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**From:** Brian Ellrott - NOAA Federal <brian.ellrott@noaa.gov>  
**Sent:** Wednesday, December 19, 2018 8:48 PM  
**To:** Cathy Marcinkevage - NOAA Federal  
**Cc:** Garwin Yip; Howard Brown; Maria Rea - NOAA Federal; Naseem.Alston  
**Subject:** Re: Baseline Figures

You're so right - the more you think about this issue, the more you get sucked in. These figures help a ton in thinking it through!

For the NMFS approach (last figure), I like what you did with v2, but I wouldn't include the without-action component. We've heard the without-action component is important to DOI leadership for the BA, but I don't see how we'll be using it for the BO. I view the w/o action as irrelevant to jeopardy analysis, but Naseem and Chris Keifer said it could be useful for teasing out effects of the PA relative to no operations. I just don't see how that teasing out is useful when it comes to adding the effects of the PA to the (appropriate) baseline.

That said, if we are going to use the without-action in our approach to help tease out effects of the PA, then it might help the figure to put the with-out action bracket on the right side of the figure, to distinguish it from the environmental baseline. The future without-action component does not fit the current regulatory definition of environmental baseline, and I don't believe it meets the intent of the emerging definition of environmental baseline even though that emerging definition is ambiguous when it comes to this particular future without-action case. (The first two sentences in the new definition contradict each other).

Also for v1 and v2 of the last figure, it would help to more clearly distinguish the shifting baseline when the consultation goes pre- to post. Right now it sort of looks like the ROC PA is part of the baseline. The 2009 BO figure has a vertical line through the whole figure that helps make the distinction.

As always, feel free to call me to discuss this.

Brian

On Wed, Dec 19, 2018 at 6:06 PM Cathy Marcinkevage - NOAA Federal <[cathy.marcinkevage@noaa.gov](mailto:cathy.marcinkevage@noaa.gov)> wrote:

You know, the more you look at this, the more you get sucked in to tweaking it, and thinking hard about it...

I've got a second version (Ver 2!) of the last two figures here that include revisions in response to Brian's comment and to conversation I heard at the tiger team meeting today. I'm sure not perfect and there are many ways to depict all of this, but it is another start. I can bring all version on Friday but I do think these are closer to our characterization than the first.

On Wed, Dec 19, 2018 at 2:43 PM Brian Ellrott - NOAA Federal <[brian.ellrott@noaa.gov](mailto:brian.ellrott@noaa.gov)> wrote:  
Agreed. This is super helpful Cathy! See attached for a comment on the last figure. Feel free to call if you want to talk it over.

Brian

On Wed, Dec 19, 2018 at 2:11 PM Maria Rea - NOAA Federal <[maria.rea@noaa.gov](mailto:maria.rea@noaa.gov)> wrote:  
Cathy, I would suggest bringing copies of this to the meeting on Friday. Thank you for working on this!  
- Maria

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On Wed, Dec 19, 2018 at 12:50 PM Cathy Marcinkevage - NOAA Federal <[cathy.marcinkevage@noaa.gov](mailto:cathy.marcinkevage@noaa.gov)> wrote:

All --

Earlier this morning, Garwin, Howard, Maria, and I talked about the baseline. We went back to the baseline figures from the OCAP and CWF opinions to try to visually ID how all of the parts layer on each other, and to show how their "without action" won't jive with what we need to do.

Attached is a document with all these together, including:

- NMFS 2009 BiOp Figure
- USFWS 2008 BiOp Approach

- NMFS CWF Figure
- My attempt to make a similar figure showing their "Without Action" baseline
- My attempt to make a similar figure showing how we would tackle this in our BiOp

If we can nail down the last two, we thought that they could be good to have either 1) with us during our Friday "elevation" meeting with Paul and maybe 2) to include in the memo that is being drafted.

Off to chat more about it with Rec....but let me know what you think!

Cathy

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