Preparation for

CHAPTER 1
Purpose and Need for Action

CHAPTER 2
Policy History

Implementing a Decision

Comparison of Alternatives

Chapter 3
Comparison of Alternatives

Chapter 4
Implementation and Responses to Change

for Implementing a Decision

Chapter 4

Factors Influencing Implementation

Responses to Change

Reserve Options for Future Action

Assessing the Environmental Conditions

CHAPTER 5
Affected Environment and Environmental Consequences

for Making a Decision

Choices for Managing

CHAPTER 6
Governance

the Fish & Wildlife Mitigation & Recovery Efforts

CHAPTER 4 – IMPLEMENTATION AND RESPONSES TO CHANGE

- **Provides examples of factors** that can influence the success in implementing a Policy Direction.
- **Presents the options** available to assist implementation of the Policy Directions and strategies for accommodating future change.

Once the BPA Administrator, or any other decisionmaker, chooses a Policy Direction, it will need to be implemented. Individuals, groups, or agencies will take appropriate implementing actions, such as those provided as examples in the Sample Implementation Action Tables (Volume 3). Many natural, economic, and social environmental factors will strongly influence the ultimate success of these actions. If we have chosen well, fish and wildlife mitigation and recovery will improve at an acceptable social pace and economic cost.

Even if we have chosen as well as we can, we may find, in monitoring results that we need to change our implementation actions, or the overall Policy Direction itself. Successful mitigation and recovery may mean that the Region needs to manage its resources differently. On the other hand, our efforts may not be as successful or as speedy as we wish, or the consequences for other resources may prove unacceptable. Research and development may result in new types of implementation actions, or science may determine that other types of actions might better foster fish and wildlife mitigation and recovery. Federal or state officials and the actions they advocate may change, or the preferences of society may change. Regardless of the reason, eventually, any selected Policy Direction will likely need to be modified or changed. This EIS is designed to accommodate such need.

This chapter focuses on how a Policy Direction would be implemented in light of changing conditions and influencing factors, and how it could be modified to meet future needs.

4.1 FACTORS INFLUENCING IMPLEMENTATION

Many factors can influence an implementation action (or even an entire Policy Direction). Some factors outside human control—such as weather, ocean conditions, species-specific disease, and social or economic crises—can change the predicted effect of a particular course of action. Also, while the "relationship analysis" utilized in this EIS has proven very effective in past analyses, we must allow for the possibility that forecasts of future actions and their respective impacts may require adjustment over time. New decisionmakers and the decision-making process, itself, may also affect implementation. The method of implementation influences the success and effects of an

action. Methods of implementation include voluntary assistance and incentives, as well as regulation.

Using an adaptive management approach, BPA and other Federal agencies may adjust FCRPS operations over time as changing circumstances warrant. These circumstances may involve water supply, economic outlook, power market conditions, fish and wildlife, water quality, cultural resources, or other project uses.

For example, the NMFS 2000 BiOp recognized that water management actions might change due to unforeseeable power-system, flood-control, or other emergencies. Other emergencies can include a power emergency—one based on insufficient power supply to meet demand in the Pacific Northwest. There can also be West Coast power shortages that threaten health and human safety and require an emergency response from BPA. During 2001, poor water conditions in the Columbia River Basin, coupled with an extraordinary power market on the West Coast, caused an unprecedented situation. Changes in hydropower operations were required to help maintain an adequate and reliable power supply for the Region and surrounding area (see Chapter 2 for a more detailed description).

Emergency actions are a last resort. They are not used in place of the long-term plan. Therefore, such emergency operations will not alter the analysis in this EIS because they can be taken under any of the Policy Directions. The emergency actions are intended for a relatively short duration, especially when considered in the context of this EIS, which is intended to support decisions for a number of years. If the emergency actions do persist, they could signal the need to shift to a new Policy Direction.

4.1.1 Factors in the Natural Environment

The natural environment will likely change in ways that cannot be accurately predicted. Natural disasters can influence the success of a Policy Direction. For instance, wildfires, volcanic eruptions, or other natural events can destroy or alter habitat. Ocean conditions can change, with consequent effects on fish and wildlife. Changes in the natural environment can similarly affect human activities. Changes can affect fish and wildlife mitigation and recovery efforts directly (by affecting food, habitat, or reproductive success) or indirectly, as humans react to changes in the natural environment by revising their priorities and re-evaluating their commitments.

4.1.2 Factors in the Social and Economic Environment

Social and economic factors can also influence the implementation and success of a chosen Policy Direction. A Policy Direction may have broad effects on population, regional economies, or funding that affect its implementation. Many implementation actions—especially most habitat and harvest actions—will likely require economic and social changes that cannot simply be mandated. Instead incentives may be required to realize those changes. Examples of incentives include subsidy, acquisition, leasing, and

education. Regulation may be used by those having the authority to implement it, but it is likely this will be done sparingly.

Table 4.1-1 shows some of the possible factors that could affect implementation of any Policy Direction.

Table 4.1-1: Summary of Some of the Factors Influencing Implementation of the Policy Directions

CONDITIONS IN THE NATURAL ENVIRONMENT
▪ Natural disasters
▪ The relationships among fish and wildlife recovery, climatic change, normal climatic variations, and ocean conditions (these relationships are not well understood, but may affect the success of a Policy Direction, perhaps justifying a change in Policy Direction or implementation actions)
▪ Species extinction
FUNDING AND FISH AND WILDLIFE POLICY
▪ Changes in policy-makers
▪ Intervention by the Legislative, Executive, or Judicial branches, resulting in a loss of regional control over fish and wildlife mitigation and recovery
▪ Increased reliance on Federal taxpayers and the subsequent requirements attached to Federal funding
▪ Additional listing or delisting of fish and wildlife species
▪ Lack of regional commitment, financial or otherwise, to a fish and wildlife mitigation and recovery effort plan and subsequent Policy Direction
▪ Lack of identified BPA results and mechanism for monitoring/achieving those results
▪ Other agencies' or regional decisions on fish and wildlife mitigation and recovery efforts that affect BPA's revenue stream or increase costs
▪ Changes in laws and regulations requiring additional expenditures on fish and wildlife mitigation or prolonging implementation
▪ Perceived success or failure of fish and wildlife recovery and mitigation actions
ELECTRICITY MARKETS AND REGULATION
▪ A significant change in market price (perhaps altering BPA's maximum sustainable revenue (MSR) and ability to pay fish and wildlife costs)
▪ Electricity deregulation
▪ Economic recession or dramatic change
FACTORS SPECIFIC TO POLICY DIRECTIONS
▪ Ineffective BPA cost controls
▪ The need for changes in law
▪ Inability to affect population growth and development patterns in the Region
▪ Selection of implementation options (such as acquisition, leasing, positive incentives, regulation, education, and methods) and intensity of enforcement
▪ Monitoring programs and response to monitoring efforts
▪ Inability to enforce new regulations
▪ Inability to police restricted areas or activities

▪ Inability to establish successful Basinwide Strategy practices to achieve fish and wildlife results
▪ Lack of environmental constituent support for businesses using the river, which may undermine Policy Directions

4.1.3 Factors in the Decisionmaking Process

It is particularly important to understand how the interaction of public process, political intervention, and judicial review may affect implementation of fish and wildlife mitigation and recovery plans. There are three major functions in this interaction.

- **Decisionmaking.** The major public policy decisionmakers are the tribes, states, and Federal agencies that manage and implement fish and wildlife policy. They make the key decisions, and have the ultimate responsibility for implementing a regional fish and wildlife policy.
- **Influencing.** The general public—as a special interest group or individual concerned citizens—may influence the decisionmaking process. This influence can take the form of voting, political pressure, expressing opinions and/or introducing information on technical/scientific developments. Effective public involvement is essential to sound decisionmaking. The public's influence varies based on the conflict surrounding the particular policy issue. Where regional policy on fish and wildlife is concerned, public, scientific, and political discord is extremely high. Any individual or group dissatisfied with a process or a decision may seek redress as described below.
- **Intervening.** A dissatisfied party may seek redress through the Executive, Legislative, or Judicial branches of the respective governments. These entities can directly affect the direction of a decision or its execution. See Figure 4-1 for a brief description of the different avenues of relief.

In Chapter 1, we suggested that public policy might evolve in two different ways: policy by deliberate action (via technical, political, public, and legal input), or by simple default (due to inaction or delays in making formal policy). Figure 4-2 shows how each of these influences in the development of a fish and wildlife mitigation and recovery policy. The interrelationships among the regional decisionmakers, the public interest groups, and the various branches of Federal, state, and tribal governments are some of the checks and balances in the development and implementation of public policy.

Consensus building does not always mean unanimity of thought. Parties rarely reach complete agreement on any issue, much less on an issue as controversial as developing a fish and wildlife mitigation and recovery policy. The advantage, however, of the decisionmaking process is that even a lone dissenter has avenues of relief: through policy-makers, politicians, courts, or a combination of all three, he or she may try to persuade an entity with direct control over regional decisionmakers.

A prime example of this process for the fish and wildlife mitigation and recovery efforts can be seen in a review of the history of efforts to list Oregon Coast coho salmon under the ESA (see the "Judicial Impact on Natural Resource Policy" and "Problems in

Figure 4-1: Potential Avenues Used to Change Policy Maker Decisions

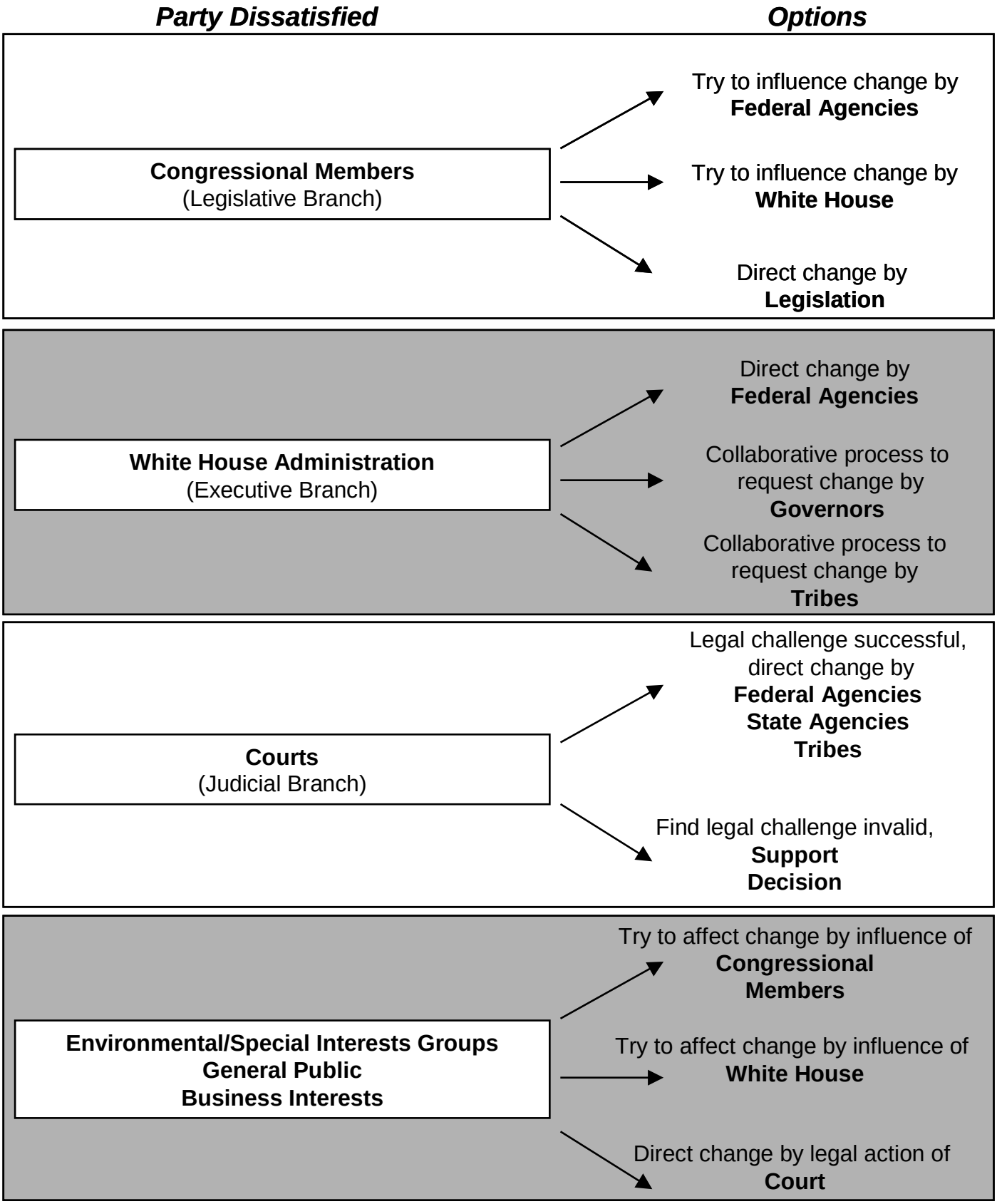
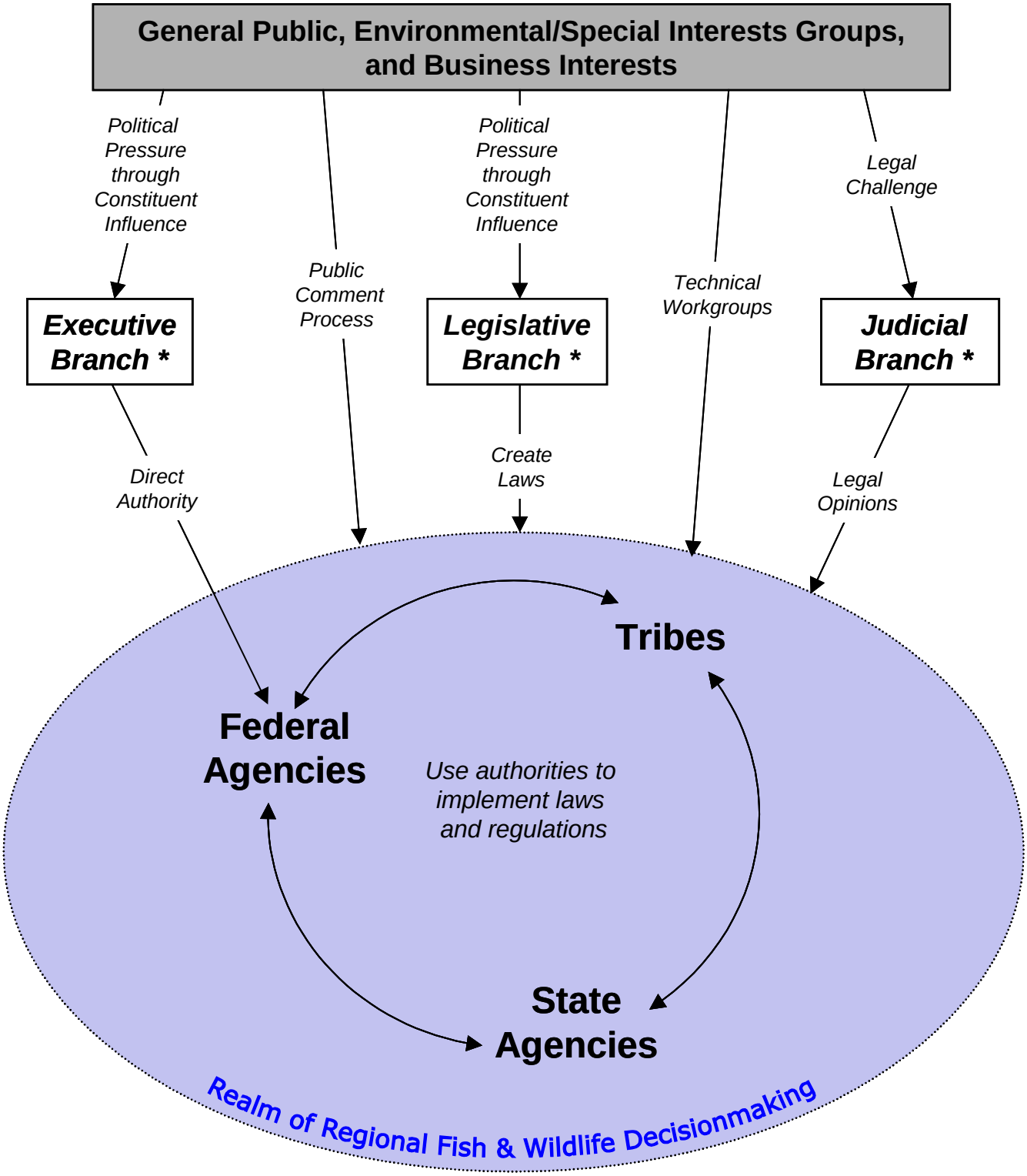


Figure 4-2: Influences on Regional Decisionmaking



* *NOTE: The regional decisionmakers face influences from several different levels.* A dissatisfied party may seek redress through:

- the **Executive Branch** - Federal: President and Administration; and States: Governors and their Administrations
- the **Legislative Branch** - Federal: US Congress; and States: Legislatures
- the **Judicial Branch** - Federal: District, 9th Circuit, and Supreme Courts; and States: District and Supreme Courts
- the **Tribes** have their own set of governing bodies (e.g., Tribal Councils)

Defining and Applying Listings" sections in Chapter 2 for a detailed description of this history). After several *decisions* by NMFS in the 1990s regarding fish policy, the checks and balances of the system began. First, in 1991, NMFS decided to issue a policy that introduced the term "evolutionarily significant unit" (ESU), which was NMFS' interpretation of the term "distinct population segment" under the ESA. Next, in 1993, NMFS decided to issue another policy providing that hatchery-spawned salmon were not part of the same ESU as the naturally spawned salmon proposed for listing, unless these salmon were considered essential to recovery of the ESU. Then, in 1998, NMFS decided to list only "naturally spawned" salmon as threatened in the Oregon Coast coho salmon ESU. Hatchery-spawned salmon from the same ESU were not listed because NMFS did not consider these salmon to be "essential to recovery" of the ESU. Finally, in 1999, parties dissatisfied with this listing decision began trying to *influence* NMFS' decisions by bringing a challenge in U.S. District Court. The court subsequently found NMFS' approach to the listing arbitrary and capricious, and thus *intervened* to have NMFS delist the Oregon Coast coho salmon ESU.

Instead of appealing the District Court's opinion, NMFS *decided* to conduct status reviews for this ESU as well as the other Pacific salmon and steelhead stocks listed in accordance with NMFS' hatchery salmon policy, to determine whether to reissue listings. As part of this review, NMFS has been conducting public review of its policy, allowing the public the opportunity to *influence* how hatchery-spawned salmon factor into listing decisions.

Various environmental and fishing groups who were dissatisfied with NMFS' decisions regarding the District Court's opinion once again tried to *influence* NMFS' decision by petitioning for the right to appeal the opinion to the Ninth Circuit Court of Appeals. They were granted the right to the appeal. The Ninth Circuit *intervened* by issuing a stay of the District Court's decision to delist the Oregon Coast coho salmon ESU, pending a Ninth Circuit ruling on the appeal. However, NMFS has nonetheless *decided* to proceed with its status review process for this ESU and others.

This series of decisions, influences, and intervention led to changes in NMFS' policy direction and related actions, changes that ultimately have altered the possible environmental consequences. As can be seen by this example, *decisionmaking, influencing*, and *intervening* all play roles in shaping and changing mitigation and recovery efforts for Pacific salmon ESUs. It is likely that future decisionmaking, influencing, and intervening will continue to affect how mitigation and recovery efforts are implemented for these species and others.

To reach a policy goal that will weather technical, legal, and political scrutiny, and to create a useful and enduring tool, we must make sure that any Policy Direction can be modified. The purpose of this EIS is to identify, in advance, the potential environmental consequences of various Policy Directions, so that all interests can be better informed of the potential consequences of their actions, including modification.

4.2 RESPONSES TO CHANGE

We know that change will occur—to the natural environment and to the social and economic environments. Any given Policy Direction might reach its intended goal, or it might fall short in one or more critical areas. Policies may change, but not all actions and effects can be changed as readily. We must be able to address future changes in the environment or in public policy. This EIS is designed to accommodate such changes: selecting a particular Policy Direction or combination of Policy Directions now does not foreclose changing the policy in the future.

To respond to change, BPA will routinely revisit and review the effects of its decisions (see Figure 3-3) on implementation of the selected policy alternative and make modifications, as necessary. Three tools help to make this process possible:

(1) response strategies that do not change the underlying theme of the Policy Direction;

(2) reserve options that extend the individual components beyond the endpoints established by the Natural Focus and Commerce Focus Policy Directions; and

(3) mix-and-match approach (hybrid alternatives) after the initial decision that changes the Policy Direction.

4.2.1 Modifications that Do Not Change the Policy Direction: Response Strategies

After the Region has decided on a particular Policy Direction, it is likely that economic, social, or natural environmental changes will require corrective measures to maintain the selected course. Response strategies allow immediate corrections or improvements *without changing the overall Policy Direction* in effect. Response strategies are used to facilitate implementation of fish and wildlife mitigation and recovery efforts and to mitigate for unforeseen or uncertain events such as changing ocean conditions or natural disasters. They represent management options within the agency's jurisdiction that have been contemplated, implicitly or explicitly, and evaluated in advance, allowing for immediate implementation.

Response strategies can be grouped into three categories: Management and Operating Agency Response Strategies, BPA Funding Response Strategies, and Regional Response Strategies.

4.2.1.1 Management and Operating Agency Response Strategies

As part of the normal course of operations, agencies must be prepared to deal with reasonably foreseeable events. When such events occur, a pre-designed and pre-assessed plan can be executed in a timely manner. Such advance preparation is usually the product of response strategies designed by both management and operating agencies.

Management responses associated with fish and wildlife mitigation and recovery efforts are developed through laws or regulations, public policy, or official plans. These responses are often influenced by Federal, state and tribal governments, the general public, or specific interest groups. These management responses do not directly interact with the natural environment.

Operating responses, on the other hand, are activities by the entities specifically authorized to carry out laws, regulations, policies or plans. For example, operating responses can include specific hydro operations, natural resource management, or construction activities.

Many Federal and state entities, as well as tribal governments, are frequently engaged in both management and operating responses. Over the past several decades, a combination of influences from agencies, courts, and others has shaped the development and management of the water, land, and fish and wildlife of the Columbia River Basin. Table 4.2-1 lists those entities with the most significant roles and responsibilities in implementing management and operating responses.

Table 4.2-1: Roles and Responsibilities

ENTITY	GENERAL REGIONAL RESPONSIBILITY
Primary Entities with Management Responsibilities	
Executive Branch	**Constitutional** – Manages the actions of the Federal agencies, certain veto powers
Judicial Branch	**Constitutional** – Determines whether actions are consistent with the U.S. Constitution, and Federal and state laws and regulations
Legislative Branch	**Constitutional** – Promulgates and amends laws as necessary; makes appropriations to complement laws
Tribes	**Treaty** – Sovereigns within the United States – Enforces Treaty rights and applicable Federal statutes
Northwest Power Planning Council	**Statutory** – Develops Regional Power Plan and Fish and Wildlife Plan under the Regional Act
NOAA Fisheries (formerly National Marine Fisheries Service)	**Statutory** – Pursuant to the ESA, produces Biological Opinions on regarding listed anadromous fish; regulates commercial/tribal harvest
Bonneville Power Administration (power marketing)	**Statutory** – Markets electric power and meets statutory obligations for fish and wildlife pursuant to the Regional Act (e.g., funding fish and wildlife mitigation measures).
U.S. Fish and Wildlife Service	**Statutory**– Pursuant to ESA, produces Biological Opinions on listed plants, wildlife, and resident fish
U.S. Army Corps of Engineers	**Statutory** – Oversees CWA regulations and implementation
Environmental Protection Agency	**Statutory** – Oversees CWA regulations and implementation, and general environmental oversight through NEPA
Federal Energy Regulatory Commission	**Statutory –** Regulates non-Federal hydroelectric projects on the Columbia River and its tributaries

ENTITY	GENERAL REGIONAL RESPONSIBILITY
Agencies with Primary Operating Responsibilities	
Bonneville Power Administration (transmission)	**Statutory** – Constructs and maintains a high-voltage transmission system throughout the Pacific Northwest. Provides primary transmission to electric utilities, public power suppliers, electric generators, and others needing wholesale transmission within and outside the Region
Bureau of Land Management	**Statutory** – Manages public forest and range lands
U.S. Forest Service	**Statutory** – Manages National Forest System Lands
U.S. Army Corps of Engineers	**Statutory** – Operates Federal dams and locks for multiple purposes including navigation, flood control, recreation, and power
Bureau of Reclamation	**Statutory** – Operates multiple purpose Federal dams and water projects for irrigation and flood control as well as power
Bureau of Indian Affairs	**Statutory** – Serves as trustee for tribal/individual Indian land and resources held in trust
State Fish and Wildlife Related Agencies	**Statutory** – Maintains separate and/or joint responsibility with the Federal government for regulating fish and wildlife, air, land, and water issues within their particular state

4.2.1.2 BPA Funding Response Strategies

Events outside BPA's control may impair the agency's ability to fund a chosen Policy Direction. This EIS presumes that such changes or unexpected results can and will occur. This section describes possible BPA strategies that will enable BPA to respond promptly to these challenges without changing the intent of the Policy Direction. Typically, these corrective measures would consist of an action(s) that would not require additional environmental analysis or process. However, should BPA determine that extraordinary circumstances exist, additional analysis, documentation, and public process could take place, possibly leading to Policy Direction changes as described in Section 4.2.2.

For example, if BPA's financial situation should change—a prolonged drought makes it impossible for the agency to recover sufficient revenues to meet its obligations—BPA could take action to (1) increase revenues, or (2) decrease spending, or (3) transfer costs in order to maintain the chosen Policy Direction. Table 4.2-2 provides examples of potential BPA funding response strategies. A more detailed discussion of response strategies is available in the BPA Business Plan EIS.[1]

[1] USDOE/BPA 1995a.

Table 4.2-2: Potential BPA Funding Response Strategies

Increase Revenues	Decrease Spending	Transfer Costs
Raise firm power rates	Eliminate power purchases	Seek 4(h)(10)(c) credit from fish and wildlife mitigation
Raise transmission rates to cover other power system costs	Reduce BPA spending on corporate overhead	Increase cost-sharing for BPA programs
Increase unbundled products and services revenues	Reduce Washington Nuclear Plan (WNP)-1, -2, and -3 spending	Reallocate costs and debt between power and non-power
Increase sales of new products and services	Reduce conservation incentive spending	Secure appropriations for BPA's costs
Implement a stranded investment charge	Reduce generation acquisition spending	Transfer program and financial responsibility
Increase seasonal storage	Reduce pollution prevention and abatement spending	Reduce mitigation and recovery actions from those BPA is authorized to implement to only those required by law*
Optimize hydro operations for net revenues	Reduce fish and wildlife spending	Prioritize projects and programs, giving lower priority items to outside entities to fund*
Increase extra-regional sales revenues	Reduce transmission construction spending	
Increase joint venture revenues	Share ownership and spending in new facilities	
Sell assets	Reduce operations and maintenance spending	
Increase rates for environmentally enhanced products*	Shift from revenue to debt financing	
Direct charge for environmental costs*	Seek increased Treasury borrowing limits	
	Lower probability of making Treasury payments	
	Restructure or refinance capital debt to reduce annual payments*	
	Prioritize projects and programs, extending implementation timeline to reduced the near-term costs*	

Source: BPA Business Plan EIS (USDOE/BPA, 1995a)
** Denotes additional examples for this EIS.*

4.2.1.3 Regional Response Strategies

Other Federal, state, tribal, or public entities may wish to develop administrative, operational, or funding strategies specific to their needs so that they may respond quickly to unexpected events, and still maintain the integrity of the chosen Policy Direction. Many of these response strategies would be consistent with existing environmental

documentation. Other response strategies would typically consist of those activities, which are the product of years of typical agency responses to change, and facilitate implementation of a chosen Policy Direction. Examples of such activities are noted below.

- *Planning Activities:* Archeological surveys or test excavations for cultural resources investigations.
- *Project Implementation Activities*: Classifying and certifying lands or fixing minor unsatisfactory environmental conditions.
- *Operations and Maintenance Activities*: Work that is within existing disturbed environmental areas and where the level of use will not increase and environmental conditions are satisfactory.

4.2.2 Modifications that Change the Policy Direction

Fish and wildlife policy in the Columbia Basin has changed over time, and is expected to continue to evolve. The specific actions being considered today are different from those that were considered 10 or 20 years ago. Developments in science and technology, past successes and failures, different people and priorities, changes in focus from salmon to multi-species, and a change in perspective from hydro actions to reviewing the interaction of all the "Hs" (habitat, harvest, hatcheries, and hydrosystem) are just a few examples of changes that have occurred recently. In the future a new Policy Direction may be needed to meet the changing needs of the fish and wildlife mitigation and recovery effort in the Region. The ability to quickly change a Policy Direction is crucial when time is a critical factor. For BPA, this ability to respond to change is also crucial in successfully competing in the electric utility marketplace. This EIS provides two tools for changing Policy Directions—Reserve Options, and the Mix and Match approach.

4.2.2.1 Reserve Options for Future Action

In the event that future developments necessitate changes beyond the specific actions currently being considered under the Policy Directions, we have identified Reserve Options to ensure that those future decisionmakers have the needed flexibility to respond to change.

All of the Policy Directions, discussed in Chapter 3, were characterized regarding their differences from Status Quo. These differences were divided into six components for each Policy Direction. These components addressed the changes in habitat, harvest, hatcheries, hydro, commerce, and tribal harvest. The Reserve Options are also characterized based on these components. These Reserve Options incrementally extend or intensify each of the six components discussed in the Policy Directions beyond the endpoints circumscribed in Natural Focus and Commerce Focus. Table 4.2-3 lists and describes the Reserve Options.

For example, the Natural Focus Policy Direction calls for removing four dams on the Snake River as well as two mainstem dams. Depending on the outcome, future

Table 4.2-3: Key to Reserve Options

Endpoints of the Reserve Options in the Fish and Wildlife Implementation Plan					
Fish and Wildlife Reserve Options					
Reserve Option	**Beyond Natural Focus Endpoints**	**Example**	**Reserve Option**	**Beyond Commerce Focus Endpoints**	**Example**
RO-1	Protect all levels of habitat	Protect pristine, marginal, and low-quality habitat for increased species diversity and abundance	RO-7	Set aside habitat only where there is little or no commercial value	Allows development of all areas that possess some commercial value even if existing habitat
RO-2	Ban all harvest	Total closure of all commercial and recreational harvest	RO-8	Allow unrestricted harvest	Eliminates regulatory control of commercial and recreational fishing, any limits or restrictions are lifted
RO-3	Eliminate hatcheries and all hatchery-produced fish	All hatchery are closed and all hatchery-produced are actively caught and removed	RO-9	Maximize artificial production through fish farming (private sector)	Eliminates the need for subsidized fish hatcheries and increases marketable fish production
RO-4	Breach/remove all mainstem dams	Remove all remaining mainstem dams after those removed under Natural Focus	RO-10	Maximize commercial benefits of the hydrosystem, including the construction of new dams	Hydrosystem is operated to maximize its multiple purposes such as power, navigation, irrigation, and recreation. New dams could be constructed on the mainstem or tributaries.
RO-5	Restrict growth and curtail economic development	Restricts development to control growth and preserve more natural conditions with less human pressure	RO-11	Maximize commercial use of natural resources	Increases the production, extraction, and use of natural resources, eliminating past restrictions
RO-6	Eliminate tribal harvest	Total closure of all tribal harvest	RO-12	Allow unrestricted tribal harvest	Allows unlimited tribal fishing, any limits or restrictions are lifted

decisionmakers may chose to breach additional mainstem dams. Consequently, one of the Reserve Options is to "breach, or remove all mainstem dams." With each step toward the endpoint of the Reserve Option, natural, economic, and social effects could become more intense and extensive, although the *kinds* of effects anticipated would remain the same. To more fully understand the anticipated effects of implementing the Reserve Options, please see Section 5.4.

When using Reserve Options decisionmakers must understand two important points:

- **A Reserve Option should be compatible with the other components of the new Policy Direction**
- **Public process will be required.**

4.2.2.2 Mix and Match Approach

By using the mix and match approach discussed in Section 3.5 and Appendix I, regional decisionmakers could revisit a chosen Policy Direction after it has been implemented and make changes. If a particular action or set of actions proved to be very successful, decisionmakers may want the flexibility to implement such actions on a broader scale. Conversely, if a particular action or set of actions were not producing the desired result, decisionmakers could substitute a more aggressive action or opt for a different strategy. By mixing and matching components of the basic Policy Directions, decisionmakers could create a new Policy Direction. Because the mix-and-match approach is used to *change a Policy Direction*, regional discussion and public process would likely be necessary.

In using the mix-and-match approach to change Policy Directions, one must keep in mind the cautions noted in Appendix I: consistency, effectiveness, clarity, coordination, cause-and-effect relationships, and compatibility of changes.

➲ **Chapter 5 presents the affected environment and environmental consequences of the different Policy Directions.**