
From: Banonis, Michelle <mbanonis@usbr.gov>
Sent: Friday, March 13, 2015 8:43 AM
To: Dan Castleberry; David Murillo; Jason PHILLIPS; Jennifer Gimbel; Joan R Langhans - NOAA Federal; John Bezdek; Larry Rabin; Letty Belin; Maria Rea - NOAA Federal; Ren Lohofener; Ryan Wulff - NOAA Federal; will.stelle
Subject: BDCP Section 7 Schedule for Discussion on Monday, March 16
Attachments: DRAFT Revised BDCP Section 7 BA-BO Schedule 3-13-15.pdf

Good Morning,

Attached, please find the draft schedule for the Section 7 process on the revised BDCP approach for our discussion on Monday at noon PST.

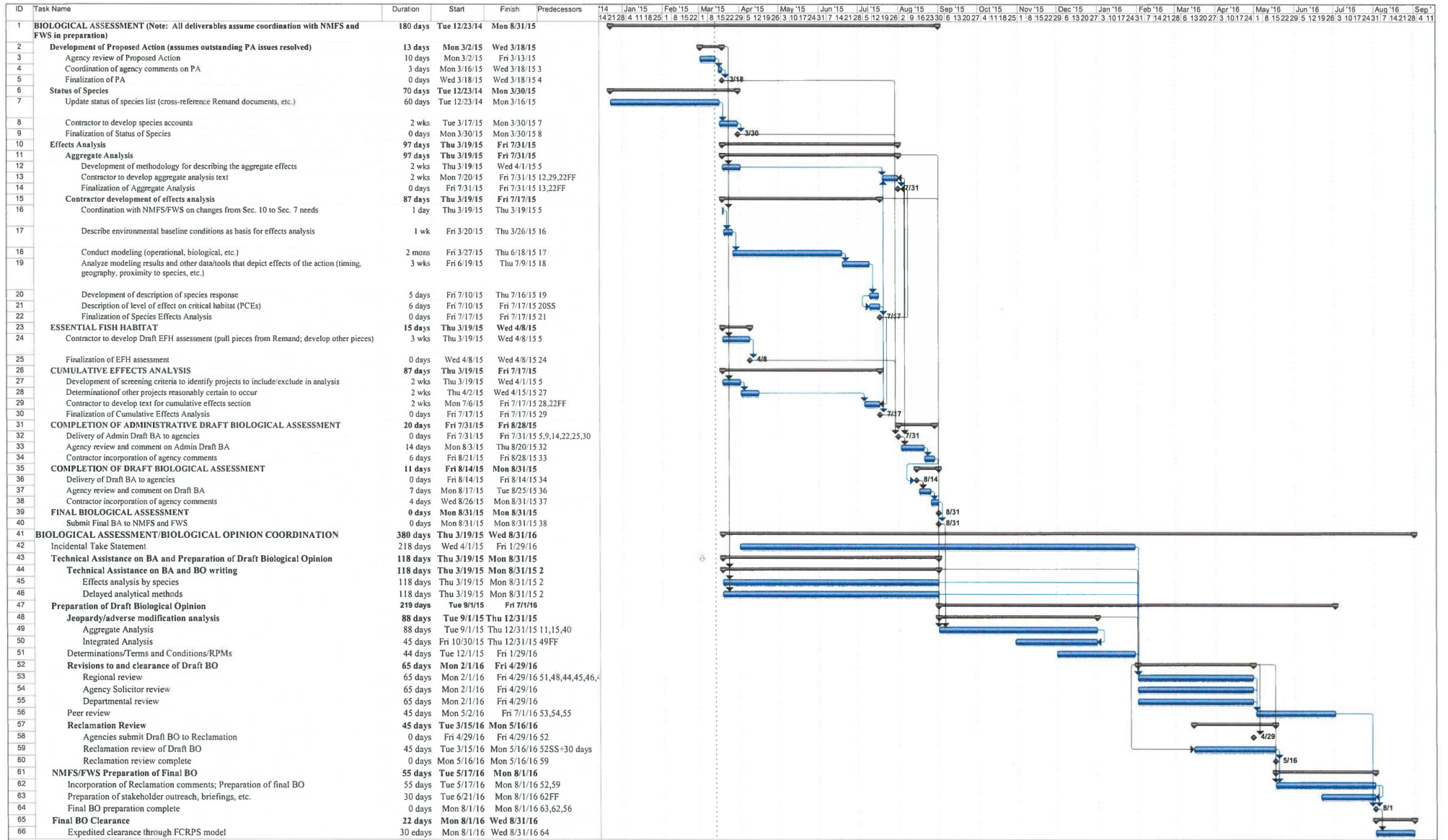
Thanks to Ryan and Larry for the input on this. If anyone has any questions in the interim, please don't hesitate to call or e-mail me.

Chat with you next week.

Michelle

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From: Banonis, Michelle <mbanonis@usbr.gov>
Sent: Sunday, March 15, 2015 2:39 PM
To: Dan Castleberry; David Murillo; Jason PHILLIPS; Jennifer Gimbel; Joan R Langhans - NOAA Federal; John Bezdek; Larry Rabin; Letty Belin; Maria Rea - NOAA Federal; Ren Lohofener; Ryan Wulff - NOAA Federal; will.stelle
Subject: Critical Success Factors List to Accompany BDCP BA/BO Schedule
Attachments: FWS_NMFS_Assumptions_Key Issues-Questions_v.2 .docx; DRAFT Revised BDCP Section 7 BA-BO Schedule 3-13-15.pdf

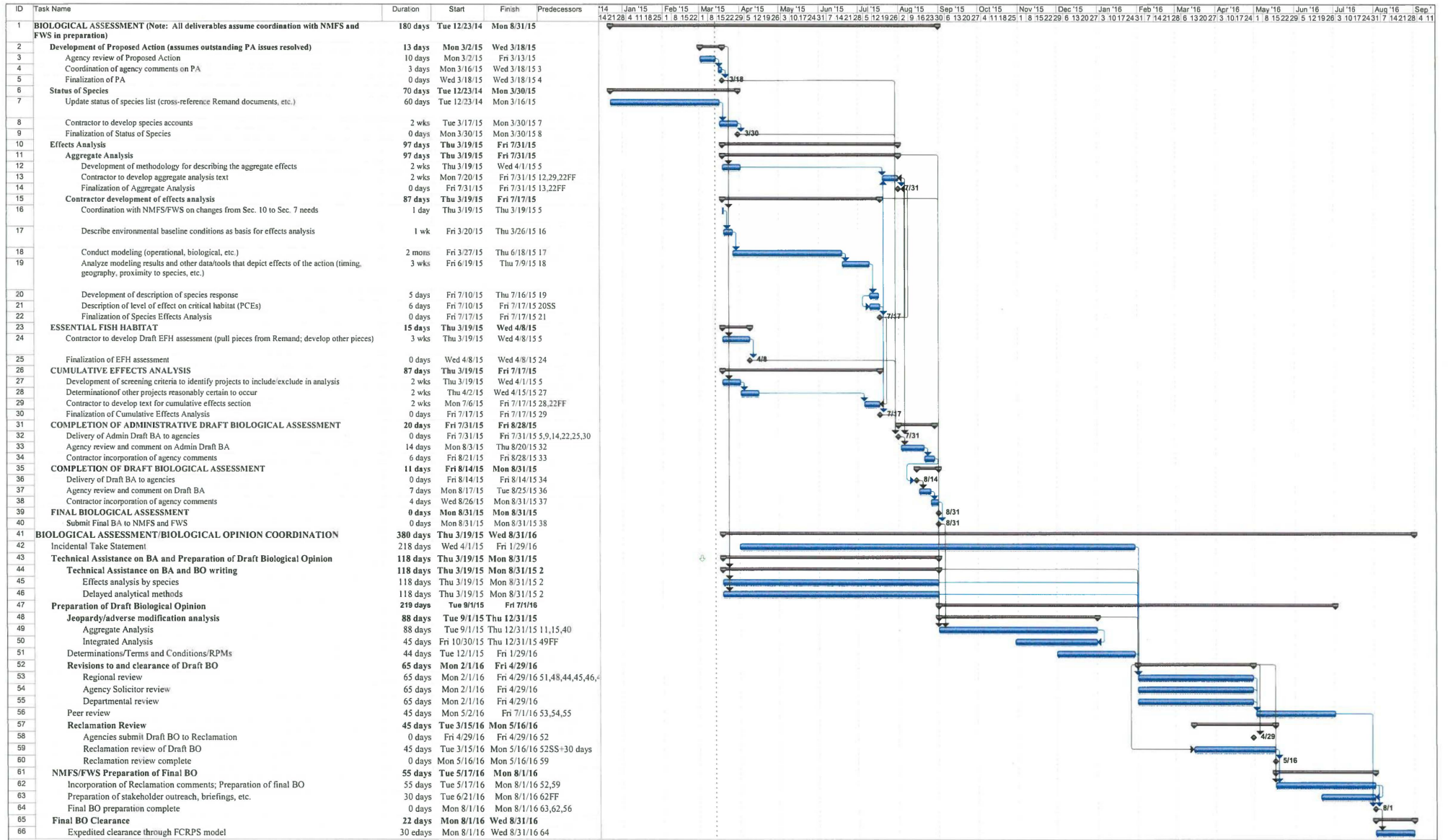
Good Afternoon,

Here is a list of Critical Success Factors and Key Issues/Questions pulled together by NMFS and FWS to go with the schedule discussion on Monday. I'm also attaching the schedule again for reference.

Thanks,
Michelle

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Critical Success Factors that must be met for expedited consultation schedule:

1. All major technical/policy issues and red flags resolved and final decisions made on BDCP, final project description is complete and Reclamation's proposed action is designed to result in no jeopardy for both listed FWS and NMFS species and adequately incorporates necessary consideration of candidate species.
2. Development of a framework for how to integrate the BiOp with the Services (and agreement on Framework) prior to Initiation of Formal Consultation
3. Description of Proposed Action; BA Effects Analysis; Status and Baseline; and Consultation History are "copy and paste-able" into the BiOp.
4. Final BA is complete (sufficient detail to assess the specific effects of both construction and operations on listed species), no additional information is needed when submitted to FWS/NMFS.
5. Reclamation, FWS, and NMFS would be working closely together through the entire consultation process. Any issues would be quickly elevated and resolved.
6. Existing staff and/or technical staff from agencies and consultants working on the development of the BA are available for technical assistance during the BiOp development phase.
7. Agencies have dedicated staff who are working solely on this effort at the beginning of the development of the BA (to provide technical assistance and understanding of issues early on in the process) and resources available for implementing and completing the expedited schedule are not re-directed to drought, new legislation, or other issues.
8. All necessary staffing, including consultants, are in place prior to development of BA. Fish agencies have a project manager, facilitator, and consulting team in place. Reclamation has a project manager, facilitator, and consulting team in place. (These teams may have some overlap).
9. Peer review and Reclamation review of draft BiOp does not result in significant changes to the BiOp.
10. Internal reviews at the Regional, HQ, Department, and Solicitor levels do not result in significant changes to the BiOp.
11. Any future "operationalizing" process does not lead to changes in the coordinated long-term operations with BDCP analysis.
12. NMFS BDCP funding would continue.
- 12.** Conservation needs of individual species do not come in conflict with one another.

Key issues/questions, with potential schedule implications, that need to be answered:

1. *Issue:* Key early components of the analytic approach are not yet developed. NMFS expects contractor assistance for deconstructing the action, identifying the baseline, and developing the aggregate analysis framework.

Schedule implication: This may take notable time that is not incorporated into the early steps of the BA phase. While this doesn't necessarily hold up the rest of the process, it is important in identification of which methods need to be employed and how the analysis will be conducted.

Recommended way forward:

Continue joint-agency effort to develop a BA that is highly transformable into a BiOp;
Begin identification of contractor assistance; coordinate with agencies to develop framework for deconstruction, baseline, and aggregate analysis.

2. *Issue:* Several analytical methods and tools that are candidates for use in the section 7 analysis are not yet sufficient for application or have been noted by NMFS (and Reclamation) as needing revisions. This includes the NMFS Chinook salmon life-cycle model, SALMOD, DPM, the salvage-density method and temperature evaluation.

Schedule implication: The production of key products could drive or halt the schedule or require additional time during the BiOp phase if not ready during the BA phase.

Recommended way forward:

Make it a priority to answer these questions as soon as possible:

- What items will be required for jeopardy analysis that will not be ready for application in the BA?
- How much time is required in the BiOp phase to incorporate those analyses?
- What, if any, products could halt the timeline if not ready?

3. *Issue:* The time required for modeling, analysis, and synthesis may be longer than expected. It is not yet clear what, if any, effects outside of the project area have been or plan to be traced and analyzed.

Schedule implication: More schedule implications if 1) the proposed action includes analysis of multiple scenarios to characterize a “bracket” or effects and/or 2) the analysis extends to include upstream and downstream effects.

Recommended way forward:

Make it a priority to answer these questions as soon as possible:

- What is spatial extent of analysis?
- Has it been done to date?
- How will the proposed action be characterized in terms of modeling scenarios?

4. *Issue:* The sufficiency review will need to be written as per regulations and will take some time to complete, review and clear.

Schedule implication: This may be less of an issue if the Services review the BA progressively as it is developed, and the action agencies submit complete and internally reviewed/cleared sections in a timely manner. Otherwise the Services will need to wait for the final BA to prevent the need for any changes due to Reclamation review of the draft sections.

Recommended way forward: Set up a process for the progressive review of sections that are already fully approved by the action agency.

5. *Issue:* The preparation of the draft BiOp requires several components (e.g., preparation of the effects analysis, preparation of jeopardy analysis, etc.) that likely will need to be completed consecutively rather than simultaneously.

Schedule implication: This requirement may require more time than expected. Any efficiencies in preparation that allow simultaneous completion will contribute to a shortening of the timeline.

Recommended way forward: Identify tasks that require serial rather than simultaneous completion.

6. *Issue:* The need to do Southern Resident killer whale and related hatchery analysis, similar to OCAP.

Schedule implication: These analyses have neither been done to date nor folded into our schedule discussions.

Recommended way forward: Identify analyses needed and how this can most efficiently fit into the current process.