1.0	> 1.0	< 0.2	0.2 to 1.0	> 1.0	< 0.2	0.2 to 1.0	> 1.0
Physical Habitat	Inundation	Wetted Acre-Days	Duration	1 to 9			1 to 9			1 to 9		
Physical Habitat	Inundation	Events/Year	Recurrence Interval (RI)	≥ 2 in 3 years; (minimum of 1 week drawdown to distinguish discrete event); >1 event per year in years when innundation occurs			≥ 2 in 3 years; (minimum of 1 week drawdown to distinguish discrete event); >1 event per year in years when innundation occurs			≥ 2 in 3 years; (minimum of 1 week drawdown to distinguish discrete event); >1 event per year in years when innundation occurs		
Landform and Cover	Cover	% Suitable; HSI Score		Presence and diversity of suitable cover type(s); Average HSI score greater ≥ 0.5 (see table)			Presence and diversity of suitable cover type(s); Average HSI score greater ≥ 0.5 (see table)			Presence and diversity of suitable cover type(s); Average HSI score greater ≥ 0.5 (see table)		
Landform and Cover	Substrate	grain size; % fines		Greater than X% cobble/ gravel Less than X% fines			Greater than X% cobble/ gravel Less than X% fines			Greater than X% cobble/ gravel Less than X% fines		
Landform and Cover	Spatial Distribution			[Reaches]: ≥ X% [Reaches]: ≥ X% [Reaches]: ≥ X% [Reaches]: ≥ X% [Reaches]: ≥ X%			[Reaches]: ≥ X% [Reaches]: ≥ X% [Reaches]: ≥ X% [Reaches]: ≥ X% [Reaches]: ≥ X%			[Reaches]: ≥ X% [Reaches]: ≥ X% [Reaches]: ≥ X% [Reaches]: ≥ X% [Reaches]: ≥ X%		

Notes:
[1] Bell 1986

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Table 9
In-Channel Rearing Habitat

Desired Habitat Parameter	Physical Parameter	Units	Metric	Entire River to Confluence								
				Fall-Run Chinook			Spring-Run Chinook			Steelhead		
				Optimal	Sub-Optimal	Detrimental	Optimal	Sub-Optimal	Detrimental	Optimal	Sub-Optimal	Detrimental
Water Quality	Temperature	°C (°F)	7DADM	6 to 16 (42.8 to 60.8)	17 to 20 (62.6 to 68)	> 20 (68)	6 to 16 (42.8 to 60.8)	17 to 20 (62.6 to 68)	> 20 (68)	6 to 16 (42.8 to 60.8)	17 to 20 (62.6 to 68)	> 20 (68)
Water Quantity	Flow Variability			TBD (X to X applicable during X time of year)			TBD (X to X applicable during X time of year)			TBD (X to X applicable during X time of year)		
Water Quality	Pesticides, including Copper[2]	Risk - Frequency of Benchmark Exceedances	Frequency of Exceedances	≤ 0.017	0.018 to 0.303	≥ 0.304	≤ 0.017	0.018 to 0.303	≥ 0.304	≤ 0.017	0.018 to 0.303	≥ 0.304
Water Quality	Other Contaminants - Selenium	mg/kg (d.w., tissue) µg/L (water)	Maximum Concentration	8.1 mg/kg (whole body) 11.8 mg/kg (muscle) 4.8 µg/L (water, lotic)			8.1 mg/kg (whole body) 11.8 mg/kg (muscle) 4.8 µg/L (water, lotic)			8.1 mg/kg (whole body) 11.8 mg/kg (muscle) 4.8 µg/L (water, lotic)		
Water Quality	Other Contaminants - Mercury	mg/kg (w.w., tissue, whole body, juvenile)	Maximum Concentration	< 0.2	0.2 to 1.0	> 1.0	< 0.2	0.2 to 1.0	> 1.0	< 0.2	0.2 to 1.0	> 1.0
Landform and Cover	Substrate	Grain Size; % Suitable		> X% cobble/gravel < X% fines			> X% cobble/gravel < X% fines			> X% cobble/gravel < X% fines		

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Table 10
Juvenile Migratory Habitat

Desired Habitat Parameter	Physical Parameter	Units	Metric	Entire River to Confluence								
				Fall-Run Chinook			Spring-Run Chinook			Steelhead		
				Optimal	Sub-Optimal	Detrimental	Optimal	Sub-Optimal	Detrimental	Optimal	Sub-Optimal	Detrimental
Water Quality	Temperature	°C (°F)	7DADM	6 to 16 (42.8 to 60.8)			6 to 16 (42.8 to 60.8)			12.5 (54.5)		> 12.5 (54.5)
Water Quality	Temperature	°C (°F)	Weekly Average							11 (51.8)		> 11 (51.8)

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ATTACHMENT 5

Scientific Evaluation Process (SEP)

Report

Draft Tuolumne Stressor Analysis for Chinook Salmon (*Oncorhynchus Tshawytscha*) and *O. mykiss*

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Draft SEP Tuolumne Stressor Analysis for Chinook Salmon and Steelhead

Stressor Response Prioritization Key

Stressor Response **Scale:**

1 Coarse scale "roll up" stressor (Multiple combined stresses)

2 Fine scale "individual" stressor (Individual stress e.g. Temperature)

Stressor **Term:**

Near Applicable to current populations

Long Applicable to target populations

Stressor Scores			**Priority**	**Stressor Response Type**
Magnitude	*Certainty*	*Total*		
4	4	8	A-1	Priority 1 Action - and associated monitoring
3	4	7	A-2	Priority 2 Action - and associated monitoring
4	3	7	A-2	Priority 2 Action - with adaptive management and monitoring
3	3	6	A-3	Priority 3 Action - with adaptive management and monitoring
2	3	5	A-4	Priority 4 Action - with adaptive management and monitoring
4	2	6	R-1	Priority 1 Research - to inform action design
4	1	5	R-2	Priority 2 Research - to inform action design
3	2	5	R-2	Priority 2 Research - to inform action design
3	1	4	R-3	Priority 3 Research - to confirm need for action
2	2	4	R-3	Priority 3 Research - To inform action design
2	1	3	R-4	Priority 4 Research - To evaluate need for action
1	2	3	R-5	Priority 5 Research - To confirm no action is warranted
1	1	2	R-5	Priority 5 Research - To understand magnitude
1	3	4	T-1	Priority 1 Monitoring (General/ Baseline) - to track magnitude/ ensure no action is warranted
1	4	5	T-2	Priority 2 Monitoring (General/ Baseline) - to track magnitude/ ensure no action is warranted

Draft SEP Tuolumne Stressor Analysis for Chinook Salmon and Steelhead
Fall Run Coarse Stressors

Species	Life History Stage	Stressor	Score Mag	Cert	Total	Sequence Term	Priority	Stressor Response Type	Scale
FR	Adult Spawning	Interactions with hatchery fish and other runs	4	4	8	Near	A-1	Priority 1 Action - and associated monitoring	1
FR	Juvenile Rearing/ Migration	Compression of the Rearing and Migration Window	4	4	8	Near	A-1	Priority 1 Action - and associated monitoring	1
FR	Adult Holding	Lack of Suitable Habitat	2	3	5	Near	A-4	Priority 4 Action - with adaptive management and monitoring	1
FR	Adult Spawning	Inadequate availability of high-quality habitat	2	3	5	Near	A-4	Priority 4 Action - with adaptive management and monitoring	1
FR	Egg Incubation	Inadequate Incubation Conditions	2	3	5	Near	A-4	Priority 4 Action - with adaptive management and monitoring	1
FR	Juvenile Rearing/ Migration	Lack of Suitable Rearing Habitat	4	2	6	Near	R-1	Priority 1 Research - to inform action design	1
FR	Adult Spawning	Compression of the Spawning window	3	2	5	Near	R-2	Priority 2 Research - to inform action design	1
FR	Juvenile Rearing/ Migration	Lack of suitable migratory cues and conditions	3	2	5	Near	R-2	Priority 2 Research - to inform action design	1
FR	Adult Holding	Loss of Fecumdidty	2	2	4	Near	R-3	Priority 3 Research - to confirm need for action	1
FR	Juvenile Rearing/ Migration	Lack of suitable over-summering habitat	1	3	4	Near	T-1	Priority 1 Monitoring (General/ Baseline) - to track magnitude/ ensure no action is warranted	1
FR	Juvenile Rearing/ Migration	Compression of the Rearing and Migration Window	4	4	8	Long	A-1	Priority 1 Action - and associated monitoring	1
FR	Adult Spawning	Inadequate availability of high-quality habitat	4	3	7	Long	A-2	Priority 2 Action - with adaptive management and monitoring	1
FR	Adult Spawning	Interactions with hatchery fish and other runs	4	3	7	Long	A-2	Priority 2 Action - with adaptive management and monitoring	1
FR	Adult Holding	Lack of Suitable Habitat	3	3	6	Long	A-3	Priority 3 Action - with adaptive management and monitoring	1
FR	Egg Incubation	Inadequate Incubation Conditions	3	3	6	Long	A-3	Priority 3 Action - with adaptive management and monitoring	1
FR	Juvenile Rearing/ Migration	Lack of suitable over-summering habitat	2	3	5	Long	A-4	Priority 4 Action - with adaptive management and monitoring	1
FR	Adult Spawning	Compression of the Spawning window	4	2	6	Long	R-1	Priority 1 Research - to inform action design	1
FR	Juvenile Rearing/ Migration	Lack of suitable migratory cues and conditions	4	2	6	Long	R-1	Priority 1 Research - to inform action design	1
FR	Juvenile Rearing/ Migration	Lack of Suitable Rearing Habitat	4	2	6	Long	R-1	Priority 1 Research - to inform action design	1
FR	Adult Holding	Loss of Fecumdidty	3	2	5	Long	R-2	Priority 2 Research - to inform action design	1

Draft SEP Tuolumne Stressor Analysis for Chinook Salmon and Steelhead
Spring Run Coarse Stressors

Species	Life History Stage	Stressor	Score Mag	Cert	Total	Sequence Term	Priority	Stressor Response Type	Scale
SR	Egg Incubation	Inadequate Incubation Conditions	4	4	8	Near	A-1	Priority 1 Action - and associated monitoring	1
SR	Adult Holding	Lack of Suitable Habitat	3	4	7	Near	A-2	Priority 2 Action - and associated monitoring	1
SR	Juvenile Rearing/ Migration	Compression of the Rearing and Migration Window	4	3	7	Near	A-2	Priority 2 Action - with adaptive management and monitoring	1
SR	Juvenile Rearing/ Migration	Lack of suitable migratory cues and conditions	2	3	5	Near	A-4	Priority 4 Action - with adaptive management and monitoring	1
SR	Juvenile Rearing/ Migration	Lack of Suitable Rearing Habitat	4	2	6	Near	R-1	Priority 1 Research - to inform action design	1
SR	Adult Holding	Loss of Fecundity	3	2	5	Near	R-2	Priority 2 Research - to inform action design	1
SR	Adult Spawning	Compression of the Spawning window	3	2	5	Near	R-2	Priority 2 Research - to inform action design	1
SR	Adult Spawning	Inadequate availability of high-quality habitat	3	2	5	Near	R-2	Priority 2 Research - to inform action design	1
SR	Juvenile Rearing/ Migration	Lack of suitable over-summering habitat	1	3	4	Near	T-1	Priority 1 Monitoring (General/ Baseline) - to track magnitude/ ensure no action is warranted	1
SR	Adult Holding	Lack of Suitable Habitat	4	4	8	Long	A-1	Priority 1 Action - and associated monitoring	1
SR	Egg Incubation	Inadequate Incubation Conditions	4	4	8	Long	A-1	Priority 1 Action - and associated monitoring	1
SR	Adult Spawning	Compression of the Spawning window	4	3	7	Long	A-2	Priority 2 Action - with adaptive management and monitoring	1
SR	Adult Spawning	Inadequate availability of high-quality habitat	4	3	7	Long	A-2	Priority 2 Action - with adaptive management and monitoring	1
SR	Juvenile Rearing/ Migration	Compression of the Rearing and Migration Window	4	3	7	Long	A-2	Priority 2 Action - with adaptive management and monitoring	1
SR	Juvenile Rearing/ Migration	Lack of suitable migratory cues and conditions	2	3	5	Long	A-4	Priority 4 Action - with adaptive management and monitoring	1
SR	Juvenile Rearing/ Migration	Lack of suitable over-summering habitat	2	3	5	Long	A-4	Priority 4 Action - with adaptive management and monitoring	1
SR	Juvenile Rearing/ Migration	Lack of Suitable Rearing Habitat	4	2	6	Long	R-1	Priority 1 Research - to inform action design	1
SR	Adult Holding	Loss of Fecundity	3	2	5	Long	R-2	Priority 2 Research - to inform action design	1

Draft SEP Tuolumne Stressor Analysis for Chinook Salmon and Steelhead

Steelhead Coarse Stressors

Species	Life History Stage	Stressor	Score Mag	Score Cert	Score Total	Sequence Term	Priority	Stressor Response Type	Scale
SH	Adult Holding	Lack of Suitable Habitat	3	4	7	Near	A-2	Priority 2 Action - and associated monitoring	1
SH	Egg Incubation	Inadequate Incubation Conditions	3	4	7	Near	A-2	Priority 2 Action - and associated monitoring	1
SH	Adult Spawning	Inadequate availability of high-quality habitat	3	3	6	Near	A-3	Priority 3 Action - with adaptive management and monitoring	1
SH	Adult Spawning	Compression of the Spawning window	2	3	5	Near	A-4	Priority 4 Action - with adaptive management and monitoring	1
SH	Juvenile Rearing/ Migration	Lack of suitable migratory cues and conditions	4	2	6	Near	R-1	Priority 1 Research - to inform action design	1
SH	Juvenile Rearing/ Migration	Lack of suitable over-summering habitat	3	2	5	Near	R-2	Priority 2 Research - to inform action design	1
SH	Juvenile Rearing/ Migration	Compression of the Rearing and Migration Window	2	2	4	Near	R-3	Priority 3 Research - to confirm need for action	1
SH	Juvenile Rearing/ Migration	Lack of Suitable Rearing Habitat	2	2	4	Near	R-3	Priority 3 Research - to confirm need for action	1
SH	Adult Holding	Lack of Suitable Habitat	4	4	8	Long	A-1	Priority 1 Action - and associated monitoring	1
SH	Egg Incubation	Inadequate Incubation Conditions	4	4	8	Long	A-1	Priority 1 Action - and associated monitoring	1
SH	Adult Spawning	Inadequate availability of high-quality habitat	4	3	7	Long	A-2	Priority 2 Action - with adaptive management and monitoring	1
SH	Adult Spawning	Compression of the Spawning window	3	3	6	Long	A-3	Priority 3 Action - with adaptive management and monitoring	1
SH	Juvenile Rearing/ Migration	Lack of suitable migratory cues and conditions	4	2	6	Long	R-1	Priority 1 Research - to inform action design	1
SH	Juvenile Rearing/ Migration	Lack of suitable over-summering habitat	3	2	5	Long	R-2	Priority 2 Research - to inform action design	1
SH	Juvenile Rearing/ Migration	Compression of the Rearing and Migration Window	2	2	4	Long	R-3	Priority 3 Research - to confirm need for action	1
SH	Juvenile Rearing/ Migration	Lack of Suitable Rearing Habitat	2	2	4	Long	R-3	Priority 3 Research - to confirm need for action	1

Draft SEP Tuolumne Stressor Analysis for Chinook Salmon and Steelhead
Example Prioritzation Matrix with Fall Run Coarse Stressors



Actions	Priority 1 Action - and associated monitoring	Priority 2 Action - and associated monitoring	Priority 2 Action - with adaptive management and monitoring	Priority 3 Action - with adaptive management and monitoring	Priority 3 Action - with associated Monitoring	Priority 4 Action - with adaptive management and monitoring
Adult Holding						Lack of Suitable Habitat
Adult Spawning	Interactions with hatchery fish and other runs					Inadequate availability of high-quality habitat
Egg incubation						Inadequate Incubation Conditions
Juvenile Rearing/ Migration	Compression of the Rearing and Migration Window					

Research		Priority 1 Research - to inform action design	Priority 2 Research - to inform action design	Priority 3 Research - to confirm need for action	Priority 3 Research - To inform action design	Priority 4 Research - to evaluate need for action	Priority 5 Research - to confirm that action is not warranted	Priority 5 Research - to understand magnitude
Adult Holding					Loss of Fecundity			
Adult Spawning			Compression of the Spawning window					
Juvenile Rearing/ Migration		Lack of Suitable Rearing Habitat	Lack of suitable migratory cues and conditions					

Monitoring	Priority 1 Monitoring (General/ Baseline) - to track magnitude/ ensure no action is warranted	Priority 2 Monitoring (General/ Baseline) -to track magnitude
Juvenile Rearing/ Migration	Lack of suitable over-summering habitat	

Attachment 6

Wards Ferry Recreation Site
Don Pedro Recreation Area

Overview of Current Situation,
and Safety Concerns



WARDS FERRY BRIDGE: An Afternoon In The Life

Approaching the bridge from upstream with river reaching the bridge;
You see activity on both sides of the river



Line-up of vehicles on bridge deck waiting for arrival of commercial trips (looking upstream)



Day use folks watching rafts approaching from upstream e



Day users on river



Day Users from previous slide packing it up

Kayakers are usually the 1st to arrive from WSR. There are few places for folks to enjoy the river here. Boaters take out at the same places day users are gathered. Day users often are driven out by the boat traffic.



Couple enjoying the water and shade directly beneath upstream edge of bridge deck.



Afternoon fun on pylon foundation under bridge

Warning is for debris boom blocking navigation downstream



So nice to have a flat spot to swim from on a hot summer day under the bridge



Day users leaving as more boats arrive



More day users packing it in as boats arrive



Booming with day users under the boom arm



Commercial rafters arrive to begin booming from pylon foundation



Time to head home, the rafters are coming , the rafters are coming



The rafters are here, a commercial group letting off passengers.



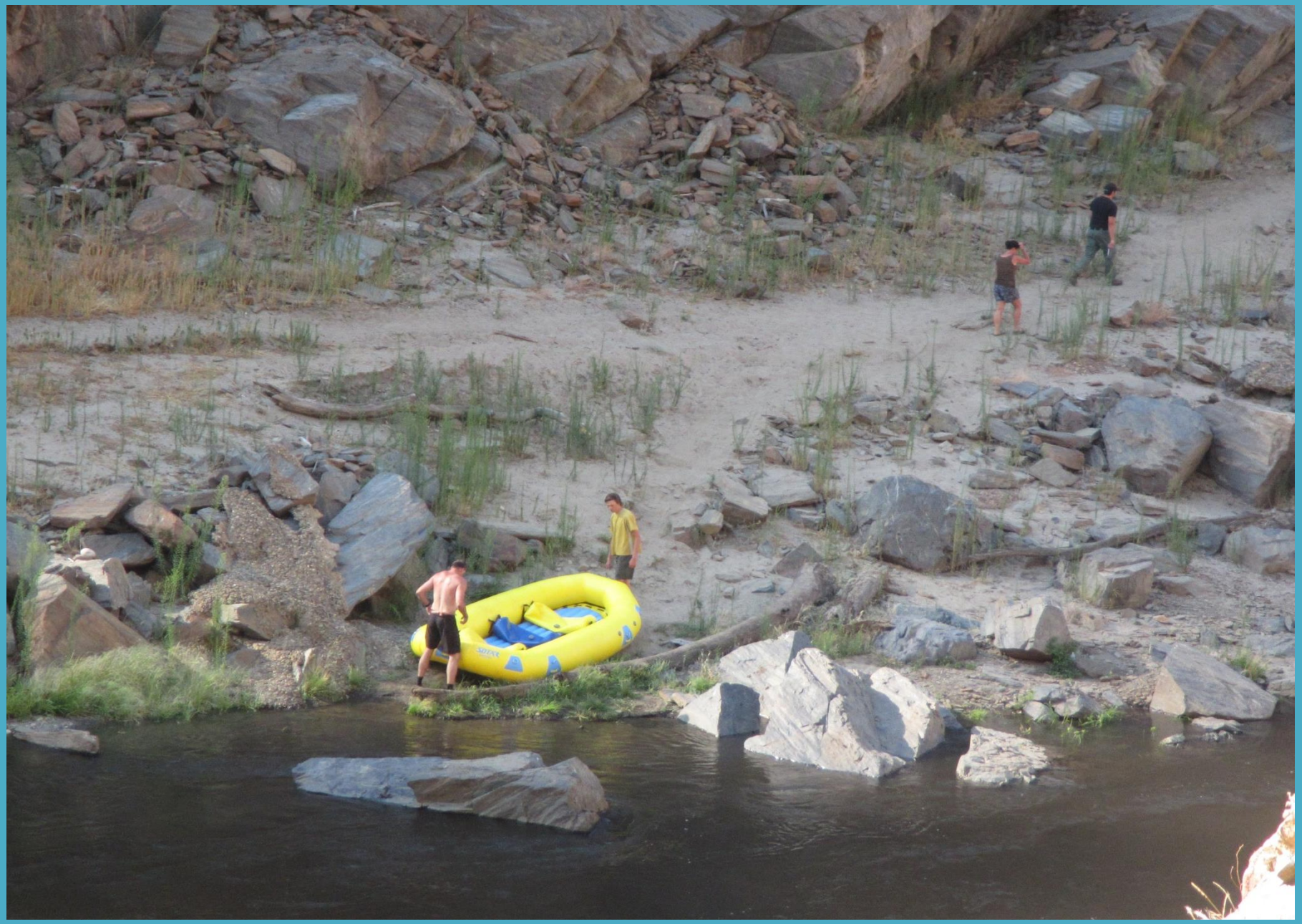
Now some more kayakers from the WSR



Look closely… you can see 3 boom cables going down to river



Send ‘em, up up and away!



Now the Private Boaters start up...they have something else to look forward to…



Yes, extra fun in the hot sun!



Look out folks, we're comin' thru



This part is narrow, get lined up straight and careful not to tip the boat !



Whoa hot and tired, gotta rest… darn this is fun!



We’re getting there



Almost there, “Oh look, the commercials are already loading their trucks and busses!”



Road approach to bridge



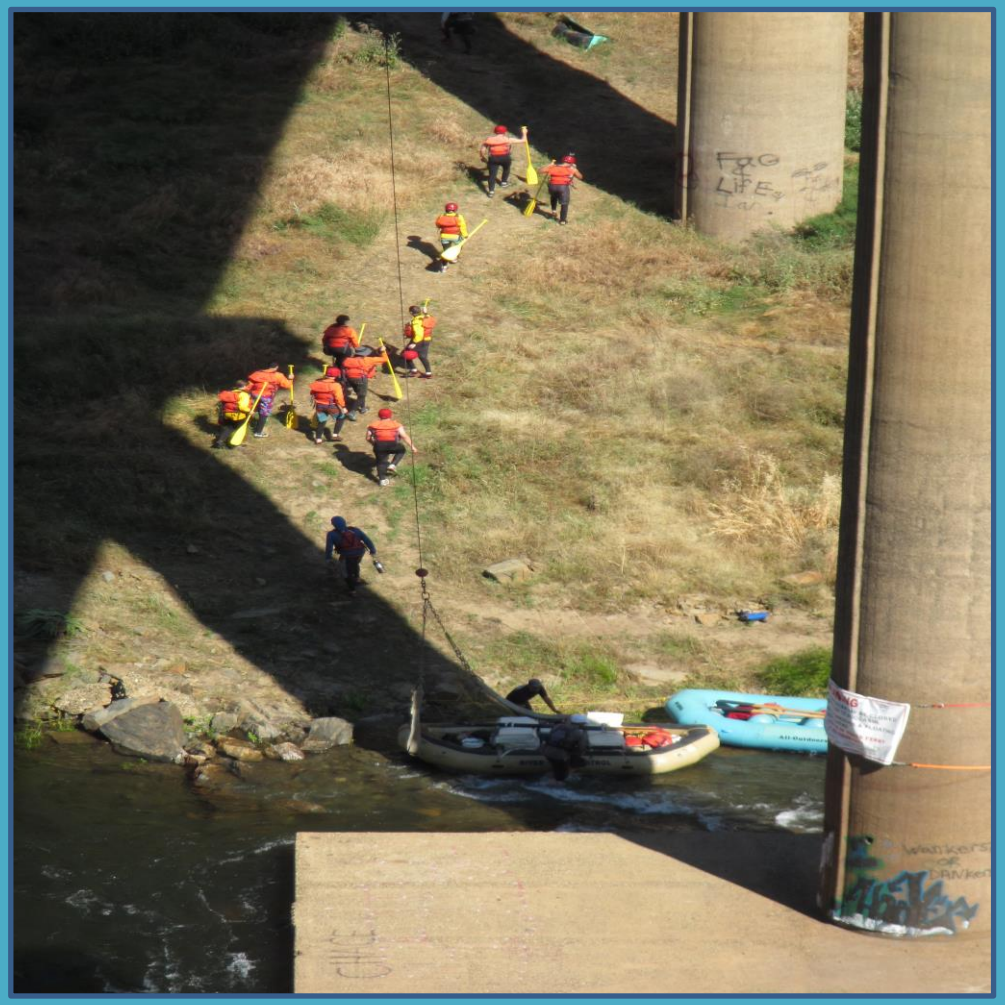
Can you see those folks way down there? Don’t drop your soda!



Booms on the bridge



Raft coming up with onlookers below, heads up!



Rigging boats for booming



Boat arriving to bridge deck



Boat coming on to bridge deck



Bridge deck during booming operations



Let's get outta here, this looks a little crazy!



Last of the day use picnickers leaving



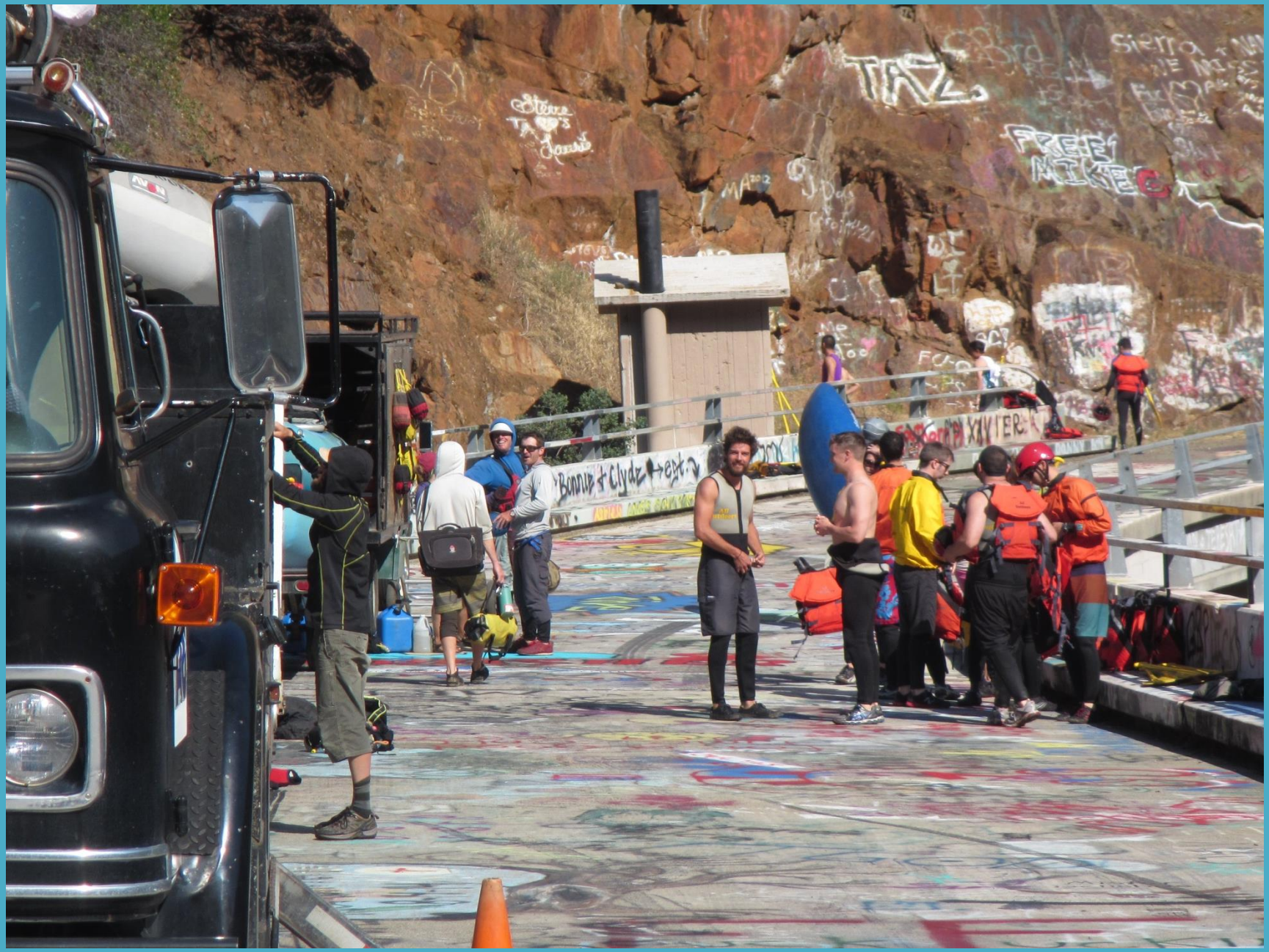
No caption!



We gotta Film this! Folks won't believe it otherwise!



Busy busy….



Not done yet



More boats coming onto deck while a raft frame moves back across roadway



Forest Service Participates !



Another view with reservoir around 800 elevation

Wards Ferry is a Dangerous Place on Summer Afternoons

1)Congestion, confusion, and severe hazards from falling objects (including fully loaded cargo rafts) exist during boom operations to retrieve boats out of the reservoir or river.

2) Carrying boats up and out of the reservoir is a dangerous and difficult procedure over steep, unstable terrain

3)Every year unnecessary injuries occur while taking out boats at the bridge.

4) Day users are exposed to these risks

5) The bridge deck is not a suitable place to conduct boom operations . Airborne booming is extremely dangerous in the windy conditions of the canyon during afternoons.

6) The proposed boom deck (ALFA 11Oct17) is not aligned with winds for airborne booming and does not allow retrieval by private boaters w/o booms and winches.

7) The proposed boom deck could be made very much safer by incorporating angled riverside pylons incorporated with steel rail ramps . Boats would then not go airborne while retrieving them. This would be a much safer situation.

8) The solution mentioned in Item 7 will allow users to raise boats without booms. This means that all users can retrieve their boats using only mechanical advantage

9) Day users must have parking and safe day use facilities to allow them to use the river and reservoir at the same time as the whitewater boaters arriving from the Tuolumne WSR.

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