

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	Notes
SJRRP Flows and their recapture in the Restoration Area and the Delta	Yes	Yes	Yes	No – already consulted on	Reclamation and NMFS agree. SJRRP Program BO does not provide take coverage for steelhead.
SJRRP Recapture in Lower SJR	In progress	In progress	Yes	No – will be consulted on	Reclamation and NMFS agree. Reclamation's SJRRP office will do compliance for lower SJRRP recapture.
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	<p>Reclamation will not be covering this activity in the ROC LTO consultation because they do not have discretion as follows:</p> <p>Article 3N of the Friant contracts requires the United States to only deliver to the Exchange Contractors from Friant if required by the Exchange Contract, and the United States agrees that it will not voluntarily and knowingly determine itself unable to deliver to the Exchange Contractors. Therefore the United States does not have discretion in when deliveries occur to the Exchange Contractors from Friant.</p> <p>However, ROC on LTO modeling will be updated and will reflect drought conditions and the need to meet the Exchange Contract through Friant releases that occurred.</p> <p>Steelhead take coverage for Exchange Contract deliveries to Mendota Pool prior to screening is provided in the Reach 2B/Mendota Pool Bypass BO.</p> <p>Pre-screen operations at Arroyo Canal do not have steelhead take coverage under the current BO, although Reclamation is developing a Biological Assessment in preparation for Section 7 consultation with NMFS on this activity.</p>

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 will be identified in the Restoration Flow Guidelines of the SJRRP.
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