Chapter 2 Edits to the Draft EIS/EIR

Chapter 2 Edits to the Draft EIS/EIR

Introduction

This chapter shows the edits to text in the SDIP Draft EIS/EIR in response to comments provided on the SDIP Draft EIS/EIR. The pages where edits have been made are included in this chapter with the additions of text underlined and the deletion of text in strikeout.

Changes were made in the following sections:

- Executive Summary
- Section 7.1

Chapter 9

Chapter 12

Chapter 13

Chapter 1

■ Section 7.10

• Chapter 2

■ Chapter 4

■ Chapter 8

- Chapter 3
- Chapter 10

- Section 5.1
- Section 5.3

Section 6.1

- Appendix J

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for exporting CVP supplies via CCF and SWP Banks Pumping Plant (SWP Banks). Of the remaining three, one was modified after discussions with CVP and SWP contractors in the summer of 2003 to improve integrated operation of the SWP and CVP. Each of these operational scenarios is evaluated in combination with at least one proposed physical/structural component in the Draft EIS/EIR.

SDIP Decision Stages

After certifying and filing the Final EIS/EIR for the SDIP, DWR and Reclamation will each adopt a project and issue a decision during each of two stages of the SDIP decision-making process. Stage 1 will include making a decision on the physical/structural component. For this decision, DWR will assume the existing operational rules including the <u>Corps</u> permitted limit for SWP diversions at CCF_{*} and the existing regulations and constraints such as <u>JPOD</u>-D-1641, ESA, and CESA. DWR will issue a Notice of Determination (NOD) and Reclamation will issue a Record of Decision (ROD) for the decision regarding the actions and mitigation needed to implement any physical/structural component adopted during the Stage 1 decision-making process. The added flexibility and adaptability provided by the physical/structural component alone will achieve, to some extent, each of the SDIP objectives, regardless of the operational decision made during Stage 2.

The decision-making process for Stage 2 will begin after the Stage 1 decision is made. Assuming a physical/structural component is selected in Stage 1, Stage 2 will include the selection of the preferred operational component, based upon the operational scenarios presented in the Draft EIS/EIR and incorporating public input, and additional information collected on the condition of pelagic organisms in the Delta. During this stage, and prior to the selection of the preferred operational component, the public will be provided the opportunity to comment on the preferred operational component. A supplemental document for NEPA and CEQA compliance describing the preferred operational component will be made available for public review for at least 45 days prior to finalizing the decision on the operational component. A second NOD from DWR and an ROD from Reclamation regarding the selection of the preferred operational component will complete the environmental analysis for Stage 2 of the SDIP. More information about this process is presented below in the 'Public Involvement and Next Steps' section.

The Need, Purpose, and Objectives of the SDIP

The SDIP is being pursued to address the needs of the Delta aquatic environment, as well as longstanding statewide, regional, and local water supply needs. Flows into and out of the Delta can have a major effect on these resources. Fish survival as well as water quality and quantity in the south Delta is affected by the natural split of San Joaquin River flow at the head of Old River; tidal fluctuation;

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in the Draft EIS/EIR and are shown in Table ES-1. The alternative physical/structural components are shown as 2, 3, and 4. The preferred physical/structural component is identified as 2. The alternative operational components are shown in Table ES-1 as A, B, and C. There is no preferred operational component identified in the Draft EIS/EIR. The selected physical/structural component combined with the existing operational rules as described above, including the <u>Corps</u> permitted limit for SWP diversions at CCF, will be used to develop appropriate mitigation measures for the Stage 1 decision. The preferred operational component and any additional appropriate mitigation measures will be developed during Stage 2 and will not be selected until after the Stage 1 decision is made.

The following describes the basic actions related to the physical/structural component and the operational component of the SDIP:

Physical/Structural Component Actions

 Replace the seasonal barrier with a permanent operable fish control gate on Old River

Where Old River splits from the San Joaquin River, a permanent operable fish control gate will be constructed and operated to keep young salmon in the San Joaquin River as they migrate to the ocean in the spring. In the fall, and in coordination with other water management needs in the south Delta, the gate will be operated to improve dissolved oxygen in the San Joaquin River for adult salmon in the river as they migrate upstream.

Replace inefficient seasonal barriers with permanent operable flow control
gates on Middle River, Grant Line Canal and Old River

Up to three permanent operable flow control gates will be constructed and operated to allow water to flow during times of high water and flooding, while maintaining water levels in Delta channels for local water users during the irrigation season. The flow control gates will also improve water circulation, helping to manage water quality in the south Delta.

 Dredge portions of Middle River, Old River, and West, Grant Line, Victoria and North Canals to improve flows in the south Delta channels

Portions of Middle River, Old River, and West Canal would be dredged to improve conveyance and the operation of private local agricultural siphons and pumps for irrigation. Siphons and pumps in Old River, Grant Line, North, and Victoria Canals would be extended and dredged around to ensure diversion capability.

Operational Component Action

Increase permitted limit for diversions into Clifton Court Forebay

SWP Banks Pumping Plant (SWP Banks) has an existing installed pumping capacity of 10,300 cfs. Flow diverted from the Delta into Clifton Court Forebay, which is pumped by SWP Banks, is limited by permit to 6,680 cfs except in July-September when an additional 500 cfs is allowed for the

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Chapter 1

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	Dredge and install operable barriers to ensure wate and quality to agricultural diverters within the sour include installation of an operable Grant Line Can- be constructed and operated in accordance with co specified by the USFWS, DFG, and NOAA Fisher ROD commits to seeking funding and authority to Middle River, Old River, and Grant Line Canal by	h Delta. This would al barrier, which would nditions and directions ies. The CALFED complete barriers on
•	Design and construct floodway improvements on the le River to provide conveyance, flood control, and ecosys	
•	Reduce agricultural drainage in the Delta.	
Cu	rently, two of the above actions are proposed in the SD	IP:
•	Increase SWP pumping from the current limit from Ma 15 to 8,500 cfs; and modify existing pumping criteria f March 15 to allow greater use of SWP export capacity	from December 15 to
•	Dredge and install operable barriers (now referred to a water of adequate quantity and quality to agricultural o south Delta.	* /
	remaining actions are being pursued as separate project the future. These actions are:	ts or will be pursued
-	As noted in footnote 1, increasing SWP pumping to the of 10,300 cfs would require fish screens to protect three and other sensitive fish species. The Tracy Fish Collect described in the CALFED ROD has not been impleme delayed indefinitely, primarily because of concerns ab Reclamation and other CALFED agencies are currently improvement of the existing Tracy Fish Collection Fac performance of the existing Tracy Fish Collection Fac through actions such as improved debris management hydraulic control, and improved predation management formulated at this time. It is expected that some improv- implemented as soon as 2006. Others will likely not b future-years.	atened, endangered, ction Facility project as nted, and has been out costs. However, y considering ility. The salvage ility could be improved methods, improved methods, improved tt. Studies are for achieving the tts have been ements will be
•	Specific floodway improvements on the San Joaquin F determined. DWR is coordinating with the Corps as th feasibility study.	
-	The Old River and Rock Slough Water Quality Improv currently underway to reduce agricultural drainage in t Costa Water District (CCWD) published a public draft Declaration for the Old River–Byron Tract Water Qua Project in winter 2003, and for the Rock Slough–Veale Improvement Project in January 2004. These projects implemented by fall 2005.	he Delta. The Contra Mitigated Negative lity Improvement Tract Water Quality
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The CALFED ROD (page 52) also lists Complementary Act They are:	tions to the SDIP.
 Install and operate temporary barriers in the south Delta barriers (now referred to as "gates") are constructed as the implemented. 	
Take actions to protect navigation and protect local dive Delta who are not adequately protected by the Temporar Action that needs to be taken to protect these diverters m installation and operation of portable pumps, limited pro dredging of intakes, and/or project-specific modification structures including the conversion of siphons to pumps.	ry Barriers Program. nay include oject-specific n to diversion
DWR intends to continue to implement the Temporary Barri permanent gates are operable and to extend and dredge arour agricultural diversions.	
All the components of the SDIP are discussed in greater deta "Project Description."	ail in Chapter 2,
The operational changes at the pumps, channel dredging, and that are part of the SDIP were contemplated as part of the the approach to conveyance in the CALFED ROD. However, S other through-Delta conveyance actions, could contribute to Program objectives even if other elements of the Program ch over time. (CALFED Bay Delta Program 2000a, p. 23.) At proposed physical/structural component for the SDIP (consis gates, modification of local agricultural diversions, and dred independent utility as a program identified in State Water Bo DWR and Reclamation meet conditions of their water right j water quality objectives for agricultural beneficial uses in the (D-1641, p. 87, 159–161), and to comply with the Central V. Improvement Act (CVPIA), Pub. L. 102-575, to construct a the head of Old River.	rough-Delta DIP, independent of the overall CALFED nange and evolve the same time, the sting of operable lging) would have oard D-1641 to help permits to implement e south Delta alley Project
The SDIP meets the policy commitments described in the C. each project implementing the CALFED Program would be appropriate type of environmental analysis and will evaluate appropriate programmatic mitigation strategies described in EIS/EIR and the CALFED ROD. (<i>Id.</i> , pp. 29–30, 32–35, & Further, the SDIP is consistent with the recently enacted Cal Act, which charges DWR with implementing the conveyanc CALFED Program.	subject to the and use the the Programmatic Appendix A.) iifornia Bay-Delta
<u>ernor.:<http: www.baydelta.ca.gov=""></http:></u>	
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Relationship to the Delta Improvements Package

The Delta Improvements Package (DIP) was developed by the California Bay Delta Authority (<u>State Agency providing coordination and oversight for the CALFED Program</u>), in coordination with stakeholders <u>in 2004</u> to outline the process for implementing a series of projects, including the SDIP. The DIP clarifies the roles, responsibilities, and commitments of the state and federal agencies in the implementation of programs, projects, evaluations, and other undertakings focused on the Delta region that advance the CALFED Program goals in the areas of water delivery reliability, water quality, ecosystem restoration, Delta levee integrity, and science. <u>The SDIP cannot itself provide all of these CALFED goals.</u>

The state and federal agencies are coordinating their assumptions and schedules to move forward with a set of activities focused on the Delta that are consistent with the CALFED Program's principle of balanced implementation. Coordination of these key activities, including the SDIP, will help the state and federal agencies avoid the conflict and gridlock that the CALFED program was created to address. Readers who desire more information about the DIP may wish to review the web page resources at < http://calwater.ca.gov/>.

Relationship to the CALFED Bay-Delta Programmatic Environmental Impact Statement/ Environmental Impact Report

The Programmatic EIS/EIR provides an analysis of the general effects of implementing the multiple components of the CALFED Program over a 30-year period, across two-thirds of the state. The impacts analysis in the Programmatic EIS/EIR was not intended to address site-specific environmental effects of individual projects. Accordingly, the direct, indirect, and cumulative impacts analysis of the Programmatic EIS/EIR is not sufficiently detailed for purposes of making a decision on SDIP. The SDIP EIS/EIR focuses on a specific project and specific affected geographic areas over a different time frame. The Programmatic EIS/EIR was used only to develop background information and provide mitigation guidance. This SDIP EIS/EIR stands alone, and includes an independently developed analysis of the impacts of the SDIP, including direct, indirect, and cumulative impacts, alternatives, and avoidance/mitigation measures.

Readers who desire more information about the CALFED Program, the Programmatic EIS/EIR, the Programmatic ROD, or the new California Bay-Delta Authority (CBDA) may wish to review the following web page resources and documents, which are available from CBDA at 650 Capitol Mall, 5th Floor, Sacramento, CA 95814, (916) 445-5511:

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- Local south Delta water users downstream of the head of Old River are
 affected by water quality and <u>tidal</u> water levels at each intake location. <u>Tidal</u>
 <u>Ww</u>ater levels are influenced by many factors, one of which is diversions in
 the south Delta by the SWP and CVP. In addition, there are opportunities to
 improve circulation and, therefore, water quality in the south Delta.
- There are unmet water supply needs, with respect to quantity and reliability
 of deliveries, south of the Delta for agricultural, M&I, and environmental
 <u>beneficial</u> uses.

Project Objectives/Purpose

DWR and Reclamation have, therefore, identified the following project objectives and purposes:

- reduce the movement of San Joaquin River watershed Central Valley fall-/late fall-run juvenile Chinook salmon into the south Delta via Old River;
- maintain adequate water levels and, through improved circulation, water quality available for agricultural diversions in the south Delta, downstream of the head of Old River; and
- increase water deliveries and delivery reliability to SWP and CVP water contractors south of the Delta and provide opportunities to convey water for fish and wildlife purposes by increasing the maximum permitted level of <u>daily</u> diversion through the existing intake gates at CCF to 8,500 cfs.

Meeting these objectives by implementing the SDIP will provide increased operational flexibility and the ability to respond to real-time fish conditions while maintaining water delivery reliability.

Background of the Purpose and Need

The following background and historical information provides additional context for understanding the SDIP purpose and need. DWR developed the SDIP project physical/structural and operational components (as analyzed in this EIS/EIR) through many related state and federal efforts to improve Delta water conveyance capabilities and water quality in a manner that takes into consideration multiple beneficial uses of a unique Delta resource. The SDIP project is being pursued to address the needs of the Delta aquatic environment, as well as longstanding regional and local water supply needs. The major factors that have influenced water resources decision-making, uses, and regulatory constraints in the south Delta are presented below.

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Ongoing Protection of Fish Resources and Other Environmental Resources

The operations of the SWP and CVP export facilities in the south Delta can cause direct losses of the Central Valley fall-/late fall run Chinook salmon evolutionarily significant unit (ESU), a candidate for listing under the ESA, and other several special-status species. The SWP and CVP exports change preproject flow patterns in several Delta channels, affecting migration habitat conditions. The SWP and CVP Delta export facilities also result in the increased exposure of these fish species to predation. Additional losses occur when fish are entrained to varying degrees by the SWP and CVP Delta export facilities and other diversions in the Delta and Central Valley rivers.

South Delta Fish Protection

Flows of the San Joaquin River typically divide downstream of Mossdale at the head of Old River, with part of the flow entering Old River. During the 1960s, low levels of dissolved oxygen were observed in the Stockton area and were identified as a source of delay or blockage to the upstream migration of adult San Joaquin River watershed Central Valley fall-/late fall-run Chinook salmon (Hallock 1968). <u>Several-Two measures (to be used alone or in combination)</u> were identified as needed to improve conditions (Lee and Lee 2003, p. 13):

□increased flow through the Stockton area and

⊟improved sewage treatment.

-supplemental aeration;

upstream oxygen demand load control; and

and increased flow

In response to flow concerns and to improve conditions for salmon, DWR has constructed a temporary fish barrier at the head of Old River near Mossdale each fall since 1968.— in the majority of years (28 of 39) since 1968. The spring barrier has been installed in 9 of 15 years since 1992 (not installed in high-flow years). The fall barrier is installed and operated April through mid MayJune and possibly extended to Junely 1 if warranted, and mid-September through November. In the spring (generally mid-April to mid-May), the barrier is constructed 10 feet high with six culverts to allow only minimasomel diversion of flow into Old River and prevent downstream-migrating salmon smolts in the San Joaquin River from entering Old River, which would expose them to SWP and CVP diversion operations and unscreened agricultural diversions. In the fall, the barrier impediment_increased flow in the San Joaquin River past Stockton helps maintain adequate dissolved oxygen concentrations for adult salmon migrating upstream (Hayes 1995). The barrier is notched at the top in the fall to

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U.S. Department of the Interior, Bureau of Reclamation, Introduction and the California Department of Water Resource: allow passage of salmon migrating up Old River to the San Joaquin River during high tide water levels. Environmental Water Account The Environmental Water Account (EWA) is a cooperative water management program, the purpose of which is to provide protection to at risk native-fish species of the Bay-Delta, without reducinghile improving water delivery reliability for water users. The EWA actions involve the development and management of alternative sources of water supply, called EWA assets, to address-maintain the water delivery reliability of the SWP and CVP whileand reducing fish entrainment, ecosystem quality objectives. The EWA program makes environmentally beneficial changes in the operations of the SWP and the CVP, at no uncompensated water loss to the CVP and SWP water users. Protective actions for at-risk native-fish species range from reducing Delta export pumping to augmenting instream flows below CVP and SWP reservoirs. and Delta outflows. Beneficial changes in SWP and CVP operations could include changing the timing of some flow releases from storage and the timing of water exports from the Delta pumping plants to coincide with periods of greater or lesser vulnerability of various fish species to environmental conditions in the Delta. For example, the EWA might alter the timing of water diversions from the Delta and carry out water transfers in order to reduce fish entrainment at the pumps and provide migratory cues for specific anadromous fish species. The EWA program is designed to replace any regular water supply interrupted by the environmentally beneficial changes to SWP and CVP operations beyond the regulatory baseline. The timing of the protective actions and operational changes vary from year to year, depending on many factors such as hydrology and realtime monitoring that indicates fish presence at the pumps. The EWA program obtains its water assets by acquiring, banking, transferring, or borrowing water and then arranging for its conveyance. Water hasis been acquired substantially through voluntary purchases in the water transfer market, and by developing additional assets over time. The EWA program also obtains water through operational flexibility of Delta objectivesfacilities. The EWA, per the CALFED ROD, was an essential commitment for meeting ESA requirements for the CALFED Program for the first four years (through September 2004). Extension of the EWA required additional environmental documentation. The Draft EIS/EIR was circulated for public review on July 23, 2003. Environmental documentation for this program was completed in March 2004. The EWA EIS/EIR assumes that current EWA actions will be implemented through 2007, (unless significant changes in existing circums require additional environmental analysis) and explains the potential for extending the program. Unless renewed by agreement, the EWA will expire on December 31, 2007. October 2005 South Delta Improvements Program Draft Environmental Impact Statement/ 1-12 J&S 02053.02 Environmental Impact Report

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This EWA program reduces the effects of the SWP and CVP current operations on fish. The SDIP analysis assumes that this current EWA program is in place for all alternatives, including the No Action. However, the proposed SDIP could result in impacts on the current EWA. Section 6.1 describes the magnitude of these impacts expected to result from the SDIP. It also describes in detail the mitigation that can be implemented to reduce the impacts on the current EWA program, and reduce SDIP fish entrainment impacts to less than significant.² More discussion of the current and future expanded EWA is included in Section 5.1 and in Appendix B.

In addition, Reclamation, DWR, USFWS, NOAA, and DFG are currently analyzing a Long-Term EWA (LTEWA) program. Should the LTEWA be adopted, it is expected that it would mitigate the operational impacts of SDIP.

Central Valley Project Improvement Act

The CVPIA is a federal statute passed in 1992 with the following purposes:

To protect, restore, and enhance fish, wildlife, and associated habitats in the Central Valley and Trinity River basins of California; to address impacts of the CVP on fish, wildlife and associated habitats; to improve the operational flexibility of the CVP; to increase water-related benefits provided by the CVP to the state of California through expanded use of voluntary water transfers and improved water conservation; to contribute to the state of California's interim and long-term efforts to protect the San Francisco Bay/Sacramento–San Joaquin Delta Estuary; to achieve a reasonable balance among competing demands for use of CVP water, including the requirements of fish and wildlife, agricultural, municipal and industrial and power contractors.

The CVPIA modified the priorities for managing water resources of the CVP, a major link in California's water supply network. CVPIA amended previous authorizations of the CVP to include fish and wildlife protection, and habitat restoration and enhancement as project purposes, having equal priority with agricultural, municipal, and industrial water supply, and power purposes. A major feature of CVPIA is that it requires acquisition of water for protecting, restoring, and enhancing fish and wildlife populations. As a result, CVP contractors experienced a reduction in average annual deliveries from approximately 2 maf to approximately 1.4 maf.

CVPIA Section 3406 (b)(1) authorizes and directs Reclamation to double the natural production of anadromous fish in Central Valley rivers and streams. To meet this goal, USFWS developed the Anadromous Fish Restoration Program (AFRP), which includes recommendations for increasing flows to complement other habitat restoration activities intended to improve conditions for anadromous fish.

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	Section 3406 (b)(3) of the CVPIA mandates the dev acquires water for 3406 (b)(1) needs to supplement dedicated to fish and wildlife purposes.	
	CVPIA Section 3406 (b)(2) (CVPIA [b][2]) authors of the Interior to dedicate and manage 800,000 acre for the primary purpose of implementing the fish, w purposes and measures authorized in CVPIA, to ass its efforts to protect the waters of the Bay-Delta and legally imposed on the CVP under state or federal 1 enactment of the CVPIA. This dedicated 800,000 a (b)(2) water, was included as a component of the P regulatory baseline for fishery protection conditions fisheries protection measures.	e-feet of CVP yield annually vildlife, and habitat restoration sist the State of California in d to help meet obligations aw following the date of acre-feet of water, known as rogrammatic EIS/EIR existing
	Section 3406 (d) mandates that the Secretary of the water supplies of suitable quality to maintain wetla National Wildlife Refuge System in the Central Va Lodge, Los Banos, Volta, North Grasslands, and M management areas; and on the Grasslands Resource Central Valley of California." The statute also dire specific goals for water supplied to these sites with	nd habitat areas on units of the lley of California; on the Gray tendota state wildlife es Conservation District in the ects Reclamation to meet
	To meet water acquisition needs under CVPIA, DC Acquisition Program (WAP), a joint effort of Recla WAP acquires water to meet two purposes: (1) refi (2) instream flows. CVPIA requires DOI to acquire (known as Level 4) to meet optimal waterfowl habi national wildlife refuges in California's Central Va management areas, and the Grasslands Resource Co WAP acquires water from willing sellers to increas support of the AFRP.	imation and the USFWS. The age water supplies, and e additional water supplies itat management needs at lley, certain state wildlife onservation District. The
V	ernalis Adaptive Management Plan	
	The Vernalis Adaptive Management Plan (VAMP) program that stipulates flows on the San Joaquin Ri the CVP and SWP for 31 days during the months o included in D-1641 and was in its sixth year in 200 to identify the effects of San Joaquin River flows, r at the head of Old River on the true- fall-Aate fall-ru delta smelt populations and survival in the lower Sa aquatic habitat conditions in the Delta, through the River barrier and pulse flows on the San Joaquin R Chinook salmon and delta smelt. Currently, CVPL reduce exports at the CVP. These export reduction used to account for the reduction. The EWA can re CVP as well. If export reductions are taken, the EV	iver and export curtailments at f April and May. VAMP was 5. The purpose of VAMP is educed exports and the barrier an Chinook salmon smolt-and an Joaquin River <u>and improve installation of the head of Old</u> <u>iver</u> , for fall /late fall run A (b)(2) water can be used to s are taken, and (b)(2) water is educe exports at the SWP and

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summer to make up for the earlier export reductions. The reductions in exports combined with the pulse flows down the San Joaquin River during VAMP allow larval and juvenile smelt to avoid becoming entrained at the export facilities and to move downstream to Suisun Bay. The potential effects of VAMP on delta smelt are unknown.

Recent Fish Declines in the Delta and Estuary

In the last few years, the abundance indices calculated by the Interagency Ecological Program (IEP) Fall Midwater Trawl survey (MWT) demonstrated significant declines in numerous pelagic fishes in the upper San Francisco Bay-Delta Estuary. The abundance indices for 2002–20045 were measured at record low levels for delta smelt and age-0 striped bass and near-record lows for longfin smelt and threadfin shad (www.delta.dfg.ca.gov). Data from another IEP monitoring survey, the Summer Townet Survey (TNS), corroborate the MWT findings. In contrast, however, the San Francisco Bay Study <u>MWT</u> did not show significant declines in its catches of marine/lower estuary species. Based on these findings, the problem appears to be limited to fish dependent on the upper portion of the Bay-Delta estuary.

While several of the declining species—including Delta smelt, longfin smelt, juvenile striped bass, and calanoid copepods—previously showed evidence of a long-term decline, there appears to have been a precipitous "step-change" to very low abundance during 2002–20045. This observation is supported by initial statistical analyses of the MWT data. Moreover, the record or near-record low abundance levels are surprising in view of the fact that the hydrological regime in the San Francisco Bay-Delta Estuary was relatively moderate (no extreme dry or wet periods) during 2002–2004. SomeMany estuarine organisms, including longfin smelt and striped bass, typically produce poor year classes in dry years (Jassby et al. 1995); delta smelt abundance is generally lowest in very wet or very dry years (Moyle et al. 1992). Thus, the moderate hydrology during the past 34 years would be expected to produce at least modest population indices.

The eurrent-initial_conceptual model for why fish abundance has declined abruptly in recent years assumes at least three general factors that may be acting individually or in combination to lower pelagic productivity: (1) toxins; (2) invasive species; and (3) water project operations. DFG, NOAA Fisheries, and USFWS are-assisteding with the development of a screening-level study being implemented in summer 2005. The results of this study wereill-be made available in November 2005. It is expected that this study will better define the degree to which each of these factors may be responsible individually, or in combination. The study is designed to identify the most likely causes and to assign priorities on the basis of where funds and resources can be best used. Results also may provide additional information on causes of long-term declines in several affected species. Several of the studies are expected to be conducted based on an "adaptive management" approach, where information is analyzed as it is made available and, depending on the results, supplementary studies are conducted in 2006.2006_and 2007 and perhaps later years.

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Scientific studies, such as described above, are <u>underwayneeded</u> to determine the cause of the decline in pelagic fish. Until a determination can be made, no specific reason should be assumed at this time. These types of studies will be ongoing and will likely lead to new scientific evidence about the relationships among various species in the Delta. Although design, fabrication, and construction of the gates may begin before these studies are complete, the SWP export limit increase will not be fully implemented until after the gates are constructed and operable (2009). This provides DWR and Reclamation time to sort out the cause of the decline in some pelagic fish in the Delta before <u>additionalsubstantial</u> pumping due to 8,500 cfs permit changes takes place.

More information regarding the potential causes of the declines and actions to investigate and solve this issue is described in Appendix J.

South Delta Water Agency Water Reliability

South Delta Water Agency (SDWA) members have a need to improve reliability of water diversions to meet consumptive use needs. SDWA is a public agency formed by law to enter into contracts with the United States and the State of California to protect the water rights of landowners within the agency's jurisdiction from salinity intrusion and to ensure a dependable water supply. Water for lands within SDWA boundaries is supplied almost exclusively from Delta channels. Water supply in the south Delta is dependent on water quality and levels, which are influenced by a variety of factors, including natural tidal fluctuation; San Joaquin River inflow; local diversions; local agricultural return flows; channel capacity resulting in restricted circulation; fluctuations in barometric pressure; local wind direction and velocity; and water exports.

In July 1982, SDWA filed a lawsuit over the effects of SWP and CVP operations on the south Delta. The suit sought a declaration of the rights of the parties as well as preliminary and permanent injunctions requiring that the projects be operated to protect the south Delta. SDWA alleged that: (1) CVP operations on the San Joaquin River, primarily Friant Dam, unlawfully reduce the quantity and degrade the quality of water flowing in the San Joaquin River to the south Delta; (2) SWP and CVP pumping operations violate SDWA rights by lowering water levels, reversing flows, and diminishing the influence of the tides; and (3) the Secretary of the DOI's designation of the Stanislaus River basin for allocation of water from New Melones Reservoir violates SDWA rights by not including the south Delta in the basin.

DWR's involvement in the suit is a result of the alleged effects of the SWP and CVP pumps on south Delta water levels and circulation. The other issues involve only Reclamation.

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placed into the main channel bed at each location along with overflow weirs and several gated culverts. These barriers are installed in the spring and removed in the fall. The fourth barrier, a fish control barrier at the head of Old River, <u>wasis</u> discussed below-under South Delta Fish Protection. While it is unrelated to the SDWA lawsuit, it has become part of the Temporary Barriers Program for purposes of coordinating construction and permitting activities. The Temporary Barriers Program continues to be implemented on an annual basis as an interim solution to water levels and circulation until a permanent solution can be implemented. Several state and federal permits have been issued for the Temporary Barriers Program. These permits are valid through 2007, with the exception of the 1601 permit issued by the DFG, which expires in November 2005. All necessary permits will be renewed to extend the program until a permanent solution, such as SDIP, is implemented.

Mismatch between Supplies and Beneficial Uses

The Bay-Delta system provides the water supply for a wide range of instream, riparian, and other beneficial uses such as drinking water for millions of Californians and irrigation water for one-third of California's agricultural land. Some of these beneficial uses depend on the Bay-Delta system for only a portion of their water needs while others are highly or totally dependent on Bay-Delta water supplies. As water use and competition among uses have increased during the past several decades, conflicts have increased among users of Bay-Delta water. Heightened competition for the water during certain seasons or during water-short years has magnified the conflicts. As a result, demands for reliable water supplies south of the Delta continue to increase (CALFED Bay-Delta Program 2000).

Further compounding the issue, water flow and timing requirements have been established for certain fish and wildlife species with critical life stages that depend on freshwater flows. These requirements have reduced water supplies and flexibility to meet the quantity and timing of water delivered from the Bay-Delta system. Water suppliers and users are concerned that additional restrictions that may be needed to protect species would increase the uncertainty and further reduce the availability of the Bay-Delta system for agricultural and M&I purposes (CALFED Bay-Delta Program 2000b).

Currently, the amount of water available for M&I, agriculture, and environmental use in any given year depends on rainfall, snow pack, runoff, carryover storage, pumping capacity from the Delta, regulatory constraints, and the amount requested. In average years, such as 2000, California receives close to 200 million acre-feet (maf) of water from precipitation and imports. Of this total supply, about 50 to 60% is used by native vegetation, evaporates into the atmosphere, provides some water for agricultural crops and managed wetlands, or flows to Oregon, Nevada, the Pacific Ocean, and salt sinks like saline groundwater aquifers and the Salton Sea. The remaining 40 to 50%, called the

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Table 1-3. California Water Balance Summary for Water Years 1998, 2000, and 2001

	1998 (Wet Year)	2000 (Average Year)	2001 (Drier Year)
Total Supply (Precipitation and Imports)	336.9 maf	194.7 maf	145.5 maf
Dedicated Supply (Includes Reuse)	94.5 maf	82.5 maf	64.7 maf
Distribution of Dedicated S	upply to Various Ap	plied Water Uses	
Urban Uses	7.8 maf	8.9 maf	8.6 maf
Agricultural Uses	27.3 maf	34.2 maf	33.7 maf
Environmental Water*	59.4 maf	39.4 maf	22.5 maf

 Environmental water includes instream flows, wild and scenic flows, required Delta outflow, and managed wetlands water use.

Source: California Department of Water Resources Public Review Draft Water Plan Update 2005, Volume 3.

To balance the needs of all beneficial users as well as the needs of the environment, CALFED agencies analyzed four different alternatives, all of which included differing operational and structural components for the SWP and CVP facilities (as well as other water conservation efforts, transfers, etc.) to reduce the mismatch between Bay-Delta water supplies and current and projected beneficial uses dependent on the Bay-Delta system.

The SDIP project is one component identified in the CALFED Programmatic Preferred Alternative that will enable the CALFED preferred alternative goals to be met. Increasing the permitted <u>daily</u> diversion capability at the SWP's CCF from the current 6,680 cfs to 8,500 cfs to allow an increase in pumping at SWP Banks would improve water export supplies during periods when there are fewer criteria for environmental needs controlling Delta flows and exports. As a result, reductions in exports could be made during times when those criteria are in effect. On balance, this would provide SWP and CVP more flexibility and therefore improve predictability of water supply from the Bay-Delta system for beneficial use needs.

State Water Project

DWR operates and maintains the SWP, which delivers water to 29 agricultural and M&I contractors in the northern California, San Joaquin Valley, the San Francisco Bay Area, and central coast and southern California. The SWP delivers water for agricultural, municipal, and industrial uses, providing water to 20 million Californians and 660,000 acres of irrigated farmland. It comprises 20 pumping plants, five hydroelectric power plants, 33 storage facilities, and more than 660 miles of aqueducts and pipelines. These facilities include its major diversion and pumping facility (CCF and SWP Banks) in the south Delta,

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	and the California Aqueduct extending from the sou southern California.	uth Delta to SWP facilities in
	The SWP began its deliveries in the 1960s, during a concerns began to shape legislation. Throughout th to protect, conserve, and restore environmental reso laws, in turn, have shaped the way DWR manages a Freshwater releases are made from upstream reserv scheduled to minimize impacts on fish, programs w were built to protect fish and wildlife.	e 1970s, regulations intending purces were enacted. These and operates SWP facilities. oirs, pumping operations are
	Twenty-nine water agencies (contractors), of which District of Southern California (Metropolitan) is the for project water. The amount of each contract is sy A amounts are used to define each contractor's proj supply that DWR will allocate and deliver to that co- contractors may request an amount not to exceed th Table A amounts are used as a basis for allocations supply to contractors is variable and depends on the The total Table A contract amount is 4.2 maf a year Table A amount is provided each year. Under the t \$1.75 billion bond issue, users for the most part pay including interest. SWP contractors also pay energy charge based on the distance the water is transporte more expensive than federal water, it is not subject	e largest, contract with DWR pecified in "Table A." Table portion of the available water ontractor. Each year, eir Table A amount. The to contractors, and the actual e amount of water available. r. Approximately 3 maf of the erms of the SWP's v all costs of the project, y costs and a transmission d. Although SWP water is
	The Monterey Agreement signed by 26 of 29 SWP restructured SWP contracts to allocate water based amounts instead of the amount of water requested f shortages, the SWP agricultural and M&I contracto Typically, however, water delivery capabilities are	on contractual Table A or the given year. In times of rs will be cut equally.
	The SWP operates under long-term contracts with p throughout the state extending from Sutter, Butte, a north to Alameda, Santa Clara, and Napa in the Bay Joaquin Valley and San Luis Obispo and Santa Bar southern California. These agencies, in turn, delive retailers or deliver it directly to agricultural and M& Department of Water Resources 1999a). There are SWP: Oroville, Delta, San Luis, San Joaquin, and Each division within the SWP contains several facil pumping plants, canals, power plants, lakes, and res SWP contracting agencies are shown in Figure 1-1 full Table A amounts in 2003 are outlined in Table	nd Plumas Counties in the y area, through the San bara Counties, and finally to r water to wholesalers or El water users (California five divisions within the Southern Field Divisions. lities including dams, servoirs. Service areas for and region, contractors, and
	SWP supplies water to the northern Delta and Napa water stored in Oroville Reservoir and distributed the Aqueduct. The Bethany Reservoir is fed by the SW	hrough the North Bay
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Action	Year	Description
Bay-Delta Plan Accord and State Water Board Order WR 95-06	1994 and 1995	Agreement and associated State Water Board order-to provide for operations of the CVP and SWP to protect Bay-Delta water quality. Also provided for further evaluation of Bay-Delta operations, which is being pursued under the CALFED process.
1995 Water Quality Control Plan and State Water Board Order WR 95-06	<u>1995</u>	Revised water quality objectives in the Delta to protect water supply and environmental resources. Included new objectives for the 2 ppt salinity gradient location (X2) and limited exports with an Export/Inflow objective. need description]
Monterey Agreement and Amendments	1995	Agreement between DWR and SWP contractors to revise water supply allocation and management under the SWP water supply contracts.
NOAA Fisheries Biological Opinions	1996 and 1997	Established criteria to protect coho salmon and steelhead in coastal streams.
NOAA Fisheries ESA listing	1999	Spring-run Chinook listing.
State Water Board Revised WR Decision 1641	2000	Revised order to provide for the operations of the CVP and SWP to protect Bay-Delta water quality.
Trinity ROD and related decisions	2001 and 2004	Restored flows on the Trinity River. The ROD was upheld by the Federal Court in 2004.
NOAA Fisheries Biological Opinion for salmonids	2004	NOAA Fisheries issued a BO stating a finding of no jeopardy on the effects of the system-wide CVP/SWP operations (OCAP).
USFWS Biological Opinion for Delta smelt	2004 and 2005	USFWS issued a BO stating a finding of no jeopardy on the effects of the system-wide CVP/SWP operations (OCAP).
ESA = fe NOAA Fisheries = N ROD = R SWP = St State Water Board = St USFWS = U	ational Marin ecord of Decis tate Water Pro- tate Water Res .S. Fish and W ater right.	ered Species Act. e Fisheries Service. sion. ject. sources Control Board. /ildlife Service.
Water F Wh con con wet wat agri con	en the SWP 1 tractors throu tracts set fort years and cr er supply, an cultural uses tractors. Art	Agreement and Amendments to State Contracts began operations in the 1960s, DWR signed contracts with water aghout the state to manage the allocation of the water. The the the conditions and regulations that were to be followed in both itical years. Article 18 addresses the allocation of shortages in d particularly under what circumstances the initial reductions to should be imposed prior to reducing allocations to urban icle 18(a) deals with temporary shortages that occur due to her temporary causes. Article 18(b) deals with the possibility of
drot	ughts and otr	ter temporary causes. Article 18(0) deals with the possibility of

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	specified types of permanent shortages of supply of proje droughts of 1987–1992, water supply was severely reduc Article 18(a) became the center of SWP allocation contre The agricultural diverters, who sustained the most drastic drought, argued that such cuts were not equitable and tha result of both undeveloped SWP project allocations and I Because M&I contractors did not face the same supply re different opinions about the implementation of Article 18 persisted with the growing water shortage, DWR and SW into discussions and negotiations to resolve the problem.	ed, and as a result, wersy. cuts during the t the shortage was a hydrological events. eduction, they held 3. As disagreement
	These discussions were threatening to enter legislative ar DWR initiated a fulltime effort to resolve the problems b October and November and setting a deadline of Decemb mediator, the group of contractors and DWR found that t shortage could not be resolved through negotiations, but specifically Article 18, needed amendment and modificat amended contracts would allow greater flexibility in wate make the SWP and the DWR more responsive to changir needs.	y hiring a mediator in per 1, 1994. With the he issue of water rather their contracts, ion. They felt that er deliveries and would
	When the 2-month period with the mediator had ended, the DWR had come to an agreement. Because these disc Monterey, the result became known as the Monterey Agr several principles, from which amendments to contracts we principles were developed to satisfy the following goals:	ussions were held in eement. It consisted of
	 Goal 1—Increase reliability of existing water supplie 	s;
	 Goal 2—Provide stronger financial management; and 	1
	 Goal 3—Increase water management flexibility, prov local water agencies to maximize existing facilities. 	riding more tools to
	Based on these goals and principles, several SWP contra- benefits were designed to increase contractor certainty at facilities use. The agreement also <u>helps</u> allows contractor supply outside of SWP contracts through:	out allocations and
	 water transfers, 	
	 water banking, 	
	 storage outside service areas, 	
	 transport of nonproject water, 	
	 permanent sales of water among contractors, 	
	 annual turn-back program, 	
	 use of Kern Water Bank property by agricultural con banking, and 	tractors for water
	 access by M&I water contractors to Kern Water Ban 	k.
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The Planning and Conservation League (PCL) filed a lawsuit on December 27, 1995, against DWR and Central Coast Water Authority (CCWA), challenging compliance under CEQA for the Monterey Amendment and the transfer of Kern Water Bank (KWB) to Kern County Water Agency (KCWA). The Sacramento County Superior Court ruled in favor of DWR and CCWA, and PCL appealed the decision. The Court of Appeal held that the EIR was inadequate and that DWR should have acted as the lead agency for the project. In addition, the Court reinstated the validation claim in the complaint, providing a forum for review of the entire Monterey Amendment, including the transfer of a portion of the KWB. The Court also directed DWR to prepare a new EIR. In July 2000, the parties reached an agreement on principles for settling the lawsuit. DWR commenced preparing a new EIR and the interested parties continued mediation to prepare a Settlement Agreement. The Superior Court approved the Settlement Agreement on May 20, 2003. Under this Settlement Agreement, the Monterey Agreements remain in effect. Implementation of the Settlement Agreement and preparation of the new EIR are underway.

State Water Resources Control Board Water Quality Control Plan and Decision 1641

The State Water Board issued D-1641 on December 29, 1999, revised March 15, 2000 (State Water Resources Control Board 1999). D-1641 is the water rights decision implementing <u>water quality objectives in</u> the 1995 Delta Water Quality Control Plan (WQCP) objectives, including the water quality standards on the San Joaquin and Mokelumne Rivers and Cache and Putah Creeks. D-1641 also approved a petition to change points of diversion of the CVP and SWP in the southern Delta and approved a petition to change places and purposes of use of the CVP. The final phase of implementation focused on how water right holders in the Sacramento Valley should contribute to meeting the 1995 Delta WQCP objectives. A negotiated settlement <u>between Sacramento Valley water users and DWR and Reclamation</u> resolved this issue <u>with by creating</u> the Sacramento Valley Water Management Agreement (SVWMA) and Program. D-1641 applies to DWR and Reclamation water rights permits through terms and conditions affecting SWP and CVP operations.

The State Water Board adopted its WQCP for the Bay-Delta and incorporated took into consideration several elements of U.S. Environmental Protection Agency (EPA), NOAA Fisheries, and USFWS regulatory suggested requirements objectives for water salinity and endangered species protection. The WQCP identifies the beneficial uses of the Bay-Delta that are to be protected and includes water quality objectives that are intended to protect those beneficial uses. The plan also includes an implementation program for achieving the water quality objectives. Under the CWA, the water quality standards comprise the uses and the objectives established to protect them. Features of the current WQCP implemented by D-1641 affect the SDIP by requiring certain Delta outflows and by regulating actions that may be used to protect fish and benefit the environment. Requirements of D-1641 that are relevant to SDIP are:

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	 water-year-classificationsexport limits that affect outflo consequently, export limitations; 	ow requirements and,
	 water quality/salinity standards <u>objectives</u> for protection M&I uses; 	n of agricultural and
	 the Delta outflow requirements for flow from the Delta Bay; and 	to San Francisco
	 limitations on combined SWP and CVP Delta exports- inflow. Sufficient Delta outflow is provided based on Exports (diversion of water from its natural course to S limited to a percentage of the measured Delta inflow in include rainfall). These percentages range are from 359 February through June, depending on the Delta inflow, remainder of the year. 	available-water, San Francisco Bay) are flow <u>s.(that does not</u> % to 45% f rom
	limitations on combined SWP and CVP exports to equ. River inflow during a 30-day period in April and May. modified to the current VAMP requirements, which inv Joaquin River inflow and combined export targets.	This limitation was
	 DCC closure periods were increased to provide more p Sacramento Chinook and steelhead, by allowing a sma migrating fish to be diverted into the central Delta. 	
Co	ordinated Operations Agreement	
	Recognizing the connection between their two major water to jointly comply with a combination of federal, state, and agency decisions, permit requirements, and agreements reli and biological resource protection, in 1986 DWR and Recl COA to manage California's water through the operations SWP and CVP water projects (see descriptions of the SWP Through this agreement and program, DWR and Reclamati operations of the SWP and CVP to meet Delta regulatory r	regional laws, policies, ating to water rights amation entered into a of their respective and CVP below). ion coordinate the
	D-1641 and the ESA.	
	D-1641 and the ESA. The COA replaced earlier similar agreements between the State of California. The COA specifies how the SWP and SWP and CVP requirements described in the 1986 WQCP (predecessor to D-1641) without adversely affecting the rig The COA identifies two types of conditions in the Delta un and CVP should operate: <i>balanced water conditions</i> and <i>econditions</i> .	CVP operate to meet and under D-1485 ghts of other parties. der which the SWP
	The COA replaced earlier similar agreements between the State of California. The COA specifies how the SWP and SWP and CVP requirements described in the 1986 WQCP (predecessor to D-1641) without adversely affecting the rig The COA identifies two types of conditions in the Delta un and CVP should operate: <i>balanced water conditions</i> and <i>e</i>	CVP operate to meet and under D-1485 ghts of other parties. der which the SWP <i>xcess water</i> eam reservoirs plus wramento Valley in-
South Delta Improvements	The COA replaced earlier similar agreements between the State of California. The COA specifies how the SWP and SWP and CVP requirements described in the 1986 WQCP (predecessor to D-1641) without adversely affecting the rig The COA identifies two types of conditions in the Delta un and CVP should operate: <i>balanced water conditions</i> and <i>econditions</i> . Balanced water conditions occur when releases from upstru unregulated flow equal the water supply needed to meet Sa basin uses plus exports. During balanced water conditions,	CVP operate to meet and under D-1485 ghts of other parties. der which the SWP <i>xcess water</i> eam reservoirs plus weramento Valley in-

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available to be stored in reservoirs, storage releases required to meet the Sacramento in-basin uses are made 55% from the CVP and 45% from the SWP. Under this condition, flow through the Delta is deemed adequate to meet all needs, and the CVP and SWP are operated to store and export as much water as possible up to the physical and contractual limits. Excess water conditions occur when the Delta inflows (combined releases from upstream reservoirs and unregulated flow) are greater than needed to meet the in-basin uses plus export. Under this condition, flow through the Delta is adequate to meet all needs, and no coordinated operation between the CVP and SWP is required.

The COA does not cover all circumstances that occur in Delta operations or all regulatory requirements (e.g., water quality requirements in the 1995 Delta WQCP and stipulations of biological opinions, the EWA, and others). DWR and Reclamation are able to make real time adjustments to the COA accounting to accommodate for theses changes in operational and regulatory requirements.

Issues of Known Controversy

NEPA requires that project proponents identify issues of known controversy that have been raised in the scoping process and throughout the development of the project. DWR and Reclamation considered these concerns in the development of the SDIP. All significant environmental impacts resulting from constructing and operating the SDIP will be mitigated. The following list outlines those issues that have been identified by agencies and the public relative to SDIP.

Effects on Delta Aquatic Resources

The effects on fish and the bay tidal system as a result of water project operations are an issue of concern to the public and government agencies. Recent data indicate that there has been a decline in abundance of pelagic fish species (as described above). Details regarding this information are provided in Appendix J.

DWR and Reclamation are working with other resource agencies to help determine the reasons for the apparent decline of pelagic fish species. In 2005, DWR and Reclamation are-redirecteding resources (S1.8 million) to evaluate the potential causes of this decline including toxics, invasive species, and water project operations. DWR and Reclamation have committed an additional S3.5 million for 2006 and S3.5 million for 2007 to continue these pelagic organism investigations. The Stage 2 decision will not be made until this incorporate any information that is collected and evaluated for these studies. The results of this evaluation will be used to determine and direct additional studies and actions. Therefore, no increase in diversions at CCF beyond that currently permitted will occur due to SDIP implementation until the effects that additional exports may have on this issue are more clearly understood.

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Chapter 2

U.S. Department of the Interior, Bureau of Reclamation, and the California Department of Water Resources Project Description Middle River (near the confluence of Middle River with Victoria Canal). Grant Line Canal (near the confluence of Grant Line Canal and Old River), and Old River (east of the DMC approximately 4,000 feet southeast of the intersection of the Alameda, Contra Costa, and San Joaquin County lines). Dredge various channels in the south Delta to improve conveyance and dredge areas surrounding agricultural diversions to improve their function. Extend up to 24 agricultural diversion intake facilities to improve their function. Operational Component Potential Scenarios Modify operations to increase the monthly average diversion rate into CCF up to 8,500 cfs. Convey up to 100,000 acre-feet of CVP Level 2 Refuge water through CCF and SWP Banks by September 1, and provide a north-of-Delta supply up to 75,000 acre-feet from CVP storage facilities to reduce SWP's obligation to comply with Bay-Delta water quality and flow requirements. As part of the Stage 2 decision, Iimplement an interim operations regime between December 15 and March 15 until the selected Stage 1 tidal gates are operational component is fully operational implemented to achieve the greater of: maximum diversions under existing Corps authorization which is 6,680 cfs plus 1/3 the flow of the San Joaquin River when flows at Vernalis are greater than 1,000 cfs, or maximum diversions of up to 8,500 cfs when (1) water quality standards (salinity at south Delta stations as defined by D-1641) are met and the dissolved oxygen (DO) in the San Joaquin River at Stockton is at or above the objective of 5 milligrams per liter (mg/l); (2) the south Delta water levels are at least 0.0 feet above mean sea level (feet msl) if needed for agricultural diversions; (3) there would be no unacceptable effects on special-status species; and (4) there would be no impact on EWA. California Environmental Quality Act/ National Environmental Policy Act Requirements CEQA and NEPA generally require consideration of a range of alternatives to a proposed project that would attain most of the basic project objectives while avoiding or substantially lessening project impacts and accomplish the project purpose and need. A range of reasonable alternatives is analyzed to sharply South Delta Improvements Program October 2005 Draft Environmental Impact Statement/ 2-2 J&S 02053.02 Environmental Impact Report

U.S. Department of the Interior. Bureau of Reclamation. Project Description and the California Department of Water Resource implement a physical/structural component or to continue installing temporary barriers will be made. A decision for Stage 1 will be made based on this EIS/EIR. The decision-making process for Stage 2 will begin after the Stage 1 decision has been documented in an NOD/ROD. The added flexibility and adaptability provided by the physical/structural component alone will achieve, to some extent, each of the SDIP objectives, regardless of the operational decision made during Stage 2. If the Stage 1 decision is to continue the installation of the temporary barriers, proceeding with Stage 2 and addressing both the physical/structural component and the operational component would be considered. Assuming the Stage 1 decision is to implement a physical/structural component, Stage 2 would include the selection of the preferred operational component, based upon the operational scenarios presented in the Draft EIS/EIR and incorporating public input, and additional information collected on the condition of pelagic organisms in the Delta. During this stage, and prior to the selection of the preferred operational component, the public will again be provided the opportunity to comment on the preferred operational component. CEQA and NEPA compliance for the decision made under Stage 2 will follow the preparation and circulation of supplemental information as directed by the CEQA Guidelines (see Article 11) and CEQ NEPA Regulations (40 CFR 1502.9(c)). DWR and Reclamation will issue the necessary supplemental document for CEQA and NEPA compliance explaining the preferred operational component, the rationale for its selection, and any additional environmental effects. This document would be available for public comment and review for a period of at least 45 days, consistent with CEQA and NEPA, and will provide opportunity for the public to submit additional comments on the environmental analysis of the operational component of the SDIP. A second Notice of Determination from DWR and an ROD from Reclamation regarding the selection of the preferred operational component will be filed to complete the environmental compliance requirements for Stage 2 of the SDIP. Parties concerned about the operational component in Stage 2 should participate early in the EIS/EIR process and review and comment on this Draft EIS/EIR. With respect to the future decision for Stage 2 that relies upon the SDIP EIS/EIR certified at the time of the NOD for Stage 1, and any supplements to the EIS/EIR, a new CEQA challenge period will commence at the time of the Stage 2 decision for parties to request judicial review of DWR's decision based on any cause of action under CEQA related to the Stage 2 decision. In any decision for Stage 2, DWR will state in the Notice of Determination that DWR has relied in part upon the SDIP EIS/EIR certified in Stage 1 and intends that those aspects of the SDIP EIS/EIR relied upon in the Stage 2 decision will be subject to further judicial review. Other permitting requirements may follow a similar staging process whereby a responsible or cooperating agency may issue a permit based on the Stage 1 decision and later amend the permit to include the Stage 2 decision. For South Delta Improvements Program October 2005 Draft Environmental Impact Statement/ Environmental Impact Report 2-5J&S 02053.02

U.S. Department of the Interior. Bureau of Reclamation. Project Description and the California Department of Water Resource diversions. Stage 2 of Alternative 2A would involve implementation of Operational Scenario A for the operational component of SDIP. Specific timing and additional detail for Operational Scenario A are provided later under the discussion of Operational Scenarios. Interim Operations Alternative 2A also includes the implementation of Interim Operations may be considered as part of the Stage 2 decision. Interim Operations would begin only after an SDIP Stage 2 decision is made and may be implemented before the permanent gates are fully operable, if the Stage 2 decision is made while the gates are under construction. The interim operations would be compatible with the Stage 2 selected pumping operations and limits. , which would allow increased diversions prior to the full implementation of the operational component. Interim Operations would be used only between December 15 and March 15, as specified in the Corps Public Notice dated October 13, 1981. During this period there are generally no local diversions, so fish entrainment is likely to be the major conditional approval issue. The existing CCF diversion limit for the December 15-March 15 period, as specified in the Corps Public Notice 5820A, Amended, dated October 13, 1981, will remain in effect until a Stage 2 decision is made. If the Stage 2 decision is to not change the maximum CCF diversion rate, the existing diversion limits-including the allowable increase from 6,680 cfs of 1/3 of the San Joaquin River flow-would remain the maximum diversion limit between December 15 and March 15. Interim Operations would include the greater of the maximum diversions of 6.680 cfs plus 1/3 the flow of the San Joaquin River when flows at Vernalis exceed 1,000 cfs (i.e., the existing limit); or maximum diversions of 8,500 cfs when (1) water quality standards (salinity at south Delta stations as defined by D-1641) are met and the DO in the San Joaquin River at Stockton is at or above the objective of 5 mg/l; (2) the south Delta water levels are at least 0.0 msl if needed for agricultural diversions; (3) there would be no unacceptable effects on specialstatus fish species; and (4) there would be no impact on EWA. Alternative 2B Alternative 2B would be implemented in 2 stages. Stage 1 would involve the implementation of the physical/structural component including the construction and operation of the head of Old River fish control gate and Old River, Middle River, and Grant Line Canal flow control gates; channel dredging in Old River, Middle River, and West Canal; spot dredging in Victoria, North, and Grant Line Canals, and in Old River and Middle River; and extension of agricultural diversions. Stage 2 of Alternative 2B would involve implementation of Operational Scenario B for the operational component of SDIP. Specific timing and additional detail for Operational Scenario B are provided later under the discussion of Operational Scenarios. South Delta Improvements Program October 2005

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Project Description

Gate Operations

Gate Operations Review Team

A federal and state interagency team will be convened to discuss constraints and provide input to the existing Data Assessment Team (DAT). The Gate Operations Review Team will make recommendations for the operations of the fish control and flow control gates to minimize impacts <u>onof</u> resident threatened and endangered species and to meet water level and water quality requirements of south Delta water users. The interagency team will include representatives of DWR, Reclamation, USFWS, NOAA Fisheries, and DFG, and possibly others as needs change. The interagency team will be responsible for providing predictive modeling, and SWP will provide operations forecasts and the conference call line. Reclamation will be responsible for providing frequency forecasts, including San Joaquin River flow, and data on current water quality conditions. Other members will provide the team with the latest information related to south Delta fish species and conditions for crop irrigation.

The Gate Operations Review Team will use information shared at the weekly meetings to determine gate operations for that week. Although there are numerous ways the gates could be operated to address the many issues in the south Delta, it is assumed that the Gate Operations Review Team will make recommendations that attempt to balance these needs. A likely gate operation is described below, and in more detail in Sections 5.2 and 5.3. It is assumed that the gate operations adopted by the GORT under varying circumstances would be the same or similar to this description.

Head of Old River Fish Control Gate Operations

The operation (or closing) of the head of Old River fish control gate is intended to benefit the San Joaquin River watershed Central Valley fall-/late fall-run Chinook salmon by reducing the downstream movement of the salmon into the south Delta channels via Old River. Because the gate is functional, operations can be more flexible in response to the detection of fish presence and/or water quality. Operation of the gates in Middle River and Old River at DMC could provide more net flows from Victoria Canal into Middle River and from Old River at Clifton Court Ferry into the Old River channel upstream of the CVP Tracy facility. The operation of the year would lower the electrical conductivity (EC) of the western portion of these channels. This gate can have the largest effect on south Delta salinity. The salinity in the south Delta channels can be reduced to approach the EC of the SWP exports if the San Joaquin River diversion flow into the head of Old River is reduced.

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	begin on April 15. Spring operati	Old River fish control gate is proposed to on is generally expected to continue through salmon and steelhead. During this time, the
	operated at a different time or for	NOAA Fisheries, and DFG, the gate needs to be a longer period (e.g., just prior to and/or after ated provided the following criteria are met:
		ion would not increase take of species in by the original proposed operation;
	 outmigrating salmon or steelh 	ead are present; and
	 SDWA agricultural diverters quantity. 	are able to divert water of adequate quality and
	in the San Joaquin River, thus ass (i.e., low dissolved oxygen) condi Stockton. During this period, par allow approximately 500 cfs of Sa warranted to protect water quality during this period would be at the USFWS. Operations would not o	30, the gate would be operated to improve flow sting in avoiding historically present hypoxic tions in the lower San Joaquin River near ial operation of the gate (partial closure to n Joaquin River flow into Old River) may be in the South Delta channels. Gate operations request of DFG, NOAA Fisheries, and ceur if the San Joaquin River flow at Vernalis is expected that this flow would maintain
	to operate the gate to improve the USFWS, NOAA Fisheries, and D	the San Joaquin River, there may be some need hypoxic conditions. If, in the opinion of FG, the gate needs to be operated at a different be operated provided the following criteria are
		ion would not increase take of species in by the original proposed operation;
	 there is a verified presence of 	outmigrating salmon or steelhead.
	annually, in coordination with the may also be modified in response	nd spring operations could be modified Gate Operations Review Team. Operations to varying conditions to avoid impacts on . During non-operational times of the year, the (open).
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U.S. Department of the Interior, Bureau of Reclamation, Project Description and the California Department of Water Resource Flow Control Gates The three flow control gates, Middle River, Grant Line Canal, and Old River near the DMC, would be operated (closed during some portion of the tidal cycle) throughout the agricultural season (April 15 through November 30) and on an asneeded basis during the rest of the year to protect water quality and levels. Reclamation and DWR have committed to maintaining water levels during these times at 0.0 foot msl in Old River near the CVP Tracy facility, 0.0 foot msl at the west end of Grant Line Canal, and 0.5 foot msl in Middle River at Mowry Bridge. It is anticipated that the target level in Middle River would be lowered to 0.0 foot msl following extension of some agricultural diversions. Water levels are based on 1929 National Geodetic Vertical Datum [NGVD]. Proposed flow control gate operations would require forecasting of water levels and potential changes in water quality in south Delta channels and operating the gates to maintain the agreed-upon water levels and water quality objectives. Forecasting would be performed on a weekly basis using the Delta Simulation Model 2 (DSM2), using forecasted tides, and proposed diversion rates of the projects. DSM2 calculates hydraulic parameters for hundreds of points in Delta channels at 15-minute intervals. DSM2 uses simulation of pumping rates, release schedules, and forecast tides to predict the water levels, tidal flows, and EC throughout the south Delta channels. Where level is predicted to be below the criteria or water quality conditions are predicted to approach the objectives, the gates would be operated to maintain the specified water level, and increase tidal circulation in the south Delta channels. The gates would be opened to enhance flow through these channels during all flood-tide (i.e., rising water level) periods, once the downstream water level was greater than 0.0 feet. Actual gate operations would likely vary from this general circulation plan and would be discussed on a weekly basis by the Gate Operations Review Team. The extension of agricultural diversions in the south Delta that are currently shallower than -2 feet msl (1929 NGVD) may lower the water level response criteria and subsequently further reduce the need to operate gates. Winter Operations For the period from December through April 14March, the Middle River, Grant Line Canal, and Old River near the DMC gates may be operated only with permission from USFWS, NOAA Fisheries, and DFG if the following criteria are met: USFWS, NOAA Fisheries, and DFG determine that such operation would not increase take of species in excess of the take authorized by the biological opinion (BO) for SDIP; USFWS, NOAA Fisheries, and DFG determine that any impacts associated with gate operation during this period would not result in additional impacts South Delta Improvements Program October 2005 Draft Environmental Impact Statement/ Environmental Impact Report 2-32J&S 02053.02

U.S. Department of the Interior, Bureau of Reclamation, Project Description and the California Department of Water Resource environmental commitments, and . emergency procedures. **Boater Awareness** DWR would operate the gates, control facilities, and boat ramp and boat locks, and will also implement a Boating Educational Program in an effort to educate boaters regarding the new structures in the area. Education for boaters would be to improve recreation in the project area and would reduce misconceptions regarding perceived difficulty of navigating past the new structures. DWR's education of boaters could occur through a variety of methods, including, but not limited to: . posting clearly readable instructional signs on the banks and waterways at all approaches to a gate site (in multiple languages), distributing educational flyers containing maps and operation schedules (in . multiple languages), offering classes at local marinas regarding the use of the lock facility, providing an information telephone hotline (in multiple languages), and providing information via an Internet homepage regarding operation of the gates (in multiple languages). Noise Compliance DWR and Reclamation and/or their contractors will comply with local noise regulations by limiting construction to the hours specified by relevant counties, except during conveyance dredging activities which would occur 24 hours a day. It is assumed that construction activities would occur during normal working hours, between 7:00 a.m. and 7:00 p.m., Monday through Friday, and between 8:00 a.m. and 5:00 p.m., Saturday and Sunday. In San Joaquin County, construction activities that occur between the hours of 6:00 a.m. and 9:00 p.m. Sunday and Saturday are exempt from the County's noise ordinance. In Alameda County, construction activities that occur between the hours of 7:00 a.m. and 7:00 p.m. Monday through Friday and between 8:00 a.m. and 5:00 p.m. Saturday and Sunday are exempt from the County's noise ordinance. Compliance with Existing Regulations DWR and Reclamation would operate the SDIP components in compliance with existing regulations and water rights requirements and restrictions, except for those changes described in the project description, including those for water guality, flows, and fish protection. Therefore, DWR and Reclamation will October 2005 South Delta Improvements Program Draft Environmental Impact Statement/ 2-51 J&S 02053.02 Environmental Impact Report

Project Description

continue to comply with the terms and conditions set forth in their water rights permits (and Reclamation's license) for diversion and use of water, including water quality and flow requirements.

Invasive Vegetation

DWR and Reclamation would require the contractor to clean all vegetation, to the extent practicable, from any equipment used in the water. This will reduce the risk of spreading invasive vegetation by the equipment from one area to another.

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Chapter 3

U.S. Department of the Interior, Bureau of Reclamation, and the California Department of Water Resources Guide to Impact Analyses

irretrievable impact or commitment of resources occurs when a resource is removed or consumed. These types of impacts are evaluated to ensure that consumption is justified. The discussion of Irreversible and Irretrievable Commitments can be found in Chapter 4, "Summary Comparison of Environmental Consequences."

Mitigation Measures

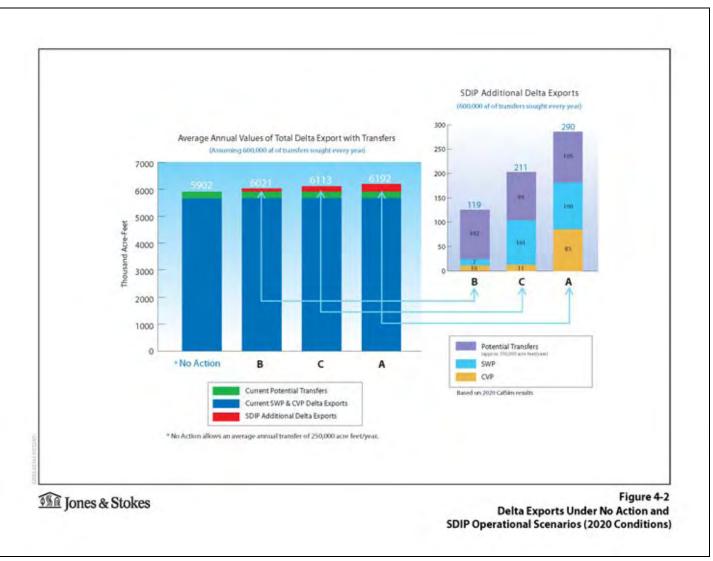
Mitigation measures include actions such as implementation of plans to minimize effects. For example, dust as a result of construction activities may be identified as a significant impact to air quality, but the implementation of a Dust Suppression Plan will mitigate the impact to a less-than-significant level. The CALFED Programmatic EIS/EIR identifies program-wide mitigation measures that may be used to avoid, minimize, restore, or compensate for potentially significant adverse impacts. <u>Those CALFED mitigation measures that are relevant to SDIP impacts have been incorporated into the SDIP EIS/EIR.</u> Not all of the programmatic mitigation measures are implemented in this document; however, where feasible, they are integrated into the SDIP mitigation measures. The Social Issues and Economics, Growth-Inducing, and Cumulative sections do not contain a separate mitigation measures section.

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Chapter 4



Summary of Environmental Consequences

Increase Water Deliveries to SWP and CVP Water Contractors South of the Delta and Provide Opportunities to Convey Water for Fish and Wildlife Purposes

Alternative 1 (No Action)

Alternative 1A would not result in changes to operations or pumping capacity limits and, therefore, would not result in any change to south Delta water supply conditions. Additional SWP or CVP deliveries would not be possible. <u>The No Action baseline unused SWP pumping capacity would allow an average of 250 taf/yr of potential water transfers, assuming a 600 taf/yr demand and supply for water transfers in each year. Figure 4-2 indicates that the total CVP and SWP exports of 5,655 taf/yr together with the potential water transfers of 247 taf/yr would average 5,902 taf/yr for the 2020 No Action conditions.</u>

Alternative 2A

Stage 1

It is likely that the operation of permanent gates, through the improved management of Delta water quality and water levels, would allow conditions for JPOD to be more easily satisfied, thereby increasing SWP and CVP flexibility.

Stage 2

Implementation of Stage 2 of Alternative 2A would result in improvement in average annual CVP water deliveries of approximately 100 thousand acre-feet per year (taf/yr) compared to 2001 and 2020 baseline conditions. Moreover, Alternative 2A would result in improvement in SWP Table A and SWP Article 21 deliveries. An average of an additional 20 to 40 taf/yr for Table A deliveries and an additional average of 50 taf/yr for Article 21 deliveries, compared to 2001 and 2020 baseline conditions would be available. Additionally, DWR would annually convey up to 100,000 acre-feet of CVP Level 2 Refuge water through CCF and SWP Banks by September 1, and Reclamation would provide SWP a north-of-Delta storage amount of up to 75,000 acre-feet from CVP storage facilities to reduce the SWP obligation to comply with Bay-Delta water quality and flow requirements. Additional unused pumping capacity would allow an average of approximately 1005 taf of additional potential water transfers. The CVP Tracy pumping would be reduced by 19 taf/yr, and the SWP exports would increase by 204 taf/yr, for a net increase of 185 taf/yr (85 taf/yr for CVP and 100 taf/yr for SWP).

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Summary of Environmental Consequences

Alternative 2B

Stage 1

It is likely that the operation of permanent gates, through the improved management of Delta water quality and water levels, would allow conditions for JPOD to be more easily satisfied, thereby increasing SWP and CVP flexibility.

Stage 2

Implementation of Stage 2 of Alternative 2B would not result in substantial improvement in average annual CVP water deliveries. Marginal increases in deliveries of approximately an average 15 to 20 taf/yr compared to 2001 and 2020 baseline conditions would provide some additional water to CVP contractors. Similarly, Alternative 2B would not result in substantial improvement in average annual SWP Table A or Article 21 deliveries. Resultant SWP Table A deliveries would range from a decrease in average deliveries of 19 taf/yr (-19 taf/yr) and an increase of only an average 2 taf/yr under 2001 and 2020 baseline conditions, respectively. Additional unused pumping capacity would allow an average of approximately 100<u>2</u> taf of <u>additional</u> potential water transfers. The CVP Tracy pumping would be reduced by 19 taf/yr, and the SWP exports would increase by 36 taf/yr, for a net increase of 17 taf/yr (10 taf/yr for CVP and 7 taf/yr for SWP).

Alternative 2C

Stage 1

It is likely that the operation of permanent gates, through the improved management of Delta water quality and water levels, would allow conditions for JPOD to be more easily satisfied, thereby increasing SWP and CVP flexibility.

Stage 2

Implementation of Stage 2 of Alternative 2C would result in improvement in average annual CVP water deliveries. Marginal increases in deliveries of approximately an average 23 and 24 taf/yr compared to 2001 and 2020 baseline conditions would provide some additional water to CVP contractors. Alternative 2C would result in improvement in average annual SWP Table A or Article 21 deliveries. Resultant SWP Table A delivery increases would range from an average 6 to 40 taf/yr compared to 2001 and 2020 baseline conditions, respectively. Resultant SWP Article 21 deliveries would increase on average by

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Summary of Environmental Consequences

55 taf/yr compared to baseline conditions. Additional unused pumping capacity would allow an average of approximately 10099 taf of <u>additional</u> potential water transfers. The CVP Tracy pumping would be reduced by 29 taf/yr, and the SWP exports would increase by 141 taf/yr, for a net increase of 112 taf/yr (11 taf/yr for CVP and 101 taf/yr for SWP).

Alternative 3B

Implementation of Alternative 3B would result in CVP and SWP delivery improvements similar to those described for Alternative 2B.

Alternative 4B

Implementation of Alternative 4B would result in CVP and SWP delivery improvements similar to those described for Alternative 2B.

Summary

All alternatives would be similar for Stage 1. For Stage 2, Alternative 2A would allow for diversions of 8,500 (on a 3-day average) year-round and would result in the greatest flexibility in maximizing diversions into CCF. It results in the greatest flexibility in maximizing diversions into CCF. It results in the greatest increase in south of Delta water deliveries for both the SWP and CVP. Therefore Alternative 2A would fulfill this export objective most often, compared to the other alternatives. Figure 4-2 shows the annual average increase in Delta exports and potential water transfers for each alternative-operational scenario, as simulated with CALSIM for the 2020 conditions. The greatest potential increase in Delta exports would be 290 taf/yr for operational scenario A. Operational scenario B would allow an average increase of 119 taf/y, and operational scenario C would allow an average increase of 211 taf/yr. These estimates of water supply changes for 2020 conditions are summarized from Table 5.1-13. Similar estimates of water supply changes for 2001 conditions are given in Table 5.1-12.

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		Stage		Level of Significance oplicable before		Level of Significance after
Resource Topic/Impact	1	2	Alternative	Mitigation	Mitigation Measure	Mitigation
Fish-32: Construction-Related Loss of Striped Bass to Direct Injury.	х		2A–2C, 3B, 4B	Less than significant	None required.	Less than significant
Fish-33: Construction-Related Loss of Striped Bass to Predation.	Х		2A–2C, 3B, 4B	Less than significant	None required.	Less than significant
Fish-34: Effects of Gate Operation on Striped Bass Migration.	х		2A–2C, 3B, 4B	Beneficial		Beneficial impact
Fish-35: Construction-Related Loss of Spawning Habitat Area for Green Sturgeon.	х		2A–2C, 3B, 4B	Less than significant	None required.	Less than significant
Fish-36: Construction-Related Loss of Rearing Habitat Area for Green Sturgeon.	Х		2A–2C, 3B, 4B	Less than significant	None required.	Less than significant
Fish-37: Construction-Related Reduction in Food Availability for Green Sturgeon.	х		2A–2C, 3B, 4B	Less than significant	None required.	Less than significant
Fish-38: Construction-Related Loss of Green Sturgeon to Accidental Spill of Contaminants.	х		2A–2C, 3B, 4B	Less than significant	None required.	Beneficial import_css than significant
Fish-39: Construction-Related Loss of Green Sturgeon to Direct Injury.	х		2A–2C, 3B, 4B	Less than significant	None required.	Less than significant
Fish-40: Construction-Related Loss of Green Sturgeon to Predation.	х		2A–2C, 3B, 4B	Less than significant	None required.	Less than significant
Fish-41: Effects of Gate Operation on Green Sturgeon Migration.	х		2A–2C, 3B, 4B	Less than significant	None required.	Less than significant
Fish-42: Operations-Related Loss of Spawning Habitat Area for Chinook Salmon.		х	2A–2C, 3B, 4B	Less than significant	None required.	Less than significant
Fish-43: Operations-Related Loss of Rearing Habitat Area for Chinook Salmon.		х	2A–2C, 3B, 4B	Less than significant	None required.	Less than significant

Section 5.1

Several tables in Section 5.1 show three panels, with the top panel showing the monthly distribution of A, "Baseline Conditions," and the middle panel showing the monthly distribution of B, "Scenario Conditions," with the bottom panel showing the monthly distribution of the scenario changes from the baseline. This third panel was labeled as (A–B) and should have been labeled as (B–A). This correction should be made to Tables 5.1-4, -6, -8, -9, -10, and -11.

U.S. Department of the Interior, Bureau of Reclamation, and the California Department of Water Resources Water Supply and Management

1995 Water Quality Control Plan and D-1641

The State Water Board's 1995 WQCP (adopted May 1995(b)) and the State Water Board's-and Reelamation's Final EIR for implementation (November 1999) incorporated several elements-changes recommended by of the EPA, NOAA Fisheries, and USFWS to the regulatory-objectives for salinity and endangered species protection. The changes from D-1485 regulatory limits for CVP and SWP Delta operations are substantial. The State Water Board implemented the 1995 WQCP with decision 1641 in March 2000. The new provisions for X2, export/inflow ratio, and the VAMP that are implemented in D-1641 will be described in the section on Delta water operations because these are the basis for the 2001 and 2020 baseline operations assumed in CALSIM.

California Water Resources

California's water supplies come from surface water and groundwater sources that vary in distribution and volume depending on the annual climatic conditions throughout the state. California's Mediterranean climate provides wet winters and dry summers throughout most of the state. Pacific storms bring rain and snow, typically from October through April. Average annual statewide precipitation is about 23 inches corresponding to a water volume of nearly 200 maf over California's land surface. About 60% of this precipitation is retained as soil moisture until returned to the atmosphere through evaporation from the soils and transpiration from trees and other vegetation. Some precipitation (5%) recharges the groundwater basins that underlie much of California's land surface. The remaining 35% represents the state's average annual runoff of about 70 maf. Less than half this runoff is diverted for M&I or agricultural water supplies. The other half of California's runoff water provides the streamflow and shallow groundwater that maintain diverse aquatic ecosystems in California's rivers, estuaries, and wetlands (California Department of Water Resources 1998a).

Because agricultural and M&I demands are highest during summer, there is an imbalance between when water supply is available in California and when most of it is needed. Another water supply imbalance is created by the differences in runoff and demand between northern and southern California. More than 70% of the runoff comes from northern California but more that 75% of M&I and agricultural demand is south of the Delta.

California water supply development includes many local water supply projects, the CVP, the SWP and the Corps reservoir projects. Because of the seasonal pattern of runoff, storage reservoirs are generally needed for effective development of surface supplies in California. Some of these surface supplies are now used for required environmental flows below reservoirs and as outflow from the Delta. All of the SWP and CVP upstream-of-the-Delta stored water that is appropriated for use in south-of-Delta export areas must pass through the Delta and the CVP or SWP Delta pumping plants. The following discussions of CVP

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U.S. Department of the Inter and the California Departme		Water Supply and Management
	14a and I-14b include the annual between the 2001 values and the 2	flow volumes (taf) and the annual variation 2020 values.
	Vernalis ranged from a minimum average of 2,660 taf/yr (3,674 cfs from 832 taf to 13,854 taf, with an average change was a decrease of attributed to the lower initial stora the 2020 CALSIM simulations. The term 2001 baseline value. The Ca more than 5% of the annual baseling	al flow volumes for the San Joaquin River at of 833 taf to a maximum of 13,927 taf, with an). The CALSIM 2020 annual values ranged a average of 2,587 taf/yr (3,573 cfs). The 73 taf/yr. Some of this reduction can be ge value for New Don Pedro Reservoir used in This represents a decrease of 2.7% of the long- ALSIM 2020 annual values were changed by ine value in 9 years. Table I-14c shows the ow (cfs) between the 2020 baseline and the
	than 10% of the 2001 baseline mo 5% change from the 2001 baselin	able number of months with changes of more onthly flow, and a few years with more than a e flow, the long-term CALSIM 2020 Vernalis usted for the different initial New Don Pedro 2001 results.
	just 0.5% less than the 2001 basel	esented by the Freeport and Vernalis flows, is ine. This suggests that the 2020 CALSIM- iction conditions are similar to the 2001 ting conditions.
Wat	er Transfers	
	contractors to allow water transfer 1996, the SWP negotiated the "M operating rules of the SWP to help	2 changed the operating rules of the CVP rs among users in prescribed situations. In onterey Agreement" which changed the <u>o facilitate</u> allow banking and limited water . These changes allow a limited water market
	easier to transfer water beyond the These laws are aimed at protecting and also protect fish and wildlife affected" by the transfer. These la	several laws in the 1980s and 1990s making it e boundaries of historical water service areas. g water users who are not a party to the transfer from being "injured" or "unreasonably aws developed an expedited process for the water rights (i.e., place of use) of those ear) water transfer.
	800 taf were purchased for transfe Bank, still the largest water transf California experienced a series of	ansfers across the Delta have occurred. Almost r in 1991 as a part of DWR's Drought Water er year of record. Beginning in 1995, 'higher-than-normal runoff years, and the need tantially. In 2001 (a dry year) EWA transferred

U.S. Department of the Inte and the California Department	rior, Bureau of Reclamation, ent of Water Resources	Water Supply and Managemen
	SWP deliveries to southern California, pumped. When operating all 14 units, 4,480 cfs, each day of the year. One u maximum delivery over the Tehachapi contractors is limited to about 3 maf.	g Plant therefore provides a limit for the since a maximum of 3.25 maf can be the plant can pump 320 cfs per unit, or nit is normally held in reserve, so the Mountains to Southern California
	about 1.2 maf (the Kern County Water	ontractors have a combined entitlement of r Authority has an entitlement of 1 maf). titlement demand of 220 taf. The North demand of about 76 taf, but this is not
	in 2000 (California Department of Wa contractor requests for the full Table A growthincreasing demand, the need to	amount increase with population use the SWP facilities at their full design will increase the operating flexibility of eater fraction of the SWP Table A
	the south Delta. This water supply see magnitude of the expected improveme	mpacts on the CVP or on local water is that supply agricultural water needs in ction presents information to document the nt in water supply reliability (based on the IM II results), and describe the potential
	Example of Central Valley P Delivery Patterns for Water	Project and State Water Project Year 1994
	last in the CALSIM hydrology sequen D-1641 that changed the Delta objecti delivery patterns illustrate the typical year. WY 1994 was classified as a cri	VP and SWP operations. WY 1994 is the ce, but was prior to the 1995 WQCP and wes substantially. The 1994 pumping and
		the CVP demands of about 3,300 taf/yr ominantly in the summer irrigation season.
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	Conditio I Baselin	, ,)										Page	1 of 2	
Per-							Pre- VAMP 4/1-	VAMP 4/16-	VAMP 5/1-	Post- VAMP 5/16-					
centile	Oct	Nov	Dec	Jan	Feb	Mar	4/15	4/30	5/15	5/31	Jun	Jul	Aug	Sep	
Min	1,616	800	351	691	641	800	800	800	800	800	800	800	868	1,410	
10	2,585	1,251	1,193	2,389	1,389	1,240	800	800	800	800	1,220	857	2,048	2,912	
20	2,998	2,431	2,889	2,999	2,877	1,865	800	800	800	800	1,734	2,571	3,718	4,275	
30	3,309	3,412	3,002	3,007	3,137	2,403	1,125	800	800	800	2,012	3,745	4,467	4,366	
40	3,914	4,217	3,212	3,026	3,679	2,772	1,500	800	800	800	2,339	4,536	4,505	4,448	
50	4,315	4,247	4,209	4,122	4,020	3,352	2,919	800	800	1,125	2,540	4,570	4,531	4,468	
60	4,344	4,250	4,221	4,222	4,224	3,685	3,564	1,125	800	1,500	2,852	4,577	4,535	4,470	
70	4,355	4,253	4,222	4,226	4,237	4,230	4,200	1,125	1,125	1,500	3,000	4,588	4,543	4,475	
80	4,365	4,256	4,224	4,228	4,245	4,274	4,544	1,500	1,500	2,692	3,000	4,600	4,553	4,481	
90	4,374	4,260	4,225	4,229	4,247	4,286	4,600	1,500	1,500	3,000	3,000	4,600	4,562	4,485	
Max	4,391	4,265	4,227	4,232	4,254	4,308	4,600	1,500	1,500	3,001	3,000	4,600	4,578	4,494	
Avg	3,781	3,541	3,415	3,504	3,479	3,088	2,737	1,019	1,011	1,507	2,365	3,790	4,021	4,183	
B. 2001	Scenari	0 A													_
							Pre- VAMP	VAMP	VAMP	Post- VAMP					
Per-							4/1-	4/16-	5/1-	5/16-					
centile	Oct	Nov	Dec	Jan	Feb	Mar	4/15	4/30	5/15	5/31	Jun	Jul	Aug	Sep	
Min	1,566	800	184	596	641	800	800	800	800	800	800	800	800	1,397	
10	2,537	1,401	1,090	2,372	1,384	867	800	800	800	800	1,251	1,271	2,049	2,912	
20	3,005	2,345	2,690	2,991	2,670	1,930	800	800	800	800	1,762	2,553	3,541	3,991	
30	3,157	2,999	2,997	3,001	3,209	2,421	1,125	800	800	800	2,027	4,006	4,381	4,352	
40	3,556	3,941	3,007	3,010	3,641	2,870	1,500	800	800	800	2,338	4,539	4,497	4,417	
50	4,098	4,237	4,215	4,056	4,152	3,467	2,842	800	800	1,125	2,562	4,574	4,532	4,468	
60	4,368	4,258	4,222	4,222	4,229	4,217	3,564	1,125	800	1,500	2,923	4,600	4,557	4,482	
70	4,377	4,261	4,226	4,229	4,236	4,275	4,451	1,125	1,125	1,500	3,000	4,600	4,565	4,487	
80	4,391	4,265	4,226	4,231	4,249	4,292	4,544	1,500	1,500	2,692	3,000	4,600	4,578	4,494	
90	4,391	4,265	4,227	4,232	4,252	4,302	4,600	1,500	1,500	3,000	3,000	4,600	4,578	4,494	
Max	4,391	4,265	4,227	4,232	4,254	4,321	4,600	1,500	1,500	3,001	3,000	4,600	4,578	4,494	
Avg	3,718	3,456	3,389	3,470	3,476	3,156	2,748	1,019	1,011	1,509	2,385	3,827	4,010	4,140	-
C. 2001	Scenari	o A Cha	inges (A-		0		Dro			Bost					_
							Pre- VAMP	VAMP	VAMP	Post- VAMP					
Per-							4/1-	4/16-	5/1-	5/16-					
centile	Oct	Nov	Dec	Jan	Feb	Mar	4/15	4/30	5/15	5/31	Jun	Jul	Aug	Sep	_
Min	-50	0	-167	-95	0	0	0	0	0	0	0	0	-68	-13	
10	-48	150	-103	-17	-5	-373	0	0	0	0	31	414	1	0	
20	7	-86	-199	-8	-207	65	0	0	0	0	28	-18	-177	-284	
30	-152	-413	-5	-6	72	18	0	0	0	0	15	261	-86	-14	
40	-358	-276	-205	-16	-38	98	0	0	0	0	-1	3	-8	-31	
50	-217	-10	6	-66	132	115	-77	0	0	0	22	4	1	0	
60	24	8	1	0	5	532	0	0	0	0	71	23	22	12	
70	22	8	4	3	-1	45	251	0	0	0	0	12	22	12	
80	26	9	2	3	4	18	0	0	0	0	0	0	25	13	
90	17	5	2	3	5	16	0	0	0	0	0	0	16	9	
Max	0	0	0	0	0	13	0	0	0	0	0	0	0	0	
Avg	-63	-85	-26	-34	-3	68	10	0	0	2	20	37	-11	-43	

D. 2020) Baselin	e					-								
							Pre- VAMP	VAMP	VAMP	Post- VAMP					
Per- centile	Oct	Nov	Dec	Jan	Feb	Mar	4/1- 4/15	4/16- 4/30	5/1- 5/15	5/16- 5/31	Jun	Jul	Aug	Sep	ta
Min	1,664	800	723	715	641	800	800	800	800	800	800	800	898	1,198	
10	2,401	1,333	1,353	2,183	1,417	1,194	800	800	800	800	1,179	1,244	2,345	2,867	
20	3,016	2,233	2,755	2,998	2,594	2,064	800	800	800	800	1,541	2,449	3,577	4,080	
30	3,154	3,301	2,999	3,004	3,289	2,576	1,297	800	800	800	2,008	3,434	4,290	4,349	
-40	3,679	3,728	3,079	3,008	3,904	2,929	2,561	800	800	800	2,260	4,533	4,503	4,442	
50	4,259	4,225	4,211	4,214	4,218	3,424	3,127	800	800	1,125	2,523	4,561	4,523	4,463	
60	4,339	4,249	4,220	4,224	4,232	3,980	3,817	1,125	800	1,500	2,908	4,578	4,535	4,471	
70	4,353	4,253	4,223	4,226	4,242	4,240	4,544	1,125	1,125	1,620	3,000	4,587	4,542	4,475	
80	4,359	4,255	4,223	4,228	4,245	4,274	4,544	1,500	1,500	2,859	3,000	4,594	4,547	4,477	
90	4,370	4,259	4,225	4,229	4,248	4,287	4,600	1,500	1,500	3,000	3,000	4,600	4,558	4,483	
Max	4,391	4,265	4,227	4,232	4,254	4,308	4,600	1,500	1,500	3,001	3,000	4,600	4,578	4,494	
Avg	3,723	3,487	3,417	3,498	3,487	3,152	2,895	1,021	1,011	1,543	2,326	3,720	3,990	4,152	2
E. 2020	Scenari	0 A													
							Pre- VAMP	VAMP	VAMP	Post- VAMP					
Per-							4/1-	4/16-	5/1-	5/16-					
centile	Oct	Nov	Dec	Jan	Feb	Mar	4/15	4/30	5/15	5/31	Jun	Jul	Aug	Sep	ta
Min	1,803	800	741	706	641	800	800	800	800	800	800	800	898	1,185	
10	2,235	1,287	1,241	1,653	1,388	1,167	800	800	800	800	1,123	1,121	1,821	2,880	
20	2,921	2,208	2,719	2,995	2,397	2,017	800	800	800	800	1,548	2,559	3,061	3,939	
30	3,186	3,016	2,995	3,000	3,375	2,435	1,125	800	800	800	1,977	3,302	4,358	4,341	
40	3,588	3,769	3,007	3,008	3,715	3,216	2,561	800	800	800	2,256	4,465	4,504	4,382	
50	3,903	4,167	4,209	3,900	4,188	3,516	3,131	800	800	1,125	2,522	4,569	4,528	4,467	
60	4,339	4,238	4,221	4,223	4,231	3,979	3,931	1,125	800	1,500	2,911	4,598	4,550	4,478	
70	4,370	4,257	4,224	4,228	4,241	4,265	4,544	1,125	1,125	1,647	3,000	4,600	4,559	4,484	
80	4,384	4,263	4,226	4,231	4,248	4,291	4,544	1,500	1,500	2,807	3,000	4,600	4,571	4,490	
90	4,391	4,265	4,227	4,232	4,252	4,300	4,600	1,500	1,500	3,000	3,000	4,600	4,578	4,494	
Max	4,391	4,265	4,227	4,232	4,254	4,315	4,600	1,500	1,500	3,001	3,000	4,600	4,578	4,494	
Avg	3,667	3,441	3,387	3,417	3,467	3,183	2,883	1,021	1,011	1,543	2,343	3,705	3,914	4,124	2
F. 2020	Scenari	o A Cha	nges (D	- E)<u>E - 1</u>	<u>D)</u>										
							Pre- VAMP	VAMP	VAMP	Post- VAMP					
Per-							4/1-	4/16-	5/1-	5/16-					
centile	Oct	Nov	Dec	Jan	Feb	Mar	4/15	4/30	5/15	5/31	Jun	Jul	Aug	Sep	ta
Min	139	0	18	-9	0	0	0	0	0	0	0	0	0	-13	
10	-166	-46	-112	-530	-29	-27	0	0	0	0	-56	-123	-524	13	
20	-95	-25	-36	-3	-197	-47	0	0	0	0	7	110	-516	-141	
30	32	-285	-4	-4	86	-141	-172	0	0	0	-31	-132	68	-8	
40	-91	41	-72	0	-189	287	0	0	0	0	-4	-68	1	-60	
50	-356	-58	-2	-314	-30	92	4	0	0	0	-1	8	5	- 4	
60	0	-11	1	-1	-1	-1	114	0	0	0	3	20	15	7	
70	17	4	1	2	-1	25	0	0	0	27	0	13	17	9	
80	25	8	3	3	3	17	0	0	0	-52	0	6	24	13	
90	21	6	2	3	4	13	0	0	0	0	0	0	20	11	
Max	0	0	0	0	0	7	0	0	0	0	0	0	0	0	
Avg	-56	-46	-30	-81	-20	31	-12	0	0	0	17	-15	-76	-28	

Per- centile	Oct	Nov	Dec	Jan	Feb	Mar	Pre- VAMP 4/1- 4/15	VAMP 4/16- 4/30	VAMP 5/1- 5/15	Post- VAMP 5/16- 5/31	Jun	Jul	Aug	Sep	taf/yr
Min	723	300	300	1,246	762	300	300	300	300	300	300	1,445	300	837	our yr
10	1,235	980	2,643	2,645	1,674	1,121	304	304	606	606	842	3,367	1,639	1,658	
20	2,666	2,255	3,135	3,893	3,016	2,570	700	700	700	1,125	2,271	3,829	5,480	3,881	
30	3,675	2,571	3,966	4,556	3,482	3,175	1,500	700	700	1,868	2,886	4,123	5,819	4,851	
40	4,210	3,229	4,472	5,272	4,111	4,234	2,904	700	700	2,692	3,475	4,745	6,524	5,782	
50	4,984	4,208	5,193	5,967	5,176	5,260	3,679	700	700	2,976	4,112	5,418	6,680	6,209	
60	5,467	5,022	5,705	6,775	6,668	6,914	4,527	700	700	3,926	4,347	6,083	6,680	6,630	
70	6,371	6,588	7,001	7,296	7,735	7,228	5,500	1,125	1,125	4,521	5,266	6,658	6,749	6,680	
80	6,680	6,680	7,047	7,465	8,437	7,561	5,640	1,500	1,500	5,639	6,072	7,180	7,003	7,180	
90	6,680	6,680	7,195	8,493	8,500	7,561	5,697	1,500	1,500	5,640	6,680	7,180	7,180	7,180	
Max	6,680	6,680	7,678	8,500	8,500	7,561	5,697	1,500	1,500	5,687	6,680	7,180	7,180	7,180	
Avg	4,583	4,172	5,110	5,769	5,409	5,006	3,413	905	916	3,214	3,991	5,350	5,767	5,457	3,312
B. 2001	-		0,110	03100	5,105	5,000	0,110		710	0,014	0,001	0,000	5,107	0,407	0,011
Per-	ocenar	10 14					Pre- VAMP 4/1-	VAMP 4/16-	VAMP 5/1-	Post- VAMP 5/16-					
centile	Oct	Nov	Dec	Jan	Feb	Mar	4/15	4/30	5/15	5/31	Jun	Jul	Aug	Sep	taf/yr
Min	349	300	300	1,247	652	300	300	300	300	300	300	1,493	300	909	
10	1,163	1,216	2,525	2,630	1,850	1,004	300	300	425	425	1,247	3,276	2,071	1,669	
20	2,552	2,012	2,888	3,988	3,023	2,570	700	700	700	899	2,354	4,423	5,160	3,974	
30	3,593	2,378	3,715	4,810	3,476	3,174	1,500	700	700	1,868	2,982	4,756	6,301	4,938	
40	4,065	2,837	4,343	4,971	4,146	4,232	2,851	700	700	2,676	3,485	5,251	7,049	5,422	
50	4,983	4,002	5,170	6,003	5,596	6,049	3,679	700	700	2,984	4,015	6,160	7,379	6,208	
60	5,478	4,909	6,319	6,341	6,368	6,922	4,523	700	700	3,945	4,361	6,559	7,648	6,840	
70	5,959	5,620	7,239	8,500	8,500	8,234	5,500	1,125	1,125	4,521	5,263	6,978	7,858	7,019	
80	7,721	7,021	8,500	8,500	8,500	8,500	6,274	1,500	1,500	5,817	6,048	7,713	8,032	7,533	
90	8,500	8,500	8,500	8,500	8,500	8,500	6,551	1,500	1,500	6,549	7,116	8,500	8,310	8,500	
Max	8,500	8,500	8,500	8,500	8,500	8,500	6,608	1,500	1,500	6,598	8,500	8,500	8,500	8,500	
Avg	4,843	4,301	5,457	5,960	5,571	5,384	3,578	894	910	3,338	4,162	5,869	6,470	5,786	3,514
C. 2001	Scena	rio A Cl	anges (А—В В	<u>– A</u>)										
Per-							Pre- VAMP 4/1-	VAMP 4/16-	VAMP 5/1-	Post- VAMP 5/16-					
centile	Oct	Nov	Dec	Jan	Feb	Mar	4/15	4/30	5/15	5/31	Jun	Jul	Aug	Sep	taf/yr
Min	-374	0	0	1	-110	0	0	0	0	0	0	48	0	72	
10	-72	236	-118	-15	176	-117	-4	-4	-181	-181	405	-91	432	11	
20	-114	-243	-247	95	7	0	0	0	0	-226	83	594	-320	93	
30	-82	-193	-251	254	-6	-1	0	0	0	0	96	633	482	87	
40	-145	-392	-129	-301	35	-2	-52	0	0	-16	10	506	525	-360	
50	-1	-206	-23	36	420	789	0	0	0	8	-97	742	699	-1	
60	11	-113	614	-434	-300	8	-4	0	0	19	14	476	968	210	
70	-412	-968	238	1,204	765	1,006	0	0	0	0	-3	320	1,109	339	
80	1,041	341	1,453	1,035	63	939	634	0	0	178	-24	533	1,029	353	
90	1,820	1,820	1,305	7	0	939	854	0	0	909	436	1,320	1,130	1,320	
Max	1,820	1,820	822	0	0	939	911	0	0	911	1,820	1,320	1,320	1,320	
Avg	260	129	347	191	162	378	165	-11	-6	124	171	519	703	329	202

 Table 5.1-6.
 CALSIM–Simulated Scenario A SWP Exports Monthly Distribution, for 2001 and 2020

 Conditions (cfs)
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Table	5.1-6.	Contir	nued										Pag	ge 2 of	2
D. 202) Baselii	ne													
							Pre-			Post-					
Per-							VAMP 4/1-	VAMP 4/16-	VAMP 5/1-	VAMP 5/16-					
centile	Oct	Nov	Dec	Jan	Feb	Mar	4/15	4/30	5/15	5/31	Jun	Jul	Aug	Sep	taf/y
Min	586	301	1,065	1,358	778	300	300	300	300	300	300	1,781	302	801	out j
10	1,141	1,188	2,599	2,890	1,994	1,182	320	320	700	700	333	2,740	1,859	1,532	
20	2,362	1,957	3,562	4,160	3,104	2,823	1,560	700	700	700	2,292	3,856	4,842	3,983	
30	3,083	2,666	4,125	4,625	3,867	3,555	2,749	700	700	1,799	3,038	4,111	6,102	4,884	
40	4,003	3,192	4,326	4,929	4,478	4,476	3,450	700	700	2,653	3,717	4,691	6,594	5,380	
50	4,624	4,234	5,131	6,354	5,686	6,135	4,172	700	700	3,033	3,973	5,768	6,680	5,946	
60	5,394	5,354	5,501	7,296	7,431	7,060	4,964	700	700	3,804	4,538	6,680	6,749	6,380	
70	,	6,357	6,713	7,405	8,171	7,254		1,125	1,125	4,416	5,302	7,180	7,026	6,550	
	6,464		,				5,640								
80	6,680	6,680	7,032	8,070	8,437	7,561	5,640	1,500	1,500	5,639	5,969	7,180	7,180	6,686	
90	6,680	6,680	7,157	8,500	8,500	7,561	5,697	1,500	1,500	5,640	6,680	7,180	7,180	7,180	
Max	6,680	6,680	7,678	8,500 5,987	8,500	7,561	5,697	1,500 914	1,500	5,687	6,680	7,180	7,180	7,180	2.25
Avg	4,436	4,220	5,122	5,987	5,692	5,201	3,763	914	920	3,160	3,981	5,433	5,861	5,290	3,35
E. 2020) Scenar	io A								P					
							Pre- VAMP	VAMP	VAMP	Post- VAMP					
Per-							4/1-	4/16-	5/1-	5/16-					
centile	Oct	Nov	Dec	Jan	Feb	Mar	4/15	4/30	5/15	5/31	Jun	Jul	Aug	Sep	taf/y
Min	300	300	300	1,358	778	300	300	300	300	300	300	1,592	300	776	
10	1,130	1,263	2,772	3,069	1,782	1,174	525	525	300	300	828	2,901	1,977	1,532	
20	2,293	1,904	3,477	4,296	3,113	2,805	1,650	700	700	700	2,348	4,196	4,422	3,879	
30	3,316	2,609	4,274	4,809	3,893	3,420	2,704	700	700	1,500	3,107	4,752	6,310	4,775	
40	3,801	3,336	4,814	5,115	5,166	4,477	3,450	700	700	2,696	3,723	5,053	6,870	5,353	
50	4,522	3,817	5,535	6,322	6,117	6,315	4,171	700	700	3,035	3,989	6,009	7,441	5,858	
60	5,397	4,563	5,984	7,874	7,793	7,600	4,964	700	700	3,804	4,688	6,446	7,716	6,420	
70	6,120	5,381	6,610	8,500	8,500	8,500	5,903	1,125	1,125	4,418	5,307	7,326	7,961	6,905	
80	7,963	6,788	8,239	8,500	8,500	8,500	6,551	1,500	1,500	5,798	5,958	8,473	8,129	7,282	
90	8,500	8,500	8,500	8,500	8,500	8,500	6,551	1,500	1,500	6,549	6,960	8,500	8,467	8,500	
Max	8,500	8,500	8,500	8,500	8,500	8,500	6,608	1,500	1,500	6,598	8,500	8,500	8,500	8,500	
Avg	4,831		5,535	6,253	5,762	5,639	4,045	921	891	3,263	4,155	5,906	6,408	5,532	3,55
) Scenar														
1. 2020	- Section	io a ci	anges (0 0 <u>1</u>	- 0)		Pre-			Post-					
							VAMP	VAMP	VAMP	VAMP					
Per-	0				an. 1		4/1-	4/16-	5/1-	5/16-				0	
centile	Oct	Nov	Dec	Jan	Feb	Mar	4/15	4/30	5/15	5/31	Jun	Jul	Aug	Sep	taf/y
Min	-286	-1	-765	0	0	0	0	0	0	0	0	-189	-2	-25	
10	-11	75	173	179	-212	-8	205	205	-400	-400	495	161	118	0	
20	-69	-53	-85	136	9	-18	90	0	0	0	56	340	-420	-104	
30	233	-57	149	184	26	-135	-44	0	0	-299	69	641	208	-109	
40	-202	144	488	186	688	1	0	0	0	43	6	362	276	-27	
50	-102	-417	404	-32	431	180	-1	0	0	2	16	241	761	-88	
60	3	-791	483	578	362	540	0	0	0	0	150	-234	967	40	
70	-344	-976	-103	1,095	329	1,246	263	0	0	2	5	146	935	355	
80	1,283	108	1,207	430	63	939	911	0	0	158	-11	1,293	949	596	
90	1,820	1,820	1,343	0	0	939	854	0	0	909	280	1,320	1,287	1,320	
Max	1,820	1,820	822	0	0	939	911	0	0	911	1,820	1,320	1,320	1,320	
Avg	395	115	413	266	70	438	282	7	-29	104	174	473	547	242	20

A. 200	1 Baseli	ine	-												
Per-			_				Pre- VAMP 4/1-	VAMP 4/16-	VAMP 5/1-	Post- VAMP 5/16-					
centile	Oct	Nov	Dec	Jan	Feb	Mar	4/15	4/30	5/15	5/31	Jun	Jul	Aug	Sep	taf/y
Min	1,616	800	351	691	641	800	800	800	800	800'	800	800	868	1,410	
10	2,585	1,251	1,193	2,389	1,389	1,240	800	800	800	800	1,220	857	2,048	2,912	
20	2,998	2,431	2,889	2,999	2,877	1,865	800	800	800	800	1,734	2,571	3,718	4,275	
30	3,309	3,412	3,002	3,007	3,137	2,403	1,125	800	800	800	2,012	3,745	4,467	4,366	
40		4,217	3,212	3,026	3,679	2,772	1,500	800	800	800	2,339	4,536	4,505	4,448	
50		4,247	4,209	4,122	4,020	3,352	2,919	800	800	1,125	2,540	4,570	4,531	4,468	
60		4,250	4,221	4,222	4,224	3,685	3,564	1,125	800	1,500	2,852	4,577	4,535	4,470	
70		4,253	4,222	4,226	4,237	4,230	4,200	1,125	1,125	1,500	3,000	4,588	4,543	4,475	
80	4,365	4,256	4,224	4,228	4,245	4,274	4,544	1,500	1,500	2,692	3,000	4,600	4,553	4,481	
90		4,260	4,225	4,229	4,247	4,286	4,600	1,500	1,500	3,000	3,000	4,600	4,562	4,485	
Max	4,391	4,265	4,227	4,232	4,254	4,308	4,600	1,500	1,500	3,001	3,000	4,600	4,578	4,494	
Avg	3,781	3,541	3,415	3,504	3,479	3,088	2,737	1,019	1,011	1,507	2,365	3,790	4,021	4,183	2,3
B. 200	1 Scena	rio B													
Per-							Pre- VAMP 4/1-	VAMP 4/16-	VAMP 5/1-	Post- VAMP 5/16-					
centile	Oct	Nov	Dec	Jan	Feb	Mar	4/15	4/30	5/15	5/31	Jun	Jul	Aug	Sep	taf
Min	1,958	800	17	592	641	800	800	800	800	800	800	800	800	1,402	
10	2,584	1,266	1,086	1,921	1,386	1,202	800	800	800	800	1,220	856	1,799	2,911	
20	2,980	2,385	2,352	2,991	2,208	2,035	800	800	800	800	1,784	2,554	3,513	4,259	
30	3,150	3,218	2,999	3,002	3,082	2,520	1,125	800	800	800	2,027	4,393	4,463	4,362	
40	3,622	3,819	3,005	3,008	3,426	2,643	1,500	800	800	800	2,326	4,539	4,511	4,448	
50	4,294	4,218	4,209	3,568	3,925	3,059	2,939	800	800	1,125	2,557	4,573	4,531	4,468	
60	4,342	4,250	4,222	4,220	4,222	3,651	3,564	1,125	800	1,500	2,885	4,582	4,538	4,472	
70	4,355	4,253	4,222	4,226	4,236	4,245	4,202	1,125	1,125	1,500	3,000	4,590	4,544	4,476	
80	4,366	4,257	4,224	4,228	4,245	4,276	4,544	1,500	1,500	2,692	3,000	4,600	4,553	4,481	
90	4,372	4,259	4,225	4,229	4,247	4,284	4,600	1,500	1,500	3,000	3,000	4,600	4,559	4,484	
Max	4,391	4,265	4,227	4,232	4,254	4,308	4,600	1,500	1,500	3,001	3,000	4,600	4,578	4,494	
Avg	3,752	3,482	3,344	3,434	3,366	3,060	2,736	1,019	1,011	1,510	2,379	3,816	4,020	4,165	2,2
C. 200	1 Scena	rio B C	hanges	(A-B	<u>B – A</u>)										
Per-							Pre- VAMP 4/1-	VAMP 4/16-	VAMP 5/1-	Pos-t VAMP 5/16-					
centile	Oct	Nov	Dec	Jan	Feb	Mar	4/15	4/30	5/15	5/31	Jun	Jul	Aug	Sep	taf
Min	342	0	-334	-99	0	0	0	0	0	0	0	0	-68	-8	
10	-1	15	-107	-468	-3	-38	0	0	0	0	0	-1	-249	-1	
20	-18	-46	-537	-8	-669	170	0	0	0	0	50	-17	-205	-16	
30	-159	-194	-3	-5	-55	117	0	0	0	0	15	648	-4	-4	
40	-292	-398	-207	-18	-253	-129	0	0	0	0	-13	3	б	0	
50	-21	-29	0	-554	-95	-293	19	0	0	0	17	3	0	0	
60	-2	0	1	-2	-2	-34	0	0	0	0	33	5	3	2	
70	0	0	0	0	-1	15	2	0	0	0	0	2	1	1	
80	1	1	0	0	0	2	0	0	0	0	0	0	0	0	
90	-2	-1	0	0	0	-2	0	0	0	0	0	0	-3	-1	
Max	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Avg	-29	-59	-71	-70	-113	-28	-1	0	0	3	14	26	-1	-18	-2

		Contin	ucu.											Page 2	
D. 202							Pre- VAMP 4/1-	VAMP 4/16-	VAMP 5/1-	Post- VAMP 5/16-					
centile	Oct	Nov	Dec	Jan	Feb	Mar	4/15	4/30	5/15	5/31	Jun	Jul	Aug	Sep	taf
Min	1,664	800	723	715	641	800	800	800	800	800	800	800	898	1,198	
10	2,401	1,333	1,353	2,183	1,417	1,194	800	800	800	800	1,179	1,244	2,345	2,867	
20	3,016	2,233	2,755	2,998	2,594	2,064	800	800	800	800	1,541	2,449	3,577	4,080	
30	3,154	3,301	2,999	3,004	3,289	2,576	1,297	800	800	800	2,008	3,434	4,290	4,349	
40	3,679	3,728 4,225	3,079	3,008 4,214	3,904 4,218	2,929	2,561	800 800	800 800	800	2,260	4,533	4,503	4,442	
50	4,259 4,339		4,211			3,424	3,127		800	1,125	2,523	4,561	4,523 4,535	4,463	
60		4,249	4,220	4,224	4,232	3,980	3,817	1,125		1,500	2,908	4,578		4,471	
70	4,353	4,253	4,223	4,226	4,242	4,240	4,544	1,125	1,125	1,620	3,000	4,587	4,542	4,475	
80 90	4,359	4,255	4,223	4,228	4,245	4,274	4,544	1,500	1,500	2,859	3,000	4,594	4,547	4,477	
90 Max	4,370 4,391	4,259 4,265	4,225	4,229	4,248 4,254	4,287 4,308	4,600 4,600	1,500 1,500	1,500 1,500	3,000 3,001	3,000 3,000	4,600 4,600	4,558 4,578	4,483 4,494	
	3,723	4,203 3,487			3,487	3,152	2,895	1,001	1,011	1,543	2,326	3,720	3,990	4,152	2,3
Avg	3,723	3,407	5,417	3,490	3,407	3,132	2,093	1,021	1,011	1,545	2,520	3,720	3,990	4,152	<i>4</i> .,
E. 202	0 Scena	rio B													
Per-							Pre- VAMP 4/1-	VAMP 4/16-	VAMP 5/1-	Post- VAMP 5/16-					
centile	Oct	Nov	Dec	Jan	Feb	Mar	4/15	4/30	5/15	5/31	Jun	Jul	Aug	Sep	tat
Min	1,693	800	682	735	641	800	800	800	800	800	800	800	898	1,193	
10	2,313	1,262	1,366	2,169	1,060	1,197	800	800	800	800	1,164	910	2,308	2,860	
20	3,024	2,199	2,656	2,998	2,575	1,792	800	800	800	800	1,502	2,559	3,119	4,031	
30	3,062	2,939	2,992	3,004	2,997	2,561	1,500	800	800	800	1,860	3,537	4,370	4,346	
40	3,564	3,731	3,004	3,008	3,580	2,849	2,601	800	800	800	2,261	4,531	4,500	4,419	
50	4,220	4,217	4,209	4,002	3,943	3,293	3,127	800	800	1,125	2,523	4,561	4,523	4,464	
60	4,334	4,247	4,220	4,220	4,231	3,952	3,856	1,125	800	1,500	2,908	4,578	4,535	4,470	
70	4,352	4,253	4,223	4,225	4,235	4,242	4,544	1,125	1,125	1,666	3,000	4,587	4,542	4,475	
80	4,361	4,255	4,223	4,228	4,245	4,274	4,544	1,500	1,500	2,846	3,000	4,597	4,549	4,478	
90	4,370	4,259	4,225	4,229	4,248	4,281	4,600	1,500	1,500	3,000	3,000	4,600	4,558	4,483	
Max	4,391	4,265	4,227	4,232	4,254	4,305	4,600	1,500	1,500	3,001	3,000	4,600	4,578	4,494	
Avg	3,684	3,403	3,368	3,470	3,404	3,095	2,911	1,021	1,011	1,543	2,324	3,750	3,991	4,138	2,2
F. 2020) Scena	rio B C	hanges	(D E	E – D)										
					_		Pre- Vamp	Vamp	Vamp	Post- Vamp					
Per- centile	Oct	Nov	Dec	Jan	Feb	Mar	4/1- 4/15	4/16- 4/30	5/1- 5/15	5/16 5/31	Jun	Jul	Aug	Sep	taf
Min	29	0	-41	20	0	0	0	0	0	0	0	0	0	-5	
10	-88	-71	13	-14	-357	3	ő	ő	ő	ő	-15	-334	-37	-7	
20	8	-34	-99	0	-19	-272	0	0	0	0	-39	110	-458	-49	
30	-92	-362	-7	0	-292	-15	203	0	0	0	-148	103	80	-3	
-40	-115	3	-75	0	-324	-80	-40	0	0	0	1	-2	-3	-23	
50	-39	-8	-2	-212	-275	-131	0	0	0	0	0	0	0	1	
60	-5	-2	0	-4	-1	-28	39	0	0	0	0	0	0	-1	
70	-1	0	0	-1	-7	2	0	0	0	47	0	0	0	0	
80	2	0	0	0	0	0	0	0	0	-14	0	3	2	1	
90	0	0	0	0	0	-6	0	0	0	0	0	0	0	0	
Max	0	0	0	0	0	-3	0	0	0	0	0	0	0	0	
Avg	-39	-84	-49	-28	-83	-57	16	0	0	1	-2	30	1	-14	

A. 200	1 Basel	mo													
A. 200	I Dasei	ine					Pre- VAMP	VAMP	VAMP	Post- VAMP					
Per-			_				4/1-	4/16-	5/1-	5/16-					
centile	Oct	Nov	Dec	Jan	Feb	Mar	4/15	4/30	5/15	5/31	Jun	Jul	Aug	Sep	taf∕y
Min	723	300	300	1,246	762	300	300	300	300	300	300	1,445	300	837	
10	1,235	980	2,643	2,645	1,674	1,121	304	304	606	606	842	3,367	1,639	1,658	
20	2,666	2,255	3,135	3,893	3,016	2,570	700	700	700	1,125	2,271	3,829	5,480	3,881	
30	3,675	2,571	3,966	4,556	3,482	3,175	1,500	700	700	1,868	2,886		5,819	4,851	
40	4,210	3,229	4,472	5,272	4,111	4,234	2,904	700	700	2,692	3,475		6,524	5,782	
50	4,984	4,208	5,193	5,967	5,176	5,260	3,679	700	700	2,976	4,112		6,680	6,209	
60	5,467	5,022	5,705	.,	6,668	6,914	4,527	700	700	3,926	4,347	6,083		6,630	
70	6,371	6,588	7,001	7,296	7,735	7,228	5,500	1,125	1,125	4,521	5,266	6,658		6,680	
80	6,680	6,680	7,047	7,465	8,437	7,561	5,640	1,500	1,500	5,639	6,072	7,180	7,003	7,180	
90	6,680	6,680		8,493	8,500	7,561	5,697	1,500	1,500	5,640	6,680	7,180	7,180	7,180	
Max	6,680	6,680	7,678	8,500	8,500	7,561	5,697	1,500	1,500	5,687	6,680	7,180	7,180	7,180	2.21
Avg	4,583	4,172	5,110	5,709	5,409	5,006	3,413	905	916	3,214	3,991	5,550	5,767	5,457	3,31
B. 2001	1 Scena	rio B													
							Pre-			Post-					
Per-							VAMP 4/1-	VAMP 4/16-	VAMP 5/1-	VAMP 5/16-					
centile	Oct	Nov	Dec	Jan	Feb	Mar	4/15	4/30	5/15	5/31	Jun	Jul	Aug	Sep	taf/y
Min	300	300	300	1,246	328	300	300	300	300	300	300	1,929	300	1,150	
10	1,180	921	2,211	2,622	1,672	1,122	316	316	486	486	612	3,083	1,810	1,656	
20	2,563	2,051	2,856	3,492	3,012	2,720	700	700	700	903	2,138	4,226	5,162	3,846	
30	3,363	2,394	3,769	4,316	3,481	3,174	1,500	700	700	1,868	2,849	4,775	6,418	4,787	
40	3,904	3,014	4,314	4,972	4,111	4,375	2,849	700	700	2,682	3,481	5,480	6,848	5,413	
50	4,874	3,820	5,218	5,372	5,296	5,327	3,679	700	700	2,978	4,112	6,146	7,080	6,232	
60	5,260	4,744	5,330	6,531	6,368	6,468	4,527	700	700	3,926	4,440	6,611	7,334	6,568	
70	5,979	5,673	6,726	7,180	7,180	7,180	5,502	1,125	1,125	4,519	5,266	6,899	8,055	6,832	
80	7,713	6,788	7,180	7,180	7,180	7,180	5,891	1,500	1,500	5,827	6,072	7,748	8,307	7,448	
90	8,500	8,500	7,180	7,180	7,180	7,180	5,891	1,500	1,500	5,890	7,111	8,186	8,310	8,500	
Max	8,500	8,500	7,180	7,180	7,180	7,180	5,948	1,500	1,500	5,937	7,180	8,500	8,500	8,500	
Avg	4,816	4,252	4,892	5,401	4,934	4,890	3,455	903	912	3,221	4,002	5,877	6,373	5,660	3,34
C. 200	1 Scena	rio B C	hanges	(A—B]	<u>B – A</u>)										
							Pre-			Post-					
Per-							VAMP 4/1-	VAMP 4/16-	VAMP 5/1-	VAMP 5/16-					
centile	Oct	Nov	Dec	Jan	Feb	Mar	4/15	4/30	5/15	5/31	Jun	Jul	Aug	Sep	taf∕y
Min	-423	0	0	0	-434	0	0	0	0	0	0	484	0	313	
10	-55	-59	-432	-23	-2	1	12	12	-120	-120	-230	-284	171	-2	
20	-103	-204	-279	-401	-4	150	0	0	0	-222	-133	397	-318	-35	
30	-312	-177	-197	-240	-1	-1	0	0	0	0	-37	652	599	-64	
40	-306	-215	-158	-300	0	141	-54	0	0	-10	6	735	324	-369	
50	-110	-388	25	-595	120	67	0	0	0	2	0	728	400	23	
60	-207	-278	-375	-244	-300	-446	0	0	0	0	93	528	654	-62	
70	-392	-915	-275	-116	-555	-48	2	0	0	-2	0	241	1,306	152	
80	1,033	108	133	-285	-1,257	-381	251	0	0	187	0	568	1,304	268	
90		1,820	-15	-1,313	-1,320	-381	194	0	0	250	431		1,130		
Max	1.820	1,820	-498	-1,320	-1.320	-381	251	0	0	250	500	1.320	1,320	1.320	

rabie	0.1-0.	. Conti	nueu											Page 2	
D. 202	0 Basel	ine													
							Pre- VAMP	VAMP	VAMP	Post- VAMP					
Per-							4/1-	4/16-	5/1-	5/16-					
centile	Oct	Nov	Dec	Jan	Feb	Mar	4/15	4/30	5/15	5/31	Jun	Jul	Aug	Sep	taf?
Min	586	301	1,065	1,358	778	300	300	300	300	300	300	1,781	302	801	
10	1,141	1,188	2,599	2,890	1,994	1,182	320	320	700	700	333	2,740	1,859	1,532	
20	2,362	1,957	3,562	4,160	3,104	2,823	1,560	700	700	700	2,292	3,856	4,842	3,983	
30	3,083	2,666	4,125	4,625	3,867	3,555	2,749	700	700	1,799	3,038	4,111	6,102	4,884	
40	4,003	3,192	4,326	4,929	4,478	4,476	3,450	700	700	2,653	3,717	4,691	6,594	5,380	
50	4,624	4,234	5,131	6,354	5,686	6,135	4,172	700	700	3,033	3,973	5,768	6,680	5,946	
60	5,394	5,354	5,501	7,296	7,431	7,060	4,964	700	700	3,804	4,538	6,680	6,749	6,380	
70	6,464	6,357	6,713	7,405	8,171	7,254	5,640	1,125	1,125	4,416	5,302	7,180	7,026	6,550	
80	6,680	6,680	7,032	8,070	8,437	7,561	5,640	1,500	1,500	5,639	5,969	7,180	7,180	6,686	
90	6,680	6,680	7,157		8,500	7,561	5,697	1,500	1,500	5,640	6,680	7,180	7,180	7,180	
Max	6,680	6,680	7,678	8,500	8,500	7,561	5,697	1,500	1,500	5,687	6,680	7,180	7,180	7,180	
Avg	4,436	4,220	5,122	5,987	5,692	5,201	3,763	914	920	3,160	3,981	5,433	5,861	5,290	3,3
			-,		-1	- ,	21.02				- pp or	.,		- 14	- 10
E. 202	0 Scena	rio B					D			P					
							Pre- VAMP	VAMP	VAMP	Post- VAMP					
Per-							4/1-	4/16-	5/1-	5/16-					
centile	Oct	Nov	Dec	Jan	Feb	Mar	4/15	4/30	5/15	5/31	Jun	Jul	Aug	Sep	taf/
Min	300	300	300	1,359	778	300	300	300	300	300	300	2,060	302	817	
10	1,109	1,166	2,509	3,002	1,838	1,238	700	700	700	700	546	2,779	1,525	1,523	
20	2,426	1,998	3,138	4,009	3,194	2,827	1,541	700	700	700	2,262	4,420	4,699	3,674	
30	3,135	2,676	3,957	4,321	3,765	3,368	2,749	700	700	1,799	2,887	4,752	6,227	4,843	
40	3,705	3,289	4,316	4,931	4,309	4,476	3,450	700	700	2,686	3,734	5,129	6,978	5,331	
50	4,480	3,928	5,233	6,077	5,329	5,900	4,171	700	700	3,031	3,963	6,242	7,441	5,865	
60	5,335	4,490	5,332	7,180	7,180	7,180	4,973	700	700	3,804	4,533	6,687	7,688	6,156	
70	6,147		6,138	7,180	7,180	7,180	5,772	1,125	1,125	4,416	5,305	7,443	7,988	6,724	
80	8,003	6,745	7,180	7,180	7,180	7,180	5,891	1,500	1,500	5,805	5,969	8,214	8,189	7,229	
90	8,500	8,500	7,180	7,180	7,180	7,180	5,948	1,500	1,500	5,890	7,029	8,500	8,310	8,500	
Max	8,500	8,500	7,180	7,180	7,180	7,180	5,948	1,500	1,500	5,937	7,180	8,500	8,500	8,500	
Avg	4,749	4,244		5,622	5,167	5,092	3,854	923	918	3,212	4,024	5,997	6,372	5,477	3,3
F. 202	0 Scena	rio B C	hanges	(0 b j	<u>c – D</u>)		Dra			Boot					
							Pre- VAMP	VAMP	VAMP	Post- VAMP					
Per-							4/1-	4/16-	5/1-	5/16-					
centile	Oct	Nov	Dec	Jan	Feb	Mar	4/15	4/30	5/15	5/31	Jun	Jul	Aug	Sep	taf/
Min	-286	-1	-765	1	0	0	0	0	0	0	0	279	0	16	
10	-32	-22	-90	112	-156	56	380	380	0	0	213	39	-334	-9	
20	64	41	-424	-151	90	4	-19	0	0	0	-30	564	-143	-309	
30	52	10	-168	-304	-102	-187	0	0	0	0	-151	641	125	-41	
40	-298	97	-10	2	-169	0	0	0	0	33	17	438	384	-49	
50	-144	-306	102	-277	-357	-235	-1	0	0	-2	-10	474	761	-81	
60	-59	-864	-169	-116	-251	120	9	0	0	0	-5	7	939	-224	
70	-317	-1,015	-575	-225	-991	-74	132	0	0	0	3	263	962	174	
80	1,323	65	148		-1,257	-381	251	0	0	166	0	1,034	1,009	543	
90	1,820	1,820		-1,320		-381	251	0	0	250	349	1,320	1,130	1,320	
Max	1,820	1,820	-498		-1,320	-381	251	0	0	2.50	500	1,320	1,320	1,320	
Avg	313	24	-165	-365	-525	-109	92	9	-1	52	43	564	511	187	

A. 200	1 Basel	ine													
Per- centile	Oct	Nov	Dec	Jan	Feb	Mar	Pre- VAMP 4/1- 4/15	VAMP 4/16- 4/30	VAMP 5/1- 5/15	Post- VAMP 5/16 5/31	Jun	Jul	Aug	Sep	tafy
Min	1,616	800	351	691	641	800	800	800	800	800	800	800	868	1,410	
10	2,585	1,251	1,193	2,389	1,389	1,240	800	800	800	800	1,220	857	2,048	2,912	
20	2,998	2,431	2,889	2,999	2,877	1,865	800	800	800	800	1,734	2,571	3,718	4,275	
30	3,309	3,412	3,002	3,007	3,137	2,403	1,125	800	800	800	2,012	3,745	4,467	4,366	
40	3,914	4,217	3,212	3,026	3,679	2,772	1,500	800	800	800	2,339	4,536	4,505	4,448	
50	4,315	4,247	4,209	4,122	4,020	3,352	2,919	800	800	1,125	2,540	4,570	4,531	4,468	
60	4,344	4,250	4,221	4,222	4,224	3,685	3,564	1,125	800	1,500	2,852	4,577	4,535	4,470	
70	4,355	4,253	4,222	4,226	4,237	4,230	4,200	1,125	1,125	1,500	3,000	4,588	4,543	4,475	
80	4,365	4,256	4,224	4,228	4,245	4,274	4,544	1,500	1,500	2,692	3,000	4,600	4,553	4,481	
90	4,374	4,260	4,225	4,229	4,247	4,286	4,600	1,500	1,500	3,000	3,000	4,600	4,562	4,485	
Max	4,391	4,265	4,227	4,232	4,254	4,308	4,600	1,500	1,500	3,001	3,000	4,600	4,578	4,494	
Avg	3,781	3,541	3,415	3,504	3,479	3,088	2,737	1,019	1,011	1,507	2,365	3,790	4,021	4,183	2,31
B. 200	1 Scena	гіо С													
Per-							Pre- VAMP 4/1-	VAMP 4/16-	VAMP 5/1-	Post- VAMP 5/16-					
centile	Oct	Nov	Dec	Jan	Feb	Mar	4/15	4/30	5/15	5/31	Jun	Jul	Aug	Sep	tafy
Min	1,751	800	16	603	641	800	800	800	800	800	800	800	800	1,394	
10	2,623	1,280	1,087	1,921	1,014	872	800	800	800	800	1,220	859	1,753	2,911	
20	2,989	2,380	2,426	2,993	2,445	1,990	800	800	800	800	1,779	2,556	3,517	4,262	
30	3,157	3,005	2,999	3,004	3,096	2,325	1,125	800	800	800	2,027	3,985	4,463	4,362	
40	3,638	3,819	3,083	3,009	3,426	2,635	1,500	800	800	800	2,327	4,540	4,508	4,455	
50	4,294	4,203	4,209	4,042	3,941	2,867	2,939	800	800	1,125	2,557	4,573	4,531	4,469	
60	4,343	4,250	4,222	4,222	4,225	3,509	3,564	1,125	800	1,500	2,921	4,583	4,539	4,473	
70	4,355	4,253	4,223	4,226	4,237	4,230	4,202	1,125	1,125	1,500	3,000	4,588	4,543	4,475	
80	4,366	4,255	4,224	4,228	4,245	4,276	4,544	1,500	1,500	2,596	3,000	4,600	4,553	4,481	
90	4,374	4,260	4,225	4,229	4,247	4,291	4,600	1,500	1,500	3,000	3,000	4,600	4,562	4,486	
Max	4,391	4,265	4,227	4,232	4,254	4,307	4,600	1,500	1,500	3,001	3,000	4,600	4,578	4,494	
Avg	3,751	3,465	3,364	3,450	3,383	3,003	2,737	1,019	1,011	1,505	2,385	3,809	4,012	4,165	2,28
C. 200	1 Scena	rio C C	hange	(AB	B-A)										
Per-							Pre- VAMP 4/1-	VAMP 4/16-	VAMP 5/1-	Post- VAMP 5/16-					
centile	Oct	Nov	Dec	Jan	Feb	Mar	4/15	4/30	5/15	5/31	Jun	Jul	Aug	Sep	tafy
Min	135	0	-335	-88	0	0	0	0	0	0	0	0	-68	-16	
10	38	29	-106	-468	-375	-368	0	0	0	0	0	2	-295	-1	
20	-9	-51	-463	-6	-432	125	0	0	0	0	45	-15	-201	-13	
30	-152	-407	-3	-3	-41	-78	0	0	0	0	15	240	-4	-4	
40	-276	-398	-129	-17	-253	-137	0	0	0	0	-12	4	3	7	
50	-21	-44	0	-80	-79	-485	19	0	0	0	17	3	0	1	
60	-1	0	1	0	1	-176	0	0	0	0	69	6	4	3	
70	0	0	1	0	0	0	2	0	0	0	0	0	0	0	
80	1	-1	0	0	0	2	0	0	0	-96	0	0	0	0	
90	0	0	0	0	0	5	0	0	0	0	0	0	0	1	
Max	0	0	0	0	0	-1	0	0	0	0	0	0	0	0	
Avg	-30	-76	-51	-54	-96	-85	0	0	0	-2	20	19	-9	-18	-2

Table	5.1-10). Con	tinued	1										Page 2	2
D. 202	0 Basel	ine													
Per-							Pre- VAMP 4/1-	VAMP 4/16-	VAMP 5/1-	Post- VAMP 5/16-					
centile	Oct	Nov	Dec	Jan	Feb	Mar	4/15	4/30	5/15	5/31	Jun	Jul	Aug	Sep	
Min	1,664	800	723	715	641	800	800	800	800	800	800	800	898	1,198	ï
10	2,401	1,333	1,353	2,183	1,417	1,194	800	800	800	800	1,179	1,244	2,345	2,867	
20	3,016	2,233	2,755	2,998	2,594	2,064	800	800	800	800	1,541	2,449	3,577	4,080	
30	3,154	3,301	2,999	3,004	3,289	2,576	1,297	800	800	800	2,008	3,434	4,290	4,349	
40	3,679	3,728	3,079	3,008	3,904	2,929	2,561	800	800	800	2,260	4,533	4,503	4,442	
50	4,259	4,225	4,211	4,214	4,218	3,424	3,127	800	800	1,125	2,523	4,561	4,523	4,463	
60	4,339	4,249	4,220	4,224	4,232	3,980	3,817	1,125	800	1,500	2,908	4,578	4,535	4,471	
70	4,353	4,253	4,223	4,226	4,242	4,240	4,544	1,125	1,125	1,620	3,000	4,587		4,475	
80	4,359	4,255	4,223		4,245	4,274	4,544	1,500	1,500	2,859	3,000	4,594	4,547	4,477	
90	4,370	4,259	4,225	4,229	4,248	4,287	4,600	1,500	1,500	3,000	3,000	4,600	4,558	4,483	
Max	4,391	4,265	4,227	4,232	4,254	4,308	4,600	1,500	1,500	3,001	3,000	4,600	4,578	4,494	
Avg	3,723	3,487	3,417	3,498	3,487	3,152	2,895	1,021	1,011	1,543	2,326	3,720	3,990	4,152	
E. 202	0 Scena	rio C													
							Pre- VAMP	VAMP	VAMP	Post- VAMP					
Per-							4/1-	4/16-	5/1-	5/16-					
centile	Oct	Nov	Dec	Jan	Feb	Mar	4/15	4/30	5/15	5/31	Jun	Jul	Aug	Sep	
Min	1,661	800	740	720	641	800	800	800	800	800	800	800	898	1,187	
10	2,341	1,295	1,285	1,818	1,063	1,166	800	800	800	800	1,113	856	1,986	2,803	
20	2,921	2,181	2,690	2,995	2,252	1,762	800	800	800	800	1,577	2,248	3,486	4,018	
30	3,053	3,196	2,992	3,000	2,993	2,457	1,500	800	800	800	1,833	3,491	4,149	4,350	
40	3,619	3,694	3,004	3,008	3,562	2,644	2,608	800	800	800	2,261	4,529	4,500	4,436	
50	4,234	4,007	4,209	3,780	3,943	3,284	3,129	800	800	1,125	2,523	4,562	4,523	4,465	
60	4,326	4,240	4,220	4,218	4,229	3,963	3,843	1,125	800	1,500	2,908	4,579	4,536	4,472	
70	4,353	4,253	4,223	4,226	4,235	4,249	4,544	1,125	1,125	1,589	3,000	4,588	4,542	4,475	
80	4,359	4,255	4,223	4,228	4,245	4,277	4,544	1,500	1,500	2,813	3,000	4,598	4,551	4,479	
90	4,370	4,259	4,225	4,229	4,247	4,287	4,600	1,500	1,500	3,000	3,000	4,600	4,558	4,483	
Max	4,391	4,265	4,227	4,232	4,254	4,308	4,600	1,500	1,500	3,001	3,000	4,600	4,578	4,494	
Avg	3,677	3,407	3,380	3,417	3,385	3,083	2,910	1,021	1,011	1,542	2,316	3,695	3,971	4,134	
F. 202	0 Scena	rio C C	hanges	(ЗE	E – D)										
Per-							Pre- VAMP 4/1-	VAMP 4/16-	VAMP 5/1-	Post- VAMP 5/16-					
centile	Oct	Nov	Dec	Jan	Feb	Mar	4/15	4/30	5/15	5/31	Jun	Jul	Aug	Sep	
Min	-3	0	17	5	0	0	0	0	0	0	0	0	0	-11	ľ
10	-60	-38	-68	-365	-354	-28	0	0	0	0	-66	-388	-359	-64	
20	-95	-52	-65	-3	-342	-302	0	0	0	0	36	-201	-91	-62	
30	-101	-105	-7	-4	-296	-119	203	0	0	0	-175	57	-141	1	
40	-60	-34	-75	0	-342	-285	46	0	0	0	1	-4	-3	-6	
50	-25	-218	-2	-434	-275	-140	2	0	0	0	0	1	0	2	
60	-13	-9	0	-6	-3	-17	26	0	0	0	0	1	1	1	
70	0	0	0	0	-7	9	0	0	0	-31	0	1	0	0	
80	0	0	0	0	0	3	0	0	0	-47	0	4	4	2	
90	0	0	0	0	-1	0	0	0	0	0	0	0	0	0	
Max	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Avg	-46	-80	-37	-81	-102	-69	15	0	0	-1	-10	-25	-19	-18	

A. 200	1 Basel	ine													
Per- centile	Oct	Nov	Dec	Jan	Feb	Mar	Pre- VAMP 4/1- 4/15	VAMP 4/16- 4/30	VAMP 5/1- 5/15	Post- VAMP 5/16 5/31	Jun	Jul	Aug	Sep	taf∕y
Min	723	300	300	1,246	762	300	300	300	300	300	300	1,445	300	837	
10	1,235	980	2,643	2,645	1,674	1,121	304	30.4	606	606	842	3,367	1,639	1,658	
20	2,666	2,255	3,135	3,893	3,016	2,570	700	700	700	1,125	2,271	3,829	5,480	3,881	
30	3,675	2,571	3,966	4,556	3,482	3,175	1,500	700	700	1,868	2,886	4,123	5,819	4,851	
40	4,210	3,229	4,472	5,272	4,111	4,234	2,904	700	700	2,692	3,475	4,745	6,524	5,782	
50	4,984	4,208	5,193	5,967	5,176	5,260	3,679	700	700	2,976	4,112	5,418	6,680	6,209	
60	5,467	5,022	5,705	6,775	6,668	6,914	4,527	700	700	3,926	4,347	6,083	6,680	6,630	
70	6,371	6,588	7,001	7,296	7,735	7,228	5,500	1,125	1,125	4,521	5,266	6,658	6,749	6,680	
80	6,680	6,680	7,047	7,465	8,437	7,561	5,640	1,500	1,500	5,639	6,072	7,180	7,003	7,180	
90	6,680	6,680	7,195	8,493	8,500	7,561	5,697	1,500	1,500	5,640	6,680	7,180	7,180	7,180	
Max	6,680	6,680	7,678	8,500	8,500	7,561	5,697	1,500	1,500	5,687	6,680	7,180	7,180	7,180	
Avg	4,583	4,172	5,110	5,769	5,409	5,006	3,413	905	916	3,214	3,991	5,350	5,767	5,457	3,31
B. 200	1 Scena	rio C													
Per-							Pre- VAMP 4/1-	VAMP 4/16-	VAMP 5/1-	Post- VAMP 5/16-					
centile	Oct	Nov	Dec	Jan	Feb	Mar	4/15	4/30	5/15	5/31	Jun	Jul	Aug	Sep	taf∕y
Min	300	300	300	1,248	752	300	300	300	300	300	300	1,483	300	915	
10	1,289	924	2,174	2,630	1,669	1,124	300	300	609	609	559	2,882	1,448	1,655	
20	2,425	1,867	2,820	3,682	2,984	2,570	700	700	700	1,125	2,456	4,182	5,134	3,351	
30	3,471	2,474	3,761	4,809	3,481	3,174	1,500	700	700	1,882	2,994	4,673	6,145	4,851	
40	3,727	3,014	4,348	4,958	4,148	4,375	2,849	700	700	2,690	3,590	5,253	6,621	5,278	
50	4,787	3,919	5,191	5,685	5,597	5,613	3,679	700	700	2,973	4,062	6,131	7,022	6,277	
60	5,338	5,000	6,319	6,391	6,320	6,442	4,527	700	700	3,926	4,338	6,565	7,266	6,563	
70	5,969	5,778	6,912	8,500	8,500	7,561	5,502	1,125	1,125	4,521	5,262	6,822	7,699	6,924	
80	8,190	6,748	8,500	8,500	8,500	7,561	5,640	1,500	1,500	5,639	6,071	7,741	8,308	7,433	
90	8,500	8,500	8,500	8,500	8,500	7,561	5,697	1,500	1,500	5,640	6,680	8,500	8,310	8,500	
Max	8,500	8,500	8,500	8,500	8,500	7,561	5,697	1,500	1,500	5,687	6,680	8,500	8,500	8,500	
Avg	4,815	4,269	5,338	5,927	5,477	5,003	3,390	900	916	3,201	4,029	5,858	6,299	5,680	3,43
C. 200	1 Scena	rio C C	hanges	(AB	$\underline{B-A}$										
Per-							Pre- VAMP 4/1-	VAMP 4/16	VAMP 5/1-	Post- VAMP 5/16-					
centile	Oct	Nov	Dec	Jan	Feb	Mar	4/15	4/30	5/15	5/31	Jun	Jul	Aug	Sep	taf/y
Min	-423	0	0	2	-10	0	0	0	0	0	0	38	0	78	
10	54	-56	-469	-15	-5	3	-4	-4	3	3	-283	-485	-191	-3	
20	-241	-388	-315	-211	-32	0	0	0	0	0	185	353	-346	-530	
30	-204	-97	-205	253	-1	-1	0	0	0	14	108	550	326	0	
40	-483	-215	-124	-314	37	141	-54	0	0	-3	115	508	97	-504	
50	-197	-289	-2	-282	421	353	0	0	0	-4	-50	713	342	68	
60	-129	-22	614	-384	-348	-472	0	0	0	0	-9	482	586	-67	
70	-402	-810	-89	1,204	765	333	2	0	0	0	-4	164	950	244	
80	1,510	68	1,453	1,035	63	0	0	0	0	0	-1	561	1,305	253	
90	1,820	1,820	1,305	7	0	0	0	0	0	0	0	1,320	1,130	1,320	
Max	1,820	1,820	822	0	0	0	0	0	0	0	0	1,320	1,320	1,320	
Avg	232	97	228	158	68	-3	-23	-5	0	-13	38	508	532	223	12

D. 202	0 Basel	ine													
Per- centile	Oct	Nov	Dec	Jan	Feb	Mar	Pre- VAMP 4/1- 4/15	VAMP 4/16- 4/30	VAMP 5/1- 5/15	Post- VAMP 5/16- 5/31	Jun	Jul	Aug	Sep	tafy
Min	586	301	1,065	1,358	778	300	300	300	300	300	300	1,781	302	801	
10	1,141	1,188	2,599	2,890	1,994	1,182	320	320	700	700	333	2,740	1,859	1,532	
20	2,362	1,957	3,562	4,160	3,104	2,823	1,560	700	700	700	2,292	3,856	4,842	3,983	
30	3,083	2,666	4,125	4,625	3,867	3,555	2,749	700	700	1,799	3,038	4,111	6,102	4,884	
40	4,003	3,192	4,326	4,929	4,478	4,476	3,450	700	700	2,653	3,717	4,691	6,594	5,380	
50	4,624	4,234	5,131	6,354	5,686	6,135	4,172	700	700	3,033	3,973	5,768	6,680	5,946	
60	5,394	5,354	5,501	7,296	7,431	7,060	4,964	700	700	3,804	4,538	6,680	6,749	6,380	
70	6,464	6,357	6,713	7,405	8,171	7,254	5,640	1,125	1,125	4,416	5,302	7,180	7,026	6,550	
80	6,680	6,680	7,032	8,070	8,437	7,561	5,640	1,500	1,500	5,639	5,969	7,180	7,180	6,686	
90	6,680	6,680	7,157	8,500	8,500	7,561	5,697	1,500	1,500	5,640	6,680	7,180	7,180	7,180	
Max	6,680	6,680	7,678	8,500	8,500	7,561	5,697	1,500	1,500	5,687	6,680	7,180	7,180	7,180	
Avg	4,436	4,220	5,122	5,987	5,692	5,201	3,763	914	920	3,160	3,981	5,433	5,861		3,35
-		1.0													
E. 202	0 Scena	rio C					Dro			Deut					
							Pre- VAMP	VAMP	VAMP	Post- VAMP					
Per-							4/1-	4/16-	5/1-	5/16-					
centile	Oct	Nov	Dec	Jan	Feb	Mar	4/15	4/30	5/15	5/31	Jun	Jul	Aug	Sep	taf∕y
Min	300	300	300	1,358	778	300	300	300	300	300	300	1,593	300	806	
10	1,148	1,096	2,585	3,061	1,963	1,174	700	700	700	700	749	3,163	976	1,596	
20	2,222	1,809	3,287	4,191	3,045	2,826	1,538	700	700	700	2,162	4,450	4,750	4,001	
30	3,289	2,633	3,970	4,812	3,809	3,527	2,749	700	700	1,799	3,107	4,843	6,418	4,697	
40	3,679	2,981	4,811	4,981	4,363	4,677	3,448	700	700	2,655	3,725	5,347	6,775	5,314	
50	4,488	3,927	5,341	6,320	6,319	6,168	4,172	700	700	3,031	3,975	6,176	7,302	5,846	
60	5,285	4,622	5,995	7,767	6,737	7,232	4,971	700	700	3,804	4,534	6,506	7,725	6,246	
70	6,103	5,368	6,322	8,500	8,500	7,561	5,640	1,125	1,125	4,416	5,305	7,326	8,064	6,669	
80	8,500	6,755	8,044	8,500	8,500	7,561	5,640	1,500	1,500	5,639	5,969	8,458	8,310	7,045	
90	8,500	8,500	8,500	8,500	8,500	7,561	5,697	1,500	1,500	5,640	6,680	8,500	8,390	8,500	
Max	8,500	8,500	8,500	8,500	8,500	7,561	5,697	1,500	1,500	5,687	6,680	8,500	8,500	8,500	
Avg	4,769	4,271	5,434	6,167	5,721	5,256	3,775	923	919	3,158	3,992	6,055	6,347	5,507	3,49
F. 2020) Scena	rio C C	hanges	(D-E	E – D)										
							Pre VAMP	VAMP	VAMP	Post VAMP					
Per- centile	Oct	Nov	Dec	Jan	Feb	Mar	4/1- 4/15	4/16- 4/30	5/1- 5/15	5/16 5/31	Jun	Jul	Aug	Sep	tafy
Min	-286	-1	-765	0	0	0	0	0	0	0	0	-188	-2	5	
10	7	-92	-14	171	-31	-8	380	380	0	0	416	423	-883	64	
20	-140	-148	-275	31	-59	3	-22	0	0	0	-130	594	-92	18	
30	206	-33	-155	187	-58	-28	0	0	0	0	69	732	316	-187	
40	-324	-211	485	52	-115	201	-2	0	0	2	8	656	181	-66	
50	-136	-307	210	-34	633	33	0	0	0	-2	2	408	622	-100	
60	-109	-732	49.4	471	-69.4	172	6	0	0	0	-4	-174	976	-134	
70	-361	-989	-391	1,095	329	307	0	0	0	0	3	146	1,038	119	
80	1,820	75	1,012	430	63	0	0	0	0	0	0	1,278	1,130	359	
90	1,820	1,820	1,343	0	0	0	0	0	0	0	0	1,320	1,210	1,320	
Max	1,820	1,820	822	0	0	0	0	0	0	0	0	1,320	1,320	1,320	
4.800	333	51	312	180	20	55		0				622	486		

333

Avg

51 312

180

29 55

13

8

-1

-2 11

622 486

217

141