

Table Summarizing Friant Division Elements Relative to ROC LTO.

Friant Element	Existing Project-specific NEPA compliance	Existing Project-specific BOs	Proposed for Description and Modeling in ROC on LTO	Possibly Proposed for Consultation in ROC on LTO	NMFS Input
SJRRP Flows and their recapture in the Restoration Area and the Delta	Yes	Yes	Yes	No – already consulted on	Agree. Program BO does not provide take coverage for steelhead.
SJRRP Recapture in Lower SJR	In progress	In progress	Yes	Only if ongoing consultation is not complete	This is included in the SJRRP programmatic consultation. Program BO does not provide take coverage for steelhead. The subsequent consultation should be completed within SJRRP not ROC LTO
Exchange Contract releases from Friant Dam	N/A - Exchange Contract signed before NEPA	N/A - Exchange Contract signed before ESA	Yes	No – limited potential impacts, not within Reclamation's discretion	Agree that this doesn't need to be covered in the ROC LTO but NMFS needs clarification about whether these deliveries were modeled in the SJRRP BA. At the time of that consultation, Friant had never been called on to meet this demand. We will need to have new modeling to support the subsequent SJRRP consultation on additional release of flows from Friant under the Settlement. The modeling for ROC LTO should be updated to reflect the conditions in 2015 and 2016 that created the need to meet the Exchange Contract through Friant releases. Steelhead take coverage for Exchange Contract deliveries to Mendota Pool prior to screening is provided in the Reach 2B/Mendota Pool Bypass BO. Pre-screen operations at Arroyo Canal do not have steelhead take coverage under the current BO.
Flood operations	N/A - No Reclamation action*	N/A - No Reclamation action*	Yes	No – not within Reclamation's discretion	Agree. Suitable ramping rates following flood operations to protect fish are identified in the Restoration Flow Guidelines.

*Reclamation is looking into whether there are any existing ramping rates