
From: J. Stuart - NOAA Federal <j.stuart@noaa.gov>
Sent: Sunday, June 16, 2019 6:07 PM
To: Barbara Byrne - NOAA Federal
Cc: Garwin Yip - NOAA Federal
Subject: Re: Delta section with supplemental analysis

Barb is correct, the 2009 ITL was very "generous" in its allowable take in my opinion for winter-run and steelhead. The new Incidental Take limit is more limiting, but the 90 percent of the highest take level in the past 9 years (2010 - 2018) for winter-run is pretty high compared to the other years in the group, so based on that snapshot, we may not get to the limits for cutting exports all that frequently (2 years out of 9 based on the graph from Reclamation). The limits for steelhead will be reached more frequently, but it doesn't look like we will hit it every year. Thus overall potential take will likely be lower due to a lower ceiling on the take limits, but you are not going to get the consistent reduction in OMR that we saw in the 2009 opinion during the April and May SJR inflow to export action. Plus Reclamation still can decide not to implement an OMR action based on its Risk Assessment. The "final call" is still their's to make.

On Sun, Jun 16, 2019 at 5:49 PM Barbara Byrne - NOAA Federal <barbara.byrne@noaa.gov> wrote:

I don't think the 2009 ITLs were very limiting, so loss thresholds less than 2009 ITLs not necessarily limiting.

I do think that the final PA loss thresholds (based on historical loss, so quite a bit less than the 2009 ITLs) will result in less direct loss than under the original PA loss thresholds, but there is uncertainty about overall far-field as noted in the supplemental analysis since unclear what OMR will result under the final PA.

On Sun, Jun 16, 2019 at 5:25 PM Garwin Yip - NOAA Federal <garwin.yip@noaa.gov> wrote:

OK, looking now.

I got to thinking about the supplemental Delta analysis last night. I don't need a long explanation, but even if Reclamation decides to conduct a risk assessment and shine off -3,500 cfs and/or -2,500 cfs OMR, would the new loss thresholds result in less OMR effect because the annual and cumulative loss thresholds are lower than the 2009 ITLs?

-Garwin-

Garwin Yip
Water Operations and Delta Consultations Branch Chief
NOAA Fisheries West Coast Region
U.S. Department of Commerce
California Central Valley Office
650 Capitol Mall, Suite 5-100
Sacramento, CA 95814
Office: 916-930-3611
Cell: 916-716-6558
FAX: 916-930-3629
www.westcoast.fisheries.noaa.gov



On Sun, Jun 16, 2019 at 5:18 PM Barbara Byrne - NOAA Federal <barbara.byrne@noaa.gov> wrote:
Thanks, Garwin. Current master doc on server (and attached, in case either of you are having VPN trouble)
is: *2.5 and 2.6 Delta Effects V16 MASTER--GY--BB.doc*

I did the following:

1. Reviewed your edits(didn't accept yet so Jeff can review easily in combo with my few new revisions); am good with all but:
--suggestion to flag supplemental analysis at end of original analysis (since readers may be spot-reading BiOp, I think important to flag at the top of the key sections so left it there at the top of each section with a Level 5 heading related to OMR management. Thought about adding to end, but "end" of section is usually specific to some sub-PA component -- the top is more clear for an "overarching" comment unless I add an explicit summary section which would require a lot of new text.)
--one edit referring to OMR under the COS, final PA, and revised PA (not sure what you meant by revised PA so rejected your edits and just kept the original comparison between final PA and COS)
2. Responded to all comments (either with new text, or noted why no edit needed).
3. Wordsmithed CH table text on p. 241 and 248 from "partially mitigated in final PA by loss thresholds" to "lesser effect in final PA due to revised loss thresholds."

On Sat, Jun 15, 2019 at 11:10 PM Garwin Yip - NOAA Federal <garwin.yip@noaa.gov> wrote:
Good job.

See attached for my track changes (disposition in red, below). Main comment was whether the base Delta effects section utilized the original Feb.5 PA, or the April 30 revised PA. If the latter, we should insert a middle column in the table that compares and contrasts the differences in the PAs (great table, by the way).

I added a sentence associated with the programmatic nature of the steelhead life cycle monitoring plan. Please search for programmatic treatment of other PA components, and make sure that there is a general effects statement (e.g., beneficial or adverse) so it can be considered in our jeopardy analysis.

-Garwin-

Garwin Yip

Water Operations and Delta Consultations Branch Chief
NOAA Fisheries West Coast Region
U.S. Department of Commerce
California Central Valley Office
650 Capitol Mall, Suite 5-100
Sacramento, CA 95814
Office: 916-930-3611
Cell: 916-716-6558
FAX: 916-930-3629
www.westcoast.fisheries.noaa.gov



On Sat, Jun 15, 2019 at 1:27 PM Barbara Byrne - NOAA Federal <barbara.byrne@noaa.gov> wrote:
Subject doc attached--this V16 MASTER doc includes my and Jeff's edits in track changes; I have accepted all of Susan's formatting/citation edits. Send back any edits and I'll drop the updated file on the ROCON drive.

Edits are at:

Effects to species:

p. 76 -- caveat for "old" OMR management analysis--**see comment**

p. 80 -- caveat for "old" South Delta ops analysis--**see comment**

p. 147-158 -- primary supplemental Delta analysis section (*Note that the introductory paragraph was grabbed from the Shasta section that Cathy drafted; I'll send Cathy the final version in the Delta for her to consider for the Shasta section since we agreed they should be basically the same*)--**I accepted the track changes before starting my own.**

p.222 -- Table 2.5.5-61 (DCC effects) --**No comments**

Effects to CH

p. 235 -- DCC tweaks--**edits**

p. 241 -- edit to CVP/SWP Export facilities row in CH for salmonids table--**edit**

p. 245 -- edit in GS discussion re: loss thresholds--**edits**

p. 248 -- edit to CVP/SWP Export facilities row in CH for GS table--**edit**

****Edits on p. 241 and 248 add "partially mitigated by loss thresholds in revised PA." to the response column; is "mitigated" an okay term to use here? ** I was gonna wordsmith that, as I don't think it's an appropriate word in that context. Thought about "reduce," but I think we have "reduce" at the beginning of the cell.**

Looked at but didn't think edits needed given original qualitative assessment.

p. 228 -- Table 2.5.5-66 (South Delta Export operations) on p. 232

p. 240 -- DCC Gate ops row of CH table

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Barb Byrne

Fish Biologist

NOAA Fisheries West Coast Region

U.S. Department of Commerce

Office: 916-930-5612

barbara.byrne@noaa.gov

California Central Valley Office

650 Capitol Mall, Suite 5-100

Sacramento, CA 95814



Find us online

www.westcoast.fisheries.noaa.gov



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Barb Byrne

Fish Biologist
NOAA Fisheries West Coast Region
U.S. Department of Commerce
Office: 916-930-5612
barbara.byrne@noaa.gov
California Central Valley Office
650 Capitol Mall, Suite 5-100
Sacramento, CA 95814



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Barb Byrne

Fish Biologist
NOAA Fisheries West Coast Region
U.S. Department of Commerce
Office: 916-930-5612
barbara.byrne@noaa.gov
California Central Valley Office
650 Capitol Mall, Suite 5-100
Sacramento, CA 95814



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www.westcoast.fisheries.noaa.gov



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Jeffrey S. Stuart, M.S.

Fishery Biologist

NOAA Fisheries West Coast Region
U.S. Department of Commerce
California Central Valley Office
650 Capitol Mall, Suite 5-100
Sacramento, CA 95814-4706

Office: 916-930-3607
J.Stuart@noaa.gov



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www.westcoast.fisheries.noaa.gov

