

**File Code:** 2670

**Date:** January 19, 2007

Ken S Berg, Western WA Office Manager  
U.S. Fish and Wildlife Service  
510 Desmond Drive SE, Suite 102  
Lacey, WA 98503

Steve Landino  
National Marine Fisheries Service  
510 Desmond Drive SE, Suite 103  
Lacey, WA 98503

Dear Ken and Steve:

In accordance with regulations in interagency cooperation (50 CFR 402) pursuant to Section 7 of the Endangered Species Act (ESA) of 1973 (as amended), we, the Responsible Officials for the Columbia River Gorge National Scenic Area (CRGNSA), Gifford Pinchot National Forest (GIP), and Olympic National Forest (OLY) are requesting consultation on the Proposed Actions described and analyzed in the *OLY Environmental Impact Statement Beyond Prevention: Site-Specific Invasive Plant Treatment Project* and the *GIP and CRGNSA Environmental Impact Statement Site-Specific Invasive Plant Treatment Project*. In addition, we are requesting conferencing following formal consultation procedures for species proposed for listing, see Table 1. We are requesting formal consultation for the Proposed Actions and as agreed upon by the Level II team, we are requesting a Letter of Concurrence for certain treatment areas on OLY, GIP, and CRGNSA (Washington side) listed in Attachment A.

The Proposed Action described and analyzed in the enclosed Biological Assessments (BAs) is to treat in a timely manner, using a variety of treatment methods and techniques, existing, and new infestations of invasive plants. Treatment objectives are to contain, control and/or eradicate invasive plants where they are doing the most damage on the OLY, GIP, and CRGNSA (Washington side). The Proposed Action includes the use of 10 herbicides and other non-herbicide methods for purposes of treating and restoring invasive plant sites. The OLY proposes to treat an estimated 3,830 acres of invasive plants, and GIP and CRGNSA an estimated 2,710 acres of invasive plants. Project Design Features (PDF) or Criteria (PDC) included in the Proposed Action will be followed to eliminate or minimize potential adverse effects of herbicide and non-herbicide treatment methods. A key feature of the Proposed Action is the Early Detection/Rapid Response (EDRR) process which allows for invasive plant treatment "within the scope of the EIS" to occur on new sites, sites that are expected to be found over the next five to fifteen years. The EDRR component of the Proposed Action is programmatic in nature.

The Proposed Action includes an Implementation Planning Process to ensure that the treatments of new site treatments are similar to those analyzed and that PDFs are appropriately applied. This process will ensure that treatments of new infestations would have effects within the scope of those disclosed in the BAs.

On August 8, 2005, we initiated the informal consultation process as outlined in the July 1999 Streamlined Consultation Procedures for Section 7 of the Endangered Species Act by requesting early participation from your staff. Rachel Friedman from NOAA Fisheries and Patty Walcott from USFWS have been participating as Level 1 team members dedicated to our tri-unit EIS effort. The Level 1 team helped provide a framework for the analysis provided in the enclosed BAs. The first Level 2 meeting held on June 27, 2006 addressed timelines and the consultation process. Although a signed consultation



agreement was not completed, the Level 2 members verbally agreed to adhere to the consultation agreement that was drafted for signatures.

The OLY BA concludes that the Proposed Action “**may affect, but are not likely to adversely affect**” the following species and designated critical habitat, and therefore, we request concurrence on this conclusion for: bald eagle (*Haliaeetus leucocephalus*), northern spotted owl (*Strix occidentalis caurina*), and marbled murrelet (*Brachyramphus marmoratus*), Puget Sound chinook critical habitat, and Hood Canal summer-run chum critical habitat. The OLY BA concludes there will be “no effect” for designated critical habitat for the northern spotted owl, marbled murrelet, and coastal Puget Sound bull trout.

The OLY BA also concludes that the Proposed Action “**may affect, and are likely to adversely affect**” the following species, and therefore, we request formal consultation for: Puget Sound chinook, Hood Canal summer-run chum, and Coastal Puget Sound bull trout, see Table 1 below.

In addition, the OLY BA concludes that actions conducted under the Proposed Action “**may affect, and are likely to adversely affect**” the Puget Sound steelhead trout, and therefore, we request conferencing following formal consultation procedures for this species.

Table 1. Federally Listed Species on Olympic National Forest.

Species on Olympic National Forest	Listing Status	Species Effect Determination <sup>1</sup>	Critical Habitat	Habitat Effect Determination
<b>Birds</b>				
Bald eagle	Threatened	NLAA	No	N/A
Northern spotted owl	Threatened	NLAA	Designated	No Effect
Marbled Murrelet	Threatened	NLAA	Designated	No Effect
<b>Fish</b>				
Puget Sound Steelhead Trout	Proposed	LAA	No	N/A
Puget Sound Chinook	Threatened	LAA	Designated	NLAA
Hood Canal Summer-run Chum	Threatened	LAA	Designated	NLAA
Coastal Puget Sound Bull Trout	Threatened	LAA	Designated	No Effect

<sup>1</sup> NLAA (Not Likely to Adversely Affect); LAA (Likely to Adversely Affect), N/A (Not Applicable).

The GIP and CRGNSA (Washington side) BA concludes that actions conducted under the Proposed Action “**may affect, but are not likely to adversely affect**” the following species and designated critical habitat, and therefore, we request concurrence on this conclusion for: bald eagle, northern spotted owl, and marbled murrelet, Middle Columbia River steelhead trout, Upper Columbia River steelhead trout, Snake River spring-summer run chinook, Snake River fall-run chinook, Upper Columbia River spring-run Chinook, Snake River sockeye, Lower Columbia River steelhead trout critical habitat, Middle Columbia River steelhead trout critical habitat, Lower Columbia River chinook critical habitat, and Columbia River chum critical habitat, see Table 2 below.

The GIP and CRGNSA BA also concludes that actions conducted under the Proposed Action “**may affect, and are likely to adversely affect**” the following species, and therefore, we request formal consultation for: Lower Columbia River steelhead trout, Lower Columbia River Chinook, Lower Columbia River coho, Columbia River chum, and Columbia River bull trout.

The GIP and CRGNSA BA concludes that the Proposed Action will have “no effect” on: gizzly bear (*Ursus arctos horribilus*), gray wolf (*Canis lupus*), coastal Puget Sound bull trout, or designated critical habitat for northern spotted owl, marbled murrelet, upper columbia River steelhead trout, Snake River spring/summer-run chinook, Snake River fall-run chinook, Upper Columbia River spring-run chinook, Columbia River bull trout, or Snake River Sockeye.

Table 2. Federally Listed Species on Gifford Pinchot National Forest and Columbia River Gorge National Scenic Area, Washington side.

<b>Species on Gifford Pinchot National Forest and Columbia River Gorge National Scenic Area (Washington side)</b>	<b>Listing Status</b>	<b>Species Effect Determination<sup>1</sup></b>	<b>Critical Habitat</b>	<b>Habitat Effect Determination</b>
<b><i>Birds</i></b>				
Bald eagle	Threatened	NLAA	No	N/A
Northern spotted owl	Threatened	NLAA	Designated	No Effect
Marbled Murrelet	Threatened	NLAA	Designated	No Effect
<b><i>Mammals</i></b>				
Grizzly bear	Threatened	No effect	No	N/A
Gray wolf	Endangered	No effect	No	N/A
<b><i>Fish</i></b>				
Lower Columbia River Steelhead Trout	Threatened	LAA	Designated	NLAA
Middle Columbia River Steelhead Trout	Threatened	NLAA	Designated	NLAA
Upper Columbia River Steelhead Trout	Endangered	NLAA	Designated	No Effect
Snake River Spring/Summer-run Chinook Salmon	Threatened	NLAA	Designated	No Effect
Snake River Fall-run Chinook Salmon	Threatened	NLAA	Designated	No Effect
Upper Columbia River Spring-run Chinook Salmon	Endangered	NLAA	Designated	No Effect
Lower Columbia River Chinook Salmon	Threatened	LAA	Designated	NLAA
Lower Columbia River Coho Salmon	Threatened	LAA	No	N/A
Columbia River Chum Salmon	Threatened	LAA	Designated	NLAA
Coastal Puget Sound Bull Trout	Threatened	No Effect	Designated	No Effect
Columbia River Bull Trout	Threatened	LAA	Designated	No Effect
Snake River Sockeye Salmon	Endangered	NLAA	Designated	No Effect
NLAA (Not Likely to Adversely Affect); LAA (Likely to Adversely Affect), N/A (Not Applicable).				

Based on previous Level 2 discussions and agreements, we are requesting a Letter of Concurrence for treatment areas listed in Attachment A within 30 days, and anticipate a Biological Opinion to be issued within 90 days upon receipt of this letter per CFR 402.14(e). We request a draft of the Biological Opinion for Forest Service review at least 14 days prior to final issuance and we will respond with any comments within 7 days upon receipt of the draft Biological Opinion.

Thank you for your cooperation.

Sincerely,



**/s/ DANIEL T. HARKENRIDER**  
DANIEL T. HARKENRIDER  
Columbia River Gorge National Scenic Area Manager



**/s/ CLAIRE LAVENDEL**  
CLAIRE LAVENDEL  
Forest Supervisor  
Gifford Pinchot National Forest



**/s/ DALE HOM**  
DALE HOM  
Forest Supervisor, Olympic National Forest

Enclosures

cc: Lynn Burditt  
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Attachment A

<b>Table 1. Gifford Pinchot NF and CRGNSA, WA side - Treatment Areas outside of the 100 ft buffer of streams with Federally-listed fish</b>			
TREATMENT_ID	SITE_DESCRIPTION	TREATMENT_ID	SITE_DESCRIPTION
31-01q	Quarry	33-11	RoadPlus
31-08q	Quarry	33-11q	Quarry
31-08r2	CampDispersed	33-11r1	Campground
31-08r3	Parking	33-11r3	Parking
31-09q	Quarry	33-12q	Quarry
31-09qa	Quarry	33-12r1	Campground
31-09r2	CampDispersed	33-12r3	Parking
31-10q	Quarry	33-12r4	Viewpoint
31-10qa	Quarry	35-13q	Quarry
31-10r1	Campground	35-14m	Meadow
31-10r3	Parking	35-14m2	Meadow
31-10r4	Viewpoint	35-14p	Plantation
31-19q	Quarry	35-14q	Quarry
33-03q	Quarry	35-14qa	Quarry
33-03qa	Quarry	35-14r1	Campground
33-05	RoadPlus	35-14r3	Parking
33-05q	Quarry	35-14r4	Viewpoint
33-05qa	Quarry	35-16qa	Quarry
33-05r2	CampDispersed	35-16r4	Viewpoint
33-05r3	Parking	35-17q	Quarry
33-06q	Quarry	35-17qa	Quarry
33-06qa	Quarry	35-18q	Quarry
33-07m	Meadow	35-18r3	Parking
33-07q	Quarry	<b>CRGNSA sites outside of 100 foot buffer</b>	
33-07r0	Admin	Portions of 22-09 Burdoin/Catherine/Major Cks	Forest
33-07r2	CampDispersed		
33-07r3	Parking		
33-07r4	Viewpoint		

Source feature class: ListedFish.mdb\TA\_gp\_outside100ft (qryTA\_gpWin100ft\_switch)

<b>Table 2. Gifford Pinchot NF and CRGNSA, WA side - Treatment Areas entirely outside of subwatersheds containing Federally-listed fish – determined as No Effect to ESA Fish and Designated Critical Habitat</b>			
TREATMENT ID	SITE DESCRIPTION	TREATMENT ID	SITE DESCRIPTION
31-08qa	Quarry	33-05m4	Meadow
31-09r1	Campground	33-05p1	Plantation
31-19qa	Quarry	33-05p2	Plantation
31-19r2	CampDispersed	33-05r0	Admin
33-04	RoadPlus	33-05r1	Campground
33-04m1	Meadow	33-05r4	Viewpoint
33-04p1	Plantation	33-11m1	Meadow
33-04q	Quarry	33-11qa	Quarry
33-04r1	Campground	33-11r2	CampDispersed
33-04r3	Parking	33-12qa	Quarry
33-04r4	Viewpoint	35-14m1	Meadow
33-05m1	Meadow	35-14m3	Meadow
33-05m3	Meadow	35-17r1	Campground
<b>CRGNSA sites outside ESA fish distribution</b>			
22-02 Mount Pleasant	Clearing	22-15 South BZ	Clearing
22-14 Wishram	Grassland		
Source Feature Class: ListedFish.mdb\TA_gpOutsideESAhuc6			

Attachment A

<b>Table 3. Olympic National Forest - Treatment Areas outside of the 100 ft buffer of streams with Federally-listed fish</b>			
TREATMENT_ID	SITE_DESCRIPTION	TREATMENT_ID	SITE_DESCRIPTION
9H-04	RoadPlus	*9P-07	Trail_multi
9H-06b	RoadPlus	*9P-08	Admin
9H-06c	RoadPlus	*9P-09	RoadPlant
9H-07	RoadPlus	*9P-10	RoadPlus
9H-08a	RoadPlus	*9P-11	RoadPlus
9H-08b	RoadPlus	*9P-12	RoadPlant
9H-10	RoadPlus	*9P-13	RoadPlus
9H-12	Campground	*9P-14	RoadPlus
*9H-14	RoadPlus	*9P-15	RoadPlant
*9H-15	RoadPlus	*9P-16	RoadPlus
*9H-16a	RoadPlus	*9P-17	GeneralForest
*9H-16b	RoadPlus	*9P-18	RoadPlus
9H-21	RoadPlus	*9P-19	RoadForest
9H-24	RoadPlus	*9P-19a	RoadPlus
9H-25	RoadPlus	*9P-20	RoadPlus
9H-26	RoadPlus	*9P-21	RoadPlus
9H-28	RoadPlus	*9P-22	RoadPlus
*9H-29 Buckhorn BA	Meadow	9P-25	RoadPlus
*9H-31	Meadow	9P-29	RoadPlus
*9H-32	CampDispersed	9P-30	RoadPlant
9H-Cranberry Bog Bot Area	Wetland	9P-31	RoadPlus
9H-Pats Prairie Bot. Area	Meadow	9P-35	RoadPlus
9H-Three O'Clock BA	Trail_multi	9P-37	RoadPlant
*9H-Three Peaks Botanical Area	GeneralForest	9P-39	RoadPlus
9H-Tyler Peak Bot. Area	GeneralForest	9P-44	RoadPlus
*9H-Wet Weather Ck Bot. Area	GeneralForest	9P-45	Trail_multi
*9P-01	RoadPlus	9P-BillsBog BA	GeneralForest
*9P-02	RoadPlus	9P-MthnyPr BA	GeneralForest
*9P-03	RoadPlus	9P-MthnyRdg BA	GeneralForest
*9P-04	RoadPlus	9P-NF Matheny Ponds BA	GeneralForest
*9P-05	RoadPlus	*9P-PineMt BA	GeneralForest
*9P-06	RoadPlus	*9P-SFkCal BA	GeneralForest
*9P-06a	RoadPlus		
<b>*Treatment areas on ONF that overlap into subwatersheds with no federally listed fish</b>			
Source Feature Class: ListedFish.mdb\TA_olyOutside100ft			

<b>Table 4. Olympic National Forest - Treatment Areas entirely outside of subwatersheds containing Federally-listed fish – determined as No Effect to ESA Fish and Designated Critical Habitat</b>			
TREATMENT ID	SITE DESCRIPTION	TREATMENT ID	SITE DESCRIPTION
9H-14	RoadPlus	9P-10	RoadPlus
9H-15	RoadPlus	9P-11	RoadPlus
9H-16a	RoadPlus	9P-12	RoadPlant
9H-16b	RoadPlus	9P-13	RoadPlus
9H-29 Buckhorn BA	Meadow	9P-14	RoadPlus
9H-31	Meadow	9P-15	RoadPlant
9H-32	CampDispersed	9P-16	RoadPlus
9H-Three Peaks Botanical Area	GeneralForest	9P-17	GeneralForest
9H-Wet Weather Ck Bot. Area	GeneralForest	9P-18	RoadPlus
9P-01	RoadPlus	9P-19	RoadForest
9P-02	RoadPlus	9P-19a	RoadPlus
9P-03	RoadPlus	9P-20	RoadPlus
9P-04	RoadPlus	9P-21	RoadPlus
9P-05	RoadPlus	9P-22	RoadPlus
9P-06	RoadPlus	9P-45	Trail_multi
9P-06a	RoadPlus	9P-PineMt BA	GeneralForest
9P-07	Trail_multi	9P-SFkCal BA	GeneralForest
9P-08	Admin		
9P-09	RoadPlant		
Source Feature Class: ListedFish.mdb\TA_olyOutsideESAhuc6			

Attachment A

<b>Table 5. Definitions for “site_descriptions” listed in Tables 1-4.</b>	
<b>Site Description</b>	<b>Description</b>
Admin	Administrative Site
CampDispersed	Dispersed Camp Site
Campground	Established Campground
Clearing	Clearing -manmade opening
Corral	Corral
Fire	Fire area
Fireline	Fireline, hand or machine constructed
FloodPlain	Flood Plain
GeneralForest	Forested Site not covered in other categories
Landing	Landing in a timber sale
Meadow	Meadow
OHV_Area	Off Highway Vehicle trails, staging areas, & Camps
Opening	Opening in a tree canopy, Natural
Parking	Parking areas
Plantation	Plantation
Pullout	Pullout area along a road
Quarry	Quarry
RadioTower	Radio and microwave facilities
RangeAllot	Range Allotmen
Resort_Permit	Resort or major permit areas
Road	Road prism
RoadOld	Road - Closed or decommissioned
RoadPlant	Road prism and adjacent plantation
RoadPlus	Road prism and adjacent disturbed areas
RoadStream	Roadside and Streamside
Stream	Stream Bank
SummerHome	Summer Home Tracts
Trail_hike	Trail, Hiking
Trail_multi	Trail, Multi_user
Utility	Utility corridor, powerline, pipeline, fiber optic, etc.
Viewpoint	Viewpoint areas along a road
HarvestUnit	Harvest Unit - not a plantation
Lake	Lake or Pond - adjacent to
RoadForest	Road prism, adjacent disturbed areas into Forest
Wetland	Wetland
Trail	Trail, Unknown use