

**United States
Department of
Agriculture
Forest Service**

**United States
Department of
Interior Bureau of
Land Management**

**United States
Department of
Commerce
National Marine
Fisheries Service**

**United States
Department of
Interior Fish
& Wildlife
Service**

File Code: 2670(FS)/6840(BLM) (OR-931)P
Route To:

Date: October 14, 1999

MEMORANDUM FOR: USDA Forest Service, Regional Foresters, Regions 1, 4, and 6,
Columbia River Basin

USDI Bureau of Land Management State Directors, Idaho,
Montana, Oregon, and Washington

USDI Fish and Wildlife Service, Regional Director, Region 1

USDOC National Marine Fisheries Service, Regional
Administrator, Northwest Region

FROM: Interagency Implementation Team

SUBJECT: Interagency Implementation Team Second Semi-Annual
Evaluation of Accomplishment of Requirements in June 22, 1998,
Biological Opinion on Continued Implementation of Land and
Resource Management Plans in the Upper Columbia and Snake
River Basins

This memorandum provides a status report from the Interagency Implementation Team (IIT) on the accomplishment of requirements in National Marine Fisheries Service's (NMFS) June 22, 1998, biological opinion (Opinion) on the subject actions. The Opinion was issued to complete Endangered Species Act (ESA) section 7 consultation in response to a September 16, 1997, biological assessment (BA) evaluating effects on listed salmon and steelhead of 18 U.S. Forest Service (USFS) and Bureau of Land Management (BLM) Land and Resource Management Plans (LRMP).

Through the Opinion, NMFS coordinated with USFS and BLM to develop five mechanisms that strengthen and focus species and habitat protection and restoration efforts during the extended application of interim strategies pending completion of the Interior Columbia Basin Ecosystem Management Project (ICBEMP). The five mechanisms are required terms and conditions of the consultation and must be completed within specific timeframes. The Opinion also requires that every six months NMFS evaluate the action agencies' accomplishment of the mechanisms to ensure consistency with the incidental take statement. The IIT is copying this letter and enclosures to NMFS to assist them in completing the second semi-annual evaluation, for the period December 23, 1998, to June 22, 1999. The IIT previously provided a February 5, 1999,

evaluation for the first reporting period which NMFS used in completing its first semi-annual evaluation (May 13, 1999, letter) of implementation of the Opinion.

The IIT is an interagency group created shortly after issuance of the Opinion. The IIT is charged with directing and overseeing implementation of the various requirements in NMFS' Opinion and in U.S. Fish and Wildlife Service's (USFWS) August 14, 1998, Opinion on bull trout. This team has met regularly for the last year, and has held candid, productive discussions to highlight and clarify the tasks in the Opinions and ensure they are implemented. The IIT has developed a strategy to implement the Opinions which includes: 1) creating four task teams to accomplish specific tasks; 2) directing and coordinating with management units to accomplish other tasks; 3) monitoring the accomplishment of management unit tasks; and 4) tracking accomplishments with monthly meetings of the IIT and task team leaders. The details of this strategy are described in the IIT charter, which was approved December 11, 1998, by the regulatory and management agency executives.

The IIT used information primarily from its monthly meetings and documents transmitted from management units and task teams to the IIT to complete its evaluation of implementation of the Opinion. The IIT has been very pleased with the unprecedented level of participation from both regulatory and management agencies in the implementation of the Opinion. The task teams and management units have made a strong effort to meet the requirements of the Opinion, and where implementation has been difficult the team has worked together to refine tasks and timeframes and achieve practical solutions while meeting the legal requirements of the Opinion. The IIT is committed to implementing each of the Opinion's many elements, and thus has identified some specific areas where implementation needs to be strengthened.

In its February 5, 1999, letter evaluating implementation of the Opinion over the first six months, the IIT identified specific recommended actions where needed to strengthen implementation of the Opinion. The evaluation below is in four sections: 1) a follow-up on the IIT's recommended actions from the first evaluation period; 2) additional recommendations in response to implementation needs during the second evaluation period; 3) a summary of the implementation to date of each of the five mechanisms in the Opinion; and 4) a summary of the implementation of the nine BA recommendations.

I. Status of Outstanding Recommended Actions from IIT's First Evaluation

During the first evaluation period the IIT found that most of the Opinion's mechanisms and subelements were underway and several had already been accomplished, though not always on schedule. The following elements are specific actions which the IIT recommended to improve implementation of requirements in the Opinion and BA, and the status of these actions through the end of the second evaluation period and up to the date of this memorandum.

1. *Issue from first evaluation period* - Missed timelines

Action - The IIT recommends: (a) increasing IIT members' and task team leaders' responsibilities for ensuring tasks are accomplished on schedule; and (b) developing implementation reports such as this memorandum beginning approximately one month before the regulatory reporting dates.

Status - The IIT has addressed item a) by assigning specific IIT members as liaisons/overseers of particular task teams. Item b) was provided by discussing drafts of this evaluation memorandum in May, June, July, and August IIT meetings.

2. *Issue from first evaluation period* - Insufficient intra-agency understanding of Opinion requirements and their implementation.

Action - The IIT recommends: (a) briefing the executives on the requirements of the Opinion and accomplishments to date; (b) increasing management units' understanding of the Opinion's requirements by conducting a one-day workshop to inform and gather ideas from management units.; and (c) distributing IIT meeting notes to the management units.

Status - Item a) was first accomplished with a briefing at the February 8, 1999 Executive Steering Committee (ESC) meeting. The IIT plans to provide an updated briefing for the ESC, Forest Supervisors, and District Managers during Fall 1999. Item b) was partially accomplished with a series of workshops during Spring 1999 regarding the IIT monitoring task team's grazing implementation monitoring module; however, the majority of the requirements in the Opinion and BA have not been presented in a workshop. Item c) was dropped when the IIT decided this would be of limited value, and that efforts were better focused on establishing/bolstering other links between the IIT and management units. The IIT has committed to improving its communication with the field by developing a chronology of direction/accomplishments related to implementation of the Opinion, and by making this and other information available on a WEB site.

3. *Issue from first evaluation period* - Lack of review of grazing allotments effects determinations.

Action - The IIT recommends that the IIT contact the management units to verify their compliance with this requirement.

Status - Accomplished.

4. *Issue from first evaluation period* - Need for feedback on and improvement of management units' batching/bundling of projects.

Action - The IIT recommends: (a) that each management unit (or collection of units) and its level 1 and 2 teams meet as a group to determine how well they accomplished the batching/bundling requirement in the Opinion, and to develop a list of recommendations that will guide the next batching/bundling exercise and will be submitted to the IIT; and (b) that the IIT summarize managements units' input and provide overall guidance to the units on effective procedures for batching/bundling.

Status - The first step in evaluating and improving on batching/bundling was made with the action agencies requests for, and subsequent reports from management units on their accomplishments of the elements of the Opinion and BA (BLM June 26, 1999, report; USFS July 13, 1999, report). The IIT has also identified a team to evaluate how well batching and bundling was accomplished and make recommendations to help guide future batching/bundling efforts.

5. *Issue from first evaluation period* - Lack of progress on the mechanism addressing unroaded areas

Action - The IIT recommends: (a) that the regional executives assist the IIT in making this a priority and procuring the time of agency scientists to be members of the unroaded areas task team; and (b) that this task team accelerate their efforts to accomplish the mechanism.

Status - After difficulties obtaining staff time to complete this requirement of the Opinion, this task is underway, with the team having met twice and taking steps (described below under Mechanism 3) to accomplish this task.

6. *Issue from first evaluation period* - Lack of recent review of how well management agencies are exercising existing authorities, particularly with respect to actions involving mining, ANILCA, and the Ditch Act.

Action - The IIT recommends that it: (a) oversee the compilation of a list of these authorities; (b) provide direction to management units to clarify existing authorities; and (c) periodically evaluate if management units' use of their authorities meets the requirement in the Opinion.

Status - An IIT subgroup has begun this process by providing a list of the questions which should be answered to clarify existing authorities. This list will be refined by a larger task team. The IIT subgroup will then request answers to these questions from experts among the action agencies. The questions and answers will be summarized in a memorandum from the IIT. The June 26, 1999, and July 13, 1999, implementation reports from the management units indicate that most units determined existing authorities are being exercised, whereas some units reaffirmed the need for further clarification of those existing authorities. There is a need for consistent interpretation of authorities/policies between Forests and Districts.

7. *Issue from first evaluation period* - Lack of information on how well management units are implementing the special management considerations for projects in the South Fork Salmon, Middle Fork Salmon, and Selway River subbasins.

Action - The IIT recommends that the IIT obtain from each relevant management unit a summary of how these management considerations are incorporated in project design.

Status - The June 26, 1999, and July 13, 1999, implementation reports from the management units indicate that the special management considerations, where applicable, are either in progress or completed.

8. *Issue from first evaluation period* - Need for clearer vision of the multi-year strategies to accelerate restoration, per Opinion mechanism 5b.

Action - The IIT recommends that the IIT provide a description of what is envisioned, in addition to the specific wording in the Opinion, to guide primarily the restoration team, and also other teams whose products will be used in developing the restoration strategy.

Status - Accomplished.

9. *Issue from first evaluation period* - Lack of information on implementation of BA recommendations.

Action - The IIT recommends that it request this information from the management units and their level 1 teams.

Status - The June 26, 1999, and July 13, 1999, implementation reports from the management units provide this information. The implementation of BA recommendations were generally reported as either completed or in progress, with some specific notes from each unit expounding on the "in progress" rating.

II. Additional Recommended Actions IIT Identifies in this Second Evaluation Period

1) The IIT identified a need to begin addressing long term elements of mechanism 5. The long term elements will be needed if the Interior Columbia Basin Ecosystem Management Project (ICBEMP) is not in effect for the 2000 field season. Current information indicates ICBEMP will not be in effect for the 2000 field season.

2) The IIT recommends revising the management unit surveys so the second semi-annual survey includes BA recommendation 1 and provides clearer information on the level of units' accomplishments.

3) The IIT recommends that the strategy for restoration funding/program of work review (mechanisms 1c and 5b) be completed as soon as possible.

III. Accomplishment of Five Mechanisms

Enclosure 1 provides a table summarizing the IIT's findings on the accomplishment of the five mechanisms and their subelements. This table includes a brief description of each mechanism and subelement, the regulatory reporting and interagency checkpoint dates, and a brief description of what has been accomplished. The text below provides additional description of the status of these mechanisms and subelements.

Mechanism 1 - The Opinion requires that the management agencies develop a mechanism for accountability and oversight that ensures PACFISH direction, direction in the LRMP Opinions, and BA recommendations are fully implemented through a mechanism other than level 1 teams. The Opinion requires reporting accomplishment of this mechanism to NMFS by November 1999.

As noted in enclosure 1, almost all subelements of this mechanism have been accomplished. Two subelements are still in progress: the review of the fiscal year program of work for attainment of fish conservation measures, and program for monitoring commensurate with on-the-ground activities. The program of work review is being addressed in concert with funding the restoration strategy. This program of work interagency review did not occur as planned for 1999; however, the steps are being taken to ensure it occurs as part of an effective restoration program in 2000. The IIT has reviewed several drafts of a strategy regarding restoration funding and program of work review, and held a meeting August 6, 1999, to pull together this strategy so that it can be effective for FY 2000. Regarding the monitoring subelement which is still underway, the monitoring task team is in the process of drafting an aquatic monitoring package which will provide effectiveness monitoring for grazing and other activities.

Mechanism 2 - The Opinion requires that the management agencies complete prior commitments in PACFISH, LRMPs, and previous Opinions. The primary commitments identified are implementation of PACFISH grazing standard GM-1 and range monitoring, road evaluation and planning requirements in line with PACFISH standards RF-2 and RF-3, and batching/bundling of projects by watersheds instead of submitting project by project consultations. The Opinion requires reporting accomplishment of this mechanism to NMFS by January 15, 1999.

The subelements of this mechanism were underway at the end of the first reporting period (ending December 22, 1998), and further progress has been made during the second reporting period. The grazing implementation monitoring module was completed April 7, 1999, and was put in place with several workshops overseen by the IIT. As noted above, the monitoring task team is now completing other aspects of the monitoring program. Also, the roads task team completed its task with an April 29, 1999, report and roads database of existing electronic information. The roads task team is currently working to fill gaps (e.g., electronic information for BLM units) in the database, and to provide better information on road conditions and priorities for treatment related to aquatic restoration. The batching/bundling of projects by watershed has continued to occur and has been completed on several units during the second reporting period. Most units completed bundling for a one-year period, so the watershed BAs

will need to be updated and new consultations completed for most actions proposed for 2000 and beyond.

Mechanism 3 - The Opinion requires that the management agencies implement conservation actions based on mapping and analysis of unroaded areas and areas of species occurrence. The Opinion also requires submission of an implementation report for this mechanism to NMFS by September 1, 1999.

The unroaded areas task team met in June and July 1999 and developed an approach to accomplishing this task which the IIT approved in its August 3, 1999, meeting. The approach entails a GIS based analysis by the team and GIS staff following a protocol developed for the Nez Perce National Forest. The products of this analysis will be: 1) descriptions, maps, and a data layer of unroaded areas; 2) descriptions, maps, and a data layer of current management direction in these areas; and 3) descriptions, maps, and a data layer based on a coarse assessment of the value of these areas for listed fish species. These products will be passed to the field units in November 1999 for refinement and recommendations where field units feel additional protections are warranted. The team will in turn analyze the information provided by the field and forward technical recommendations to senior managers regarding additional protection, if needed, for these areas.

Mechanism 4 - The Opinion requires that the management agencies exercise existing authorities on land management programs with a pattern of adverse effects (e.g., mining, water conveyances, and some non-Federal activities enabled by Federal road access permits) in accordance with ESA section 7(a)(1). This mechanism will be tracked at the project level and does not require plan-level reporting under the Opinion.

An IIT subgroup has begun this process by providing a list of the questions which should be answered to clarify existing authorities. This list will be refined by a larger task team. The IIT subgroup will then request answers to these questions from experts among the action agencies. The questions and answers will be summarized in a memorandum from the IIT. The June 26, 1999, and July 13, 1999, implementation reports from the management units indicate that most units determined existing authorities are being exercised, whereas some units reaffirmed the need for further clarification of those existing authorities. There is a need for consistent interpretation of authorities/policies between Forests and Districts.

Mechanism 5 - The Opinion requires that the management agencies implement long-term strategies to accomplish BA recommendations 4, 5, and 7. The Opinion also requires that if ICBEMP is not in place for the 2000 field season, the agencies must begin implementing key components of a long-term aquatic conservation strategy. Annual implementation reports are required for this mechanism beginning in May 1999.

As noted in enclosure 1, subelements of this mechanism which were due during the first and second reporting periods (adhering to special management considerations, developing the restoration strategy, and providing a schedule for watershed analyses) have been completed. The IIT notes, however, that subelements which come into play if ICBEMP may not be implemented for the 2000 field season (basin review, subbasin assessments, and watershed action plans based

on subbasin assessments) have not been scheduled for completion. The IIT plans to develop an approach, preferably paralleling ICBEMP, to meet these requirements now that it appears likely ICBEMP will not be in place for field season 2000.

IV. Accomplishment of BA Recommendations

The nine recommendations in the BA have been effect since September 16, 1997, when the BA was issued. Some of the recommendations (recommendations 5 and 7) have been further developed and incorporated as one of the five mechanisms, the implementation of which was discussed above. The other recommendations involve elements of section 7 consultation, and are implemented primarily through the consultation streamlining process. As noted in enclosure 2, the June 26, 199 and July 13, 1999, management unit survey results showed that the recommendations have been or are being implemented by all units where the recommendations apply. The units were not asked to address recommendation 1 (regarding application of requirements in the 1995 Opinion); this question should be added to the next semi-annual survey.

Summary

The IIT believes that it has developed a solid, productive interagency approach to implementing the Opinion. Elements of implementation have proved difficult and have caused some delays; however, the IIT finds that over the past year a large portion of the requirements have been accomplished, and substantial progress has been made toward accomplishing the other requirements. The IIT plans to continue to track the specific actions identified during the first and second reporting periods, continue to move forward with positive solutions to complete these actions and meet each requirement of the Opinion, and continue to build solid working relationships between the agencies which will be critical for both interim and long term approaches to recovery of listed species.

/s/Gordon Haugen
GORDON HAUGEN
Interagency Implementation Team Coordinator

enclosures

Enclosure 1

1998 LRMP Opinion Mechanisms for Extended Implementation of PACFISH

Regulatory Reporting Date			
	Mechanism (#s correspond to Opinion Appendix 2)	Inter-agency Check-point	Task Accomplished?
November 1998 Deliverable Received: IIT meeting notes provided a partial description of accomplishments re: this mechanism. This memorandum completes the description.			
	1a. Develop mechanism for accountability and implementation of plan-level direction.	October 20, 1998	Yes. IIT and task teams established (chartered December 11, 1998)
	1b. Establish priority watersheds for steelhead.	August 21, 1998	Yes. Priority watersheds submitted to NMFS January 15, 1999.
	1c. Review fiscal year work program for attainment of fish conservation measures; identify shortfalls; given shortfalls, mutually develop strategy to implement aquatic conservation measures.	By March 1 each year	In progress: draft guidance developed in August 6, 1999 meeting
	1d. Implement monitoring commensurate with on-the ground activities and provide feedback to NMFS on the effects of the activities.		In progress. Monitoring task team finishing grazing strategy, drafting monitoring protocols re: other activities
	1d.1. Review NMFS' 1995 LRMP Opinion expectations when updating the PACFISH monitoring strategy.		Yes. Monitoring task team is referring to this in developing strategy
	1d.2. Activate the PACFISH monitoring subgroup to develop monitoring strategy commensurate with activity, funding, and staffing levels.	October 20, 1998	Yes. Monitoring task team established
	1d.3. Improve implementation of PACFISH by, for example, expanding regional, state, line officer involvement in oversight and review.		In progress. This is a goal of the IIT
January 15, 1999 Deliverable Received: This document provides the report to NMFS on this mechanism			
	2a.1. Improve and monitor grazing strategies to meet PACFISH standard GM-1. An interagency group will develop stratified monitoring plans and link these to adaptive management of grazing to ensure compliance with PACFISH.	Prior to 1999 Grazing Season	In progress. The implementation monitoring plan is complete. Effectiveness portion being developed; validation portion not yet done.

Regulatory Reporting Date			
	Mechanism (#s correspond to Opinion Appendix 2)	Inter-agency Check-point	Task Accomplished?
	2a.2. Monitoring plans in 2a.1. will be fully implemented beginning in 1999. Alternative monitoring approach may be approved by the interagency team. Without approved monitoring, only grazing allowed is that which level 1 team deems "not likely to adversely affect."	1999 Grazing Season	In progress. Implementation monitoring module in place; effectiveness being developed
	2b.1. Provide NMFS with road inventories on the management units using existing information and road definitions. Provide missing information within two years.	October 20, 1998/ June 22, 2000	Accomplished. Roads team provided IIT and Restoration Team with maps of roads and road densities April 29, 1999.
	2b.2. Collaborate with NMFS in developing multi-year road restoration strategies for priority watersheds		In progress (see element 5b)
	2b.3. Annually update road inventories	October 20 each year	(element not due)
	2c. Conduct biannual programmatic reviews and/or project bundling by watershed or subbasin. Provide updated environmental baseline using best available information; group, analyze, and submit the ensuing two years' projects in these biannual reviews.	January 15, 1999 and each subsequent year	In progress. Some units provided this, others still compiling. Units are including many but not all 99/00 actions

Regulatory Reporting Date			
	Mechanism (#s correspond to Opinion Appendix 2)	Inter-agency Check-point	Task Accomplished?
September 1, 1999	Deliverable Received:		
	3. Convene team of agencies technical experts and research scientists to guide an assessment of unroaded and low density roaded areas in relation to conservation of listed salmon and steelhead. Assessment will include items below.		In progress. Team convened, beginning tasks
	3a. Provide descriptions, locations, and maps of unroaded and low density roaded areas, and existing information on the relative habitat value of the areas for anadromous fish.	October 1, 1998	In progress. Team has strategy to have a coarse evaluation of these elements to give to management units for refinement by November 1999
	3b. Summarize existing management direction in these areas.	October 1, 1998	In progress. Part of team's coarse evaluation, to be verified by the field.
	3c. Technical/research team reviews this information and makes recommendations to senior managers regarding at a minimum: need for additional habitat protection; risks to listed fish from developmental activities; priorities for subbasin assessments and watershed analyses; connectivity between areas; and restoration priorities. Proposed roading of these areas not submitted for consultation until this mechanism is completed.	March 1, 1999	In progress. Team would evaluate refined information and recommendations from units and would provide its recommendations to senior managers. (Re: deferment of roading these areas, unknown since areas not yet delineated)
	3d. Provide a mutually agreed on strategy to accomplish any additional habitat protections recommended by the technical/research team.	September 1, 1999	(element not due)
	4. Exercise existing authorities per ESA section 7(a)(1) to protect critical habitat from activities associated with laws that may conflict w/ ESA (e.g. ANILCA, Ditch Act, mining laws, etc.)	Effective June 22, 1998	In progress. IIT subgroup compiled authorities needing clarification and will seek clarification from action agency staff

Regulatory Reporting Date			
	Mechanism (#s correspond to Opinion Appendix 2)	Inter-agency Check-point	Task Accomplished?
Annually, Beginning May 1999 Deliverable Received:			
	5a. Adhere to special management considerations for South Fork Salmon, Middle Fork Salmon, and Selway River subbasins (refer to enclosure 2, action item 4) via consultation streamlining and accountability mechanism 1a., above.	Effective June 22, 1998	Yes. Relevant units report this is being done.
	5b. Develop multi-year strategies to accelerate restoration of habitat for listed anadromous fish in the Snake and upper Columbia River basin priority watersheds. Include specific projects, incorporating restoration opportunities from mechanisms 2 and 3, above. Strategy provides basis for implementation of restoration in 1999 and subsequent years.	March 1, 1999	Yes. Top ten list provided for FY 1999. Restoration team has finalized its strategy, and will begin implementing via budget planning for FY 2000.
	5c. Provide schedule for completion of at least one watershed analysis per management unit per year beginning in 1999. When available, subbasin assessments (mechanism 5d.3.) should be used to prioritize watersheds for analysis.	September 20, 1998	Yes. List sent to NMFS February 15, 1999
	5d. In the event that ICBEMP may not be implemented by the 2000 field season, begin providing and implementing components of a long term strategy listed below.		(element not due; however, IIT needs to begin preparing for this)
	5d.1. Initiate basin reviews for the Snake and upper Columbia River basins. Review will include: delineation of migration corridors, metapopulations, and subpopulations of listed salmon and steelhead; subbasin priorities for further review based on value for, and level of risk to the listed fish; and determination if other subbasins warrant the special management considerations described in proposed action item 4 (refer to enclosure 2). Develop strategy to provide any protection deemed necessary for additional subbasins within 6 months following basin review.	December 15, 1999	(element not due; however, IIT needs to begin preparing for this)
	5d.2. Complete one subbasin assessment per management unit per year. Priorities for assessment provided by basin review. Mutually agree on protocols and products for these assessments.	May 1, 2000, and each year thereafter	(element not due; however, IIT needs to begin preparing for this)
	5d.3. Develop action plans at watershed scale based on goals and objectives identified in subbasin assessments. This should be coordinated with the restoration strategies in 5c., above.		(element not due; however, IIT needs to begin preparing for this)

Enclosure 2

Proposed Action Items (BA Recommendations adopted as part of the plan-level action)

Action Item (#s correspond to Opinion Appendix 1)	Timeframe	Implementation check
1. Continue applying NMFS 1995 BO and all subsequent related direction, and extend application to the Clearwater and upper Columbia River basins.	Effective starting September 1997	Unknown. This information not requested of the units. Likely being applied via level 1 teams
2. Extend to steelhead the 17 project-specific Opinions already developed for salmon.	The agencies will use current direction (plan-level and consultation streamlining) to complete consultations on these projects	IIT not aware that this has been done; some of these projects have been completed and no longer require consultation.
3. Consult on ongoing actions using consultation streamlining direction and NMFS' matrix. Prior to the consultations an interagency team will modify the matrix as needed for the Snake River and upper Columbia River basins.	Approximately August 21, 1998	In progress. Many units accomplished this. A few dealt with ongoing and proposed actions together and will soon complete consultation.
4. Apply special management considerations for management of the South Fork Salmon River, Middle Fork Salmon River, and the Selway River subbasins. These measures include restrictions on road building, timber harvest, grazing, and recreation activities. Specific fire management and riparian area management techniques are required. Emphasis is placed on road closures, obliterations, and repairs to reduce the effects of existing roads on the listed species (Opinion pp. 78-80).	Effective as of September 1997	Yes. Relevant units report these special management considerations are being applied.
5. Accelerate restoration of steelhead habitat in the Snake River basin. Mutually develop and fund restoration.	Effective September 1997	In progress. Restoration team working on this (see enclosure 1, above)
6. Review commercial and non-commercial recreational boating and floating for adverse effects on steelhead spawning; eliminate/minimize effects. Review recreational facilities as ongoing actions.	Effective September 1997	In progress. Most units report that reviews in progress, some completed
7. Strengthen monitoring and commitment to insure PACFISH is properly implemented; includes increased emphasis and scheduling of watershed analysis	Effective September 1997	Several IIT task team tasks involved. See enclosure 1, above.
8. Treat watersheds within range of the two steelhead ESUs as key watersheds and designated critical habitat	Effective September 1997	Yes. All units report this is occurring.

Action Item (#s correspond to Opinion Appendix 1)	Timeframe	Implementation check
9. Adopt these items (1-8, above) for an indefinite period pending adoption of new, long-term programmatic direction	Effective September 1997. Duration of these items as part of the interim approach depends on when consultation on LRMPs must be reinitiated (refer to Opinion, p.59-60)	