Peer Review Plan

Scientific Assessment informing Biological Assessment for 2027 Klamath Project Long—Term Operations Environmental Compliance

Date: October 20, 2026

Originating office: Bureau of Reclamation, California Great Basin Region, 6600 Washburn Way, Klamath Falls, Oregon, 97603

Reclamation roles:
Director or delegated manager: Adam Nickels, Acting Regional Director, California Great Region, Bureau of Reclamation

Peer Review Lead: Amanda Babcock, Natural Resources Specialist, Klamath Basin Area Office, Bureau of Reclamation

Subject and Purpose:

The Klamath Project was authorized in 1905 with the purpose of providing water for irrigation and related purposes (e.g., stock watering) to approximately 230,000 acres of farmland in southern Oregon and northern California.

Reclamation is required to comply with the Endangered Species Act (ESA) by consulting with the U.S. Fish and Wildlife Service and the National Marine Fisheries Service to ensure that Klamath Project operations do not jeopardize federally listed species or adversely modify their designated critical habitat.

Reclamation intends to reinitiate consultation under the ESA for long-term operations by developing a Biological Assessment (BA) to analyze the effects of operating the project for its authorized purposes.

The BA will describe biological conditions and critical habitat within the action area relevant to and impacts associated with Klamath Project Long-Term Operations. It is anticipated that the BA will document stressors identified in previous assessments and biological opinions, listing materials, recovery plans, status reviews, and scientific literature; and propose conceptual models that identify pathways for conditions in the environmental baseline versus operational effects on which to consult. On decision-support, this approach would support what is anticipated to be a focused effects analysis and, where incidental take is anticipated, an incidental take statement addressing take attributable to discretionary operations, and non-operational conservation measures and long-term adaptive management.

Reclamation seeks to assure the quality of scientific assessment within the BA per Reclamation's Peer Review Policy CMP-P14, which defines scientific assessment as:

"An evaluation of a body of scientific or technical information that typically synthesizes multiple factual inputs, data, models, assumptions, and/or applies best professional judgment to bridge uncertainties in the available information. These assessments include, but are not limited to, state-of-science reports; technology assessments; weight-of-evidence analyses; meta-analyses; ...".

The BA includes scientific assessment because BA development requires synthesis and application of many scientific information items including observational data, analytical tools, modeling analyses, and peer-reviewed literature information concerning hydrological, operational, and biological conditions relevant to the consultation. Aligned with this definition, Reclamation does not seek to regard the entire BA as scientific assessment; rather, Reclamation seeks to assure the quality of the scientific assessment within the BA.

Quality assurance interests include the curation of hydrological, operational and biological scientific information (e.g., data, models, analytical tools, etc., as defined in CMP P14), how that scientific information is applied, and how synthesis of the applied scientific information reflects best professional judgment to bridge uncertainties.

Two other peer review plans complement this HISA plan and are published on Reclamation's Peer Review Agenda:

- An Influential Scientific Information (ISI) peer review plan for Keno Release Model (KRM) model *development*, which includes KRM's development and application prior to its use in the 2026 Klamath Project Long-Term Operations studies.
    - Review of KRM's *application* for the 2026 Klamath Project Long-Term Operations studies is included in the scope of this HISA plan, which includes KRM's configurations and results reflecting the Proposed Action in relation to baseline conditions.
    - Parsing the KRM model *development* and *application* reviews into a series of two reviews has two benefits: (1) enables the ISI peer review of KRM development to be completed sooner, and (2) enables the same external KRM reviewer to serve on both plans, with KRM application review occurring in the HISA peer review context, allowing for the HISA review team to have the KRM reviewers' expertise at their disposal as KRM results are synthesized with other biological scientific information.
- An ISI peer review plan for Klamath Basin Hydro-Economic Model (KBHEM) model development and application for NEPA effects disclosure associated with 2026 Klamath Project Long-Term Operations. Because KBHEM is only informing NEPA documentation and not BA development, it is not included within this HISA peer review plan.

<u>Impact of Dissemination</u>:

The level of required peer review on the scientific assessment within the BA depends on whether the scientific assessment is regarded as Highly Influential Scientific Assessment (HISA). Such determination depends on whether the scientific assessment may be deemed novel, controversial, or to have significant interagency interest with respect to Reclamation or other known public policies or private sector decisions (per federal information quality requirements and policy summarized in CMP-P14). This scientific assessment is deemed to meet the definition of HISA requiring peer review as defined by the Office of Management and Budget Final Information Quality Bulletin for Peer Review (70 FR 2664-2677) and Reclamation Manual Peer Review of Scientific Information and Assessments Policy (CMP P14), given the following anticipated aspects of this scientific assessment:

- use in BA development and associated Klamath Project decision-support.

- novel and complex synthesis of contemporary science in the basin.
- significant amount of interest anticipated among federal and non-federal audiences.

Per CMP P14, HISA peer reviews are required to be done by experts external to Reclamation.

Peer Review Scope:

Peer reviewers will be asked to provide responses relative to the following questions:

- Does the scientific assessment appropriately leverage valid scientific information?
- Do the analyses underlying the scientific assessment reflect properly interpreted and applied scientific information?
- Does the synthesis of the interpreted and applied scientific information reflect best professional judgment to bridge uncertainties, and reasonably consider applicable comments from interested parties on scientific assessment content within the draft BA?

Timing of Review:

Review is anticipated to be completed by Spring 2027.

Methodology of Review:

Reviews will be conducted by a team of experts external to Reclamation. The identities of the reviewers will be disclosed in the final Peer Review Summary. The peer review process will not provide opportunities for public participation.

The review team will have expertise spanning for hydrology, water system operations, freshwater fish biology, salmonid biology, stream geomorphology/ecology, aquatic ecology/water quality, and application of these knowledges for the subject consultation. One or more of the review team members are expected to have knowledge of ESA Section 7 BA assembly. Reviewer team members will be independent from the scientific assessment subjected to this peer review.

Number of Peer Reviewers:

As many as five reviewers will be used from the groups described in the Methodology of Review.

Reviewer Selection Process:

Each reviewer will be selected based on their domain knowledge described under Methodology of Review and application of that knowledge in the study area.

Delivery of findings:

Reviewers will deliver findings in a provided Excel spreadsheet. Each reviewer will also provide a summary paragraph with any major findings to be included in the review report.

Response to Peer Review:

A summary paragraph from each reviewer will be published on the Reclamation's peer review website (http://www.usbr.gov/main/qoi/peeragenda.html) along with a response to comments if there were any major concerns.

Federal Register Notice:

Federal Register notices will not be provided announcing the formation of a peer review team and completion of the final report.

Applicability of the Federal Advisory Committee Act (FACA): This peer review is not subject to the Federal Advisory Committee Act (FACA) because the review does not involve open meetings or committee chartering; and, reviewers are being asked to provide individual reviews on the subject matter. Reclamation is not seeking consensus advice from the reviewers as a group.

Agency Contact:

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