

#### High level comments:

- Most of the proposed action lacks details in order to understand what is being proposed, and to evaluate the effects.
- The proposed action cannot be to operate to incidental take limits.
- Many of Reclamation's proposals are already being implemented in other venues, or are part of the current 2009 RPA, and therefore, part of the environmental baseline.
  - Much of the 2009 RPA that are yet to be implemented are not part of the PA, for example, improving both fish facilities.
- Sideboard metrics are proposed, but cannot be determined, for example, 5% emigration into the delta as the onset of OMR, and 95% exiting the Delta at Chipps Island as offramp of OMR.
- "Water Operations Governance": The main objectives for the PA are for water supply and power generation. Much of the PA does not have specific triggers for specific responses, but rather, triggers for Reclamation's risk analyses. Without specifics, the risk analyses could be evaluated based on risks to water supply and power generation, rather than risk to the species.
- "Programmatic Adaptive Management of Water Delivery Improvements":
  - Commitment to habitat improvement projects is contingent upon improvements in water supply
  - Not reasonably certain to occur
  - Many of these projects are either ongoing or required in other venues, for example, 2009 RPA, so should be part of the baseline and not future programmatic consideration contingent upon water supply gain.

#### High level comments from the revised PA:

- Cumulative salvage loss threshold is 0.8% of the juvenile production estimate for Winter-run Chinook salmon. Is that genetic winter-run, which for the current ITL is 1% of the JPE?