

Idaho Consultation Package Builder User Guide
Prepared by the Idaho Fish and Wildlife Service Office
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Document Purpose

Information for Planning and Consultation (IPaC) is a nationwide action planning tool that streamlines the U.S. Fish and Wildlife Service (Service) environmental review process. It can be accessed at: <https://ipac.ecosphere.fws.gov/>. The Consultation Package Builder (CPB) is a new tool in IPaC that provides an interactive, step-by-step process to help action agencies prepare a full Biological Assessment (BA) or Biological Evaluation (BE) using information from IPaC (see Figure 1). The system is designed to leverage Service data and recommendations, including optional conservation measures that may help avoid or minimize effects to listed species. CPB can be used for any listed entity, including candidate and proposed species. The Service may not have entered information yet for each of these entities, but the CPB user is able to enter any missing information themselves. This document is a guide that walks users through the steps used in CPB. Use of the CPB tool is not required; whether or not the CPB tool is used, we recommend following these steps when writing a BA/BE in Idaho. This format ensures consistency across our consultations and enables faster evaluation by the Service consultation biologists. We use the terminology and definitions from IPaC and CPB for consistency with Service-wide tools and describe how the BA/BE steps are accomplished using these tools. The CPB is a semi-automated tool and the user will be prompted at specific points to describe information such as the environmental baseline, including having the option to upload supplementary documentation (e.g., survey data), as appropriate.

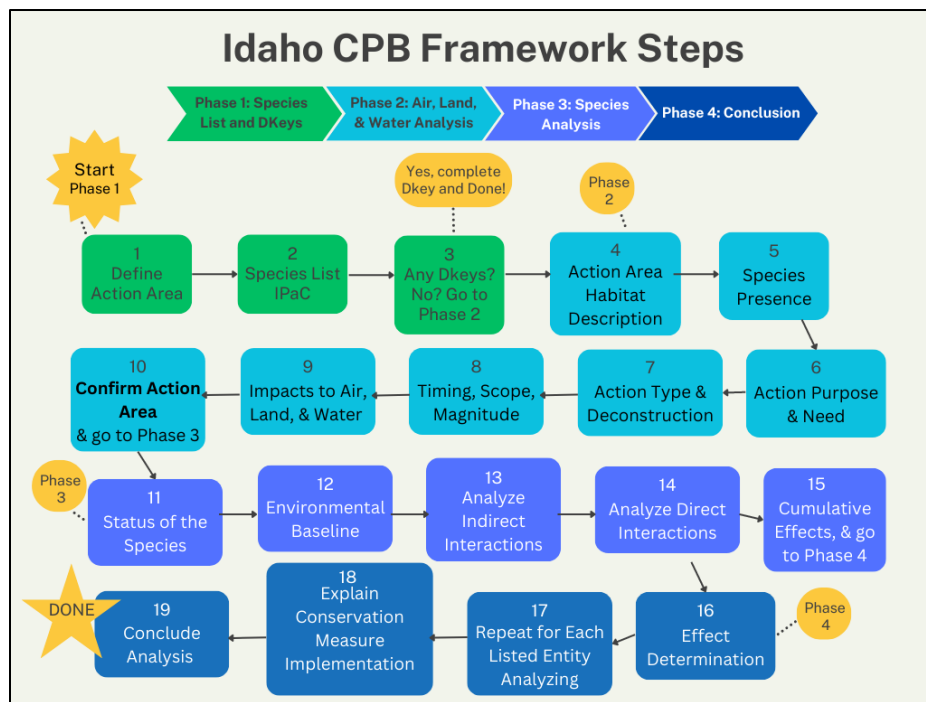


Figure 1. Steps for following the CPB framework within or outside of the online tool.

Phase 1. Species List IPaC, Programmatic Biological Opinions, and Determination Keys

This first phase of the CPB framework is using IPaC to generate a species list and checking for any programmatic consultations and determination keys (Dkey) that may be available and relevant to your proposed action (see Figure 2).

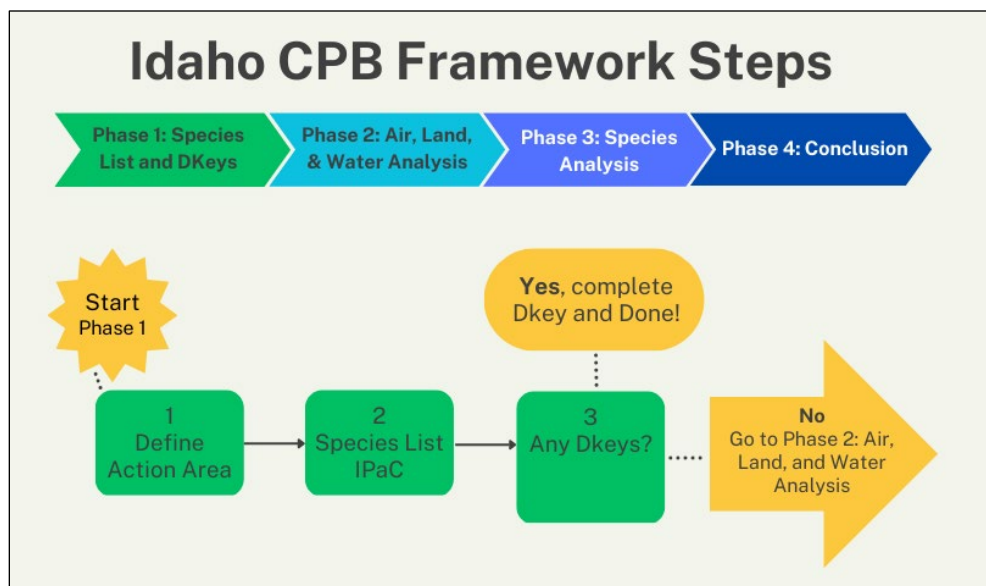


Figure 2. Phase 1 shows the first steps of the CPB process.

Step 1. Action Area

The action area includes all areas to be affected directly or indirectly by the Federal action and not merely the immediate area involved in the action (50 Code of Federal Regulations [CFR] 402.02). In delineating the action area, the farthest reaching physical, chemical, and biotic effects of the action on the environment should be identified. The first step is to enter the proposed action area into IPaC. Although IPaC asks the user to define the ‘area where activities will occur’, we recommend that the user attempt to delineate the action area. The action area can be either drawn or uploaded as a shapefile and then you will be provided with a list of resources that overlaps your proposed action area (listed entities, bald and golden eagles, migratory birds, facilities, and wetlands). Next you will be asked to define the proposed action using a project name and providing a description of the location, size, scope, and timing of the action. The action is now saved to your IPaC profile and will include the list of species and critical habitats that may be present in the action area. The action area for the entire proposed action should be clearly described in the BA/BE. The action area encompasses the geographic extent of the physical, chemical, and biotic effects of the proposed action and of those other activities caused by the proposed action. All potential effects of the action are considered, including those that may occur later in time, those that may occur outside the immediate area involved in the action, and effects of those activities that would not occur but for the proposed action, such as access roads. It is recommended that you contact your local Service field office early in the process if you have questions about the action area as it is foundational to the analysis.

Some action agencies delineate areas for analysis and/or management of a species. Although these analysis/management units are useful for tracking baseline conditions changes over time, guiding management, and may inform the effects analysis, they are not equivalent to the action area, which is specific to where the proposed action modifies the land, water, or air (see Figure 2 and Figure 3). BA/BEs that refer to analysis/management units in the action area section are often confusing, and it is important to understand the distinction between the two. As demonstrated in Figure 3, the action area may not include all a species' nearby habitat or encompass entire analysis/management units. Though caused by the action, biological effects of the action to the species may in some cases be realized/expressed far beyond the action area (e.g., number of fish available in orca feeding grounds from a project based on the Salmon River in Idaho). Though these biological ramifications should be adequately described in the effects of the action section, the action area does not expand to encircle those areas. The scope of the action area as it relates to ESA-listed entities is made clear by: 1) drawing the action area based on the effects to the land, water, or air, 2) confirming the action area after defining all the proposed structures and activities (Step 10), and 3) only then determining if the action area overlaps the ranges/habitats for any listed or proposed species.

Keeping the above in mind, management units may sometimes be included in whole within the action area. For example, if an action agency's management decision in one area of an analysis unit causes a change in the action agency's management direction in another area (e.g., allowable treatments or road access), those changes are design features and/or consequences of the proposed action that are reasonably certain to occur. Both areas would be considered part of the action area. Thus, the action area may include one or more management units if the units are defined in the relevant land management plan. The action area may include areas outside the management units (i.e., is not limited to them).

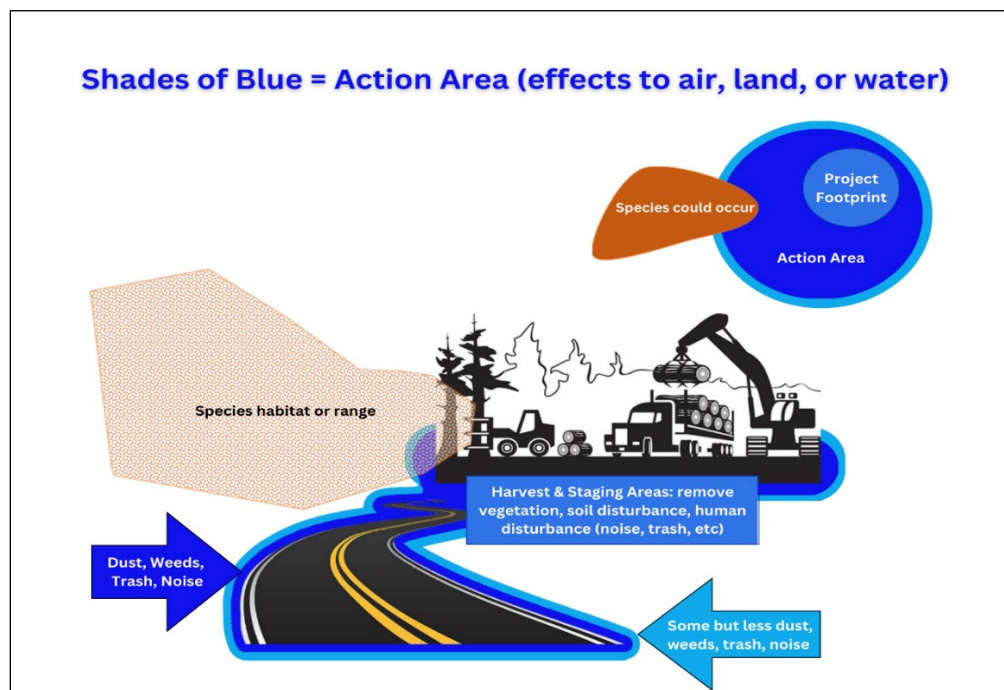


Figure 3. The action area as it relates to the project footprint and overlaps listed or proposed species, habitat, or critical habitat.

Step 2. Official Species List

In Idaho, the Service recommends requesting all official species lists using the IPaC system. When using CPB, you may request an official species list at this step, or you may skip this step until you are ready to obtain a species list for the action. Regulations require that the action agency verifies the accuracy of the species list every 90 days from the first date they obtained a species list, if they have not completed and submitted the BA/BE within that time period [CFR §402.12(e)]. Maintaining an accurate, up-to-date species list assures the consultation considers effects to species that may be present in the action area based on the best available information, minimizing or avoiding the risk of delays or reinitiation of consultations following updates to species range maps.

Step 3. Programmatic Biological Opinions & Dkeys

Some action types have already undergone consultation through a programmatic consultation or standing analysis¹. Check with your local Service field office to determine if there are any standing analyses or programmatic consultations in effect that cover the action type. To analyze your proposed action under an existing standing analysis or programmatic, the proposed action in your BA/BE should align with the programmatic consultation or standing analysis using the design criteria, including any conservation measures considered in that programmatic or standing analysis. Design criteria should be described with enough detail to ensure consistency with the programmatic consultation or standing analysis.

There also may be a Dkey available for your proposed action type, such as the Dkey for the Streams Crossings programmatic. The system will notify you if a Dkey may be available for your proposed action. If the proposed action may qualify, you will be instructed to complete the Dkey to ensure consistency and will receive an automated consistency letter that your proposed action will be reviewed by the Service. You also may skip any Dkeys if you know the proposed action will not meet the criteria identified in the associated programmatic consultation or standing analysis. If you make a no effect determination through the Dkey, you will receive a letter that acknowledges we received your determination and that you determined the project was consistent with an existing analysis. However, this letter does not provide Service concurrence with your determination, as the Service does not have the authority to concur with no effect determinations. Continue to Phase 2, step 4 if there are no programmatic consultations, standing analyses, or Dkeys available for the proposed action type.

¹ The standing analysis is a consultation tool designed to reduce the time necessary to complete consultation [including biological opinions] for a particular set of projects. It operates similarly to a programmatic or batched consultation, without dependence on a programmatic or batched biological assessment (BA) from an action agency to initiate the analysis.

Phase 2. Air, Land, & Water Analysis

The second phase of the CPB framework involves deconstructing the proposed action's activities and structures, analyzing the impacts to the air, land, and water from those activities and structures, and confirming the action area (see Figure 4). You will complete the species analysis in Phase 3.

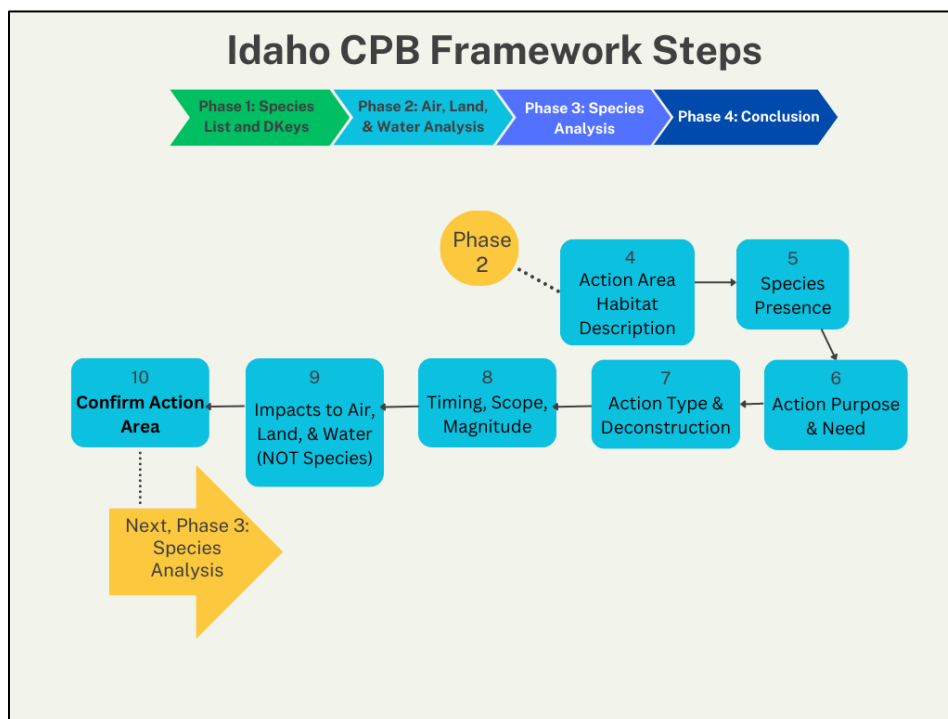


Figure 4. Phase 2 of the CPB

Step 4. Habitat Description.

In the CPB text box, describe the habitat types present in the action area (e.g., coniferous forest, wetland and riparian areas, meadows, avalanche chutes, burned areas, logged areas, etc.), including habitat quality and distribution. This is the habitat in general, not specific to listed entities. For example, 'The action area is comprised of high-elevation mid to late succession mixed coniferous forests in large, disjunct patches owing to a recent 500-acre fire that burned at mid to high severity. Several pristine alpine meadow complexes are present, as well as several 3rd and 4th order fish bearing streams with moderately burned riparian areas.' Describe the habitat across the entire action area. Consider elevation, slope and aspect, soil types, dry versus wet forest types, and multiple land uses such as recreation or grazing.' If appropriate, refer to surveys or assessments related to this information; these can be uploaded in CPB.

Step 5. Species Presence.

Determine the probable presence of each species identified in the species list, considering the entire duration of the effects from the proposed action to air, land, and water, including effects that are likely to occur later in time. The combination of effects occurring during the proposed action's implementation and those effects occurring later in time can be thought of as a "lifetime of action effects." In CPB, all species that are included on the IPaC species list for the action area are available on

the left side of the screen. Include any surveys for species or habitat and, if the species is known or likely to be present, describe how the species is likely to use the habitat in the action area during the lifetime of action effects. If a listed entity is not likely to be present during the entire duration of the effects from your action, including effects that are likely to occur later in time, CPB will ask you to provide a justification for excluding the entity from the effects analysis. IPaC also includes candidate species for informational purposes only. Consultation is not required for candidate species. CPB will ask for a justification to exclude any candidate species included in the species list, but this can be very simple including stating that it is a candidate species and consultation is not required.

Step 6. Purpose and Need

Explain the purpose and need for the proposed action, including a brief description of all proposed activities and structures (physical structures such as staging areas, roads, etc.) in relation to the defined purpose and need. Also describe any authorities or program under which the proposed action is being developed (e.g., Healthy Forest Initiative). The purpose and need should include the reason for the proposed action and the anticipated goal or outcome of the proposed action.

Step 7. Action Type and Deconstruction

Describe the proposed action type, associated activities, and associated structures. A menu of activities are available for selection in IPaC. An example of the selections that action agencies can make include:

Action Type: timber harvest,

Activities: road construction, yarding, etc., and

Structures: haul roads, staging areas, etc.

Describe the location of each activity and structure identified during the deconstruction. In CPB, simply select the relevant activity type and associated activities and structures. CPB associates suggested activities and structures with action types, select all that are applicable. You also can add additional activities and structures beyond those provided. Draw the location of each activity and structure. In CPB, you can clone/copy the original action area or other action structures or activities, if appropriate.

As you deconstruct the action, consider:

- a) site preparation (including surveys),
- b) access and staging,
- c) post-project activities (including operation, maintenance, monitoring, and restoration), and
- d) activities and structures associated with conservation measures.

Step 8. Timing, Scope, and Magnitude

Describe the timing, scope (size or extent), and magnitude (relative size or extent) of activities and associated potential stressors/impacts to air, land, or water (not species). Include design features such as timing and sequencing (e.g., seasons, years, frequency, duration, and rest periods). To consider the effects of each structure or activity on listed species later in the analysis, you will need to first determine its timing and scope along with the elements of the land, air, and water that could be impacted. This information will form the basis of the species impact analysis you will complete in Phase 3.

In CPB, you can select the relevant stressors that are automatically populated, e.g., access road construction → decrease in vegetation, then select 'may occur' or 'will not occur'. You can manually create custom stressors if they are not included in the CPB list. It is the action agency's responsibility to

ensure all stressors are included and if one is missing, to add a custom stressor as well as include temporary and permanent stressors. Do not forget to fill out the text box for the timing, scope, and magnitude of these stressors on the air, land, and water generally, which should include information such as phasing or seasonality of activities or structures. Entering the implementation and completion dates is optional, but they should be included if the activity or structure is relatively certain to occur and the timeline is more reliable.

Step 9. Impacts to Air, Land & Water (Not Species)

Describe the potential impacts from each stressor (e.g., decrease in vegetation) to air, land, and water (not species). In the description, include any design features or conservation measures that will completely avoid the stressor. In CPB, select conservation measures, if available, or manually create them. If a stressor is completely avoided by a conservation measure, describe how the conservation measure accomplishes the avoidance to the air, land, or water; this stressor will not be carried forward in the rest of the analysis, including the species analysis (Phase 3), because it has been completely avoided. If a stressor is not completely avoided, describe where and how much of the stressor will still occur on site (e.g., how much vegetation will be removed) and to what degree (complete removal? impacts to seed trees?)? If a stressor is reduced, but not completely avoided², draw the location of the remaining impacts. In CPB, you can clone the entire action location, a specific structure, or an activity location, if appropriate. All avoidance and minimization conservation measures related to the proposed action should be included when delineating the action area (including off-site conservation measures).

Step 10. Confirm Action Area

The action area includes all areas to be affected directly or indirectly by the Federal action and not merely the immediate area involved in the action (50 CFR 402.02) (see Figure 3). Considering the proposed structures, activities, and their stressors to air, land, and water as well as the proposed conservation measures, i.e., everything related to the proposed action, **confirm** the final action area. Do not consider species presence or use of the action area when confirming the action area. Once you confirm the final action area you may need to go back through some previous steps and confirm the analysis remains correct or edit the analysis, as appropriate.

The action area and deconstruction are extremely important steps for streamlining your analysis thought process. You will find that your analysis efforts are more straightforward later in the process if you clearly identify the action area and proposed activities/structures in the initial stages before moving on to the next stage.

² The analysis in CPB focuses on stressors to land, water, or air first and then any conservation measures that avoid any additional stressors to land, water, or air. If any of the stressors will remain (i.e., not avoided), it is carried forward into the listed entity analysis where the user can select whether or not each remaining stressor may impact the listed entity being analyzed. If so, the user is then able to include any conservation measures that avoid or minimize the stressor to the listed entity. At the end of the analysis, the user is asked to explain how they will implement the conservation measure (e.g., timing, etc.).

Phase 3. Species Analysis

The third phase of CPB focuses on the direct and indirect interactions between the species and the impacted environment from the proposed action's deconstructed activities and structures (see Figure 5).

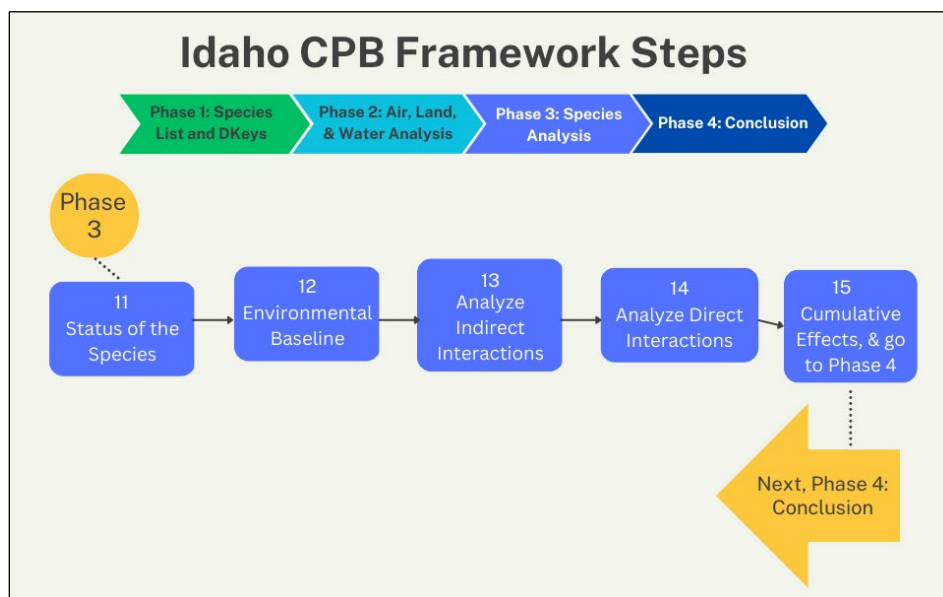


Figure 5. Phase 3 of the CPB

Step 11. Status of the Species (including Climate Change)

In this step, you will describe the following:

- a. the legal status of the species,
- b. available recovery plans,
- c. the species life history,
- d. the species resource needs (the physical and biological features of air, land, and water that a species depends on to fulfill its life cycle), and
- e. the species' rangewide conservation needs.

Effects of fire and climate changes to the listed entity should be discussed in this section as well. In CPB, (a) the legal status of the species, (b) available recovery plans and (c) the species life history are automatically filled out for each species. The species rangewide conservation needs (e) can be summarized from the recovery plans, listing notices, or the most current status assessments. For (d), species-specific resource needs also may be available in CPB and will appear under the species name on the left. If resource needs are not yet entered, you will need to add species-specific resource needs manually. Resource needs are features that are on the landscape (e.g., prey or forage), not the lack of specific attributes (e.g., noise or pollutants). Identifying the resources needed by a species is a fundamental step in developing an impact analysis. Impacts to the resources that species rely upon can lead to effects to the species. This information is helpful for connecting the dots between action's impacts, conservation needs in the action area (see below), and the proposed conservation measures.

Reach out to your local Service field office if you need assistance identifying and entering resource needs.

Step 12. Environmental Baseline (Resource Needs and Species)

Describe the condition of the listed species or its designated critical habitat in the action area contemporaneous with the proposed action, without the effects of the proposed action. The environmental baseline should include:

- a. the listed entity's presence and use of the action area,
- b. the listed entity's conservation needs for survival and recovery specifically within the action area,
- c. the general condition of the listed entity's habitat (refer to resource needs described in Step 11),
- d. any influences that might be contributing to the current environmental baseline of the species (including prior consulted on effects),
- e. The species ability to disperse through or travel through the action area, and
- f. any other additional baseline information.

Topics (a) through (e) above are each separate sections with their own required text boxes. You will primarily fill out (b) and (d). Topic (a) will be automatically filled from information you previously entered (Step 5), while (c) will be completed later in the CPB analysis.

(a) CPB automatically uses the species presence and use in the action area entered earlier. You can refer back to the section where you initially described it and provide a brief summary if you are not using CPB.

(b) Describe the species conservation needs for survival and recovery specifically within the action area, and the role and importance of the action area in meeting these needs. Include any conservation strategies from the recovery plan or other documents that pertain to the action area. If the action area overlaps a designated management or analysis unit, recovery unit, core area, etc., remember to discuss the role and condition of that specific unit to the species.

(c) Habitat condition will be automatically completed in the CPB analysis after you have identified which species' resource needs are present in the action area. You can go back and add additional information **by clicking on the "Habitat condition (general)" step on the workflow panel (left side of screen)**, if needed. If you are not using CPB, you can refer back to the section you first described the habitat and briefly summarize the condition of the resource needs in the action area.

(d) Describe any past, present, or ongoing activities or influences that have affected the reproduction, numbers, or distribution of the species within the action area, considering the threats identified in the listing, recovery, or SSA documents that are available at: <https://www.fws.gov/species/search>. Influences include both anthropogenic (e.g., hunting, baiting, and infrastructure) and natural sources (e.g., disease, predation, fire, and climate change).

(e) If you have more information about the environmental baseline for this species in your action area that would increase the general understanding of it, provide that information in this section.

Step 13. Analyze Indirect Interactions

Indirect interactions consider action-related impacts to resource needs of a species that indirectly affect individuals of a species.³ Identify which resource needs are present in the action area and explain your rationale if you determine a resource is not present. In CPB, you will select whether each resource need is present in the action area.

- Make sure that you consider the subcategories within each resource need. For example, if the resource need is cover, then the subcategories might be vegetation, rock overhangs, caves, etc.).
 - For resource needs that are present, describe the distribution, location, quantity, and quality of each resource need in the action area.
- Describe which stressors may impact the resource need (i.e., decrease in vegetation). In CPB, the stressors will be automatically populated from your air, land, and water analysis (see Phase 2). Select which stressors are likely to impact the resource needs (i.e., increase in permanent roads reduces cover).
 - If effect pathways (the chains of effects from stressors that lead to each resource need) are not yet available in CPB for a listed species in your action area, you will be provided a list of potential pathways that could apply to any species (i.e., not species-specific). The pathways leading to these suggestions also are provided for your information.
- Include any conservation measures to avoid or minimize impacts to the resource need. The Species Status Assessment or other status review documents can be used to assist with identifying appropriate conservation measures if none are available in CPB.
- You will then be asked if there will be any remaining impacts to the resource need, given the conservation measures, and, if so, to describe the size, scope, magnitude, and location of the remaining impacts.
- CPB also will ask you to describe the number of individuals that might be exposed to the stressor. If it is impractical to express this in terms of individuals, a surrogate may be used. Describe why a surrogate is necessary, as well as its causal and quantitative links to individuals of the species. For example, if you cannot estimate the number, describe the density of the species relative to other areas or any other information you can provide.
- CPB will take the selections and text box answers you have provided to populate a table that looks like Table 1 below.

³ The reference in CPB to indirect and direct interactions (effects to individuals) is not the same as direct and indirect impacts to the environment referred to in the action area definition. In CPB, the analysis is focused on direct interactions with individuals and indirect interactions with individuals via habitat impacts.

Table 1. An example resource need interactions table is provided in CPB with potential chain of effects.

RESOURCE NEED	STRESSORS*	CONSERVATION MEASURES	AMOUNT OF RESOURCE IMPACTED	INDIVIDUALS IMPACTED (exposed to stressor)
e.g. Vegetation – forage	Decrease in vegetation used for forage	Phased activity allowing forage to remain in adjacent habitat	50 acres	Estimated individuals exposed to reduced forage or surrogate (if appropriate) – effective habitat

*Stressors in this table are indirect (i.e., impact resource needs). Direct impacts to the species will be addressed later.

The habitat condition section (c) from Step 12, will automatically be entered from the resource needs that you identified as present in the action area. You can go back to this section from the left-hand panel and provide details on the condition of the habitat in your action area, such as the quality, distribution, etc. if they are not already described elsewhere (e.g., influences or additional baseline information).

[Step 14. Analyze Direct Interactions](#)

Identify the direct interactions to individuals of the listed entity that may occur (e.g., deters movement, disturbance, collisions, etc. Analyze each direct impact by describing any conservation measures that are part of the action’s design features and how many individuals (or surrogate amount) could be exposed to that direct impact.

You will be provided with a list of potential impacts that could apply to any species (i.e., not species-specific) if potential direct impacts have not been created in CPB by the Service. If potential direct impacts have been created, you will be provided with a list of potential species-specific impacts and you will select ‘may occur’ or ‘will not occur’. The pathways leading to these suggestions also are provided for your information. However, the suggestions provided are not exhaustive. It is the action agency’s responsibility to ensure all impacts are included, and if one is missing, to add a custom interaction. The table in CPB will look like Table 2 below. You will then be asked if you are implementing any conservation measures and whether there will be remaining direct impacts after the conservation measures.

Table 2. Example direct interactions table provided in CPB.

DIRECT IMPACT	CONSERVATION MEASURES	INDIVIDUALS IMPACTED (exposed to stressor)	IMPACT EXPLANATION
e.g., Disturbance	Phased activity allowing secure conditions in adjacent habitat	Estimated individuals exposed to disturbance or surrogate, XXXX total acres, XXXX acres in phase 1, XXXX acres in phase 2, etc.	Disturbance can cause [species] to startle and/or flee a preferred habitat area. Long-term displacement (under-use or avoidance) from preferred habitat could lead to [explain reasonably certain to occur consequences to breeding, feeding, or sheltering].

Step 15. Cumulative Effects

Identify and provide information on any anticipated future state or private activities (not involving Federal activities/funding) that are reasonably certain to occur within the action area. These activities are considered cumulative effects under the Endangered Species Act. Provide information about the specific predicted effects from each cumulative effect on the individuals or habitat within the action area using the text box in CPB. Use the same level process describing impact-exposure-response-effect as you did in the effects of the action section for this proposed action (i.e., Steps 9 to 14). In the cumulative effects section, it is important to include known, relevant-to-the species information about private activities on non-Federal lands within the action area as well as explain any future reasonably certain to occur activities (e.g., future road plans or development on some non-Federal lands).

Phase 4. Conclusion

In Phase 4, the action agency wraps up the analysis by making the effect determination, discussing how conservation measures will be implemented, and concluding the analysis (see Figure 6).

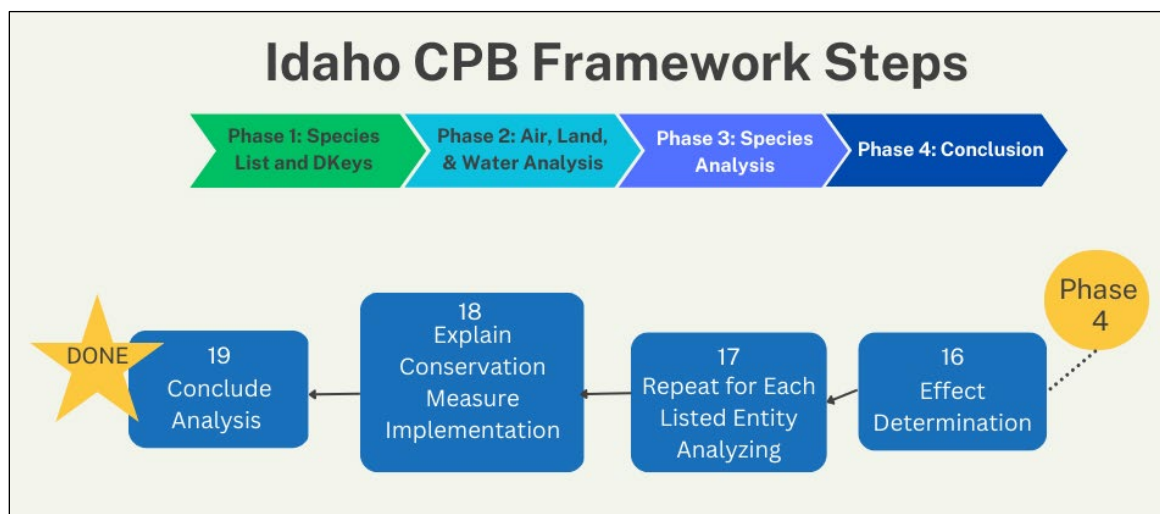


Figure 6. Phase 4 of the CPB.

Step 16. Effect Determination

Review the remaining indirect and direct interactions from the stressors associated with the proposed action's activities and structures to the species resource needs and individuals (or surrogate) and make your effect determination. CPB provides a list of the indirect (resource needs affected) and direct (individuals affected) interactions you identified as well as your description of cumulative effects to assist with the effects determination. You will select one of the effect determinations (described below). In addition, you also will have the option to describe any 7(a)(1) or other measures that avoid, minimize, or offset the consequences of the action, if you would like to highlight efforts the action agency is implementing for the recovery of the species.

No Effect – If you have indicated in earlier steps that there is the potential for any of the proposed activities or structures to interact with the species (i.e., any exposure), you will not be able to make a no effect determination for the species in CPB. If this is the case, this effect determination is not available to select because in your analysis you have determined that the

action will have some effect on listed species. The language in CPB will be as follows: “This effect determination is not available because you have determined in your analysis that the project [action] will have effects on listed species.”

Not Likely to Adversely Affect – All effects are beneficial, insignificant, or discountable. Beneficial effects have contemporaneous positive effects without any adverse effects to the species or habitat. Insignificant effects relate to the size of the impact, and they include those effects that are undetectable, not measurable, or cannot be evaluated. Discountable effects are those that are extremely unlikely to occur.

Likely to Adversely Affect – This determination is appropriate for all actions where the effects do not fit in the 'No Effect' or 'Not Likely to Adversely Affect' category. This determination requires formal consultation with the Service and the BA/BE document produced from CPB will facilitate this consultation.

Step 17. Repeat for each Listed Entity Identified

Conduct a Phase 3 analysis (Steps 11 through 16) for each listed entity that may be present in your action area. Critical habitat is considered a separate listed entity.

Step 18. Explain Conservation Measures Implementation

At the end of CPB, you are asked to review and explain how the action agency will implement any conservation measures that you identified, if you did not do that earlier. This will give you an opportunity to craft language for the conservation measures and add details relevant to the listed entity.

Step 19. Conclude Analysis

- (1) Summary Discussion - Summarize the overall effects the proposed action will have to species and critical habitat within the action area.
- (2) Conclusion – Provide clear statements connecting the dots of your analysis that will help us understand your findings.
- (3) Executive Summary - Based on the information you provided, write a short, high-level summary of the action. Ideally, this should be around one paragraph.

Phase 5. Submit BA/BE to the Service

If using CPB, download the document from CPB. Submit your draft BA/BE to the Service by email: fw1idahoconsultationrequests@fws.gov. Please note that you can add Service biologists to CPB at any step in the process to assist with development of the BA/BE, if desired. We recommend that you discuss their workload capacity with your local Service office prior to adding anyone to a proposed action in CPB. Similar to a regular consultation process, the biologist reviewing your draft BA/BE may have follow-up questions or requests of additional information for the submitted draft BA/BE. Adding the Service to the document in CPB is intended to help reduce additional information requests.