
From: Naseem Alston - NOAA Federal <naseem.alston@noaa.gov>
Sent: Tuesday, March 5, 2019 9:58 AM
To: Brian Ellrott - NOAA Federal
Cc: Howard Brown - NOAA Federal
Subject: Re: USFWS Baseline language

Interior probably "has" to use the new reg language...

that being said, I'm not following this part at all:

Current Operations scenario represents a **trend to consider** when addressing effects of the action in the aggregate (**as in, baseline?!).** The "without action" scenario will be layered on a qualitative look at current ops and how that informs the current condition of the species and critical habitat in the action area (**baseline...).**

we'd have to see what they call a "without action" to determine if we agree as well.

Not sure why we would want to deviate from the boilerplate language + what Brian was working on:

The "environmental baseline" includes the past and present impacts of all Federal, state, or private actions and other human activities in the action area, the anticipated impacts of all proposed Federal projects in the action area that have already undergone formal or early section 7 consultation, and the impact of state or private actions which are contemporaneous with the consultation in process (50 CFR 402.02).

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On Mon, Mar 4, 2019 at 8:01 PM Brian Ellrott - NOAA Federal <brian.ellrott@noaa.gov> wrote:

First paragraph makes sense to me and is consistent with our EB; second paragraph does not and is not. It would help to talk with them about it because I'm not following what was written in paragraph 2.

On Mon, Mar 4, 2019 at 4:12 PM Howard Brown - NOAA Federal <howard.brown@noaa.gov> wrote:

Brian and Naseem,

Here is something that FWS put together for baseline. If we can use this in the NMFS baseline then it would help on the consistency matter. Have a look and let me know if we can insert it into what you guys are drafting.

Howard

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