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**From:** Howard Brown - NOAA Federal <howard.brown@noaa.gov>  
**Sent:** Tuesday, March 19, 2019 2:07 PM  
**To:** Barbara Byrne; J. Stuart; Evan Sawyer - NOAA Affiliate; Sarah Gallagher - NOAA Federal; Kristin McCleery - NOAA Affiliate; Brian Ellrott; Joe Heublein - NOAA Federal; Seth Naman; Dan Lawson - NOAA Federal  
**Cc:** Cathy Marcinkevage; Garwin Yip; Justin Ly  
**Subject:** Programmatic vs. Site-specific

Effects Drafting Team,

I have been getting lots of questions about the Programmatic vs. Site-specific action components listed in BA Table 4-6 and how to address them giving the varying degree of specificity both within and across categories. My suggestion on how to handle these categories is to not get hung up on the labels that Reclamation has placed on actions and to analyze them based on the detail of information that you have to work with, whether it be from the BA or from subsequent modeling that supports the BA. Cathy, had a good visual for me: when looking at table 4-6 in the BA, just look at that action components in the far left column and cover up two columns on the right; I thought that was a helpful way to think about it, so thank you Cathy!

So, in practice, when analyzing action components that have enough detail for us to quantify the action and the effects of the action, carry that analysis through the BiOp and where there are quantifiable adverse effects, we would carry those into the ITS into the Amount and Extent of Take. Where we do not have details that allow us to quantify the action or its effects, state that as such and flag it as a programmatic component of the BiOp. For the programmatic components, we should not carry those forward into the ITS and we should specify those effects in the amount and extent of take.

I hope this helps and I am more than happy to continue this discussion on Thursday or you can track down me or Cathy this week if you need to talk it through more.

Howard

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