

Barb, Here is what I think, but am glad you asked so Reclamation can/will confirm one way or the other. See red text below.

Questions on East Side Division elements of the 2019 ROConLTO BA

1. *(High priority)* What is assumed for Vernalis flows, year-round, in COS and PA scenarios? Is the Table 7 for the COS scenario on PDF page 30 of Appendix D (in Attachment 2-1)? Are those flows assumed for Feb-June? **Yes, except for Apr15-May15 Just like the real world, USBR is refusing to go along with SWRCB’s 1641 Table 3 Pulse Flow requirements, instead, USBR is considering their 2E compliance sufficient. The PA scenario uses reduced requirements under the NM SRP.**

Table 7. Bay-Delta Vernalis Flow Objectives (average monthly cfs)

60-20-20 Index	Flow Required if X2 is West of Chippea Island	Flow required if X2 is East of Chippea Island
Wet	3,420	2,130
Above Normal	3,420	2,130
Below Normal	2,280	1,420
Dry	2,280	1,420
Critical	1,140	710

2. *(Medium priority)* COS assumes 1987 USBR-DFG agreement; PA scenario does not. Was this approach agreed to by CDFW? **The COS doesn’t allocate water per the 87 agreement, but rather, allocates fishery flows per 2E. Presumably, the only material concern CDFW would have with that might be in the Fall when CDFW might want to specify higher flows than 2E (like it did in 2018).**
3. *(High priority)* Appendix D, Attachment 2-1, PDF page 27-28 indicates that the COS flow requirements are implemented based on the New Melones yeartype. However, all Stanislaus-River-related COS results in 3-1 (Storage), 3-2 (flow), and 3-4 (temp) are summarized based on the yeartype defined by the 60-20-20 Index (the method in the PA), NOT the New Melones yeartype.

While that summary is useful in that the yeartype bins for the COS results contain the same set of years as in the PA scenario, the yeartype bins for the COS results do not accurately represent the modeled operations. For example, The Critical year bin in the COS results might include years in which the modeling implemented the Dry or Below Normal year schedule, because the 60-20-20 Index was Critical while the New Melones yeartype was Dry or Below Normal. The bottom table of Table 37-3 (Appendix D, PDF

page 559), which shows a lot of differences in modeled flows in the Critical, Dry, and Below Normal years even though the PA and COS share identical flow schedules for those yeartypes. My guess is that much of that difference is because, for example, PA flows for a Critical yeartype are being compared with COS flows from the same years, but a mix of New Melones yeartypes – what is Reclamation’s explanation for PA vs. COS differences in Critical, Dry, and Below Normal years?

Additional information is needed to (a) summarize the observed flows in the COS scenario based on New Melones yeartype, and (b) some sort of crosswalk to compare yeartypes for all years in the CALSIM record according to the two yeartype determination methods. **I will create anything you want – you tell me the chart type, title, y axis title and x axis title. Or I can just provide a table of years showing the two classifications (the fixed 60-20-20 and the variable NMI).**

4. *(Low priority)* Tulloch Dam and Goodwin Dam are non-CVP facilities located on the Stanislaus River downstream of New Melones Reservoir. What is assumed for Tulloch operations in the WOA scenario, and how does that modify the flows coming out of New Melones?
5. *(Low priority)* What is assumed about the outlet capacity at New Melones and about how downstream channel capacity might limit the release at New Melones in the WOA scenario?
6. *(High priority)* No biological modeling (including for FR relevant to SRKW analysis); no assessment of floodplain inundation/spawning/rearing areas. Very high-level, qualitative description of effects. Absent this information, we have limited scope for our effects analysis for CV steelhead and for the SRKW analysis.