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**From:** Howard Brown - NOAA Federal <howard.brown@noaa.gov>  
**Sent:** Sunday, May 26, 2019 3:56 PM  
**To:** Maria Rea  
**Cc:** Garwin Yip  
**Subject:** WOA Insert

Maria,

Attached is a without action insert for the draft BiOp. It is not formatted yet but I think it is ready for you to take a look at. There was over 500 pages in the BA where the WOA was discussed, so it took some work to narrow this down. Also, I spent quite a bit of time making sure that the effects determinations were clearly attributed to Reclamation, which is important if we are going to include something like this. Also, DOI made some pretty substantial edits and comments to our Environmental Baseline chapter that I do not think we agree with, so I included them in this section so that they are attributed to Reclamation. I also included a statement that this WOA section is "layered" into the BiOp in order to bring consistency with the FWS BiOp, but I did not go so far as to say that we layer it into our aggregate analysis in the Integration and Synthesis.

This section is longer than I had envisioned, but I don't see any harm to our effects analysis if we just insert this as a stand alone piece between the baseline and the effects analysis. I am open to your comments and thoughts about how to proceed.

Howard

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**Howard L. Brown**  
*Policy Advisor*  
NOAA Fisheries, West Coast Region  
U.S. Department of Commerce  
(916) 930-3608  
[Howard.Brown@noaa.gov](mailto:Howard.Brown@noaa.gov)



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