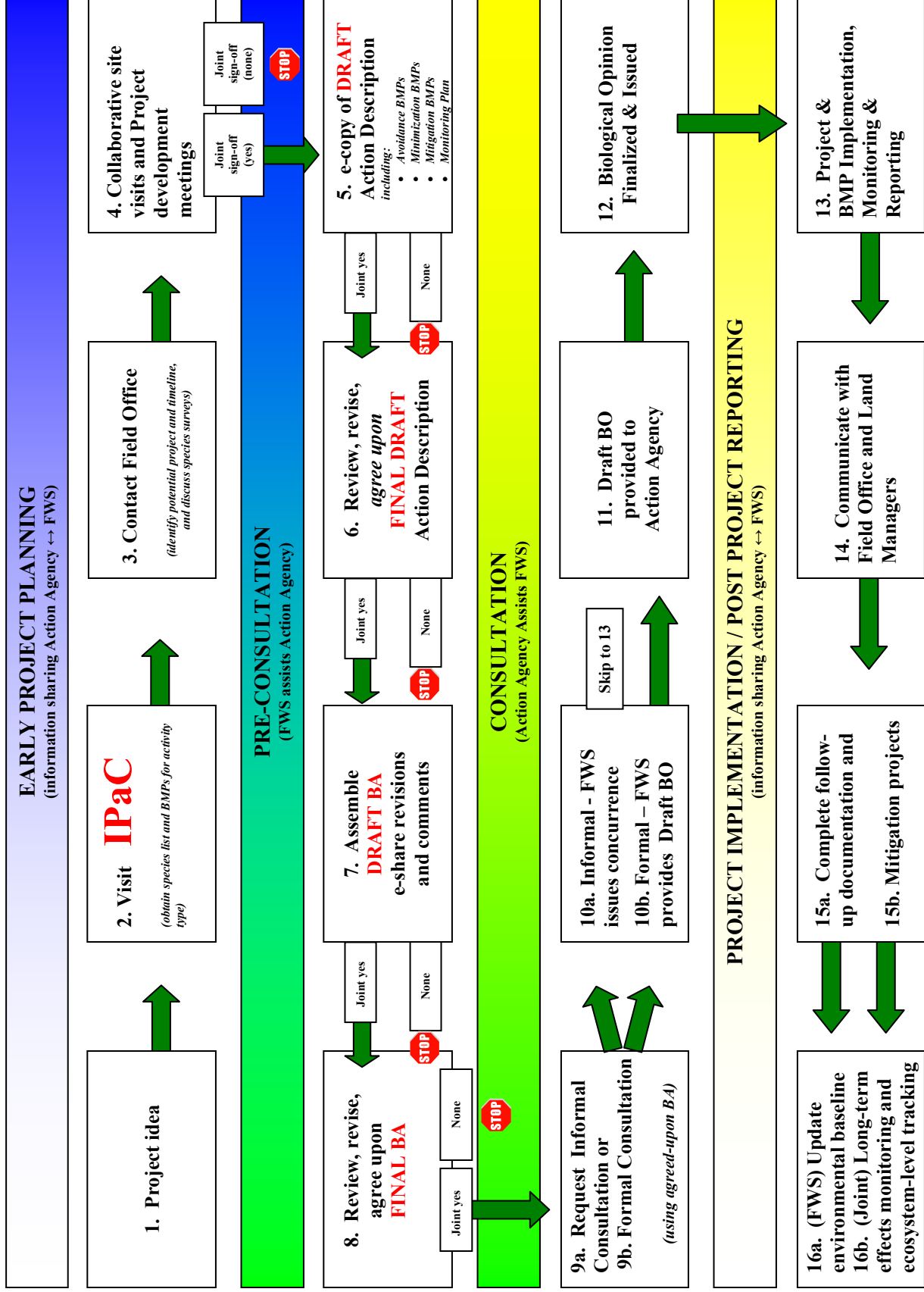


SECTION 7 STRUCTURED COORDINATION PROCESS



SECTION 7 STRUCTURED COORDINATION PROCESS

One of the most effective methods of streamlining section 7 consultation is for the Service, action agencies, and applicants to coordinate early and often throughout the consultation and design processes. This guidance is designed to assist consultation participants in conducting the appropriate level of coordination at the appropriate times in the consultation process. The guidance presented in this document is optional and is not intended to supersede the procedures presented in the Endangered Species Consultation Handbook (March 1998); however, it is strongly recommended that these coordination steps be implemented to help ensure the establishment of a complete administrative record and a smooth consultation process.

The attached guidance describes sixteen steps, in four distinct stages, for efficiently coordinating the section 7 consultation process. Additional cross references (green text boxes) for NEPA and Permitting development have been incorporated to ensure parallel process development at each section 7 step.

FLEXIBLE USE

- Optional “initialing” steps provide opportunities for achieving and documenting collaborative agreement among Project Coordination Team members.
- A basic elevation process is included to identify decision-makers and to provide a pathway for resolution of issues, if needed.
- A project development Table (template) is included as an optional tool for stakeholders to identify contact names and dates for initiation and completion of steps.
- Proposed actions that require section 7 consultation vary in complexity and collaboration needs. The Service and Action Agency should jointly consider these factors when determining the extent to which this process applies to project development. This process is recommended for complex projects, contentious projects, or those where development needs to be tracked by multiple parties.

The sixteen steps described below are intended to occur during the stages of project development represented by each box on the accompanying flow chart (SECTION 7 STRUCTURED COORDINATION PROCESS). If steps cannot be accomplished as prescribed, consultation can still proceed; however, the extent to which it can be streamlined may be limited. Streamlining may also be limited when the Service believes that there is a high likelihood that the proposed activity may jeopardize the continued existence of a listed or proposed species or destroy or adversely modify designated or proposed critical habitat. Regardless of the process used, the information required to initiate consultation remains the same [50 CFR 402.14(c)].

To provide a common understanding of project development, this document may be used as a progress tracking tool. Project Coordination Teams may choose to document progress by “initialing-off” on the completion of steps 4-8. In order to maintain the streamlining, initialing authority is intended to occur at the Project Coordinator level (e.g., field biologist level), not the “management” level, and the decision to track project development in this way should be at the discretion of the Project Coordination Team. The initialing process is intended to assist in documenting a common understanding among Project Coordination Team members; *it is not intended to and cannot limit the legal or regulatory authorities of any agency*. Each Team member should maintain an original copy to be signed at milestone coordination meetings by all appropriate agency representatives.

EARLY PROJECT PLANNING

STEP 1. Project Idea

As early as possible, identify when a project is on the horizon, if it could be considered a Federal activity, and if it could affect a listed resource. In implementing this potential project, could there be a Federal permit, funding, or will a Federal agency be involved in carrying it out? If so, then it is important to enter into the structured section 7 pathway for that action as soon as the project is identified for consideration.

NEPA and Permitting Processes:

- Purpose and Need Development

STEP 2. Visit IPaC – obtain species list

The Service's Information, Planning, and Consultation system (IPaC) website is located at < <http://ecos.fws.gov/ipac/>>. When possible, using the interactive menus, identify the location of the proposed project, obtain a species list, and begin development of a preliminary draft map of the proposed action.

Species-specific information and Best Management Practices (BMPs) are in various stages of development in IPaC. Where possible, retrieve species-specific information of importance for project development considerations. Basic species ecological information can be obtained as well as BMPs that can be incorporated into the project design to avoid, minimize, or mitigate potential impacts. BMPs may be general or species-specific, depending upon the activity type and location.

If IPaC is not available, species lists may be available through local Field Office (FO) websites or they may be obtained through a written request. Ecological Services FOs are identified on the Service's website at < <http://www.fws.gov/offices/>>.

NEPA and Permitting Processes:

- Preliminary design
- Draft map
- Begin draft Description of Proposed Action and Alternatives (DOPAA)

STEP 3. Contact FWS Ecological Services FO

Once the basic information provided by IPaC or a species list is obtained, contact the local FO regarding the potential action and timeframes. This step will begin the relationship that will last for the next 13 steps (and beyond). The initial contact should be a phone call followed up by an email introduction.

At the time of initial contact, share the preliminary draft map (in electronic form if available). The FO may provide guidance as to protocols for listed species surveys. It may be beneficial to have updated local species surveys prior to beginning step 4, and often there is a very specific window of opportunity for surveys that must be budgeted into project planning. Remember that federally funded or permitted exploratory activities that may affect listed species and that take place prior to project implementation should be coordinated with the FO (and may require appropriate authorization, as well as permits for entry). If species surveys cannot be completed, it may be appropriate to assume species presence in all areas of suitable habitat within the species' range.

- NEPA and Permitting Processes:
- Scoping letters to interagency partners
 - Share draft DOPAA and maps
 - Coordinate permits and authorizations for pre-project reconnaissance

STEP 4. Collaboration & Coordination

Project development meetings, led by the Action Agency, should occur throughout the early planning process. Collaborative in nature, and supported by site visits and maps, these meetings provide opportunities to jointly modify and clarify the proposed action. For optimal results, these meetings should be focused toward clarifying objectives of each team member, identifying challenges, and determining the means for resolution. The first coordination meeting, or “JOINT KICKOFF MEETING”, should identify the members of the Project Coordination Team, as well as the Decision-makers Team, and the First and Second Elevation Teams. The names of these individuals should be entered into Table 1 to identify relationships and ensure coordination throughout project development.

Table 1. Decision Process Team Members.

	Project Coordination Team (staff level technical team)	Decision-makers Team	Elevation Team
FWS-ES			
Action Agency			
(list other appropriate Team members here)			

Many section 7 consultations involve non-Federal entities who require some form of approval, such as a permit or license, from a Federal agency in order to implement a proposed action. These entities are known as “applicants” in the section 7 consultation process and are afforded certain rights under section 7 of the Act. Action Agency-identified applicants may participate in the consultation process with the Action Agency. For this reason, throughout this document when the term “Action Agency” is used, the intent is to include any Action Agency-supported applicants as well.

After collecting as much information as possible regarding species and habitat occurrences in the proposed project’s action area (Figure 1), the Project Coordination Team may also schedule a site visit to gather more information. Depending on the location, it may be appropriate to include land managers and species experts. If requested, the local FO or the Project Coordination Team (identified above) can help recommend agencies and individuals to add to the list of invitees. By including the right participants up front, decisions can be guided with the greatest level of expertise as early in the project development process as possible. Site visits should occur prior to locking in a final project design if effects to listed species may result. With on-site coordination, proposed actions can be modified to avoid and/or minimize impacts to listed resources (all listed species and designated critical habitat) to the greatest extent possible. FO staff may be able to provide a suite of choices for project proponents to consider, including potential mitigation methods for unavoidable impacts. The collaborative atmosphere that can be developed while discussing options in the field can often result in creative solutions that were not previously apparent.

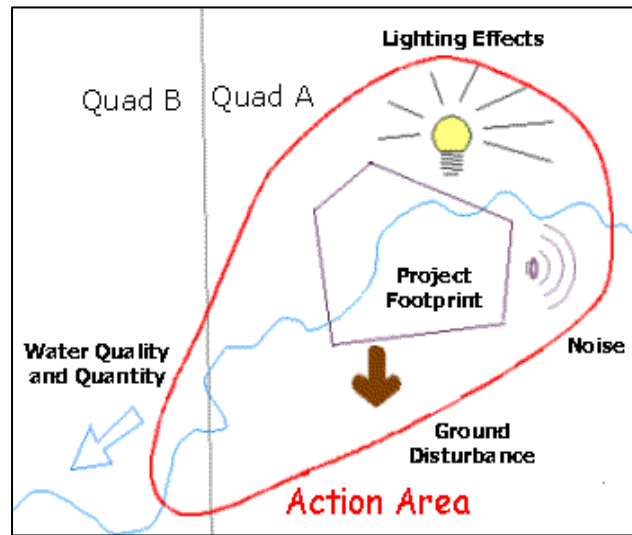


Figure 1. The action area is defined as all areas to be affected directly or indirectly by the Federal action and not merely the immediate area involved in the action.

Site visits may occur several times throughout project development and should be scheduled collaboratively. Anticipate several weeks for scheduling, and ensure that each participant has the authority to speak for his or her agency.

To facilitate efficiency in draft development, electronic copies of draft project descriptions, maps, and plan views should be shared amongst Team members. Group decisions should be documented for each agency’s administrative record. BMPs should be documented at this step, resulting in a common understanding of unavoidable impacts. Mitigation needs for unavoidable impacts should be agreed upon as well. If the Service believes that anticipated impacts are likely to jeopardize the continued existence of a listed or proposed species or adversely modify designated or proposed critical habitat, the FO will advise the Action Agency of this potential in writing.

BMP discussions at this step may result in further modification of the action once the choices between avoidance, minimization, and mitigation are apparent. For example, upon understanding the mitigation BMPs that may be warranted to offset a particular effect, the Action Agency may decide to implement an avoidance or minimization BMP that was not originally included because this choice results in a net cost savings for the project.

Project development coordination also includes conference calls, email exchanges, and other avenues for collecting information and documenting decisions.

It is recommended that the Project Coordination Team establish a timeline with milestone dates or target due dates for subsequent meetings and steps. This could assist in accountability and should facilitate a more effective process.

Once the Project Coordination Team has completed sufficient site visits and EARLY PROJECT PLANNING meetings to begin drafting a Biological Assessment or Biological Evaluation, a milestone meeting should occur for Team members to initial-off that progress is sufficient to move into the next phase, PRE-CONSULTATION. By initialing this step, a common understanding is documented for the administrative record and all parties acknowledge that collaborative meetings have resulted in sufficient information exchange to proceed to the next phase of the process.

Step 4 coordination completed (optional initialing process):

Agency:	Agency:	Agency:	Agency:	Agency:	Agency:

date					

(DO NOT PROCEED TO STEP 5 WITHOUT INITIALS, if Team has chosen this process)

- NEPA and Permitting Processes:
- Identify Agency roles
 - Identify Cooperating Agencies
 - Identify Permits needed
 - Avoidance, Minimization, Mitigation options incorporated into Alternatives
 - Notice of Intent to Prepare EIS
 - Public Scoping
 - Public Meeting

PRE-CONSULTATION

STEP 5. DRAFT Action Description

In this step, the Action Agency, with the assistance of the FO, writes the description of the action based upon information and decisions obtained during implementation of previous steps. The draft action description should be shared electronically throughout this step and should include:

- Maps of the project footprint, action area, including associated areas (e.g., staging areas, borrow sites, etc.), and access roads
- A complete description of all aspects of the proposed project, including
 - Avoidance BMPs
 - Minimization BMPs
 - Mitigation BMPs
- A monitoring plan, including reporting format and due dates
- Long-term maintenance activities

At this stage it is very important to reach a common understanding that will form the basis for all other sections of the Biological Assessment/Biological Evaluation (BA/BE) and other environmental review processes. To accomplish this, the action should be “deconstructed” into its component parts. For example, activities associated with construction of a building may include constructing a road to the facility, clearing habitat on the building site, developing staging and fuel storage areas, implementing stream crossings, etc. Each of these aspects of the project could have different potential impacts. By “deconstructing” the proposed project into its component parts, it becomes much easier to organize and evaluate the potential impacts of the project as a whole.

It is understood that designs may change throughout project development. As long as this step remains collaborative, each agency is more likely to be able to accommodate these changes and provide necessary responses in a timely fashion, thus minimizing the potential for future delays.

Step 5 first **DRAFT** completed (optional initialing process):

Agency:	Agency:	Agency:	Agency:	Agency:	Agency:
---------	---------	---------	---------	---------	---------

_____ date

(DO NOT PROCEED TO STEP 6 WITHOUT INITIALS, if Team has chosen this process)

- NEPA and Permitting Processes:
- Refine Purpose and Need
 - Stakeholder Coordination
 - Refine Alternatives, resolve issues

STEP 6. FINAL Action Description

This final action description is the result of all known information to date and has undergone review from all appropriate parties (Action Agency, FWS-Ecological Services FO, Land Management Agencies, etc.). This is the action description that will be moved forward into BA/BE development (and NEPA and Permitting documents) and it must include all of the bulleted items listed in step 5. If the proposed project changes after this time, the process will either return to this point before proceeding (though it may take less time to redo the subsequent steps), or it will switch to the standard consultation process (not expedited). As effects are analyzed in step 7, the Action Area may change, potentially resulting in changes to the action description. The FO should assist the Action Agency, as needed. If the concern that the action is likely to jeopardize listed species or adversely modify or destroy critical habitat identified in step 4 has not been addressed through project modifications and/or BMPs, the Project Coordination Team should initiate the elevation process. The Structured Coordination Process will be suspended until the issue is resolved.

Step 6 **FINAL** Action Description completed (optional initialing process):

Agency:	Agency:	Agency:	Agency:	Agency:	Agency:
---------	---------	---------	---------	---------	---------

_____ date

(DO NOT PROCEED TO STEP 7 WITHOUT INITIALS, if Team has chosen this process)

- NEPA and Permitting Processes:
- Preliminary Draft EA/EIS development in coordination with Cooperating Agencies
 - Begin drafting Permit requests for construction

STEP 7. Assemble DRAFT BA

Using the “Format for Biological Evaluations and Biological Assessments” (Attachment A), or other jointly agreed upon format as a template, begin populating the sections of the draft BA with the information obtained so far.

BA sections include:

- A. Executive Summary - should be a brief overview (based upon the action description) followed by a Table of listed resources (obtain species list from IPaC, where possible, and include the effect determinations for each species and habitat).
- B. Project Description - should be the exact text agreed upon in step 6 (above).
- C. Description of Species and Habitats - should be a combination of information obtained through IPaC where available, other sources, and action area species surveys (if performed), or assumed presence (if appropriate). If presence is assumed, document the basis for this assumption.
- D. Environmental Baseline - may be developed from similar sections in the draft NEPA document.
- E. Effects of the Action - may be very straight-forward by this time, or it could be extremely complex. Coordinate with the FO to develop a list of effects anticipated from the proposed project. (It is very important to reach a common understanding of potential project effects before proceeding.) Subsequently, the FO can assist in recommending ways to analyze those effects, if needed. Effects analyses in BAs should include potential direct, indirect, and cumulative effects, with discussions focusing on the nature of overlap in time and space of the stressors* resulting from the proposed action on listed resources. An exposure analysis (a matrix for identifying the overlap of species needs and project effects) is a useful tool for laying out this relationship in a simple understandable way.

Step 7 **DRAFT BA** (First Draft shared electronically) (optional initialing process):

Agency:	Agency:	Agency:	Agency:	Agency:	Agency:
---------	---------	---------	---------	---------	---------

_____ date

(DO NOT PROCEED TO STEP 8 WITHOUT INITIALS, if Team has chosen this process)

NEPA and Permitting Process: <ul style="list-style-type: none">• Collaboration with interagency partners, sharing drafts
--

* A stressor is a stimulus that negatively affects a species. Stressors can be physical (e.g., sedimentation, water removal, litter), chemical (e.g., contaminants, herbicides, hormones), and active (e.g., vehicle strikes, aerial obstructions, entrapment in ditches).

STEP 8. Final BA

Completion of this step means that the DRAFT BA has been reviewed by all appropriate parties. It is likely that draft revisions will be transmitted back and forth in step 7 as language is adjusted and issues are resolved. Step 8 involves coming to agreement on the FINAL version of the BA, after all comments and reviews are incorporated. Note that at times it may not be possible to come to complete agreement on the final version of the BA. However, this step may involve documenting the position of each of the consultation participants. If complete agreement cannot be achieved, it may or may not be possible to continue with the structured coordination process. The FO will make decisions regarding the appropriateness of continuing in the process on a case-by-case basis after evaluating the nature and scope of the disagreements. For example, while the parties may disagree on the potential for a specific life stage of a species to be impacted, upon further evaluation the FO may determine that because subsequent life stages are also anticipated to be impacted, overall differences in impacts to the species will be minimal.

Electronic sharing during this step is critically important to expediting the next series of steps. The FO should be drafting portions of the Biological Opinion (BO) as the BA is being finalized, thus jump-starting the consultation process.

Step 8 **FINAL** BA agreed-upon (maintain a copy of agreed upon BA)(optional initialing process):

Agency:	Agency:	Agency:	Agency:	Agency:	Agency:
---------	---------	---------	---------	---------	---------

date

(DO NOT PROCEED TO STEP 9 WITHOUT INITIALS, if Team has chosen this process)

NEPA and Permitting Processes:

- Incorporate BA into NEPA and Permitting documents

CONSULTATION

STEP 9. Request (a.) Informal or (b.) Formal Section 7 Consultation

In this step, the Action Agency requests in writing initiation of section 7 consultation with the FO:

- a. **informal** (“not likely to adversely affect” determinations for all listed resources)
- b. **formal** (one or more effect determinations are “likely to adversely affect”)

The agreed-upon BA from step 8 is submitted along with a transmittal letter requesting initiation of consultation. The hardcopy request should be addressed to the Field Supervisor, or other agreed upon contact, and mailed; however, an additional email copy sent to the consultation biologist can facilitate faster responses. Note that consultation is expedited in part through implementing parallel processes to shorten turn-around times. The FO should be immediately notified of any changes to the initiation package that occur during the Action Agency’s internal review process.

NEPA and Permitting Processes:

- Prepare and Publish Notice of Availability of Draft EIS
- Distribute Draft EIS

STEP 10. FWS Response

a. **Informal consultation (“concurrence” letter).** The FO responds to the informal consultation request with a letter of concurrence for “not likely to adversely affect” determinations for all listed species or habitats. Once concurrence is received, skip to step 13.

b. **Formal consultation (Draft BO).** The FO provides the Action Agency with a letter or memo, as appropriate, stating that all information necessary to initiate formal consultation has been received. (This letter/memo starts the “consultation clock.”)

NEPA and Permitting Processes:

- Apply for Special Use Permits

STEP 11. DRAFT BO

The FO provides a courtesy copy of the DRAFT BO to the Action Agency. Due to the coordination completed during the earlier steps, it is anticipated that any revisions would be minor in nature. If, for some unforeseen reason, issues are raised here, the process should return to steps 7 and 8, or shift to the standard consultation process. This would mean that agreement was not actually achieved during the earlier steps and additional coordination may be needed.

Upon review, Action Agency comments are returned to the FO (phone calls, emails, and discussion are encouraged).

NEPA and Permitting Processes:

- Public Meeting
- Public Review Period ends
- Collaborate on Public Comments with Cooperating Agencies
- Public Review for Special Use Permits

STEP 12. FINAL BO Issued

The FO finalizes the BO considering feedback from the Action Agency, applicant, and the Regional Office, as appropriate. The BO is then signed and issued.

NEPA and Permitting Processes:

- Review and Respond to comments
- Prepare and Publish Final EIS
- Public Review – FWS Refuge Compatibility (as appropriate)
- Public Review - NEPA
- Publish ROD

PROJECT IMPLEMENTATION/POST PROJECT REPORTING

STEP 13. Project and BMP Implementation, and Monitoring and Reporting

The project is implemented as proposed. In an effort to achieve a common understanding of compliance issues, it is helpful to invite the FO and Land Managers to pre-construction meetings. To facilitate communication, points-of-contact should be provided to all appropriate agencies. During this step, the BMPs should be monitored for effectiveness, and on-the-fly project changes reported immediately to appropriate contacts.

STEP 14. Communication with FO and Land Managers

Supporting step 13, this step ensures that communication lines remain open and progress is updated regularly. It is also appropriate at this time to invite the FO and/or Land Managers to the project site for on-the-ground discussions regarding assumptions, BMP efficacy, and other coordination issues.

STEP 15. Project Completion

a. Complete follow-up documentation. Although progress reports should be provided throughout construction as specified in the consultation documents, this step requires completion and submittal of the final report, as described in the monitoring and reporting section of the agreed-upon action description of the BA and/or BO (please refer to step 5).

b. Mitigation projects. The mitigation component of the project should be initiated as soon as possible during project implementation (or before, when possible). In some cases, mitigation requires success criteria monitoring, and thus extends out in time beyond actual construction activity. Annual reports may be required to document success, and coordination meetings may be required if there is an adaptive management component.

STEP 16. Post-project/Long-term

a. FWS Updates environmental baseline. Using the final reports submitted in step 15, the FO now has the information needed to update species and habitat baselines. This can be adjusted during project implementation, but should be completed upon receipt of final reports.

b. Long-term effects monitoring and ecosystem-level tracking. These are joint steps agreed upon during consultation to assist the Action Agency in complying with section 7(a)(1) of the Act. This step may require both FWS and Action Agency efforts.

TRACKING CONSULTATION PROGRESS

NOTE: Several steps may (should) be ongoing, or in development simultaneously. Some steps may also need to be repeated if subsequent information results in a change that should be coordinated. However, steps 4-8 should not proceed without PCT support.

Section 7 Steps BOTH NEPA/Permitting Tasks

STEP/TASK	START	END	JOINT YES?	FWS-ES (enter name here)	Action Agency (enter name here)	Other (enter name here)	Other (enter name here)	Other (enter name here)	Other (enter name here)
ACTIVITY BLOCK I.									
EARLY PROJECT PLANNING									
1. Project Idea			N/A						
Purpose & Need									
2. IPaC (species list)			N/A						
IPaC (BMP list)									
Preliminary Design Draft map									
Draft DOPAA									
3. Contact FWS-ES (by phone and email, as appropriate)			N/A						
Plan Pre-project reconnaissance									
Coordinate with FWS-ES for potential species effects									
Conduct Surveys									
• Biological Surveys									
• Cultural Surveys									
• Geotechnical Surveys									
Scoping Letters to Agencies									
Share Draft DOPAA & maps									
Permits & Authorizations									

STEP/TASK	START	END	JOINT YES?	FWS-ES (enter name here)	Action Agency (enter name here)	Other (enter name here)	Other (enter name here)	Other (enter name here)	Other (enter name here)	Other (enter name here)
ACTIVITY BLOCK II.										
BEGIN NEPA DOCUMENT DEVELOPMENT, PRE-CONSULTATION										
4. JOINT KICKOFF MEETING			Date step 4 completed _____							
POCs identified (all agencies – use PCT table)										
Identify all Construction Permits needed										
Identify Cooperating Agencies										
Site Visits										
General effects ID'd										
• Species										
• Cultural										
• Water										
• Etc.										
Avoidance, Minimization, Mitigation options discussed & incorporated										
NOI to prepare EIS										
Public Scoping										
Public Scoping Meeting										
PCT AGREEMENT NEEDED TO PROCEED										
<i>Transition from DOPAA to Draft NEPA Document</i>										
5. Develop project details (e-copies shared)			Date step 5 completed _____							
Maps (updated, detailed)										
Deconstruct the Action										
Avoidance BMPs identified										
Minimization BMPs identified										

STEP/TASK	START	END	JOINT YES?	FWS-ES (enter name here)	Action Agency (enter name here)	Other (enter name here)	Other (enter name here)	Other (enter name here)	Other (enter name here)	Other (enter name here)
Mitigation BMPs identified										
Monitoring Plan included										
Long-term maintenance activities included										
Refine Purpose & Need										
Stakeholder Coordination										
Refine Alternatives, Resolve Issues										
PCT AGREEMENT NEEDED TO PROCEED										
6. Final Project Details (e-copies shared amongst PCT)			Date step 6 completed							
Reviewed by all PCT										
All items in step 5 complete										
Preliminary draft EA/EIS development in coordination with Cooperating Agencies										
Begin drafting permit requests for construction										
PCT AGREEMENT NEEDED TO PROCEED										
7. Draft BA development (use BA format, e-copies shared amongst PCT)			Date step 7 completed							
Executive summary										
Project description		N/A		Insert agreed-upon text from Step/Task 6.						
Include Permit Info										
Description of Species & Habitats										

STEP/TASK	START	END	JOINT YES?	FWS-ES (enter name here)	Action Agency (enter name here)	Other (enter name here)	Other (enter name here)	Other (enter name here)	Other (enter name here)	Other (enter name here)
Environmental Baseline										
Effects Analysis										
Collaborate with Interagency partners, share draft EA/EIS										
PCT AGREEMENT NEEDED TO PROCEED										
8. Final BA (e-copies to PCT)			Date step 8 completed							
Final comments incorporated										
Coordination among action agencies for initiation letter										
Incorporate BA into EA/EIS/Permitting docs										
PCT AGREEMENT NEEDED TO PROCEED										
ACTIVITY BLOCK III.										
NEPA, CONSULTATION, PERMITTING										
9. Request s7 Consultation			N/A							
Prepare & Publish DEIS NOA										
Distribute DEIS										
10. Receive Conc./ Draft BO			N/A							
Apply for Special Use Permits										
11. Draft BO Review			N/A							
Public Meeting										
Public Review Ends										
Collaborate on Public comments with Coop. Agencies										
Public Review on SU Permits										

STEP/TASK	START	END	JOINT YES?	FWS-ES (enter name here)	Action Agency (enter name here)	Other (enter name here)	Other (enter name here)	Other (enter name here)	Other (enter name here)
12. BO finalized/issued			N/A						
Review & Respond to Comments									
Prepare & Publish final EIS									
FONSI/ROD									
Permits Issued									
ACTIVITY BLOCK IV.									
PROJECT IMPLEMENTATION/POST PROJECT REPORTING									
13. Construction, BMP Implementation, Monitoring			N/A						
Invite Project Development Team, land managers to pre-con mitg									
Identify POCs									
Monitor BMPs, reporting mechanism established									
Report Project Changes									
14. Communicate with FO & Land Mgrs.			N/A						
Site visits									
Email updates									
Telephone contact									
15. Follow-up Documentation Final Report submitted			N/A						
Mitigation completed									
16. Update Environmental Baseline			N/A						
Long-term effects monitoring/tracking									

ELEVATION PROCESS

The Action Agency will work directly with FOs (and other appropriate agencies) on project level consultations. (Note that there will be actions and issues not related to specific projects that may involve the Service’s Washington Office working with Regional Office staff; for instance, programmatic consultations and policy or procedural matters.)

When the FO and the Action Agency are not able to reach agreement, any member of the team may request the elevation of the issue. The FO and the Action Agency will cooperate to document issues and each agency’s position by submitting the following form to the appropriate representatives within (an agreed-upon time) days of the decision to initiate elevation. Additional boxes may be added for other PCT member positions.

The first elevation team will respond to the FO/Action Agency team within 30 days to notify them of their resolution or planned action. If resolution cannot be reached by the first elevation team, the issue will be elevated to the next level identified in Table 2, with 30 day responses at each step.

If resolution is not achieved through the elevation process, the Structured Coordination Process is documented as unachievable (signed below), and the Action Agency may opt to continue the process through the standard section 7 process.

Table 2. Levels of Elevation

Decision Process		Project Coordination Team <small>(staff level technical team)</small>	Decision-maker Team	Elevation Team
	FWS-ES			
	Action Agency			
	(List other appropriate Team members here)			

POSITION STATEMENTS

Joint Problem Definition: _____

FWS Position (one paragraph, six sentence limit) articulating the issue from the FO perspective.

Submitted by _____	Date _____

Action Agency Position (one paragraph, six sentence limit) articulating the issue from the Action Agency's perspective.

Submitted by _____	Date _____

Elevation team response (resolution or justification for ending the Structured Coordination Process)

Submitted by _____ (FWS) and _____ (Action Agency)	
Date _____	

Elevation Signatures

Project Coordination Team/Decision-makers

FWS-ES	Date
Action Agency	Date
	Date
	Date
	Date
	Date
	Date
	Date
	Date
	Date

Elevation

	Date
	Date
	Date
	Date