

**Comment from the California Natural Resources Agency
April 11, 2013**

The National Marine Fisheries Service (NMFS) provided their 'NMFS Progress Assessment and Remaining Issues Regarding the Administrative Draft BDCP Document'¹ to the Department of Water Resources (DWR) on April 4, 2013. In that document a specific comment (1.17, page 12) is made regarding the potential extirpation of winter-run Chinook salmon from the Sacramento River due to the cumulative effects of the project when combined with effects of climate change and other baseline conditions.

The BDCP proposes a robust conservation strategy in the legal Delta and Suisun Marsh to contribute to the recovery of winter-run; however, climate change is going to cause challenging conditions for winter-run that BDCP alone cannot address. In their 2009 biological opinion, NMFS identified that winter-run access to historical habitat upstream of existing dams is necessary in the face of climate change in order to avoid jeopardy in the long-term. Taking into consideration the biological opinion, along with full implementation of the RPAs, and our understanding of the modeled upstream impacts, BDCP will not make the extirpation of winter-run from the Sacramento River more likely. In fact, the BDCP conservation measures will provide some benefits to winter run. BDCP will be working with the Fisheries Agencies to better understand the modeled results and resolve the inconsistencies between the evaluated starting operations (ESO) and existing biological conditions (EBC2).