

## Timelines Options Explained

Under Option 1 -- Begin with identification of preferred alternative, Add 90 days for consultation, At conclusion of consultation phase, reconcile with DEIS and publish on day 90. 45 days comment on DEIS, 15 days to convert to FEIS. On day 150, you have an FEIS ready to file. Transmit and start MSA clock. Decision Day is day 245 (about 8 months from identification of preferred alternative).

Under Option 2 – At time of identifying preferred alternative, initiate ESA consultation (90 days), and also publish DEIS (45 day comment period). Assuming ESA consultation results are consistent with DEIS and no new information arises through comment period, under NEPA, ROD could issue as early as day 90. However, ESA BO would not be complete until day 135. MSA clock could be initiated with FEIS (e.g., as early as day 60), and decision day could be as early as day 150. The results of the BO would be available on Day 135, the ROD on the EIS could be signed as early as day 90. MSA 90 days of review would include days 60-150, so results of the EIS comment period and BO could lead to disapproval with no option for modification. Total time after identification of preferred alternative would be 150 days (about 5 months). Shorter total time frame, greater risk of disapproval or compromised record.

Under Option 3 – Assume DEIS is published and ESA consultation initiated at the same time, e.g., at time of identification of preferred alternative. Assume results of consultation reveal new information. The DEIS must be revised and recirculated. It may be necessary to select a new preferred alternative. Assume the NEPA process takes 180 days instead of 90. Begin MSA clock when FEIS is prepared on day 180. MSA decision day would be day 270 (about 9 months after identification of preferred alternative).

Under Option 4 – assume no ESA-listed species are present. The Council might publish the DEIS prior to identifying a preferred alternative. There would be a 45 day comment period on the DEIS. Assuming no new information, the Council could immediately vote on the preferred alternative, transmit and begin the MSA clock, when filing the FEIS. MSA decision day could be (45 + 95) 140 days after identification of a preferred alternative.

Under Option 5, assume there are no listed species issues and an EA is the appropriate NEPA document. The only applicable timeline would be the MSA 95 day review.