

FERC weighs in on Initial Study Report

As part of the joint Modesto Irrigation District-Turlock Irrigation District process to relicense the Don Pedro Project, the Federal Energy Regulatory Commission (FERC) issued its 45-page Determination on Requests for Study Modifications and New Studies on May 21, 2013.

FERC's determination follows the Districts' April 9, 2013 submittal to FERC of their Response to Relicensing Participants Comments regarding the Districts' Initial Study Report (ISR). As part of the Integrated Licensing Process (ILP), the Districts completed a number of environmental studies in 2012 and prepared reports which were provided to FERC and relicensing participants with the Jan. 17, 2013 submittal of the ISR. The studies are required in accordance with FERC's Study Plan Determination issued in 2011.

The reports included in the ISR were summarized by the Districts and their consultants at meetings with the public held Jan. 30-31. These open meetings served to summarize each study and address questions or initial comments on the studies. Attendance was excellent and many questions were addressed. Of key interest were the results of the lower Tuolumne River Predation Study, the Lower Tuolumne River Operations Model, and the Spawning Gravel Study.

Relicensing participants then had until March 9 to file comments on the reports, and the Districts had until April 9 to file their responses to those comments. Comments were received from the National Marine Fisheries Service, the United States Fish and Wildlife Service, National Park Service, California Department of Fish and Wildlife, the State Water Resources Control Board, various conservation groups, and the Bureau of Land Management. As part of the ILP,

INTERESTED IN STUDIES?

Glance inside for more details about relicensing studies, including a planned 2014 study focusing on predation of young salmon by bass and pikeminnow.

FERC then resolves any remaining disagreements about the need for new studies or modifications to the studies already completed by issuing its formal determination.

On April 9, the Districts responded to all the comments received, amounting to more than 100 separate responses. This response document was filed with FERC and is available online at www.don-pedro-relicensing.com/documents.

The ISR contains status reports or results of field work completed for over 30 cultural, terrestrial, recreation, and resource studies. Work continues into 2013 analyzing results of these field studies, incorporating information into models, and responding to FERC's May 21, 2013 study plan determination.

Important dates

by Nov. 30, 2013
DRAFT License Application filed with FERC

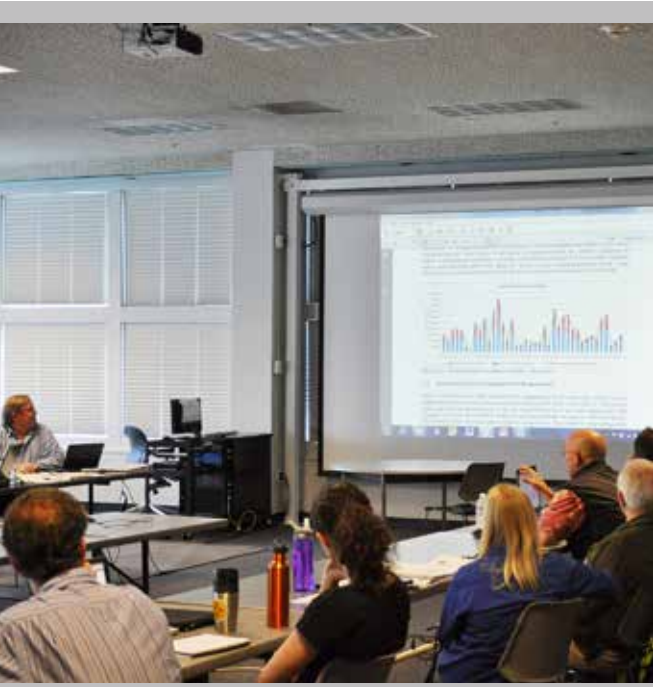
by April. 30, 2014
Final License Application filed with FERC



Useful information is online at www.donpedro-relicensing.com

What's inside

- Public workshops
- Studies
- Dry water year
- State flow proposal



Hands-on analysis part of model workshops

Public workshops are one of many opportunities for public input regarding the relicensing process. Additionally, state and federal agencies, as well as non-governmental organizations, also are involved in the process.

Some examples of such participation occurred in May and June of 2013, when a series of workshops were held. During these workshops, the Districts released analytical models to relicensing participants.

These models, used as tools by the Districts and other participants as part

of the relicensing process, include the Lower Tuolumne River Operations Model Base Case, the Don Pedro Reservoir Temperature Model, the Lower Tuolumne River Temperature Model, and the Chinook Salmon Population Model.

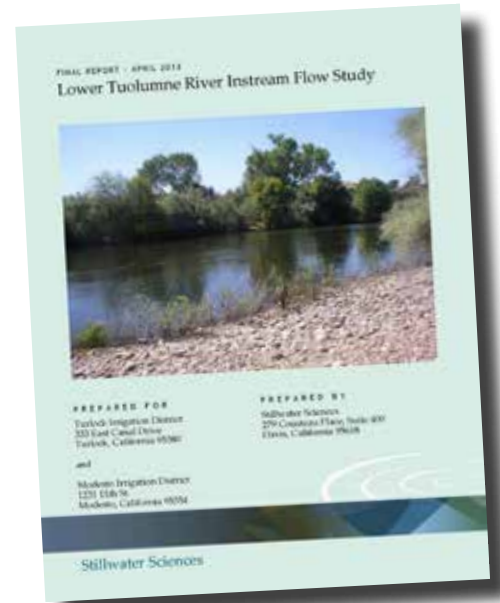
At the workshops, which were well-attended, background information and model assumptions were discussed, digital copies of the models were handed out, and participants had the opportunity to test the models and analyze model results based on varying inputs.

More than three years in the making, IFIM study filed

The Districts' Lower Tuolumne River Instream Flow (IFIM) Study Report was filed with FERC on April 29, 2013 after more than three years of study effort, including extensive collaboration with resource agencies and other interested parties.

The instream flow study was to determine instream flows necessary to maximize fall-run Chinook salmon and O. mykiss production, and to maximize survival throughout their various life stages.

In a proceeding underway before relicensing, FERC issued a July 16, 2009 order directing the Districts to develop and implement an Instream Flow Incremental Method/Physical Habitat Simulation (IFIM/PHABSIM) study of the lower Tuolumne River.



Since initiation of the instream flow study, the Districts have initiated the relicensing process for the Don Pedro Project.

It is the Districts' intent to integrate the IFIM study results into all relicensing studies and analyses where pertinent.

Second consecutive dry year

When operating a power plant that is fueled by falling water released from a reservoir, hydrology data and water year status take on increased interest and importance.

Thus is the case with the Don Pedro Project, which receives inflow from the Tuolumne River. The Tuolumne's 2013 water year is shaping up to be dry (among the 25 driest years in over 115 years of record keeping). Its full natural

flow this year will not reach 1.1 million acre-feet. Additionally, following a dry 2012, water supply is impacted more during consecutive dry years compared to non-sequential dry years.

Compare those consecutive years to the Department of Water Resources 50-year annual average of about 1.9 million acre-feet, and it's to see why many utilities are hoping for a wet 2014.



Many studies finished, others in works

The Districts completed more than 20 relicensing studies in 2012, and more work is to be completed in 2013 and 2014, leading up to the April 2014 filing of the Districts' Final License Application for the Don Pedro Project.

In its May 21, 2013 Determination on Requests for Study Modifications and New Studies, FERC required that seven of the Districts' studies should be expanded to provide additional information and two new studies should be conducted, both of which had been proposed by the Districts. In addition to following FERC's Determination, the Districts will be conducting a study of the loss of salmon smolts resulting from predation by other fish species (primarily black bass and striped bass) in 2014.

Results of the 23 completed studies, and status reports on the remaining 12 in-progress studies are identified in the Districts' Initial Study Report (ISR). Completed studies include 10 terrestrial studies, three recreation studies, and 10 of the water and aquatic resources studies. The ISR, as well as hundreds of other documents related to the relicensing process,

are located on the Documents page at www.donpedro-relicensing.com/documents.

Another major milestone nearing is the filing of the Districts' Draft License Application. This draft application is for the specific purpose of obtaining comments and questions from all interested parties, and is required to be issued prior to November 30, 2013. The Final License Application must be filed before April 30, 2014.

In other news: On June 27, 2013, FERC granted the Districts' request for a time extension related to the La Grange diversion dam. In its order dated Dec. 19, 2012, FERC found that the La Grange diversion dam and TID's small power station was subject to FERC's licensing authority because it included a hydropower generating plant and is located on a navigable stream.

The Districts and conservation groups disagree with the La Grange decision and have sought rehearing. FERC has ordered the Districts to file a licensing plan, which they did on March 19, 2013. FERC is granting an extension of six months to the schedules the Districts' submitted in the licensing plan.

State's flow plan raises concerns

A proposal by the California State Water Resources Control Board is in the works, and could require the Merced, Tuolumne, and Stanislaus rivers to dedicate 35 percent of unimpaired flow to fish and wildlife from February to June each year.

At current, Phase 1 of the board's update to its Bay-Delta Water Quality Control Plan is in the environmental review stages. The board's Substitute Environmental Document was the topic of public workshops in March 2013, with water agencies such as the MID and TID opposing the flow proposal, citing the potential harm to water and power customers and the region's economy, agriculture operations and water supply.

Of additional concern to the Districts is the timing of the board's proposal, which conflicts with many aspects of the relicensing process.

333 E. Canal Drive
PO Box 949
Turlock, CA 95381
209.883.8300

