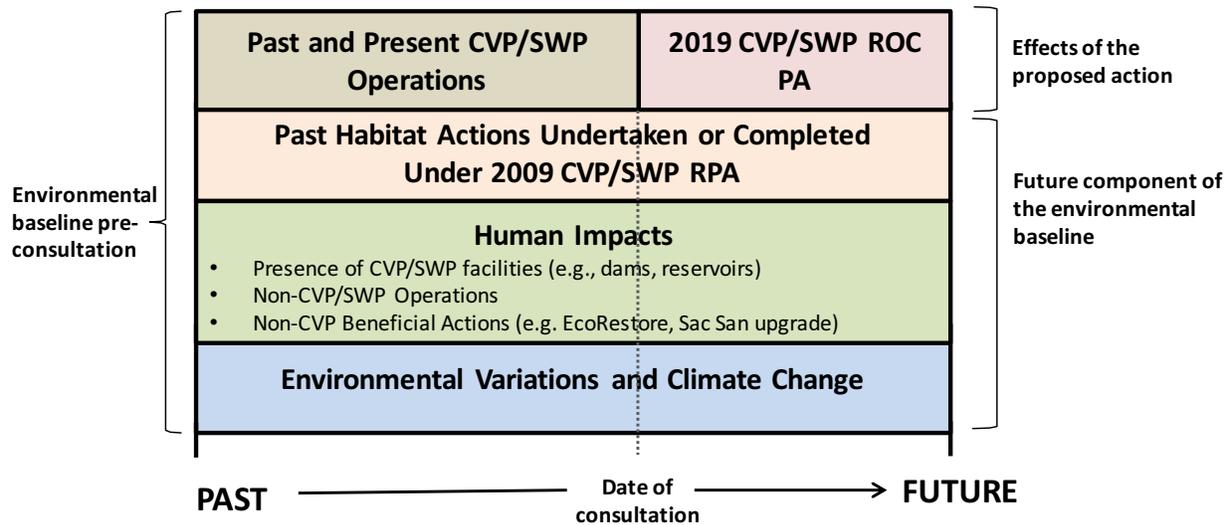


**Environmental Baseline Considerations in the NMFS CVP/SWP Draft Biological Opinion**  
 April 23, 2019

The definition of environmental baseline is provided in the ESA regulations, and is a necessary component of a Biological Opinion. NMFS, FWS and DOI have coordinated extensively in the drafting of the baseline sections of the two Opinions. Both Services are using the same baseline. Additionally, given past litigation on baseline, this is an area where both agencies legal counsels have provided advice that has insured that the regulations are applied correctly and defensibly.

In the *Environmental Baseline* section of this draft biological opinion, we summarize the past, present and continuing impacts of factors leading to the current status of the species in the action area, including the physical presence of dams, the effects of Central Valley Project (CVP) and State Water Project (SWP) operations, to date, the beneficial effects of habitat restoration projects and the past and continuing effects of environmental variation. The figure below illustrates the general categories of components that we consider in the *Environmental Baseline*. The figure does not denote relative intensity of effect or whether impacts are positive or negative; temporal variability of effect/impact is not depicted.



The *Environmental Baseline* section of the biological opinion also recognizes an analytical approach applied in Reclamation’s biological assessments that includes a without-action condition. The without action scenario includes the existence of Federal and State dams and also Federal and State south Delta facilities, but removes operations of these facilities. This without action scenario is a useful analytical tool to separate some of the effects related to the existence of CVP and SWP facilities and provides context for how these facilities have shaped the habitat conditions for species and critical habitat in the action area.