
From: Barbara Byrne - NOAA Federal <barbara.byrne@noaa.gov>
Sent: Tuesday, December 4, 2018 12:43 PM
To: Maria Rea
Cc: Howard.Brown; Garwin Yip - NOAA Federal; J. Stuart
Subject: Re: OMR on-set language

Maria -- Thanks for flagging this issue.

Reclamation's thinking: At the 11/28/18 Tiger Team meeting, we asked Reclamation why, if interested in a real-time distribution approach, Reclamation's criteria didn't rely simply on the 5% element. Reclamation was frank and explained that they didn't want to onset OMR (for salmonids) before January 1 in consideration of water supply.

What the SST report says: On p. 20 of Volume 2, the report says "...the Jan 1 onset of OMR reverse flow management coincides with the presence of protected salmonids in the Delta in almost all years, but an earlier onset would often be more effective for some listed salmonids." Note that the SST made no determination whether the earlier onset was "necessary" or not, just that ESA-listed fish were usually in the Delta before January 1 and thus might get some protective benefit from an earlier onset.

Elevation: Given Reclamation's seeming disinclination to take a wholly distribution-based approach, and the direction in your e-mail, I've added this issue to the "Issue Resolution and Elevation" google doc for you and Howard to consider in developing the short-list to raise with Barry and Paul. Most of the thoughts in this e-mail are captured in the google doc.

Barb's thoughts: In principle, this "hybrid" approach (distribution + date) will never provide greater protection relative to the 2009 BiOp, and may provide lesser protection. However, in practice, my opinion is that the criteria (even with the calendar dates included) will usually result in a similar OMR management window to that implemented under the 2009 BiOp. I have more concerns about the reduced protections that may result from the proposed (a) OMR storm flexibilities and (b) real-time triggers.

Barb

On Tue, Dec 4, 2018 at 11:02 AM Maria Rea - NOAA Federal <maria.rea@noaa.gov> wrote:

Barb - Thanks for looping me into the OMR sub-team discussions you are having with Reclamation by sharing the language. It looks like Reclamation's language is using both a calendar date and a 5% distribution - whichever comes later in time, to on-ramp the OMR action. Does this seem consistent with the CAMT SST language to you on what is scientifically supported? It seems that if Reclamation wants to move to real-time distribution, than that could either be earlier or later in time than the existing on-set/measures. If you agree with this, have you raised this with Reclamation to ask for why their thinking and justification is significantly different that what the science would seem to support?

If you have not raised it in your conversations and think it will be raised somewhere else, then it needs to be captured on the issues for elevation chart that Howard is preparing.

Thanks,

- Maria

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