

the 2009 BiOp chapter on synthesis to get a feel of the types of material to expect in the last chapter.

1.2 General Observations

The Analytical Approach does a good job of describing how jeopardy and critical habitat assessments are expected to be performed for a Proposed Action (PA). However, when it comes to the divisional assessments of the effects of the actions, a considerable amount of the actual analytical analyses was based on a comparison of the Current Operating Situation (COS) and the Proposed Action (PA). Consequently, some analyses of effects were based on the absolute condition of the PA and others on the Δ change in conditions between COS and PA. While both types of information are useful, the Analytical Approach only addresses the absolute assessment of the PA. The description of the Analytical Approach needs to be amended to describe the incorporation of both absolute status and change in status information and an explanation for why both forms of assessment are useful

The sections on Evidence Available for Analysis (2.1.4) and Primary Analytical Models (2.1.4.1) need to be updated to what is actually being used in the draft BiOp. A starting point may be the section on New Science (4.8) of BOR BA. Numerous references and models used in this draft BiOp are not included in these reference lists. These sections need to be updated to better represent the Literature Cited sections of the river division chapters. For example, the Perry (2018) model is used extensively in Section (2.5.4) but not listed as a source material.

1.3 Review Activities

Besides reviewing the supplied chapters of the draft BiOp and its appendices H and I, the following reference materials were also examined:

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