

# State Water Project Incidental Take Permit Risk Assessment for Delta Smelt and Longfin Smelt

## Section 1: Overview

**Date: 13 April 2021**

### **Life Stages Present:**

Delta Smelt: Adult, Larvae

Longfin Smelt: Adult, Juvenile, Larvae

### **Advice to Water Operations Management Team (WOMT):**

The Smelt Monitoring Team (SMT) does not recommend any OMR Index (OMRI) limits for the protection of Longfin Smelt (LFS) or Delta Smelt (DS). The SMT determined that a recommendation would not change the salvage trajectory of LFS in the south Delta. No diversion restrictions are in place for Barker Slough Pumping Plant (BSPP) operations under Condition of Approval 8.12.

### **Risk Assessment:**

*Delta Smelt:* Based on distribution patterns over the past decade and rare detections in this water year, DS are unlikely to be prevalent in the South Delta. Limited detection data supports DS being present in Suisun Marsh, west of the Sacramento-San Joaquin confluence, and within the Sacramento Deep Water Ship Channel. The distribution of adult DS is expected to extend upstream of the confluence which is supported by historical Spring Kodiak Trawl (SKT) data analysis. The likelihood of DS adult entrainment is slightly lower relative to the previous seven days due to seasonal timing. The likelihood of larval entrainment is slightly higher than the previous seven days due to seasonal timing. No larval DS have been detected. The less negative levels of OMRI decrease the potential for entrainment of DS in the central Delta, which includes fish in the lower San Joaquin River, into the south Delta.

Condition of Approval 8.12 is not controlling BSPP operations. No DS have been detected at station 716 during recent sampling. The period in which LFS protection could control BSPP operations ended on 3/31/2021.

*Longfin Smelt:* Projected operations are expected to result in an OMRI ranging from -300 to -1,500 cfs. 20mm Survey 2 sampled from 4/5/2021 through 4/8/2021 and reported 28 LFS [Fork Length (FL) = 10 – 23 mm] at station 809, near Jersey Point, and five LFS (FL = 11 – 19 mm) at station 901 in Franks Tract. No LFS were detected at the remaining 10 stations listed in Condition of Approval 8.4.2 in the Central and South Delta or at stations 716, 718, 723, 724 or 726 in the North Delta. Sample processing is ongoing and data for the remaining stations are pending. Persistent dry conditions are expected to continue and OMRI is not expected to

become more negative than -1,500 cfs. The most protective level that the SMT can recommend under Condition of Approval 8.4.2 is -1,250 cfs. However, the SMT lacks the information necessary to distinguish between a -1,250 OMRI scenario and a -1,500 cfs OMRI scenario. The distribution reported by the most recent 20-mm survey indicates that juvenile LFS are present in the lower San Joaquin River near Jersey Point and in Franks Tract. Detections of juvenile LFS at the salvage facilities indicate that they are present within, or immediately outside of, Clifton Court Forebay (CCF) and within the vicinity of the federal Tracy Pumping Plant. LFS present in the Old and Middle River corridor and within CCF will continue to be entrained and a recommendation for a more conservative OMRI level would not prevent further loss to entrainment. LFS in Franks Tract are believed to be outside of the area associated with high risk of entrainment under low exports levels.

Over the past seven days, 100 juvenile LFS were salvaged at the state Skinner Fish Facility and eight juvenile LFS were salvaged at the federal Tracy Fish Collection Facility. To date, 168 juvenile LFS have been salvaged at the state Skinner Fish Facility and 100 juvenile LFS have been salvaged at the federal Tracy Fish Collections Facility. Salvage estimates are expanded based on sampling effort. The difference in salvage trends at the facilities was attributed to differing operations and the presence of Clifton Court Forebay.

#### **Section 1-A: Sacramento River and Confluence**

Risk of entrainment into the central Delta and export facilities for DS and LFS in Sacramento River (8.1.5.2 C ii, iii, iv)

- Exposure Risk (Hydrology):
  - Delta Smelt: Low
  - Longfin Smelt: Low
- Routing Risk (Behavior and life history):
  - Delta Smelt: Low
  - Longfin Smelt: Moderate risk of LFS adults moving from the confluence into the Central Delta of their own volition. Chipps Island Trawl detected five LFS over the prior seven days.
- Overall Entrainment Risk
  - Delta Smelt: Low
  - Longfin Smelt: Low

#### **Section 1-B: Central Delta**

Risk of entrainment into the export facilities for DS and LFS in the central Delta

- Exposure Risk:
  - Delta Smelt: Low
  - Longfin Smelt: Low risk for LFS in Franks Tract and further downstream, moderate risk for LFS in the OMR corridor.
- Change in exposure from previous week:

- Delta Smelt: Slightly elevated due to seasonal timing and previously elevated turbidity in the central Delta.
- Longfin Smelt: Similar to last week.
- Reporting OMRI (*Number and range of OMRI bins will vary based on anticipated hydrology and operations*)
  - OMRI is projected to range from -300 cfs to -1,500 cfs.
  - OMRI = -1,250 to -1,500 cfs. Low risk for LFS in Franks Tract and further downstream. A recommendation to limit OMRI to -1,250 would not change the salvage trend when compared to the most negative OMRI based on projected operations.

## **Section 2: Basis for Advice**

The 2020 [Incidental Take Permit for Long-Term Operation of the State Water Project in the Sacramento-San Joaquin Delta 2081-2019-066-00](#) (ITP) states that advice to WOMT shall be based the following Conditions of Approval:

*List relevant Condition of Approval number and title based on species/life stage, time of year, etc.*

### **8.1.5.2 Smelt Monitoring Team Risk Assessment**

#### **8.4.2 Larval and Juvenile Longfin Smelt Entrainment Protection.**

From January 1 through June 30, when a single SLS or 20 mm Survey (20 mm) sampling period exceeds one of the following thresholds:

- LFS larvae or juveniles found in four or more of the 12 SLS or 20 mm stations in the central Delta and south Delta (Stations 809, 812, 815, 901, 902, 906, 910, 912, 914, 915, 918, 919), or
- LFS catch per tow exceeds five LFS larvae or juveniles in two or more of the 12 stations in the central Delta and south Delta (Stations 809, 812, 815, 901, 902, 906, 910, 912, 914, 915, 918, 919).

Permittee shall restrict south Delta exports for seven consecutive days to maintain a seven-day average OMRI no more negative than -5,000 cfs. Permittee shall also immediately convene the SMT to conduct a risk assessment (see Condition of Approval 8.5.1.2) to assess the risk of larval and juvenile LFS entrainment into the South Delta Export Facilities, determine if an OMRI flow restriction is warranted, and recommend an OMRI flow limit between -1,250 cfs and -5,000 cfs. The SMT risk assessment and operational advice shall be reviewed by the WOMT (Condition of Approval 8.1.3) via the Collaborative Real-time Decision-making process (Condition of Approval 8.1.4). Permittee shall operate to the export restriction and OMRI flow target approved through Conditions of Approval 8.1.3 and 8.1.4. Each week the SMT shall convene to conduct a new risk assessment and determine whether to maintain, or off ramp from, export restrictions based on the risk to LFS, or until the DS and LFS off-ramp has been met as described in Condition of Approval 8.8 (End of OMR Management).

From January 1 through June 30, DWR and CDFW SMT staff shall conduct weekly, or more often as needed, risk assessments (see Condition of Approval 8.5.1.2) to assess the risk of larval and juvenile LFS entrainment into the South Delta Export Facilities. As a part of the risk assessment, the SMT shall provide advice on the appropriate OMRI flow targets to minimize LFS entrainment or entrainment risk, or both. The SMT shall provide its advice to WOMT (Condition of Approval 8.1.3) and use the Collaborative Approach to Real-time Risk Assessment process described in Condition of Approval 8.1.4 to determine if an OMRI flow restriction is warranted and determine an OMRI flow limit between -1,250 cfs and -5,000 cfs. The OMRI flow limit shall be in place until the next risk assessment conducted by the SMT determines that it is no longer necessary to minimize take or related impacts to LFS, or until the DS and LFS off-ramp has been met as described in Condition of Approval 8.8 (End of OMR Management).

### **8.5.2 Larval and Juvenile Delta Smelt Protection.**

If the five-day cumulative salvage of juvenile DS at the CVP and SWP facilities is greater than or equal to one plus the average prior three years' FMWT index (rounded down), Permittee shall restrict south Delta exports for seven consecutive days to maintain a seven-day average OMRI no more negative than -5,000 cfs. Additionally, if the five-day cumulative salvage threshold is met or exceeded, Permittee shall immediately convene the SMT to conduct a risk assessment (Condition of Approval 8.1.5.2) and determine the future risk of entrainment and take of larval and juvenile DS. The SMT may provide advice to further restrict south Delta exports to maintain a more positive OMRI than -5,000 cfs. The SMT may provide advice for further restrictions within three risk categories:

- Low risk: Limit OMRI between -4,000 cfs to -5,000 cfs
- Medium risk: Limit OMRI between -2,500 cfs to -4,000 cfs
- High risk: Limit OMRI between -1,250 cfs to -2,500 cfs

The duration and magnitude of operational advice shall be provided to the WOMT (Condition of Approval 8.1.3) and decisions shall be made following the process described in Condition of Approval 8.1.4 (Collaborative Real Time Risk Assessment). When conducting risk assessments to evaluate the risk of entrainment and take of juvenile DS, the SMT shall evaluate the following information sources, in addition to any other models or surveys they deem appropriate and those listed in Condition of Approval 8.1.5.2:

- Results from a CDFW approved DS life cycle model.
- DS recruitment levels identified by the SMT using the CDFW- approved life cycle model that links environmental conditions to recruitment, including factors related to loss as a result of entrainment such as OMRI flows. In this context, recruitment is defined as the estimated number of post-larval DS in June per number of spawning adults in the prior February-March period.
- Hydrodynamic models and forecasts of entrainment informed by the EDSM or other relevant survey data to estimate the percentage of larval and juvenile DS that could be entrained.

If expanded salvage at the CVP and SWP facilities of juvenile DS exceeds 11 within a three-day period under this condition, Permittee shall restrict south Delta exports for seven consecutive days to maintain a seven-day average OMRI no more negative than -3,500 cfs. If juvenile DS continue to be salvaged at the CVP and SWP facilities during the seven days of OMRI restrictions, then Permittee shall continue restrictions and request a risk assessment by the SMT to determine if additional advice and subsequent restrictions are warranted and provide advice to WOMT (see Condition of Approval 8.1.3) and follow the decision-making process described in Condition of Approval 8.1.4.

#### **8.12 Barker Slough Pumping Plant Longfin and Delta Smelt Protection.**

Permittee shall operate the BSPP to protect larval LFS from January 15 through March 31 of dry and critical water years. Permittee shall operate to protect larval DS from March 1 through June 30 of dry and critical years. If the water year type changes after January 1 to below normal, above normal or wet, this action will be suspended. If the water year type changes after January to dry or critical, Permittee shall operate according to this Condition of Approval.

From January 15 through March 31 of dry and critical water years, Permittee shall reduce the maximum seven-day average diversion rate at BSPP to less than 60 cfs when larval LFS are detected at station 716. In addition, in its weekly meetings from January 15 through March 31, the Smelt Monitoring Team shall review LFS abundance and distribution survey data and other pertinent abiotic and biotic factors that influence the entrainment risk of larval LFS at the BSPP. When recommended by the SMT, and as approved through the decision-making processes described in Conditions of Approval 8.1.3 and 8.1.4, Permittee shall reduce the maximum seven-day average diversion rate at BSPP according to the advice provided by the SMT.

From March 1 through June 30 of dry and critical water years, Permittee shall reduce the maximum seven-day average diversion rate at BSPP to less than 60 cfs when larval DS are detected at station 716. In addition, in its weekly meetings from March 1 through June 30, the SMT shall review DS abundance and distribution survey data and other pertinent abiotic and biotic factors that influence the entrainment risk of larval DS at the BSPP (including temperature and turbidity). When recommended by the SMT, and as approved through the decision-making processes described in Conditions of Approval 8.1.3 and 8.1.4, Permittee shall reduce the maximum seven-day average diversion rate at BSPP to less than 60 cfs. The DS requirements described in this condition may be adjusted to align with USFWS requirements to minimize take of DS through an amendment to this ITP.

#### **8.13 Water Year Type Definition.**

All references to water year type in this ITP shall be defined based on the Sacramento Valley Index unless otherwise noted.

## Discussion of Conditions of Approval

*Provide sentence or two addressing criteria for each Condition of Approval listed in “Basis for Advice” section. Refer to data below where appropriate.*

SMT will conduct weekly risk assessments as described in Condition of Approval 8.1.5.2.

8.3.1 Environmental conditions did not exceed the thresholds identified in this condition during Water Year 2021. This Condition of Approval ended on 1/31/2021.

8.3.3 This Condition of Approval ended on 2/28/2021.

8.4.1 This Condition of Approval ended on 12/28/2021 when SLS detected a larval LFS in the lower San Joaquin River.

8.4.2 This Condition of Approval was not triggered by the most recently available data and the SMT determined that a recommendation was not warranted. At the time of the SMT meeting, data was available for the 12 relevant stations. Twenty-eight LFS (FL = 10 – 23 mm) at station 809, near Jersey Point, and five LFS (FL = 11 – 19 mm) at station 901 in Franks Tract. No LFS were detected at the remaining 10 stations listed in Condition of Approval 8.4.2

8.5.1 This Condition of Approval ended on 4/1/2021.

8.5.2 This Condition of Approval has not been triggered. The three-year average FMWT Index for DS is zero, resulting in a salvage threshold of one for juvenile DS. No DS have been salvaged this water year.

8.12 This Condition of Approval has not been triggered. No DS were detected at station 716 during 20mm Survey 2. The relevant period for LFS ended on 3/31/2021.

## Section 3: Hydrology and Operations

Assessment of hydrologic, operational, and meteorological information. 8.1.5.2 A.

### Section 3-A: Water operations conditions. 8.1.5.2.A. i

- Antecedent Actions: (e.g. DCC gate closure and actions such as integrated early winter pulse protection, etc.)
  - ITP Conditions of Approval 8.3.2 Salmonid Presence limits exports to maintain a 14-day running OMRI average no more negative than -5,000 cfs. as of 1/1/2021.
  - DCC gates will remain closed for the remainder of the season (through May 20, 2021 per the PA description for DCC gate operations).
  - Grantline Canal agricultural barrier was breached on 11/11/2020. The OMRI equation was adjusted accordingly to accommodate the change in barrier status.

- Controlling Factors: Delta Outflow and X2 location.
- Water Temperature:
  - CCF = Not discussed (*Condition of Approval 8.8: Daily average temperature at CCF exceeds 25°C for 3 consecutive days*)
  - 3 Station Average = 17.42°C
- Tidal Cycle: Not discussed
- Turbidity:
  - 8.3.1 Freeport 3-day average = Not reported. 8.3.1 terminated without being triggered.
  - 8.5.1 OBI Turbidity = 2.85 FNU
- Salinity: X2 > 81 km. Estimated to be 84.7 km on the Sacramento River and 84.3 km on the San Joaquin River
- Hydrologic Footprint: The SMT did not request any new PTM runs.

#### **Section 3-B: Water operations outlook. 8.1.5.2.A. ii**

- Outages
  - SWP: None reported.
  - CVP: None reported.
- Exports
  - CCF: 300 - 700cfs
  - Jones: 800 cfs
- Meteorological Forecast: No precipitation is in the forecast
- Storm Event Projection: No precipitation is in the forecast

#### **Section 3-C: Projected conditions. 8.1.5.2.A. iii**

- DCC Gates position: Closed for season (through May 20, 2021)
- Sacramento River flow at Freeport: 8,000 - 9,000 cfs
- San Joaquin River flow at Vernalis: 1,000 cfs. Could reach 2,000 cfs with Stanislaus releases.
- Qwest: +700 cfs to 1,700 cfs
- Old River at Bacon Island Turbidity: 2.60 FNU.
- Expected changes in South Delta Exports: SWP exports may increase if San Joaquin River flow increases to 2,000 cfs.
- NDOI: Operations are targeting a 3-day running average of 7,100 cfs

Table 1: Comparison of OMR and OMR Index (5-day and 14-day averages for OMR Index and USGS gauge were reported on [SacPAS website](#), accessed 4/13/2021.

Date	Averaging Period	USGS gauges (cfs)	Index (cfs)
4/13/2021	Daily	Not Reported	-1,200 cfs
4/10/2021	5-day	-270 cfs	-1,070 cfs
4/10/2021	14-day	-680 cfs	-780 cfs

#### Section 4: Distribution and Biology.

##### 8.1.5.2.B. Assessment of biological information for Delta Smelt and Longfin Smelt

#### Section 4-A: Delta Smelt population status 8.1.5.2.B. i

- EDSM did not collect any DS during sampling conducted from 3/29/2021 through 4/2/2021. No abundance estimate was calculated. Sampling scheduled for 4/5/2021 through 4/9/2021 was canceled due to COVID-19 mitigation.
- The 2020 Annual FMWT Index for DS is zero for the third consecutive year.
- Delta Smelt LCM discussion. Not Discussed.
- Biological Conditions: Not Discussed
- % of population in Delta zones: SMT did not discuss distribution in terms of percentage in Delta zones.
- Other Surveys: The last DS detection was on 1/26/2021 by EDSM.
- Salvage: No DS have been detected at either salvage facility this season. No DS have been detected in larval sampling at the Tracy Fish Collection Facility (CVP) or Skinner Fish Facility (SWP). Larval sampling began at the Tracy Fish Collection Facility on 2/15/2021 and at the Skinner Fish Facility on 2/22/2021.

#### Section 4-B: Longfin Smelt population status 8.1.5.2.B. ii.

- FMWT Index: The FMWT Annual Index for LFS is 28. Monthly indices for September and October are zero, the index for November is 22 and index for December is 6.
- Bay Study: In March, Bay Study detected 1 LFS in the lower Sacramento River, six LFS in Suisun Bay and four LFS downstream of Carquinez Strait.
- Other Surveys:
  - Chipps Island Trawl collected 5 LFS
  - EDSM began Phase 2 sampling on 3/29/2021. They reported 137 LFS collected from 3/29/2021 through 3/30/2021 for samples processed and identification confirmed to date. Eight were collected in the Lower Sacramento River, two

were collected in the lower San Joaquin River and 127 were collected in Suisun Marsh. These numbers will be revised as sample processing is completed.

- 20mm Survey 2 sample processing is ongoing. Twenty-eight LFS (FL = 10 – 23 mm) at station 809, near Jersey Point, and five LFS (FL = 11 – 19 mm) at station 901 in Franks Tract. No LFS were detected at the remaining 10 station listed in Condition of Approval 8.4.2 or at stations 716, 718, 723, 724 or 726. Sample processing is ongoing

#### Salvage:

Over the past seven days, 100 juvenile LFS were salvaged at the state Skinner Fish Facility and eight juvenile LFS were salvaged at the federal Tracy Fish Collection Facility. To date, 168 juvenile LFS have been salvaged at the state Skinner Fish Facility and 100 juvenile LFS have been salvaged at the federal Tracy Fish Collections Facility. Salvage estimates are expanded based on sampling effort.

#### **Section 4-C:** Additional data sources to assess sensitivity to entrainment Delta. 8.1.5.2.C & D. i

- SMT estimated X2 using a tool developed by DWR staff that applies the same methodology used to calculate X2 reported on CDEC.

#### Notes:

The SMT ITP Risk Assessments can be accessed on the CDFW [Water Branch website](#).

A presentation will be scheduled for SMT members to learn about turbidity mapping available on Bay Delta Live. This presentation will likely occur in mid-May.

A discrepancy was noted between the range of OMRI values reported in the Operations Outlook and in the SMT Risk Assessment. This was due the more nuanced reporting provided during SMT meetings. CDFW requested that the SMT assess the full range of OMR values reported in the Operations Outlook so that both documents remain consistent.

The SMT discussed the interpretation of Condition of Approval 8.4.2 and clarified that catch per tow is the average catch per tow at a station.

Information was requested regarding the D-1641 April/May flow pulse. Operations do not expect to meet this requirement.

The SMT requested that catch updates be provided in table format to ensure accurate communication.

It was noted that combined export operations have been at or near minimum health and safety levels (1,500 cfs) for the past three weeks.

Attachments:

Table 1: Sample week March 29 - April 1, 2021 EDSM 20 mm Osmerid catch

Date	Stratum	Species	Catch	FL Range (mm)	ID Status
29-Mar	Lower Sacramento	LFS	8	7.8 - 16.1	complete
29-Mar	Lower San Joaquin	LFS	2	13.4 and 22	complete
30-Mar	Suisun Marsh	LFS	127	6.7 - 30.1	complete
31-Mar	Sacramento Deep Water Ship Channel	LFS	1	14.9	Primary
31-Mar	Suisun Marsh	LFS	204	8.1 - 33	Primary
1-Apr	Suisun Bay	LFS	16	9.5 - 19.5	Primary
<b>TOTAL LFS</b>	NA	NA	<b>358</b>	NA	NA
31-Mar	Suisun Marsh	OSM	5	8.0 - 15.1	Primary
1-Apr	Suisun Bay	OSM	2	7.0 and 10.1	Primary
<b>TOTAL OSM</b>	NA	NA	<b>7</b>	NA	NA

OSM – Unidentified Osmerid. Generally due to poor sample quality, will be genetically verified if visual verification can not be determined.

Complete – Two independent blind ID's have confirmed

Primary – Needs second independent blind ID to confirm