UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
West Coast Region
650 Capitol Mall, Suite 5-100
Sacramento, California 95814-4700

August 17, 2016

David Murillo
Regional Director
U.S. Bureau of Reclamation
Mid-Pacific Region
2800 Cottage Way
Sacramento, California 95825

Re: Request to Engage in Adaptive Management Provisions for RPA 11.2.1.2

Dear Mr. Murillo:

Thank you for your August 2, 2016, letter requesting the use of the adaptive management provision outlined in section 11.2.1.2 of the reasonable and prudent alternative (RPA) in NOAA's National Marine Fisheries Service's (NMFS) June 4, 2009, biological and conference opinion on the long-term operation of the Central Valley Project (CVP) and State Water Project (SWP) (2009 Opinion).

We agree that recent multiple years of drought conditions, new science and modeling, and data demonstrating low population abundance levels of Sacramento River winter-run Chinook salmon and Sacramento River spring-run Chinook salmon warrant modifications to the Shasta RPA actions (RPA Action Suite I.2) in the 2009 Opinion.[1] We appreciate the unprecedented levels of coordination between NMFS and the Bureau of Reclamation, in addition to the U.S. Fish and Wildlife Service, California Department of Water Resources, California Department of Fish and Wildlife, and California State Water Resources Control Board, on the development and implementation of Sacramento River temperature management plans in 2014 through 2016. The same state and Federal agencies displayed equally impressive coordination through real-time operational discussions of the Sacramento River Temperature Task Group, Real-time Drought Operations Management Team, directors' meetings, and Shasta Water Interagency Managers Team. Despite these valiant and concerted efforts, however, juvenile winter-run Chinook salmon from brood years 2014 and 2015 have likely suffered considerably higher than average mortalities in the egg-to-fry stage. In addition, juvenile spring-run Chinook salmon have likely also suffered higher than average mortalities in the mainstem Sacramento River.

Various RPA actions within Action Suite I.2 are not performing as designed to achieve their objective to avoid jeopardy of winter-run Chinook salmon during extended drought conditions.

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[1] Action Suite I.2 starts on page 17 of enclosure 2 in
http://www.westcoast.fisheries.noaa.gov/publications/Central_Valley/Water%20Operations/Operations,%20Criteria%20and%20Plan/040711_ocap_opinion_2011_amendments.pdf

We have responded separately to your August 2, 2016, request for reinitiation of consultation on the 2009 Opinion. Since that process will be a longer-term process, at this time, the most expeditious path to an effective operation in the near-term is to utilize the amendments process provided in the RPA (section 11.2.1.2, Research and Adaptive Management, on page 9 of the 2011 amendment[2]). This section of the RPA anticipated that new scientific information could be included through such an amendment process.

Therefore, we propose to review potential modifications to the Shasta RPA Action Suite 1.2 that incorporate new information regarding temperature management that has been developed during the recent drought period. We recognize that some of the elements in the revised Shasta RPA actions may cause re-operations in ways that affect deliveries to contractors and the integrated CVP/SWP system as a whole, and we propose to work closely together to provide for winter-run and spring-run habitat needs and minimize any impacts to operations and deliveries.

If you have any questions, please contact me, at will.stelle@noaa.gov or (206) 526-6150, or contact Maria Rea, at maria.rea@noaa.gov or (916) 930-3600.

Sincerely,

William W. Stelle, Jr.
Regional Administrator

cc: Copy to file: ARN 151422SWR2006SA00268

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[2] http://www.westcoast.fisheries.noaa.gov/publications/Central_Valley/Water%20Operations/Operations,%20Criteria%20and%20Plan/040711_ocap_opinion_2011_amendments.pdf