

Shasta RPA Adjustment Outstanding Issues

	Page	Section	Topic	NMFS Proposal (12/15/2016)	Reclamation Response (12/22/2016)	Resolution
1	4-5	11.2.1.2	Research and Adaptive Management	Rationale language for 2017 amendments	Deleted reinitiation trigger language (e.g. RPA Action I.2.1 has not been met, level of incidental take in 2014 and 2015 was exceeded	Agree that reinitiation triggers have been hit. (Refer to exchange of letters re: reinitiation.) Adjustment process sets interim operations necessary at this time. Changes will be reviewed in the context of larger reinitiation of consultation.
2	10 and 11	Action I.2.1	End of April storage	Annual end of April storage performance measure	Deleted end of April storage requirement	<p>Agree to operate as storage targets in the interim adjustment. If target is not met, BOR will document reason for inability to hit target. Further examination of EOA storage needs will occur in larger reconsultation.</p> <p>**Change EOA to 'time of maximum storage within April/May'.</p> <p>[BOR--confirm operating to these storage volumes is w/in the range of alternatives included in NEPA analysis. This will determine ability to meet target in RPA.]</p>
3	11	Action I.2.1	Temperature-dependent mortality objectives	Temperature dependent mortality thresholds that shall not be exceed. Note: Numbers still need to be finalized	<p>Highlighted that:</p> <p>(1) Approach does not account for consecutive drought years.</p> <p>(2) Numbers are not consistent with 2008 BA.</p> <p>(3) Would like to see underlying documentation/analysis for these numbers.</p>	<p>Agree as these are interim objectives to be reviewed and assessed in larger reconsultation.</p> <p>Agree to analyze and assess impacts of successive water year types within larger</p>

						reinitiation. Check percentage on 'below normal' year type with SWFSC.
4	11	Action I.2.1	End of September storage	Annual end of September storage requirements	Changed from requirement to target	Agree to operate as storage targets in the interim adjustment. If target is not met, BOR will document reason for inability to hit target. If inability to meet 1.9MAF in critical dry year, agencies will confer and determine additional actions are needed (1.2.3.c). Further examination of EOS storage needs will occur in larger reconsultation.
5	11	Action I.2.1	Rationale for end of April storage	End of April storage requirements are based on historical data and Reclamation analysis	Disagrees with basis for rationale	[Ron will examine longer historical averaging period to determine specific EOA storage numbers. Brycen and Ron will discuss new information and determine if numbers are in close alignment and further report to group.]
6	16-17	Action I.2.3	February Forecast	February forecast shall meet requirements in RPA Action I.2.1	(1) Changed February forecast to Initial Water Year forecast (2) Deleted date requirement	Accept BOR change to initial water year forecast. Accept BOR date changes. Add 'including but not limited to' in front of conservative model input factors. BOR may propose additional items to include in this list.
7	17	Action I.2.3	Stable Keswick releases Aug – Oct to minimize winter-run	Draft February forecast shall include stable Keswick releases Aug – Oct to minimize winter-run dewatering	Deleted language	Keep Keswick deleted text, changing 'relatively stable' to 'manage'.

			dewatering			Keep 'and flow management' adding ';' and flow management, as necessary;'
8	17	Action I.2.3	Adult winter-run holding temperature compliance location	Changed metric from 56°F DAT between Balls Ferry and Bend Bridge to 61°F 7DADM at Jellys Ferry	Changed metric back to 56°F DAT between Balls Ferry and Bend Bridge	<Discussion deferred.>
9	18	Action I.2.3.A	Metrics to be met on the February forecast	(1) End of April storage ≥ 4.2 MAF (2) End of September storage ≥ 3.2 MAF (3) 51.5°F Keswick release temperature from May 15 through October 31 (this would be used as a surrogate for 55°F 7DADM at CCR) (4) Full side gate access at Shasta Dam no earlier than Oct 15.	(1) Deleted end of April storage (2) Changed end of September storage requirement to water year type requirements (as outlined in RPA Action I.2.1) (3) Deleted reference to 55°F 7DADM at CCR (4) Changed full side gate access from Oct 15 to Oct 1.	Agreed edits included in RPA document. 1. Accept EOA deletion. 2. Accept EOS changes with additional changes in redline text, pending Brycen discussion re: different #. 3. Deferred 4. Deferred. NMFS consider accepting Oct . 1 or removing.
10	18-19	Action I.2.3.B	Keswick Release Schedule if February forecast shows that metrics in Action I.2.3.A are not achievable	April through October Keswick release schedule by water year type to ensure storage, temperature, and TCD metrics are met.	Deleted June through October Keswick release schedule (kept April and May).	Agree to accept deletion of June to October in this section---include this detail in an additional technical advice memo. Will have additional technical discussions prior to issuing advice memo. Commitment to model June to October flow schedules in table and compare to BOR proposed operations plan.
11	19	Action I.2.3.C	Drought Exception Procedure	Changed Clear Creek Temperature Compliance Point metric to 55°F 7DADM at CCR	Reverted back to Clear Creek Temperature Compliance Point metric	
12	20	Action I.2.3.C	Relaxation of Wilkins Slough	Changed from 4,000 cfs to 3,800 cfs	Reverted back to 4,000 cfs	
13	21	Action I.2.4	Temperature	(1) Changed metric from 56°F	(1) Changed metric back to 56°F	

			Compliance Location metric	DAT at a location between Balls Ferry and Bend Bridge to 55°F 7DADM at CCR (2) TCP shall be adjusted to downstream most redd.	DAT at a location between Balls Ferry and Bend Bridge. (2) Deleted temperature compliance point to most downstream redd.	
14	21-22	Action I.2.4	3 year pilot study to operate to 55°F 7DADM at CCR	(1) Pilot study for up to 3 years to operate to meet surrogate to the temperature criterion of 55°F 7DADM at CCR. (2) A surrogate temperature criterion may be granted with requirements based on water year type. And also strive to meet 55°F 7DADM at CCR. (3) Data and analysis from annual reports will form basis for whether a surrogate will be granted in the subsequent year.	(1) Changed 55°F 7DADM at CCR from criterion to target and requirements to objectives. (2) Agreed to operate to surrogate temperature. Deleted operate to the agreed upon temperature criterion while striving to meet 55°F 7DADM at CCR. (3) Deleted data and analysis from annual reports will form basis for whether a surrogate will be granted in the subsequent year.	
15	25	Action I.2.5	Egg-to-fry survival evaluation	Achieve the following Egg-to-fry survival metrics: <ul style="list-style-type: none"> • Critically dry years: >15% • Dry years: >20% • Below Normal years: >25% • Above Normal years: >25% • Wet years: >25% 	Requested access to the documentation/analysis supporting establishment of these values.	
16	26	Action I.4	Wilkins Slough Operations	Operate to flows less than 5,000 cfs, depending on Shasta storage, water year type, Delta requirements, and consultation with the fish agencies	Deleted rationale that although 3800 cfs is not preferable, it was feasible, and the reduced flow was necessary to extend the limited cold water pool.	