



United States
Department of
Agriculture

Forest
Service

Pacific
Northwest
Region

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File Code: 2670

Date: June 17, 2005

Mr. Kemper McMaster, State Supervisor
Oregon Fish and Wildlife Office
2600 SE 98th Avenue
Portland, OR 97266

Dear Mr. McMaster:

In accordance with regulations on interagency cooperation (50 CFR 402) pursuant to Section 7 of the Endangered Species Act (ESA) of 1973 (as amended), the USDA Forest Service, Pacific Northwest Region (Region 6) requests consultation on the Proposed Action described and analyzed in the *Pacific Northwest Region Invasive Plant Program; Preventing and Managing Invasive Plants Final Environmental Impact Statement* (EIS). The selected alternative (Proposed Action) of this EIS will amend the Land and Resource Management Plans (LRMPs) of all National Forests in Region 6: Colville, Deschutes, Ochoco (including Crooked River National Grassland), Fremont, Winema, Gifford Pinchot (including Washington portions of the Columbia River Gorge National Scenic Area), Malheur, Mount Baker-Snoqualmie, Mount Hood (including Oregon portions of the Columbia River Gorge National Scenic Area), Okanogan, Wenatchee, Olympic, Rogue, Siskiyou, Siuslaw, Umatilla, Umpqua, Wallowa-Whitman (including Hell's Canyon National Recreation Area), and Willamette National Forests.

The Proposed Action (the selected alternative) described in the EIS and analyzed in the Biological Assessment (BA) amends LRMPs to improve and increase consistency of invasive plant prevention and allows the use of an expanded set of invasive plant treatment tools. The Proposed Action also includes restoration requirements and an inventory and monitoring framework. Key features of the Proposed Action include reducing ground disturbance and limiting the introduction and spread of invasive plants, increased emphasis on early detection and treatment of new infestations, increased emphasis on protecting and restoring healthy native plant communities, and the requirement for long-term site goals that will link treatment to prevention, restoration and monitoring in an integrated and adaptive process. The Proposed Action will substantially improve the ability of Region 6 to restore habitat that has been degraded by invasive plant species, and protect habitat that has not yet been infested. These efforts will potentially contribute to the protection and restoration of designated or proposed critical habitat and recovery of ESA-listed species.

The enclosed Biological Assessment (BA) addresses the LRMP amendments, as well as the potential effects from future activities conducted according to the LRMP amendments. The Proposed Action (i.e. the LRMP amendments including standards, goals, and objectives) **does not authorize any activities or projects to be implemented**. Future projects must conduct site-specific analysis and consultation, when applicable, before implementation can occur. However, future actions (such as the use of certain herbicides) can be considered for use because of the



LRMP amendments; it is the potential effects of these future actions that the BA analyzes. Please note that the effect determinations for specific future project-level actions have not been made.

The BA concludes that potential future actions conducted according to the LRMP amendments “may affect, and are likely to adversely affect” the following species and designated critical habitat, and we therefore request formal consultation on: northern bald eagle (*Haliaeetus leucocephalus*), northern spotted owl (*Strix occidentalis caurina*), marbled murrelet (*Brachyramphus marmoratus*), western snowy plover (*Charadrius alexandrinus nivosus*), showy stickseed (*Hackelia venusta*), MacFarlane’s four o’clock (*Mirabilis macfarlanei*), Spalding’s catchfly (*Silene spaldingii*), Lost River sucker (*Delistes luxatus*), shortnose sucker (*Chasmistes brevirostris*), Oregon chub (*Oregonichthys crameri*), bull trout (Coastal/Puget Sound, Columbia River, and Klamath distinct population segments)(*Salvelinus confluentus*), bull trout (Columbia River and Klamath distinct population segments) designated critical habitat, Oregon silverspot butterfly (*Speyeria zerene hippolyta*) and designated critical habitat, and Bliss Rapids snail (*Taylorconcha serpenticola*).

The BA concludes that potential future actions conducted according to the LRMP amendments “may affect, but are not likely to adversely affect” the following species and designated critical habitat, and we therefore request concurrence on this conclusion for: grizzly bear (*Ursus arctos horribilis*), gray wolf (*Canis lupus*), Canada lynx (*Lynx canadensis*), woodland caribou (*Rangifer tarandus caribou*), Wenatchee mountains checkermallow (*Sidalcea oregana var. calva*) and critical habitat, MacDonald’s rockcress (*Arabis macdonaldiana*), Gentner’s fritillary (*Fritillaria gentneri*), Cook’s lomatium (*Lomatium cookii*), Ute ladies’-tresses (*Spiranthes diluvialis*), Kincaid’s lupine (*Lupinus sulphureus kincaidii*), and Warner sucker (*Catostomus warnerensis*).

The FS analysis concludes that the proposed action will have no effect on the following species and critical habitats: American brown pelican (*Pelecanus occidentalis*), Fender’s blue butterfly (*Icaricia icarioides fenderi*), northern spotted owl critical habitat, marbled murrelet critical habitat, and Warner sucker critical habitat.

In addition, the LRMP action area included proposed critical habitat for the following species: western snowy plover, Coastal/Puget Sound bull trout, and the Lost River and shortnose suckers. We have made a “may affect” determination for the western snowy plover and Coastal/Puget Sound bull trout critical habitats, and request conferencing following formal consultation procedures for these proposed critical habitats.

In the case of the Lost River and shortnose suckers, a substantial amount of time has lapsed since critical habitat for the Lost River and shortnose suckers was proposed. It is the belief of the FS that any final designation may involve substantial modifications to the original proposal. It appears unlikely that conferencing following formal consultation procedures would provide an Opinion that could be directly applied in the event that critical habitat is designated. After discussions with the U.S. Fish and Wildlife Service, and as a result of the analysis in the BA, the FS has determined that the Proposed Action will not result in destruction or adverse modification of proposed critical habitat for the Lost River and shortnose suckers. Therefore, based on the conferencing requirements in 50 CFR 402.10(a), we are not requesting a conference using consultation procedures for critical habitat for the Lost River and shortnose suckers.

We have submitted a draft BA to the Level 1 Team and incorporated their suggested changes into the final BA. The Level 1 team for this consultation process has agreed to the content of this final BA.

We plan to sign the Record of Decision for the EIS by September 8, 2005, and therefore request conclusion of formal consultation/conference before that date. To meet this schedule, we request a final draft of the Biological Opinion for Forest Service review by August 22. We will respond with any comments by August 29.

If you have any questions, please do not hesitate to contact Shawna Bautista at: (503) 808-2697.

Sincerely,

/s/Mike Ash (for)

LINDA GOODMAN
Regional Forester

1 Enclosure
1- Biological Assessment

cc:
Robin Bown, Oregon Fish and Wildlife Office, 2600 SE 98th Avenue, Portland, OR 97266
Sarah Madsen, FS
Scott Woltering, FS