



United States Department of the Interior

FISH AND WILDLIFE SERVICE
San Francisco Bay-Delta Fish and Wildlife Office
650 Capitol Mall, Suite 8-300
Sacramento, California 95814



In reply refer to:

APR 12 2019

Mr. Ronald Kneib
Mr. Joseph Merz
Mr. Ernst Peebles

Subject: Independent Peer Review of the Draft Delta Smelt Effects Analysis for the Reinitiation of Consultation on the Coordinated Long-Term Operation of the Central Valley Project and State Water Project

Gentlemen:

Thank you for agreeing to serve on the independent peer review panel for the draft delta smelt effects analysis of the Reinitiation of Consultation on the Coordinated Long-Term Operation of the Central Valley Project and State Water Project (ROC on LTO). Pursuant to section 7 of the Endangered Species Act (16 U.S.C. 1531 *et seq.*), the U.S. Fish and Wildlife Service (USFWS) is developing the Biological Opinion (BiOp) addressing the effects of ROC on LTO on several federally-listed species and designated critical habitat. The subject of this independent peer review is our draft analysis of the effects of ROC on LTO on the threatened delta smelt and its critical habitat.

We are seeking input from the panel on the following questions:

1. How well does the draft BiOp use best available scientific and commercial information?
Specifically:
 - a. Do the analyses in the status of the species and critical habitat and environmental baseline sections reflect the best available scientific and commercial information?
 - b. Are assumptions in the effects analysis clearly stated and reasonable based on current scientific thinking?

2. Does the BiOp adequately analyze effects of the proposed action on delta smelt and critical habitat?
 - a. Did we adequately analyze effects for both standard/site-specific (described at a site-specific level with no future consultation required) and programmatic (which require future consultation before they can be implemented) components of the proposed action?

b. Are the methods utilized appropriate to determine if the proposed action is likely to jeopardize delta smelt or adversely modify its critical habitat?

In addition to the draft effects analysis, we have also included information about our approach to this consultation, a description of the elements of the proposed action that are likely to affect USFWS-jurisdictional species and critical habitat, and the current status and environmental baseline for delta smelt and critical habitat. Our analytical framework for the BiOp is also included, which describes the components that contribute to making the jeopardy and adverse modification determinations. The revised Biological Assessment that the Bureau of Reclamation developed to support this section 7 consultation has also provided for your reference.

We welcome any questions that may arise as you are reviewing the document. In order to be best prepared to respond, we would appreciate if you would provide your questions to me in advance. Thanks again for your time and interest.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Kaylee Allen', with a long horizontal flourish extending to the right.

Kaylee Allen
Field Supervisor