

January 5, 2010

(via e-mail)

Tim Ford Aquatic Biologist Turlock Irrigation District 333 East Canal Drive Turlock, CA 95380

Subject: Comments for FERC Project 2299 – Tuolumne River *Oncorhynchus mykiss* monitoring report December 2009

Dear Mr. Ford:

The California Department of Fish and Game (Department) has reviewed the Turlock and Modesto Irrigation District's (Districts) Tuolumne River *Oncorhynchus mykiss* (*O. mykiss*) Monitoring Report which was prepared in compliance with ordering paragraph (C) (5) of the April 3, 2008 Order on Ten-Year Summary Report under Article 58 for project 2299. The Department provides the following comments.

The Department believes that the monitoring resulting in the December 2009 Tuolumne River *Oncorhynchus mykiss Monitoring* report was not adequate for generating a statistically valid population estimate. The 2009 population estimate was generated through snorkel surveys that were conducted during March and July. The Department believes that the intensity and frequency of snorkel surveys must be increased to adequately monitor the *O. mykiss* population throughout the year.

The Department believes that the Districts' did not demonstrate a clear relationship between river temperatures and *O. mykiss* density and distribution within the 2009 monitoring report. The Department requests that the Districts' compare population densities and river temperature data at each survey site for the current study year and include this data within the monitoring reports.

The Department feels that the Districts' current monitoring efforts are inadequate for determining the population size and habitat needs of *O. mykiss* in the Tuolumne River. The Department encourages the implementation of more monitoring studies such as conducting **monthly** snorkel surveys in order to get an accurate representation of the river population throughout the year, extending the duration of the Districts' Alaskan weir video monitoring observations through June each year in order to monitor *O. mykiss* migration, and modification of the Districts' previously proposed acoustic tagging study. The Department can provide recommendations to the Districts' for modifying the acoustic tagging study design.

The Department appreciates the opportunity to provide comments to the December 2009 Tuolumne River *Oncorhynchus mykiss* monitoring report. If you have any questions regarding these comments, please contact Ms. Jennifer O'Brien, Fisheries Biologist at (209) 853-2533 ext. 3#.

Sincerely,

Tim Heyne

Senior Environmental Scientist

cc: Kim Webb

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Tuolumne River Technical Advisory Committee Via email