

Talking Points for DC ROC on LTO Meeting
April 4, 2019, 12-1pm

Purpose of the Talking Points: To help provide a sense of how Reclamation is proposing to do things that are different from past operations and create challenges for the consultation process.

Changed Management Approaches:

- Reclamation is seeking more operational autonomy
- Significant increase in Delta Exports, particularly in April and May (increases risk to spring-run and steelhead)
- Elimination of important non-flow measures
 - Winter-run passage over Shasta
 - Non-physical barriers (Georgiana Slough and Head of Old River)

Challenges with Proposed Action:

- General Lack of Specificity (difficult to reconcile given Reclamation's interest in operational autonomy)
- Lack of biological modeling in the PA (NMFS had to pick this up while drafting BiOp)
- Continued changes to the proposed action while the consultation is in play (Reclamation will contend that the changes are just clarifications)
 - Fall X2
 - Trinity side flows
- Lack of Management Metrics
 - Shasta 4-tiered Cold Water Pool Management
 - OMR triggers for spring-run and steelhead
- No Adaptive Management Program
- Increased Exports (increases risk without I:E ratio and non-physical barriers)