



Supplement to 6/17/13 MPWMD Board Packet

Attached are copies of letters received between May 14, 2013 and June 10, 2013. These letters are also listed in the June 17, 2013 Board packet under item 27, Letters Received.

Author	Addressee	Date	Topic
Dick Butler	David J. Stoldt	6/6/13	Complaint from Carmel River Steelhead Association re Steelhead Rescues
Saoirse Folsom	Arlene Tavani	6/7/13	No Access to the Water Main Shut-Off Valve
Barbara Evoy	David J. Stoldt	5/31/13	Order WR 2009-0060 California American Water-Monterey
Samuel H. Armacost	California-American Water	6/1/13	Concern re Water Bill Spike
Margaret Paul	David J. Stoldt	5/23/13	Complaint from Carmel River Steelhead Association re Steelhead Rescues

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UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
 NATIONAL MARINE FISHERIES SERVICE
 Southwest Region
 777 Sonoma Ave., Room 325
 Santa Rosa, CA 95404-4731

June 6, 2013

In response, refer to:
 SW/F/SWR3:JM

Rob MacLean, President
 California American Water
 1033 B Avenue, Suite 200
 Coronado, California 92118

RECEIVED

JUN 10 2013

David Stoldt
 General Manager
 Monterey Peninsula Water Management District
 5 Harris Court, Building G
 P.O. Box 85
 Monterey, California 93942-0085

MPWMD

Dear Messrs. MacLean and Stoldt:

As you are aware, the Carmel River provides habitat for South-Central California Coast (S-CCC) Distinct Population Segment steelhead, listed as threatened under the federal Endangered Species Act (ESA). California American Water (CAW) is responsible for the annual fish rescues from the mainstem of the Carmel River during the dry season. Rescues of fish in the Carmel River are necessary each year due to CAW's water withdrawals throughout the Carmel River. The Monterey Peninsula Water Management District (District) is CAW's designee for implementation of the annual fish rescue program.

On May 20, 2013, NOAA's National Marine Fisheries Service (NMFS) received electronic correspondence and letters from the Carmel River Steelhead Association (CRSA) regarding their concerns of the current steelhead rescue efforts currently undertaken by the District. The CRSA contend they observed many fish (several life stages) left in areas of the river that were perhaps either overlooked by the District, or not rescued due to the fact the District does not have enough staff within their rescue program to adequately keep up with fish rescue demands. Because of this, the CRSA offered to assist the District with rescues on the mainstem. However, their offer was rejected by District staff even though CRSA assistance with annual rescues in the mainstem Carmel is included and described in the 2009 draft Rescue and Rearing Management Plan that was developed for the ESA permitting process (see below).

Additionally, on May 19, 2013, NMFS' Office of Law Enforcement Special Agent, Mr. Roy Torres, responded to a request from Mr. Brian LeNeve of the CRSA regarding stressed and dying steelhead observed in areas of the river downstream of the Via Mallorca Bridge. As a



result, Mr. Torres conducted a site visit and observed several adult steelhead that were dead or dying and at risk to predation and poaching. Based on these findings, Mr. Torres determined it prudent to rescue and relocate the living adult steelhead. He requested immediate assistance from Mr. LeNeve and the CRSA rescue team and were able to safely rescue and release the steelhead to the Pacific Ocean near the mouth of the Carmel River.

The CRSA communicated concerns of additional fish still located elsewhere within the mainstem of the river upstream of the Via Mallorca Bridge and likely suffering from similar conditions. Because of the need to rescue these fish, and our Special Agent's findings, NMFS is concerned with CAW's and the District's ability to adequately rescue the amount of fish currently located in areas with poor habitat conditions. NMFS is also aware and concerned with the perceived lack of collaboration between the District and the CRSA regarding this matter. If the District is understaffed or unable to adequately cover the extent of rescues required within the mainstem of the river, then CAW (which is ultimately responsible) is urged to develop a fish rescue program that ensures steelhead rescue needs are met.

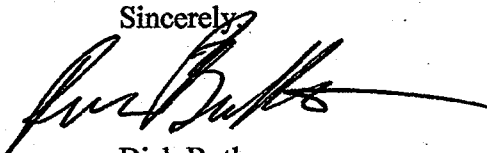
Section 10(A)1(a) Permit

NMFS has been providing technical assistance to the District on the fish rescue and rearing program since 2005. As part of the ESA research and enhancement permitting process, NMFS convened an interagency (the District, NMFS, CRSA, California Department of Fish and Wildlife) technical advisory committee (TAC) in 2006 to develop the Rescue and Rearing Management Plan (RRMP) application and necessary supporting documents.

It took the District from late 2008 until July 15, 2009, to complete the final draft plan, and submit it to NMFS for an initial review prior to the formal submission. NMFS expedited the review of the draft plan and transmitted suggested edits and comments for the District to consider on August 26, 2009, with the expectation the final plan would be submitted for the formal permitting process shortly thereafter. However, the District has not yet finalized the plan nor submitted the plan and application for the permitting process. Over the last several years, the District has indicated to NMFS the plan is a priority and has provided target dates for completion, but the dates have come and gone. The District has been tasked with obtaining the necessary ESA permit for the annual rescues since 2005, but has failed to complete the documents necessary to initiate the permitting process. We strongly recommend the District or CAW complete and submit the RRMP and associated section 10(a)(1)(A) permit application as soon as possible, but no later than November 1, 2013, so that the permit can be processed and issued for use in 2014. If the District does not submit the completed application and associated RRMP by this date, the District will not have ESA take coverage for the 2014 rescue season. We also encourage the District to reconsider the exclusion of CRSA, and instead be consistent with CRSA's involvement with the rescues outlined in the 2009 draft RRMP and utilize this resource.

We look forward to discussing these issues in more depth at the meeting scheduled for June 11, 2013, at the MPWMD's office. NMFS is committed to the conservation and recovery of S-CCC steelhead in the Carmel River Watershed, and values your organizations' efforts on this matter. If you have any questions regarding this letter, please contact Jacqueline Meyer of my staff at 707-575-6057, or via email at Jacqueline.pearson-meyer@noaa.gov.

Sincerely,



Dick Butler
North Central Coast Office Supervisor
Protected Resources Division

cc: Chris Yates, ARA, NMFS, Long Beach
Jeffery Jahn, NMFS Long Beach
Roy Torres, NOAA OLE, Pacific Grove
Paul Ortiz, NOAA GC, Long Beach
Eric Sabolsice, CAW, Pacific Grove

Arlene Tavani

RECEIVED

From: Saoirse Folsom <sgfolsom@gmail.com>
 Sent: Friday, June 07, 2013 7:31 PM
 To: Arlene Tavani
 Subject: We no longer have access to the water main shut-off valve

JUN 10 2013

MPWMD

Greetings Arlene,

I am writing to the Monterey Water District due to a Cal-Am Water development that I just noticed at my house in Carmel Valley. This is a new change that happened sometime between January and May 15th without any notice. Cal-Am has apparently covered the water main shut-off valve that is right next to their water meter so that residents like myself, can no longer turn their water off from the main.

The obvious problem here is this: residents are still held responsible to pay for water leaks that occur in their pipes from the length of pipe that runs from the house shut-off valve, to the main shut-off valve by the meter. In my case that could be as much as 150 ft of pipe! **I have several questions/concerns but my central question is this: How can I be held responsible for this if I have no access to turn off the water from the main anymore?** We do not have a shut-off valve close to the house, and frankly I cannot afford the \$600.00+ to put one in right now.

I called Cal-Am water to discuss this issue, and the first person I spoke with didn't know anything about it, but promised to have someone call me back with more information. I never received a call back. The second person I called told me that they are always prompt to "immediately arrive 24 hours a day, seven days a week to turn off water from the main" and that I should rest assured that they would "work with me to reduce the cost of any leakage for that area of pipe should a leak occur" I informed them that I have reported high-pressure water main leakages to them in the past and have noted it takes 4 hours+ for them to respond in some instances. Can you imagine the cost burden involved in such a situation; being held responsible for 4+ hours of water leakage from the time you discovered a leak to the time Cal-Am gets out to your house in Carmel Valley and shuts off the water so a plumber can start the repairs?

This is even more problematic due to the area in which we live, wherein high-pressure water leaks are not uncommon as there is a water pressure tank for the neighborhood just down the road from our house.

My additional questions/concerns:

- What about the residents that don't have shut-off valves right against their house, like myself? Will Cal-Am reimburse customers to have a new shut off valve installed right next to where the old one used to be against the water main?
- How will plumbers deal with this? What happens at 3am in the morning, or weekends, or if someone wants to make a repair on the pipe? Will Cal-Am promptly come to turn the water off, then wait until the repair is done, or come back after to promptly turn the water back on, and then wait while the plumber does a leak test to make sure that the repairs took? If there are additional tweaks needed by the plumber does Cal-Am again wait until the repair is done? Are you imagining as I am, the man-hours involved in such a proposition? How does Cal-Am propose to deal with this additional labor cost as they implement the limited main access across the water district, will our bills go up?

- 6
- What if the house is a rental that needs prompt water leak repairs, will Cal-Am reimburse a landlord for having to provide tenants with a hotel room while tenants have no access to water?
 - Isn't this also a water conservation issue? Shouldn't residents be provided with the best possible access to the main shut-off valve to prevent water waste in unanticipated leakages?

This terrible new "improvement" will lead to high costs and unfair burdens on Cal-Am water customers. Thanks to Cal-Am I will have to save up to install a new water shut-off valve right next to the water main, another \$600+ expense that I can't afford and shouldn't have to make if they had more foresight.

What does MPWMD plan to do about this? Is this legal? Is MPWMD aware that this is happening?

I look forward to your thoughtful response.

Thank you,

Saoirse

--
Saoirse Folsom-Morales (pronounced sairsha)
(510) 706-7077
sgfolsom@gmail.com



RECEIVED

JUN - 4 2013



EDMUND G. BROWN JR.
GOVERNOR

MATTHEW RODRIGUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

State Water Resources Control Board

MPWMD

MAY 31 2013

In Reply Refer to:
JO:262.0(27 -01)

Mr. David J. Stoldt, General Manager
Monterey Peninsula Water Management District
5 Harris Court, Building G
P.O. Box 85
Monterey, CA 93942-0085

Dear Mr. Stoldt:

ORDER WR 2009-0060 CALIFORNIA AMERICAN WATER-MONTEREY

Thank you for meeting with us on March 8, 2013 and for your March 1, 2013 letter. Your letter identifies Monterey Peninsula Water Management District's (MPWMD) concerns related to California American Water-Monterey's (Cal-Am) interpretation and implementation of the State Water Resource Control Board's (State Water Board) Order WR 2009-0060. I know the Monterey community is keenly aware of the need to significantly reduce water use as the compliance deadlines of Order WR 2008-0060 approach. The State Water Board is also interested in supporting any significant reductions in water use by the community. However, because Cal-Am has indicated they will not be able to implement a water replacement solution by the dates specified in Order WR 2009-0060, it is important to carefully articulate the framework for compliance.

Your letter indicates that Cal-Am's interpretation of my April 9, 2012 letter to them interferes with water savings that might otherwise be achieved through subdividing, remodeling, new connections (under certain circumstances), and conversion of existing commercial water use sites to mixed use commercial/residential water use. You suggest that additional savings can be realized by allowing a change in-use as long as there is no increase in water use to the site.

Specifically, you ask that I confirm MPWMD's understanding as to the meaning and proper interpretation of Condition 2 of Order WR 2009-0060 by amending my April 2012 letter to Cal-Am in the following manner:

- a) For purposes of interpreting a "change of use," only local land use authorities will be considered, not MPWMD's defined term "Change of Use";
- b) A meter split at an existing site to convert existing commercial water use to residential water use, and vice versa, may be allowed provided the aggregate use from all resulting split meters does not exceed prior water use served by the single water meter;
- c) Creation of a new service address at an existing site by subdividing or remodeling shall not constitute a "new connection" so long as there is no increase in water use to the site; and

FELICIA MARCUS, CHAIR | THOMAS HOWARD, EXECUTIVE DIRECTOR

1001 I Street, Sacramento, CA 95814 | Mailing Address: P.O. Box 100, Sacramento, Ca 95812-0100 | www.waterboards.ca.gov

Mr. David J. Stoldt, General Manager
MPWMD

- 2 -

MAY 3 1 2013

- d) Replacing a meter to a site that previously had service does not constitute a "new connection" so long as there is no increase in water use to the site.

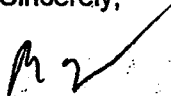
In my April 9, 2012 letter to Cal-Am, I identified that Condition 2 and the associated Footnote 47 are intended to limit an increase in water consumption from the Carmel River that may be caused by regional or local zoning and land use changes when compared to the conditions that existed at the time of the Order adoption. On October 20, 2009, the date of Order WR 2009-0060, each existing service connection had a specific zoning and use designation by both MPWMD and local land use authorities. The Order addressed new water meters at existing structures with no changes in zoning (Footnote 47 to Order WR 2009-0060) but is not interpreted to allow new meters where zoning would be changed by local land use authorities, Cal-Am or MPWMD.

At this time, I do not have enough information to determine if your four clarifications would lead to water savings, as you suggest. My April 9, 2012 letter to Cal-Am stated that the State Water Board will determine the baseline for past water use based on the lesser of the actual average metered annual water use for a water year from the last five years of records, or the amount calculated using MPWMD's fixture-unit count method. Since your letter did not address the approach to quantify baseline, please provide additional information as to how your proposal will assure that new usage will reduce consumption below the baseline, what MPWMD would use as a baseline to evaluate past water use at a given site, and how this will be monitored and enforced.

If you would like to discuss this matter further, I suggest you arrange to have representatives from State Water Board, Cal-Am, and MPWMD participate. If you have any questions concerning this matter, please contact Mr. John O'Hagan of my staff at (916) 341-5368 or by e-mail at John.O'Hagan@waterboards.ca.gov. Written correspondence should be addressed as follows:

State Water Resources Control Board
Division of Water Rights
Attn: John O'Hagan
P.O. Box 2000
Sacramento, CA 95812-2000

Sincerely,



Barbara Evoy, Deputy Director
Division of Water Rights

cc: California American Water—Monterey
c/o Tim Miller
1033 B Avenue, Suite 200
Coronado, CA 92118

SAMUEL H. ARMACOST

P.O. Box 2000
Sun Valley, ID 83353

June 1, 2013

California American Water
P.O. Box 7150
Pasadena, CA 91109-7150

Re: Account No. 05-0447089-9
26294 Carmelo
Carmel, CA

RECEIVED

JUN - 4 2013

MPWMD

Dear Sir or Madam:

I have enclosed a check for \$1337.91 representing your bill for the period ending June 3, 2013. At the same time, I am protesting this bill and asking for a rational explanation and investigation that explains what I am asserting to be an incorrect billing. I am also asking the CPUC to open an investigation of this bill. After checking the meter and talking to a supervisor at CAL AMERICAN your company's explanation is: "Sorry, we apologize for the large bill but you used the water." With respect, we did not.

We are Idaho residents and are rarely in Carmel. For the billing period in question, we were not in our Carmel home at all. The only people in, or around, the house were our gardener who asserts there are no leaks in the irrigation system, and our homemaker who walks through frequently and also noticed no internal leaks or faulty toilets.

Our normal usage for the period sixteen billing periods averaged 77 cubic feet. For the immediate three periods, when we were also not at the house, we had an average of 8.3 cubic feet of water usage. I am sure that you can understand our extreme concern - and distress - when a bill for the recent period shows usage of 419 cubic feet! We immediately asked for a meter check and review which was done on May 20. The inspector announced that the meter was correct and the water usage since the beginning of the month was only 23 cubic feet.

In discussing this with your personnel, my wife was given various possible explanations which all asserted that, somehow, we had used over 31,000 gallons of water the previous month even though we were not at the house, there were no leaks in the system, irrigation was at normal levels, and the meter was functioning properly. About the only rationale that the Cal American employee could offer was that there had been water theft. I find this unbelievable unless you can provide evidence that this is a common problem in our neighborhood. By my reckoning, stealing this much water from a hose bibb would take several days and a large tanker truck. Since many of our neighbors

June 1, 2013

Mary Jane Armacost

To: Monterey Peninsula
Water District
Board of Directors

Per: Please find a copy of a letter of complaint that my husband has sent to California American Water. You should be aware of what is happening - and of the recent article (May 23) in the Monterey Herald reporting that this is happening to others in the community.

Sincerely,
Mary Jane Armacost

Wednesday, May 29, 2013

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News Archives-Cal Am admits some spikes

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Monterey County Herald, The (CA)

May 23, 2013

Section: Top Story_1

Page: A1

Cal Am admits some spikes

JULIA REYNOLDS

California American Water says it was at fault in at least a few recent cases of high water bills, citing errors that included accounting mistakes and a mismatched water meter register. While the company insists the overwhelming majority of "spiked" water bills were caused by costly tiered rates combined with leaks and other mistakes that customers are responsible for, Cal Am spokeswoman Catherine Bowie said it's important to investigate each case individually.

"There have been other instances, though, where we did find an error on our part such as an accounting error," Bowie said in a recent email to The Herald.

However, the company said, in nearly all cases of spiked bills reported by The Herald and other news outlets, Cal Am determined the customers used the water for which they were billed.

"In every high bill instance that has been covered by the local media with the exception of one case the water measured by the meter had been consumed and was the result of a broken irrigation line, a mis-set irrigation timer, toilet leak, etc.," Bowie said.

She said the one exception was "a billing error that was fully reimbursed once it was discovered in our audit, which we conduct in all cases of high water bills."

Some Cal Am customers strongly disagree with the company's broad pronouncement.

Unexplained use

Toni Ray, whose Cal Am bill of nearly \$10,000 was eventually reduced to about \$2,300, said she has paid the final amount in full but the cause of her sudden spike was never determined, though a plumber checked her house for leaks and found none. Her bills since the spike have been about \$40 a month, she said.

Ray sent a complaint to the state Public Utilities Commission, and said she was told a few months ago that an investigation had been opened.

Nonetheless, in such cases of "unexplained use," Cal Am says it has confirmed to its own satisfaction the water was actually used or wasted even if the customer is confounded as to how.

"There have been instances, too, where the customer has been unable to identify what caused the high consumption which is easy to understand," Bowie said, giving the example of a gardener finding and fixing a leak but forgetting to report it to the homeowner. "We supply adjustments in these situations too. We call them 'unexplained water use' adjustments, which means the exact cause of the water use was never identified but the usage was confirmed."

Even the adjusted bills can be hard to take and still often total \$1,000 or more, as in Ray's case.

Odometer for water

Though Bowie said she is unable to discuss individual cases without a customer's permission, the company's admission it mismatched a meter register raises concerns for customers who have been wondering if their meters have malfunctioned.

The meter's register is the part the customer can see that indicates water usage. It is like a car's odometer in that it shows a measurement, while the water meter actually does the measuring.

There have been recent reports of companies putting the wrong sized register on a meter, as Cal Am acknowledged it has done.

In a recent Santa Clara County case, it took persistent complaining for Los Gatos engineer Tony Moore to get his \$3,100 bill resolved with San Jose Water Co.

Every time he flushed his toilet, the water meter showed he used 68.8 gallons of water.

"He joked that it would be cheaper to use bottled Perrier in his 1.6-gallon low-flow toilet," San Jose Mercury News reporter Scott Herhold wrote last week.

Water company officials investigated and told Moore his toilet was malfunctioning before discovering the register was the wrong one for his meter.

"Their default response seems to be that it's always something wrong with the customer's plumbing," Moore said.

Bowie says the same has happened with Cal Am customers, though she did not indicate how often it occurs.

"We have also had the situation described in the Mercury article where the wrong sized register was placed on a meter," she said. "These instances are very infrequent and it's important to understand that when they have occurred, there has been nothing wrong with the meter or the register it is the human error in mismatching the two that causes the problem."

She stressed the past year's steeply tiered rates "are designed to create these high bills when leaks occur," to encourage conservation.

"We are in a new world when it comes to water leaks because of the restrictions on the area's supply," she said. "A toilet leak today is unlike a toilet leak three years ago."

"To give the occasional billing error or meter misread the same level (of) attention as the rate structure in terms of an explanation for these bill spikes is disingenuous and downright misleading," she said.

Investigations opened

Officials at the Public Utilities Commission said several spiked Cal Am bill investigations were opened earlier this year, but as of press time on Wednesday they could not say whether any were resolved or how many remain open.

Bowie said understanding the tiered rate structure is going to be more important as customers start increased usage during the summer.

"We have found some errors on our part, but very few," she said. "We encourage every single person who has an issue to call us so we can re-read their meter, test their meter if needed and make absolutely sure we've done nothing wrong to cause them a higher bill than normal."

Some media reports about bill spikes "have caused undue anxiety or concern," she said. "As a result, if I were a customer I would be confused as well."

Julia Reynolds can be reached at 648-1187 or jreynolds@montereyherald.com.

Online

Share your personal experience with Cal Am good, bad or uncertain and read others at montereyherald.com/calambills.

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California Department of Fish and Wildlife

Monterey Office

Fax Cover Sheet

Office Phone: (831) 649-2870

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Upstairs Fax: (831) 649-2917

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MAY 24 2013



MPWMD



Date: 23 MAY 2013

Number of Pages (including cover): _____

To

From

Name: DAVE STOLDT

Name: MARGARET PAUL

Phone No.: _____

Phone No.: (831) 649-2882

Fax No.: 831-644-9560

Fax No.: (831) 649-2894

Message

Hello Dave -
I just returned from a trip out of the office and I found this waiting for me. I know Kevin is gone & see that you are cc'd on this. However, I wanted to make sure you got a copy. If this is in fact, a duplicate my apologies. It has become apparent in the last couple of years that CRSA is inserting themselves into the District's fish rescue.

Regards,
Margaret



Carmel River Steelhead Association
501 (c)(3) TIN 77-0093979
P.O. Box 1183
Monterey, CA 93942

Dick Butler
National Marine Fisheries
777 Sonoma Ave. # 325
Santa Rosa, CA 95404

Received
map

May 18, 2013

Dear Mr. Butler:

CRSA is extremely concerned with the number of steelhead fry rescued over the last three years. When you compare the number of fish rescued from 2001 to 2009 to fish rescued the last three years something is wrong. When you compare the number of redds observed in the lower river to the number of fish rescued in the last three years something is wrong. When you compare the number of fry observed in the lower river to the number rescued something is wrong.

Many Carmel River Steelhead Association (CRSA) members have been studying steelhead for many years including identifying redds, observing adults, kelts and fry and we feel quite confident in our ability to identify steelhead activity at all levels. Having said that we still welcome any help we can get to make ourselves more knowledgeable. At the end of March of this year, through the generous offer of the Monterey Peninsula Water Management District (MPWMD), 7 members of CRSA received further training by MPWMD staff with the promise by CRSA that the team would complete one survey per month on a section of river. The section we choose to survey was the lower river. CRSA had done surveys in this stretch of river before so we could therefore expand on our knowledge. Based on our redd surveys, CRSA is quite concerned about the number of fish rescued last year and with the progress of rescuing stranded fish in the Carmel River this year.

During this year's March and April/May surveys, CRSA members identified 83 redds between the Don Juan Bridge in Garland Park and Highway 1. Of these redds 45 were from the Cypress Well to Highway 1. This is the section of river that rescues have been performed on so far this year. During the second survey we noticed and reported countless steelhead fry especially below the Valley Greens Drive Bridge in Quail Lodge. The sighting of this many fry is not surprising considering what should be expected based on studies of redd egg-to-fry survival success on other rivers. (Please see Attachment 1.) Our concern is the number of fry that have been rescued last year and this year after two to three passes. In both cases the fish rescued are just a small percentage of what there should be based on redd counts and based on what we saw at the end of April this year.

Section 1.9 of the proposed Carmel River - Steelhead Rescue and Rearing Management Plan calls to rescue 90 percent of stranded fish. As no one can count the number of fry in a single hole let alone 6 miles of river, and the only known quantity is the number of redds, the only way to base rescue success is the theoretical number of fish from the given number of redds. So far the rescue effort is just a fraction of what is required by section 1.9

Last year CRSA identified 45 redds between Schulte Road Bridge and Highway 1 which is the section of river MPWMD rescued last year. Based on the conclusions contained in Attachment 2, this number of redds theoretically should have produced a minimum of 10,939 fry and a maximum of 63,467 fry yet only 7,689 fry (70.2% of the minimum and 1.9% of the maximum) were rescued in that stretch of river.

So far this year MPWMD states they have made two to three passes over the stretch of river from the Cypress Well to Highway 1. As noted before 45 redds are between the Cypress Well and Highway 1. This number of redds should produce a minimum of 10,939 and a maximum of 63,465, yet as of May 9, after two and in some cases three passes only 1,291 fry have been rescued.

Unfortunately we see the same fry-to-rescued fish results this year as last and are concerned about why such a low percentage of fish are being rescued compared to redd counts, sightings of fry, and to previous years. (Please see attachment 2) Between 2002 and 2009 both MPWMD and CRSA rescued the main stem of the Carmel. During that time MPWMD rescued a high of 84,322 fish and a low of 12,185 fish with an average of 30,098 fish per year. Combined MPWMD and CRSA rescues had a low of 14,760 fish and an average of 39,069 fish. In the last three years MPWMD rescued a high of 8,156 fish and a low of 1,685 fish with an average of 4,299 fish. This is an average drop of 34,770 fish per year. CRSA, solely doing mop-up rescues after MPWMD, averaged 8,978 fish during the period from 2002 to 2009. This average is twice as many fish as MPWMD has averaged during the last three years. CRSA is quite surprised no one else has mentioned this drop in rescued fish.

We are asking that NMF look into what is going on with the lack of rescued fish. If we are incorrect in our projections of fry, please let us know. Even if we were off 20%, there are a lot of fry needing to be rescued. If we are correct in our projections, we insist there be additional efforts to rescue as many fry as possible before even more river goes dry. There is just too much difference in the last three years compared to any year before 2011. With CRSA being prevented from rescuing the main stem last year and again this year, we cannot act as a barometer of conditions. Quite frankly from the amount of fry we see there is something seriously wrong.

Please let us know what NMF intends to do about this severe problem. Collectively we must find out what is happening before it is too late. CRSA believes and strongly recommends that we be included in any discussion. There must be more than one local voice for the river and the fish.

Sincerely,

Brian LeNeve
BriGOPY

Brian LeNeve,
President Carmel River Steelhead Association

Attachments: 2

cc: Margaret Paul, CDFW
Dave Stoldt, MPWMD

POTENTIAL FRY FROM A GIVEN NUMBER OF REDDS

TWO KNOWN QUANTITIES

- 1: From Valley Green Bridge to Highway I there were 39 redds
- 2: From Schulte Road to Highway I there were 51 redds.

If we consider that half of the redds from Schulte road to Valley Greens were in the rescue area then we would have 45 redds in the rescue area. People may say that some of the fry migrated to the lagoon but some of the upper redds would also have migrated to the rescue area. I extended the figures for 39 and 51 redds just for interest.

John McKeon NMF Santa Rosa

Earlier this year John Mckeon of NMF gave CRSA a presentation about the value of edgewater habitat. In that presentation John had a slide of the survival of steelhead from egg to returning adult. John's presentation shows 5,000 eggs, with 4000 Alevins and 140 free swimming Parr. John shows free swimming Parr are 3 to 4 CM or 1.5 inches. John said there should be 3,120 fish emerge from the Redd. As most of the fish are less than 1.5 inches we should be somewhere between 3,120 and 140. If we use 500 fish per redd at this time we are somewhere in between the other two studies.

39 redds X 500 =	19,500 fish at this time
51 redds X 500 =	25,500 fish at this time
45 redds X 500 =	22,000 fish at this time

Chelan River study University of Washington May 20 2011

A redd could have 4,923 eggs times a survival rate of 29.3%

39 redds X 4,923 eggs X 29.3% =	56,255 fry
51 redds X 4,923 eggs X 29.3% =	85,103 fry
45 redds X 4,923 eggs X 29.3% =	64,909 fish at this time

Keogh River study Ward and Slaney 1993

Egg to fry (one month post emergence) = 6.5% average

39 redds X 3,740 eggs X 6.5% =	9,480 fry one month old
51 redds X 3,740 eggs X 6.5% =	12,398 fry one month old
45 redds X 3,740 eggs X 6.5% =	10,939 fish at this time

Minimum fry in river should be fry one month old	10,939
Average of three studies should be	30,125
Maximum fry in river should be post emergence	64,909

MPWMD has, as of May 9, rescued 1,291 fry or
 11.8% of the minimum
 4.3% of the average
 1.9% of the maximum

ATTN: VRTM

MPWMD / CRSA RESCUE COMPARISON

YEAR	MPWMD MAIN STEM	CRSA MAIN STEM	CRSA % RESCUED	CRSA with TRIBS	CRSA % RESCUED	CRSA TOTAL HRS	fish per hour
2001	38985	0		10155	20.60%	417	24.35
2002	36831	5933	13.80%	8795	17.10%	514.5	17.09
2003	39748	11899	23%	18862	32.20%	517.25	36.47
2004	17131	8529	33.20%	9898	36.62%	667	14.8
2005	20821	18781	47.42%	23317	52.83%	906	25.74
2006	16375	4993	21.15%	10830	39.81%	747	14.5
2007	12185	6104	33.38%	6468	34.68%	580	11.15
2008	84322	14739	14.88%	24813	22.74%	784.5	31.6
2009	13377	1983	9.38%	5899	30.59%	633.5	9.3
2010	3058	0	0%	4853	61.34%	395.5	12.2
2011	1685	0	0%	7668	81.90%	577	13.3
2012	8156	0	0%	7238	47.00%	765.5	9.5
2013							
TOTALS	216858	65828	24.13%	119844	33.64%	6573.25	20.1