

**LA GRANGE HYDROELECTRIC PROJECT  
FERC NO. 14581**

**UPDATED STUDY REPORT**

**APPENDIX B**

**JANUARY 12, 2017 RESERVOIR TRANSIT STUDY LETTER TO FERC**



January 12, 2017

**Filed via Electronic Submittal (E-File)**

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

Subject: La Grange Project, FERC Project No. 14581  
Reservoir Transit Study

Dear Secretary Bose:

On February 2, 2015, FERC issued the Study Plan Determination (SPD) for the La Grange Project, owned jointly by Turlock Irrigation District and Modesto Irrigation District (collectively, the Districts) and located on the Tuolumne River in California. In the SPD, FERC recommended that as part of the Fish Passage Facilities Alternatives Assessment (Fish Passage Assessment), the Districts evaluate the technical and biological feasibility of the movement of anadromous salmonids through La Grange and Don Pedro project reservoirs, if the results from Phase 1 of the Fish Passage Assessment indicate that the most feasible fish passage concepts involve passage through Don Pedro Reservoir or La Grange pool. FERC recommended that the Districts prepare a study plan (Reservoir Transit Study) and allow a minimum of 30 days for licensing participants to comment on the draft study plan before filing the study plan as part of the Initial Study Report (ISR).

The Districts reported on the status of the Fish Passage Assessment and the Reservoir Transit Study Plan in the ISR filed with FERC on February 2, 2016. Subsequently on July 11, 2016, the Districts distributed the draft Reservoir Transit Study Plan to licensing participants for a 30-day review and comment period. On August 1, 2016, the Districts distributed an amendment to the study plan, which requested comments on the use of fall-run Chinook salmon smolts if the permits needed to acquire ESA-listed spring-run Chinook salmon test fish were denied or not issued in time to complete the Reservoir Transit Study planned for spring 2017. Comments on the study plan and study plan amendment were received from the Central Sierra Environmental Resource Center, the National Marine Fisheries Service (NMFS), and Mr. Lonnie Moore, a private citizen. No parties objected to the use of fall-run Chinook smolts if spring-run Chinook smolts were not available. No changes to the study plan or study plan amendment were necessary to address the comments and on September 16, 2016, the Districts filed the final study plan and their response to comments with FERC. On

Kimberly D. Bose

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September 22, the Districts filed with FERC additional copies of the study plan and study plan amendment comment letters.

On September 7, 2016, the Districts received a determination from NMFS (enclosed) that ESA-listed spring-run Chinook salmon would not be available for the study; therefore, fall-run Chinook would be the only potential source of test fish. On September 29, 2016, the California Department of Fish and Wildlife (CDFW) approved the Districts' request for fall-run Chinook test fish (enclosed). However, in its approval, CDFW required that the Districts use only triploid fall-run Chinook in the study. CDFW noted that at this time, the Iron Gate Hatchery, located on the Klamath River, is the only potential source for triploid fall-run Chinook. On October 20, 2016, the Districts received notice from CDFW (enclosed) that due to low adult fall-run Chinook returns to the Iron Gate Hatchery, there would be no triploid fall-run Chinook test fish available for the Reservoir Transit Study in 2017. On November 17, 2016, the Districts filed a letter with FERC stating that given these limitations, it would not be possible to conduct the Reservoir Transit Study in 2017. The letter also stated that in the near future, the Districts would be in communication with FERC regarding recommended next steps for the study.

If the La Grange licensing process timeline can accommodate conducting the Reservoir Transit Study, with FERC's approval, the Districts intend to conduct the Study in 2018 if results from the Fish Passage Assessment indicate that upstream or downstream fish passage at La Grange and Don Pedro projects would require anadromous fish transit through one or both reservoirs. The Districts are continuing to conduct the studies required by FERC as well as a number of voluntary studies of upper river habitat and suitability, all of which will be included in the La Grange license application. These studies may help further inform the need to conduct the Reservoir Transit Study.

Sincerely,



Steve Boyd  
Turlock Irrigation District  
P.O. Box 949  
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(209) 883-8364  
[seboyd@tid.org](mailto:seboyd@tid.org)



Anna Brathwaite  
Modesto Irrigation District  
P.O. Box 4060  
Modesto, CA 95352  
(209) 526-7384  
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cc: Mr. James Hastreiter, FERC  
Licensing Participants E-Mail List

Enclosures: (1) NMFS correspondence regarding spring-run Chinook salmon test fish  
(2) CDFW correspondence regarding the availability of test fish

## Le, Bao

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**From:** Amanda Cranford - NOAA Federal <amanda.cranford@noaa.gov>  
**Sent:** Wednesday, September 07, 2016 11:56 AM  
**To:** Le, Bao; jasonguignard@fishbio.com  
**Cc:** Deason, Jesse; John Wooster - NOAA Federal; Shivonne Nesbit - NOAA Federal  
**Subject:** Application # 20656 - Reservoir Transit Study

Good morning Bao,

This email relates to the pending Section 10(a)(1)(A) Permit application (# 20656), submitted by FISHBIO on August 11, 2016. The purpose of the proposed study is to evaluate the biological feasibility of downstream (juvenile) movement of anadromous fish through Don Pedro Reservoir on the Tuolumne River. In order to conduct this effort, FISHBIO is requesting to obtain Central Valley spring-run Chinook salmon (listed as threatened under the Endangered Species Act) from Feather River Hatchery.

The purpose of this email is to inform you that NMFS has determined that ESA-listed spring-run Chinook salmon from the Feather River Hatchery are not the appropriate stock to use for this study. This conclusion is based on the following:

1) In order to issue a Section 10(a)(1)(A) Permit for scientific research purposes, a permit application must meet the Section 10(a)(1)(A) Issuance Criteria. One of the questions to consider is, "Whether alternative non-endangered species or population stocks can and should be used."

This question is particularly relevant because there is a high level of uncertainty regarding the survival and fate of these fish. Further, given the purpose of this study (as described in the online permit application), an alternative stock could be used while still answering the questions at hand. Fall-run Chinook salmon and spring-run Chinook salmon exhibit similar sizes and run-timing during juvenile emigration and are often misidentified when using length-at-date criteria due to these similarities.

Non-listed Central Valley fall-run Chinook salmon would be an ideal and appropriate surrogate for spring-run Chinook salmon and should be considered for this study. The following are some of the benefits associated with using hatchery-origin fall-run Chinook salmon in lieu of ESA-listed spring-run Chinook salmon from the Feather River Hatchery:

1) There is no Federal permitting necessary for the experimental use of non-listed hatchery stocks. Given the proposed timeline of the study, use of fall-run Chinook salmon ensures that initiation of the study is not held up while waiting for the issuance of a permit, which can take anywhere from 6-9 months for completion.

2) There are currently five hatcheries in the Central Valley that produce fall-run Chinook salmon, and only one that produces spring-run Chinook salmon. The likelihood of obtaining fall-run Chinook salmon for experimental purposes is far greater than the likelihood of obtaining spring-run from the Feather River Hatchery. This is partially due to the ongoing impacts of drought in California, coupled with lower survival and poor adult returns this year.

3) The spring-run Chinook salmon program at Feather River Hatchery is carried out for conservation and enhancement purposes. This includes contribution to reintroduction efforts, *i.e.* the San Joaquin River Restoration Program. Research, Monitoring, and Evaluation are also a component of this program. However,

this is only for the evaluation of the spring-run Chinook salmon hatchery program and does not include general research not related to the Feather River Hatchery.

We are pleased to hear that efforts are currently underway to secure the necessary number of non-listed hatchery-origin Central Valley fall-run Chinook salmon for use in this study, given the potential issues associated with the use of ESA-listed stocks. NMFS is supportive of the proposed study and encourages your continued coordination with the California Department of Fish and Wildlife in order to obtain the juvenile fall-run Chinook salmon needed to carry out this effort. We look forward to seeing the results of the reservoir transit study when they are available.

If you have any questions or concerns regarding this email, please feel free to contact me to discuss further.

Thank you,

Amanda

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Amanda Cranford  
Natural Resource Management Specialist  
NOAA Fisheries West Coast Region  
U.S. Department of Commerce  
California Central Valley Area Office  
650 Capitol Mall, Suite 5-100  
Sacramento, CA 95814  
Office: [\(916\) 930-3706](tel:9169303706)



[www.westcoast.fisheries.noaa.gov](http://www.westcoast.fisheries.noaa.gov)

**Le, Bao**

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**To:** Jason Guignard  
**Subject:** RE: Request for hatchery fish- Don Pedro Reservoir Transit Study  
**AMServiceURLStr:** <https://Slingshot.hdrinc.com:443/CFSS/control?view=services/FTService>

**From:** "Clifford, Mark@Wildlife" <[Mark.Clifford@wildlife.ca.gov](mailto:Mark.Clifford@wildlife.ca.gov)>  
**Subject: Re: Request for hatchery fish- Don Pedro Reservoir Transit Study**  
**Date:** October 20, 2016 at 3:32:20 PM PDT  
**To:** "guignard, [jason@fishbio.com](mailto:jason@fishbio.com)" <[jasonguignard@fishbio.com](mailto:jasonguignard@fishbio.com)>

Hi Jason

I'm afraid we will not be triploiding any chinook this year due to extremely low returns in the Klamath. We will have none for our inland program or for research as a result. If you'd like to discuss, let's talk next week.

Sorry Jason. Best,

Mark Clifford, Ph.D.  
Statewide Hatchery Coordinator  
California Department of Fish and Wildlife

On Oct 20, 2016, at 4:24 PM, Jason Guignard <[jasonguignard@fishbio.com](mailto:jasonguignard@fishbio.com)> wrote:

Hi Mark,

I wanted to check-in with you regarding current fish numbers at Iron Gate, and potential for us to receive our requested study fish.

We have been seeing good numbers of Chinook in the San Joaquin Basin the last few weeks, so hopefully the same is true up North.

Thanks,

Jason Guignard  
Fisheries Biologist

**FISHBIO**  
[jasonguignard@fishbio.com](mailto:jasonguignard@fishbio.com)  
O: (209) 847-6300  
C: (209) 840-9019  
[www.fishbio.com](http://www.fishbio.com)

On Sep 29, 2016, at 11:32 AM, Clifford, Mark@Wildlife  
<[Mark.Clifford@wildlife.ca.gov](mailto:Mark.Clifford@wildlife.ca.gov)> wrote:

Hi Jason,

As we discussed this morning, your fish request was approved but fish in the study must be triploid Chinook. Don Pedro has a triploid Chinook allotment and it is our intention to triploid Chinook for this and other inland fisheries, if Iron Gate Hatchery receives enough adult returns to meet mitigation requirements. As of now the run looks insufficient and we may not proceed with Chinook triploidy or supplying that inland fishery this year. The Hatchery Manager will give us an update the week of October 10<sup>th</sup> and I will relay information to you.

Iron Gate (Klamath River) Hatchery is our only site and source for the triploid Chinook program due to complete absence of Infectious Hematopoietic Necrosis Virus (IHN) going back several decades. Also, the mitigator (owner) is supportive of these activities while other mitigators- not so much. We are considering other locations for triploiding excess Chinook eggs, but nothing could be implemented this year.

Response letter attached.

Best regards,

Mark Clifford, Ph.D.  
Statewide Hatchery Coordinator  
Senior Environmental Scientist (Specialist)  
Office: 530-918-9450  
Cell: 916-764-2526  
<image001.png>

<image002.jpg>  
[SaveOurWater.com](http://SaveOurWater.com) · [Drought.CA.gov](http://Drought.CA.gov)

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**From:** Jason Guignard [<mailto:jasonguignard@fishbio.com>]  
**Sent:** Wednesday, July 27, 2016 8:18 AM  
**To:** Clifford, Mark@Wildlife  
**Cc:** Bao Le; Andrea Fuller  
**Subject:** Re: Request for hatchery fish- Don Pedro Reservoir Transit Study

Hi Mark,

Here is a revised hatchery allocation request for Don Pedro Reservoir Transit Study.

We are working on federal permitting for spring-run, but as a contingent would like to request 1,500 fall-run should permits not be issued in time.

I will be working in the field for the remainder of this week with no email access, so any further questions prior to the Aug. 1 deadline should go to Andrea Fuller (included on this message).

Thank You,

Jason Guignard  
Fisheries Biologist

**FISHBIO**  
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<Jason Guignard FishBio Don Pedro Transit 3N IGH CHIN .pdf>