

CALFED Agency staff and CALFED Policy Group have asked how certain of the items being proposed for the Affected Environment and No Action Alternative might be implemented or might be characterized for modeling purposes.

A summary of the comments received and recommended action(s) follow:

- **Refuge Demands** - The proposal for Level IV in the No Action Alternative is described as meeting CVPIA's Level IV amount. Bureau of Reclamation is concerned with how the Level IV demand is proposed to be modeled but was okay with using Level IV as the future demand. US Environmental Protection Agency, CA Dept. of Fish and Game and the US Fish and Wildlife Service were in agreement with using Level IV as the future demand. Recommendation: Do not change current proposal and work with the agencies to reach agreement on model assumptions;
- **Delta Standards** - The US Fish and Wildlife Service requested that this assumption specifically mention that it include the Delta smelt and winter-run Biological Opinions. They also wanted the DWRSIM model updated so that it includes all the criteria within the Biological Opinions which can be modeled. Recommendation: Clarify assumption for both Affected Environment and No Action Alternative so that it is clear that they include the Delta smelt and winter-run Biological Opinions and work with the agencies to reach agreement on model assumptions;
- **Vernalis Standard** - The proposal for the No Action Alternative indicates that the standard will be met but, it does not indicate whom will meet the standard. Bureau of Reclamation is concerned about how this assumption might be modeled, but agreed along with the US Environmental Protection Agency and the US Fish and Wildlife Service that the standard should be met for the No Action Alternative. CA Dept. of Fish and Game concurred but is concerned with doing so without identifying the actions which will be taken to meet the standards. Recommendation: Continue with assumption that standard will be met and work with the agencies to reach agreement on model assumptions ;
- **Water Conservation** - Current proposal is to assume system wide conservation levels outlined in DWR's Bulletin 160-93 for both the Affected Environment and No Action Alternative. The Program is proposing that the system wide conservation levels for agricultural and urban water conservation and recycling be increased over those outlined in Bulletin 160-93. The assumptions to substantiate this proposal are based on data contained in several sources and professional interpretation of that data. The sources include: DWR Bulletin 160-93; internal DWR staff work developed as background and draft input for Bulletin 160-98; and Bureau of Reclamation's "Demand Management - Technical Appendix #3 to the Least-Cost CVP Yield Increase Plan". DWR indicated that the higher water conservation levels may prove difficult to model because they are not included in current models. Bureau of Reclamation, US Environmental Protection Agency, CA Dept of Fish and Game and the US Fish and Wildlife Service were in agreement with using increased levels of conservation for the No Action Alternative. However, more information was sought on the proposal by all. Recommendation: Use

the new proposal for the No Action Alternative and set up a meeting with the agencies to discuss the proposal and to reach agreement on model assumptions;

- CVPIA's B-2 water - Current proposal is to assume B-2 is in both Affected Environment and No Action Alternative. US Environmental Protection Agency, US Fish and Wildlife Service, CA Dept. of Fish and Game and Bureau of Reclamation agree but there is a good deal of concern about how this item should be implemented and modeled among all parties. Recommendation: Continue with the current proposal and work with the agencies to develop an approach for implementation and modeling;
- Winter-run Biological Opinion - Current proposal is to assume the Opinion is in both Affected Environment and No Action Alternative. US National Marine Fisheries Service was concerned about assumption that in critical years following critical years, storage is allowed to fall to 1.2MAF and lower. DWR wondered if we intended to model a portion of the Biological Opinion that is not being modeled, i.e., Delta Cross Channel openings. Recommendation: Continue with current proposal to include winter-run Biological Opinion in Affected Environment and No Action Alternative and work with NMFS, DWR and other agencies to reach agreement on model assumptions; and
- Splittail, steelhead and spring-run salmon - Proposal is to add these species to the No Action Alternative. Adding will require assumptions about modeling. Recommendation: Add the species to the list and work with agencies to reach agreement on model assumptions.

If you have questions or comments, please contact Mr. Rick Breitenbach at (916) 657-2666.