

**Comments on the NMFS ROC on LTO BiOp**  
**June 13, 2019**

Corey Phillips (MWD):

- Appendix H mentioned Newman in the LCM. Fish rear in Yolo Bypass
- Not sure if equation turns off flow and export effects
  
- Probabilities are identified, but not really treated that way. Survival should be conditioned upon the condition that a large proportion of the population is exposed (conditional probability), but in the LCM section, all effects are treated the same. LCM, extinction criteria.
  - Table 2.5.9-1.
  
- Asked about questions to the peer reviewers. Findings should be disclosed so the peer reviewers could weigh in on whether the findings could be supported.

Paul Weiland:

- Salinity tolerance for smelt: recent studies not reflected (USFWS issue)

Tom Birmingham (highest priority comment that will be reflected in the written comments):

- Difficult to ascertain what assumptions NMFS is making, especially with the EB. Question is whether we're evaluating the PA, or existing operations. Comment applies throughout the analysis.

Alison Collins (MWD):

- Assumptions are made in the appendices regarding the modeling, but not necessarily carried forward/applied across the effects.

Chandra (MWD):

- OMR is more protective than COS, should be reflected in the BiOp. January-March in almost all water year types.