
From: Naseem Alston - NOAA Federal <naseem.alston@noaa.gov>
Sent: Friday, May 10, 2019 3:22 PM
To: Howard Brown; Cathy Marcinkevage; Garwin Yip
Subject: effects/I&S write-ups and tables

Hi HBd, aCM, GY,

Hoping to run through a consistency/same-page check. [Please read](#):

Related to getting to work on the ITS, Brittany and I went through one of the Effects Division sections (Shasta) to see where "uncertainties" were identified, and where uncertainties were carried over to the Effect/I&S Tables. This division had a table for key assumptions for big topics like modeling and tier criteria, but was not exhaustive of all uncertainties.

Last version of winter-run I&S that I saw removed the rows of uncertainty from the table and didn't discuss those actions in the text.

[How I envisioned the handling of uncertainties in the Effects section for this mixed programmatic, was that for areas of uncertainty, we would make reasonable assumptions to reach \(at a minimum\) a "framework-level" conclusion: i.e. bad or good](#)

[Which would then carry over at the framework-level for inclusion into the I&S/J-analysis. The effect\(s\) of the component would be considered more broadly, and no take would be included.](#)

Conclusions seem to be shifting, as yesterday I was seeing "therefore we aren't including it in the consultation" - and now I see:

the ROC on LTO PA does not include specificity in timing, performance metrics, or defined actions. Therefore any benefits of this action are not included in the effects analysis of this biological opinion.

while the newer language is closer to what I was imagining - In my opinion, it should be taken a half step further to **INCLUDE** the assumed benefits at the **FRAMEWORK-level**. This was my understanding from previous conversations with Maria and others, and is how the approach was described in the attached document - intended to lay out this crosswalk. The attached doc includes language for front end Effects Section discussion, to describe the approach, as well as for division sections.

As there may have been conversations/decisions above my pay grade regarding this :) - please let me know!

I am available to talk about this with you all TODAY - or otherwise, Cathy and I can chat about it in D.C.

Another quick note - anyone have an issue with changing the "ROC on LTO PA" to something like "PA as described in the ROC on LTO BA"? - that makes it Reclamation's rather than the PA as we are describing for the Biop (or to say "BA" instead of "PA" or... "Reclamation's ROC on LTO PA").

Naseem O. Alston
ESA-Section 7 Coordinator/Fish Biologist
NOAA Fisheries West Coast Region
U.S. Department of Commerce

California Central Valley Office
Sacramento, CA
(916)930-3655
<http://www.westcoast.fisheries.noaa.gov/>