



United States Department of the Interior

BUREAU OF RECLAMATION

Mid-Pacific Region

Bay-Delta Office

801 I Street, Suite 140

Sacramento, CA 95814-2536

NOV 21 2014

IN REPLY REFER TO:

BDO-150

ENV-7.00

Dr. Michael Chotkowski, Field Supervisor
Bay-Delta Fish and Wildlife Office
650 Capitol Mall, Suite 8-300
Sacramento, CA 95814

Subject Request for Implementation of the Proposed Updates to the Cumulative Salvage Index (CSI) Calculation in the 2015 Incidental Take Limit (ITL)

Dear Dr. Chotkowski:

Mike,
The Bureau of Reclamation is submitting the enclosed proposal to update the calculation of the CSI. The CSI is used in the 2008 U.S. Fish and Wildlife Service (Service) Biological Opinion (BO) on the Coordinated Long-term Operation of the Central Valley Project (CVP) and State Water Project (SWP) to determine the threshold for the ITL for adult Delta Smelt. Reclamation is seeking concurrence for implementation of this proposed update to the CSI calculation in the 2015 ITL. If the Service concurs, Reclamation requests that the Service update the 2008 BO Incidental Take Statement to include the new CSI calculation.

Reclamation is proposing to update the calculation of the CSI by incorporating more years, turbidity data, and improved knowledge of entrainment dynamics. It is expected that this would increase confidence in the relative influence of factors that predict the CSI. The current ITL calculation in the BO limited the CSI to 3 years (2006 through 2008) that do not reflect variability in Old and Middle River flows observed in the past and, therefore, that might be expected in the future. The method, described herein, captures a greater range of environmental variability and represents a more robust statistical approach. It is anticipated that the proposed update will have no additional adverse effects on Delta Smelt or its critical habitat that were not previously analyzed in the 2008 BO because it does not affect how the Reasonable and Prudent Alternative (RPA) actions are implemented. The proposed update will not affect Reclamation's ability to meet the RPA actions included in the 2008 BO.

We appreciate the assistance we have received from the Service in evaluation of the proposal. Please contact me at 916-414-2400 if you have any questions.

Sincerely,

Susan M. Fry
Susan M. Fry
Area Manager

Enclosure

cc: See next page.

cc: Mr. Chuck Bonham
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