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Sent: Wednesday, March 10, 1999 6:29 PM (GMT)
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Subject: updating the TROA DEIS/EIR discussion of the Truckee River Operations Model

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Hi,

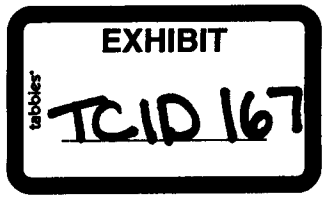
At our TROA EIS/EIR Management Team meeting yesterday, I said I'd sent you my thoughts on how the TROA DEIS/EIR should be updated to better represent our use of the Truckee River Operations Model. The three concepts which I believe should be included in the discussion of the model (Chapter 3, Section B) are:

* The Truckee River Model is the best tool available for EIS/EIR evaluations that are based on anticipated Truckee River flows. We could also mention the new USGS model, but, as I recall, that model does not include anticipated water uses. To be applicable, it would have to be substantially modified to include the water uses already represented in the Truckee River Model.

* The Truckee River Model is a much better tool for a comparative analysis than for making absolute predictions of the future. This is consistent with the primary use of the Model in the DEIS/EIR for comparing the environmental effects of TROA in the future to a future without TROA. This, in turn, is consistent with NEPA/CEQA requirements to evaluate the environmental effects of the proposed project. The DEIS/EIR does include anticipated environmental effects, but they represent our best estimate of what the future will be like, with and without TROA, and are intended to assist the public in understanding the environmental setting rather than determining if TROA causes any significant adverse environmental impacts.

* The results of the Truckee River Model serve as baseline information for the environmental analysis in the DEIS/EIR, but such results should be distinguished from the analysis itself. Analysts review these results using their best professional judgement to determine its applicability, and their evaluations are used to describe potential environmental effects.

Perhaps these are covered elsewhere in the DEIS/EIR, esp.



since I recall the TROA EIS/EIR Management Team discussing them well before the 398 DEIS/EIR came out. In any case, it wouldn't hurt to repeat them in the context of discussing the model.

Also, we might want to run these by Rod at some time to see if he would agree.

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