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5624  
**State Water Resources Control Board**

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**MAR 21 2001**

In Reply Refer to:  
NW:360:A005626

Mr. Lester Snow  
Bureau of Reclamation  
2800 Cottage Way  
Sacramento, CA 95825-1898

Dear Mr. Snow:

**PLAN OF ACTION FOR DELTA MENDOTA CANAL RECIRCULATION STUDY**

This letter acknowledges that the State Water Resources Control Board (SWRCB) received on December 15, 2000, the Plan of Action for the Delta Mendota Canal Recirculation Feasibility Study (Plan). You submitted this Plan to comply with Condition 2 (page 153) of Decision 1641 (D-1641). Recirculation of water through the Delta Mendota Canal is envisioned as an alternate means of achieving the Vernalis flow objectives during the April 15 to May 15 period. D-1641 requires that the U.S. Bureau of Reclamation (USBR) submit a Plan by October 1, 2000, to evaluate the feasibility and impacts of recirculation. In addition to including tasks for evaluating several items, the Plan is to include a schedule for milestones and due dates for implementation and to identify a funding source for the study.

The State Water Resources Control Board (SWRCB) has received comments on the Plan, dated January 16, 2001, that were submitted by the South Delta Water Agency (SDWA). My staff has reviewed the Plan and the comments of SDWA and has the following comments. The SDWA noted that there was good agreement on the scope and method of analysis in the Plan, though they objected that some of the adverse potential impacts of recirculation might also apply to the base condition.

The Plan describes eight tasks to be completed. The tasks are: (1) developing alternatives, (2) modeling alternatives, (3) evaluating impacts of the alternatives on fisheries, wetlands and mobilization of contaminants, (4) sampling and analyzing sediments, (5) reviewing legal constraints and other considerations that may affect recirculation, (6) analyzing the economic impacts of recirculation, (7) conducting public meetings, and (8) preparing a report of the study conclusions. The Plan also includes a timeline for completion of each task. The first three tasks are to be completed by March 2002. Task 4 through task 7 will be completed only if the modeling and environmental review indicates that the benefits of recirculation outweigh any impacts. The study is to be completed by March 2003. The Plan does not identify a funding source for the studies; however, the transmittal letter indicated that the USBR will either fund the study or will explore funding alternatives.

The general tasks and the timelines for completing the tasks are acceptable. However, we have some comments on the specifics discussed under the various task headings.

The general tasks and the timelines for completing the tasks are acceptable. However, we have some comments on the specifics discussed under the various task headings.

Task 1 is intended to develop alternatives and to specify modeling assumptions for the base case and for each of the alternatives to be modeled. Nevertheless, it describes alternatives and discusses some assumptions under the task heading and on *Table 1: Recirculation Scenario/Evaluation Alternatives* and the accompanying footnotes.

Page 6 of the Plan contains the statement, "All studies are based on an objective of no net loss of water supply to the SWP and the CVP." While this may be a desirable goal, it should not be a primary objective of the study; D-1641 clearly does not establish this as a requirement of the study. The objective of the study is to determine whether significant benefits can be achieved by recirculation, while at the same time complying with all relevant regulatory conditions. If, there are significant water supply impacts, then other methods for achieving the Vernalis flow objectives, such as the San Joaquin River Agreement, may be more desirable.

*Table 1: Recirculation Scenario/Evaluation Alternatives* identifies alternatives to be studied. It is not clear why the table calls for three different base condition studies in addition to an "existing conditions" study. To meet our needs, the modeling studies for the Base Condition must include the following elements, many of which have already been specified in the Plan.

1. The 1995 level hydrology and the SWP and CVP demand specified in the "Baseline Operation Criteria" are adequate.
2. The studies must comply with all objectives of the 1995 Bay-Delta Water Quality Control Plan, with the exception of the Vernalis salinity objective, which may be violated under specified conditions.
3. The studies must comply with all provisions of the winter run chinook salmon and the delta smelt Biological Opinions, including the export restrictions.
4. The studies must adhere to the CVPIA section 3406 (b)(2) Delta actions.
5. The studies must incorporate the Trinity River flows specified in the Trinity Record of Decision.
6. The studies should use the new long-term Yuba River flows set forth in the February 16, 2001, draft Yuba River decision.
7. The studies may make full use of Joint Point of Diversion in accordance with D-1641.
8. Pumping at Banks shall be constrained in accordance with the 1981 U.S. Army Corps of Engineers criteria (Public Notice 5820A), except that the studies may make use of the extra 500 cfs of pumping at Banks during July, August and September.

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9. The studies may make use of Export/Inflow flexing in accordance with Table 3, footnotes 18 and 20, when feasible.
10. New Melones Reservoir shall be operated in accordance with the Interim Operation Plan. The channel capacity limitation of 1,500 cfs shall be imposed on the Stanislaus River.
11. Vernalis Adaptive Management Plan (VAMP) shall be operated in all years. VAMP flows shall be met by releases from Don Pedro and Exchequer reservoirs in accordance with the San Joaquin River Agreement.
12. The Head of Old River (HOR) barrier shall be in place during the April-May pulse except when flows exceed its hydraulic capacity. The interior agricultural barriers may be used as needed to counteract the effects of the HOR.

If the modeling studies are conducted using the above assumptions, the model output should be sufficient to determine whether recirculation can be accomplished without increased impact to water supply, water quality, and fisheries.

We concur that the studies should be completed using CALSIM and DSM2. We concur that the DSM2 studies may be limited to the 1976 to 1991 hydrologic period.

The Plan states that the fisheries agencies will evaluate the impact of recirculation on aquatic resources but does not contain information regarding the methodology or criteria that will be used for the evaluation. The Plan expresses several concerns that the fisheries agencies have with recirculation including impacts on EWA operations, impacts of Delta Barriers when operated in the manner assumed in the recirculation study; and impacts on smolt imprinting.

When evaluating impacts of recirculation, the fisheries agencies should clearly identify those impacts that also occur as a result of base condition operations.

This letter approves the Recirculation Feasibility Study, provided that Reclamation uses the modeling assumptions and elements specified above. D-1641 specifies that semi-annual progress reports shall be submitted to me and the Plan calls for a major interim report at the conclusion of the modeling studies. I look forward to these reports. I understand that funding has not yet been identified to carry out the study. Please advise me as soon as possible if this is likely to be a continuing problem. If you have any questions, please contact Nick Wilcox, Chief of the Bay-Delta Unit, at (916) 341-5425.

Sincerely,



Edward C. Anton  
Acting Executive Director

cc: See next page.