
From: Barbara Byrne - NOAA Federal <barbara.byrne@noaa.gov>
Sent: Tuesday, February 26, 2019 7:12 AM
To: Howard.Brown; Garwin Yip - NOAA Federal; Cathy Marcinkevage
Subject: One solution for not-well-described b13 gravel programmatic in ROConLTO BA
Attachments: 2015-10-09 Upper Sac River Habitat Restoration Programmatic BO & CL Signed.pdf;
Sacramento River BA_FINAL_combined documents_02.04.15.pdf

Attached is the Sac River restoration programmatic BiOp and associated BA. The attached BA is (I think) a reasonable example of a programmatic consultation and suggests that a few sentences referring to gravel addition is not sufficient for consultation.

Potential solution for the not-well-described b13 gravel conservation measures in the ROConLTO BA: As has been suggested to Reclamation before, they could lean on this consultation to beef up their proposed gravel measures by incorporating this programmatic consultation by reference. Could they say, for example, that projects undertaken under the conservation measure are expected to meet the sideboards of this BiOp, and if not, Reclamation will seek separate consultation? And maybe they could link the Stan gravel to this BiOp as well, in terms of sideboards, even though in the "wrong" basin?

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