



BUREAU OF RECLAMATION  
Bay-Delta Office  
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Sacramento, California 95814



DEPARTMENT OF WATER RESOURCES  
Environmental Services  
3500 Industrial Boulevard  
West Sacramento, California 95691

IN REPLY REFER TO:  
BDO-150  
ENV-7.00

OCT 6 2014

Ms. Maria Rea  
Supervisor, Central Valley Office  
National Marine Fisheries Service  
650 Capital Mall, Suite 5-100  
Sacramento, CA 95814-4700

Subject: Alternative Action Request for Reasonable and Prudent Alternative Action IV.1.1

Dear Ms. Rea:

This letter refers to the implementation of Reasonable and Prudent Alternative (RPA) Action IV.1.1 of the National Marine Fisheries Service (NMFS) June 2009 Biological Opinion for the Coordinated Long-term Operation of the Central Valley Project and State Water Project. The RPA action requires "monitoring and alerts to trigger changes in the Delta Cross Channel (DCC) operation." The Bureau of Reclamation and the Department of Water Resources (DWR) are jointly requesting to continue utilizing a modified RPA Action IV.1.1 First Alert for Mill and Deer Creeks monitoring until analysis of new or previously unprocessed data identify a more accurate alert for emigration by yearling spring-run Chinook salmon from these tributaries.

The RPA action's First Alert has two components: the first is based on capture of yearling-sized (>70 mm) spring-run at rotary screw traps (RST) at the mouth of the tributaries, and the second is an increase in tributary flow of more than 50 percent over levels immediately preceding the flow spike. In 2010, California Department of Fish and Wildlife (CDFW) stopped utilizing RST on these tributaries. Since then, the Delta Operations for Salmonids and Sturgeon technical work group has continued to utilize the second component as a threshold for the First Alert. In 2013, Reclamation and DWR proposed to NMFS a flow threshold in lieu of the capture of yearling-sized spring-run of the First Alert for fish emigration during October and November, as recommended by CDFW the prior year:

- Mean daily flows greater than 110 cfs in Deer or Mill Creeks; or
- Mean daily flow increases by more than 50 percent in Deer or Mill Creeks.

On August 9, 2013, NMFS approved a request by Reclamation and DWR to use mean daily flows greater than 110 cfs in Mill or Deer Creeks in lieu of operating the Mill and Deer Creeks RST for October and November, 2013, in compliance with RPA Action IV.1.1.

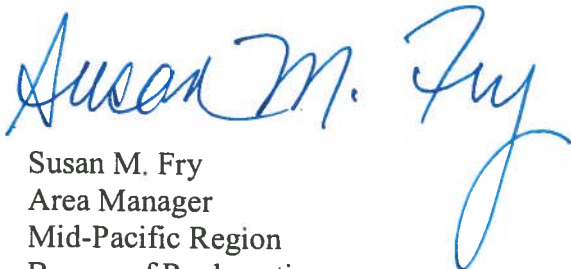
This recommendation further refines the modification of the First Alert by replacing the first component, which includes the capture of yearling-sized spring-run in RST, with a more conservative 95 cfs flow threshold. This refinement is based on further analysis of the data collected on Mill and Deer Creeks, which indicate that catch of yearling spring-run sized Chinook in October and November may occur at flows below 110 cfs. Approximately 85 percent of observed yearling spring-run Chinook catch, for which flow, size, and count information were collected, were observed at flows of 110 cfs or greater, and approximately 99 percent of observed yearling spring-run sized Chinook were observed at flows of 95 cfs or greater. No changes are proposed for the second component of the First Alert and the Second Alert.

December 1, 2014, is the current default closure date for the DCC gates. Therefore, the months of October and November are the critical periods when Deer and Mill Creeks yearling spring-run may enter the lower Sacramento River and be exposed to DCC gate operation. We believe the criteria listed below will continue to avoid incidental mortality of juvenile spring-run in CDFW's RST and provide an equivalent First Alert trigger, as required by RPA Action IV.1.1, to reduce entrainment through the DCC gates. Recommended revisions to RPA Action IV.1.1 First Alert are as follows:

- Mean daily flows greater than 95 cfs in Deer or Mill Creeks; or
- Mean daily flow increases by more than 50 percent in Deer or Mill Creeks.

Reclamation and DWR look forward to working with NMFS to continue to implement the RPA action and respectfully request a response by October 8, 2014. If you have any questions, please contact Reclamation staff member David van Rijn at 916-414-2405 or at [dvanrijn@usbr.gov](mailto:dvanrijn@usbr.gov) or DWR staff member Harry Spanglet at 916-376-9844 or at [harry.spanglet@water.ca.gov](mailto:harry.spanglet@water.ca.gov).

Sincerely,



Susan M. Fry  
Area Manager  
Mid-Pacific Region  
Bureau of Reclamation



Dean F. Messer  
Chief  
Division of Environmental Services  
California Department of Water Resources

cc: Mr. Garwin Yip  
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