Restoration Administrator Flow Recommendation

То:	Don Portz, Chad Moore, David van Rijn, Regina Story
CC:	Michael Jackson, Rufino Gonzalez, Dan Cavanaugh, Doug Obegi, Steve Ottemoeller, Ian
	Buck-Macleod, TAC
Date:	November 2, 2023
From:	Tom Johnson, Restoration Administrator
Subject:	Amended Recommendation for 2023 Restoration Flows

The following is an Amendment to the approved June 30, 2023 Restoration Flow Recommendation in response to the Addendum to Final 2023 Restoration Allocation & Default Flow Schedule, September 26, 2023 (Addendum) issued by Reclamation.

Considerations

Reclamation's Addendum describes a desired dewatering of the river to allow inspection of Mendota Dam. However, the request from the owner of the dam represents that the dam "has been historically dewatered every few years to perform a safety inspection" which suggests a routine type of activity rather than "an act that results in damage that could result in imminent failure" as cited in Reclamations justification for requiring the dewatering. It is not apparent that Reclamation nor the dam owner has sought or received any authorizations (e.g. ACOE 401 or 404 permit, or CDFW 1600 permit), nor considered alternatives to the dewatering (e.g. dewatering at a time when biological impacts would be minimal, or conducting inspections in the wet using cofferdams or other mechanisms). This dewatering of the river to facilitate a relatively routine inspection, without permits or consideration of approaches to minimize impacts to the Restoration Goal, sets a poor precedent and a low bar for dewatering for the convenience of owners of facilities or levees to be granted dewatering privileges for routine activities.

Reclamation has been clear that this dewatering exercise will occur with or without a Restoration Flow recommendation. Reclamation has at least worked extensively to reduce the impacts of the outage (which was originally described as a six-week outage) and has actively facilitated various mechanisms to both reduce the duration of the outage and maintain a degree of flow in the river except for the immediate area of Mendota Dam. If the outage as currently planned by Reclamation and the dam owner go as planned, the total impacts will have been minimized to the extent possible.

Table A and Table B in the Addendum outline the current plan for the outage. In addition, daily coordination calls are planned for November 22nd through the completion of the outage and return to normal operations. <u>Given the nature of the outage, the potential uncertainty around flow change progression and seepage related to the lower flows, and duration of the actual work at Mendota Dam, the flow schedule following is tentative and has a high likelihood of being adjusted as the outage progresses. Coordination between the RA, Program, Friant Operators and Mendota Pool Owners will occur during the course of the outage.</u>

Recommended Flow Schedule to Accommodate the Mendota Pool Outage

At this time, I am providing an updated flow schedule Recommendation to accommodate the Mendota Pool outage that accommodates the work plan and flow constraints that are included in the Addendum.

Restoration Flow Period	Date Range	Friant Release	Restoration Flows at Gravelly Ford	Total Flow at Gravelly Ford ¹	Target Restoration Flow at SJB (est.)
Base Flow	November 15 – November 23, 2023	As necessary	230 cfs	235 cfs	140 cfs
Outage Flows	November 24, 2023	Reduce Restoration Flows at Friant by 30 cfs	As occurs	As occurs	As occurs
	November 27, 2023	Reduce Restoration Flows at Friant by 140 cfs	As occurs	As occurs	As occurs
	From November 30, 2023	As necessary	60 cfs	65 cfs	As occurs, est. at 15 cfs
	From approx. December 6, 2023 ²	420 cfs	As occurs	As occurs	As occurs
	From approx. December 8, 2023 ²	As necessary	230 cfs	235 cfs	140 cfs
Base Flows + Shifted Fall Pulse	December 17 – December 28, 2023	As necessary	520 cfs	525 cfs	385 cfs
Base Flow	December 29 - December 31, 2023	As necessary	230 cfs	235 cfs	140 cfs
Base Flows	January 1 – February 29, 2024	As necessary	250 cfs	255 cfs	165 cfs

Table 1. Summary of Restoration Flow Recommendations for November 15, 2023, through February 29, 2024.

¹Total Flow includes the minimum Holding Contract flows of 5 cfs required at Gravelly Ford ²Dates may adjust subject to status of work.

Additional Elements of this Recommendation

The amount of Restoration Flows withheld during the outage period will result in Unreleased Restoration Flows (URF's) totaling an estimated 3.388 TAF. Those URFs are immediately released to Reclamation to utilize for a URF exchange with interested Friant Water Contractors. The intent of the exchange will be to swap the URF's, located in Millerton Reservoir, for water stored in San Luis Reservoir. Reclamation has arranged for exchanged water in San Luis Reservoir to be released to the Delta Mendota Canal (DMC) and released from the DMC to the San Joaquin River at the Firebaugh Wasteway. The timing and volume of the release of the exchanged water will be coordinated by Reclamation with the objective of maintaining a flow of approximately 100 cfs below Sack Dam for the duration of the Outage.

Additional Consultation

I will continue to coordinate with the Program Office and other river operators to monitor work and outage conditions, seepage levels and other river conditions, and will update the Restoration Flow Recommendation as conditions change.