
From: Brian Ellrott - NOAA Federal <brian.ellrott@noaa.gov>
Sent: Thursday, May 30, 2019 9:15 AM
To: Garwin Yip - NOAA Federal; Joe Heublein - NOAA Federal
Subject: Re: Accelerated ROC schedule

I addressed Rosalie's new comments in this version
2.5 and 2.6 American Effects V4--BC srb--MASTER -- JH-GY.rd. bje

I didn't see the text below incorporated, but I think it should be in order to address Reclamation's comments. They maintain the modeled results are for comparison, not absolute effects. The changes we made yesterday stress reliance on the modeled results and downplay the observed data. I think we need to look at both, and I think the following points justify reliance on the observed data.

Joe and Garwin,
Can I work this text in or do you think it should be kept out?

1. PA shows some improvements over COS at high temperatures, but the modeling results do not reflect the yet to be determined planning minimum carryover storage target intended to improve water temperatures. While the modeling includes an end-of-September carryover storage target of 275 TAF to conceptually emulate the planning minimum, the actual end-of-December planning minimum was not defined and, as such, was not included in the modeling, giving little to no certainty that the PA implementation of the planning minimum will result in temperature improvements over the COS.
2. If anyone has the expertise and experience to figure out how to operate Folsom to consistently meet the summer temperature targets, it is Reclamation and the Water Forum, but the planning minimum remains undefined and there are no quantitative data to support an assumption that the PA's implementation of a planning minimum will result in temperature improvements over current operations.
3. Based on that and the fact that despite best efforts, lower American River water temperatures have not improved over at least the last 20 years, it seems more reasonable to assume that recently observed water temperatures will be carried forward, than to assume the thermal challenges in the lower American River will be solved as the BA does on pages 5-196 and 5-197: "*The implementation of the proposed 2017 FMS measures under the proposed action would provide suitable habitat conditions in the lower American River for CV Steelhead, particularly during drought conditions and improve conditions for this life stage.*" The BA does not include information supporting the notion that the lower American River habitat will be thermally suitable.

On Thu, May 30, 2019 at 4:43 AM J. Stuart - NOAA Federal <j.stuart@noaa.gov> wrote:
Got it

On Wed, May 29, 2019 at 9:34 PM Garwin Yip - NOAA Federal <garwin.yip@noaa.gov> wrote:
All,

As a result of meetings today, NMFS committed to:

-- an expedited review of the Shasta Division effects section, and to send the section out tonight to DOI/Reclamation.

-- sending out the Delta and American River division sections tomorrow night to DOI/Reclamation.

Therefore, please coordinate within your respective division teams and have all reviewer comments addressed (in track changes) and sent to me by 4 p.m. Thursday.

Thanks.

-Garwin-

Garwin Yip

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