
From: Howard Brown - NOAA Federal <howard.brown@noaa.gov>
Sent: Wednesday, October 31, 2018 12:59 PM
To: Naseem Alston; Garwin Yip
Subject: Proposed BA Outline for BOR BA on ROC on LTO

Naseem and Garwin,

Attached is a proposed BA outline to provide to Reclamation as technical assistance in preparing their consultation package. I tailored after the WCR BiOp template and the 2009 CVP OCAP BiOp. Maria is going to share this with Reclamation on Friday, along with a package of other materials and I would like to get this to her for review this afternoon. A couple of notes/comments/questions for you to consider:

1. I moved the Action Area Section to follow the Proposed Action instead of following the Analytical Approach. It makes more sense to have it here rather than where the BiOp template suggests. This is minor.
2. In the Rangewide Status of the Species/Critical Habitat section I added an offramp for CCC Steelhead/Critical Habitat because that was the approach used in the 2009 BiOp. I believe our existing policy direction is not to offramp but to carry the NLAA through the document but that seems like overkill for a project this complicated and honestly could be confusing to Reclamation and could distract them from more important analytical considerations.
3. Garwin, I added a deconstruction of the action as section 2.4.1 so that the entirety of the action could be broken down before the reader starts getting into the effects by division, followed by a deconstruction of each division. This seems logical to me to help set up the effects analysis in steps.
4. Thanks for your help!!

Howard

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