

United States  
Department of  
Agriculture

Forest  
Service

R-6 OR/  
WA

Bureau of  
Land  
Management

United States  
Department of  
Interior

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**Reply Refer To:** 1900/2620/1950(FS)1736PFP(BLM) (OR-935)P **Date:** November 20, 2001  
**EMS TRANSMISSION 11/27/2001**  
**FS-Memorandum** **BLM-Information Bulletin No. OR-2002-033**

**To:** USDI Bureau of Land Management District Managers (Coos Bay, Eugene, Lakeview, Medford, Roseburg, Salem) and Field Managers (OR: Klamath Falls, Tillamook; CA: Arcata, Redding, and Ukiah) and USDA Forest Service Forest Supervisors within the Area of the Northwest Forest Plan

**Subject:** Answers to Questions on 2001 Survey and Manage Standards and Guidelines (Second Set)

Enclosed are answers to some of the more difficult questions asked during the February presentations of the January 2001 "Record of Decision and Standards and Guidelines for Amendments to the Survey and Manage, Protection Buffer, and other Mitigation Measures Standards and Guidelines" (S&M ROD). Also included are answers to other questions sent to Survey and Manage (S&M) agency representatives. Previously other questions on the implementation of the 2001 S&M ROD were addressed in the June 26, 2001, memoranda from the Bureau of Land Management (BLM) and Forest Service (FS) (BLM Instruction Memorandum No. OR-2001-214 and FS file code 1920/2600).

Previously, questions on the application of the 2001 S&M ROD to management activities in the planning phase, or with signed decisions as of the effective date of the S&M ROD (pages ROD 17-19), were addressed in the March 20, 2001, memoranda from the BLM and FS. These memoranda are: BLM Instruction Memorandum No. OR-2001-036 and FS Region 5 (R5) and Region 6 (R6) file code: 1920/2430.

Please address further questions to the appropriate S&M agency representative:

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or to the Interagency S&M Program Manager, Terry Brumley, [tbrumley@fs.fed.us](mailto:tbrumley@fs.fed.us), 503-808-2968.

Signed by  
Bruce A. Rittenhouse (for)  
TERRY BRUMLEY  
Survey and Manage Program Manager

Authenticated by  
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1 Attachment

1 - [Second Set of Questions](#) on Use of the Record of Decision and Standards and Guidelines (10 pp) (see below)

cc:	<u>BLM Distribution</u>
K. Anderson, R5	WO-230 (Room 204LS) - 1
P. Crumpton, R5	CA-330 (Paul Roush) - 1
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T. Brumley, R6	OR-912 (Cathy Harris, Allen Agnew, Chris Strebis) - 3
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SECOND SET OF QUESTIONS ON USE OF  
THE RECORD OF DECISION AND STANDARDS AND GUIDELINES

For Amendments to the Survey and Manage, Protection Buffer, and other Mitigation Measures  
Standards and Guidelines (January 2001)

PRE-DISTURBANCE SURVEYS

46. *Q. Should we just implement this new decision (2001 S&M ROD) or should we continue to conduct fungi surveys to keep up to date with the old decision (S&M and Protection Buffer portion of the 1994 NWFP RPD) or Settlement Agreement in case this new decision is enjoined?*

A. All projects without decision documents in place on February 12, 2001 must be surveyed in accordance with the 2001 S&M ROD. There is no need to do additional surveys to comply with the old decision or the "Settlement Agreement". The Settlement Agreement expired with the effective date of the ROD. BLM or FS may have identified certain sales where fungi surveys are recommended. Consult Lyndon Werner at BLM, Peggy Kain in Forest Service Region 6, and Brian Stone in Region 5 for advice regarding fungi surveys for agency timber sales.

47. *Q. Recently, the Office of Management and Budget required the expenditure of the new fire money to be used for local contractors. If there are no local contractors available to conduct surveys for our fire projects would this affect the "surveys practical" criteria?*

A. The criteria regarding survey practicality do not apply to site specific, local project situations. Instead the criteria apply at the plan-wide scale. The first sentence under "Practical Pre-Disturbance Surveys" on S&G page 24 indicates that the whole section following pertains to the identification of the placement of the species into the various Categories from a plan-wide perspective. The criteria listed on page 25 were applied in the development of Table 1-1 (S&G page 41-51), and will be used annually during the species review process. So, for the situation you describe above, this would not affect the practicality of surveys. If at a plan-wide scale available

or technically skilled surveyors are not available, this may affect the "surveys practical" criteria, and would be considered during the Annual Species Review.

48. *Q. Please interpret the following: "Pre-disturbance surveys are not required in the unusual circumstance that such a delay in implementation of the activity (to permit pre-disturbance surveys) would result in greatly increased and unacceptable environmental risk" (S&G page 22, 3<sup>rd</sup> paragraph).*

A. The wording above refers to urgent situations in which you determine that delaying action to conduct surveys would result in an unacceptable environmental risk (to whatever natural resources you are concerned with). You'll need to contact your REO representative to discuss the specific situation with them, and help determine if the urgency and environmental risk warrants not conducting surveys, as "Such circumstances are subject to review by the REO to ensure the urgency of the activity justifies the risk to species" (S&G page 22). In emergency situations, please instead defer to your agency regulations and operating procedures.

49. *Q. When is the "date of decision" (S&G page 24, "Timing..." section, 2d paragraph, 2d sentence) for stopping pre-disturbance surveys for the BLM?*

A. For BLM, there are basically two different situations that would constitute the "date of decision".

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The first is for all projects other than advertised timber sales. For these projects the "date of the decision" is the date that the notice of decision is published in the newspaper following the completion of the NEPA process.

The second situation is for advertised timber sales. For advertised timber sales, even though the NEPA process is complete, the notice to conduct an advertised sale constitutes the decision document and is the "date of decision". The effective date is described in 43 C.F.R. Â§5003.2(b).

As a general rule, the date that a decision is subject to protest is the "date of the decision".

#### PRE-DISTURBANCE SURVEYS - EQUIVALENT EFFORT

50. *Q. What is the appropriate "equivalent effort" survey protocol for the 3 mollusk species that do not have species-specific survey protocols (S&G pages 21 and 32; Ancotrema voyanum, Monadenia fidelis klamathica, M. f. ochromphalus)? When will these equivalent effort survey protocols be available? What do we do in the interim?*

A. We don't currently have protocols for these three species and surveys are not required until the survey protocol is prepared. We expect these protocols to be completed early in FY02. In the interim, surveys are not required for these species.

51. *Q. Are the mollusk equivalent effort surveys done in a broader, more up-to-date range than are the pre-disturbance surveys as described in the existing 1997 survey protocols?*

A. Equivalent Effort surveys are done for species for which pre-disturbance surveys are not practical. The range of the species is not a criterion for practicality of surveys thus does not enter into the difference between pre-disturbance surveys and equivalent effort surveys.

For the 5 equivalent effort mollusk species that currently have protocols in place, use the existing protocols and the range lines listed within them. Range expansions determining additional areas where surveys are required would be transmitted to the field as a result of the Annual Species Review or other analysis/assessment. For the 3 equivalent effort mollusk species that currently do not have protocols, when transmitted, the protocols for these species will indicate the range in which surveys are required.

#### PRE-DISTURBANCE SURVEYS - RANGE EXTENSION

52. *Q. What species have undergone a range extension based upon 2001 S&M ROD?*

A. Taxa leads will be assessing these changes and will respond with an information memo to the field. In the interim, you should be able to compare Table 1-1 in the S&M FSEIS ROD (S&G pages 41-51) with Table C-3 in the 1994 NWFP ROD (pages C-49 to C-61) to see where range changes may have occurred.

53. *Q. What is meant by "range expansion" on the top of S&G page 24? It seems like it could mean that the range expansion pertains to species like *Cypridium montanum* that are considered S&M in a part of their natural range beyond where they were identified on an earlier S&M list. Or maybe it could mean that the species has been found in a geographic area at some distance from where it had previously been known (e.g.: known only in WA in FEMAT, but later found in Coos Bay OR). Or it could mean both situations. Please clarify.*

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A. Both interpretations are correct. There are two definitions of "range expansion" used for interpretation of S&G page 24. The first situation you describe above refers to an expansion of where S&M requirements apply to a species within the species' range. For instance, previously S&M requirements were only applied west of the Cascades for *Cypridium montanum*, even though the species was also known east of the Cascades. The 2001 S&M ROD expanded the S&M requirements to the eastern Cascades as well, resulting in a "range expansion" for this species.

In the second situation, the "range expansion" refers to a geographic expansion of the species, where a species is located outside of its previously known range.

Both of these changes may occur through the RIEC confirmation of the annual species review process.

54. *Q. If we find an individual of a species in an area not previously considered part of its range, do we need to immediately start conducting surveys for it, between the old range line and where we just found it? (For example: an agency taxa expert said we should be surveying for a species found on adjacent admin units even if our admin unit is not identified in the protocol as within the range of the species.)*

A. No, you do not need to immediately begin surveying for this species. Use the range given in the Survey Protocol until official notice is given of RIEC confirmation of range changes. S&G page 24 indicates that "... information may ... expand the known range of a species requiring pre-disturbance surveys. Confirmation of such expansions will occur with RIEC approval of the results of the annual species review process."

55. *Q. Once an expanded species range is confirmed by RIEC through a transmittal to the field, would we need to do surveys in that expanded range for any project that does not yet have a decision?*

A. No, not necessarily. See S&G page 24: "Confirmation of such (range) expansions will occur with RIEC approval of the results of the annual species review process. Since protocols in these cases are already prepared, the survey requirement applies to activities whose NEPA decision or decision document is signed in the calendar quarter following the first full survey season (as defined in the protocol) after the expanded range is confirmed." For instance, if a range change is approved by RIEC in November 2001 and the survey window for the species is usually March through November, then surveys are required for any decisions signed after January 2003. RIEC approval of range changes through a transmittal letter to the field also constitutes the revision of range lines for the protocol and the requirements for pre-disturbance surveys.

#### PRE-DISTURBANCE SURVEYS - ROUTINE MAINTENANCE

56. *Q. The ROD states that "routine maintenance" is exempted from pre-disturbance surveys. What is meant by the term routine?*

A. In general, routine maintenance should be maintenance that occurs on some periodic schedule covering facilities and developments. Routine maintenance includes activities on developments that were intended to be maintained, designed to be maintained, or need to be maintained by law or normal fiscal concerns (protecting investments so they can continue to serve as designed). Examples include: earthen filled dams cleared of encroaching alder every 10 years; culverts cleaned when they clog; hazard trees or blowdown removed from campgrounds after infrequent windstorms; hazard trees along road right-of-ways; and powerline right-of-ways treated consistent with current permits. In general, these occur in areas where habitat has been previously disturbed.

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57. *Q. What about hazard trees in campgrounds? is this routine maintenance?*

A: Routine maintenance, including falling hazard trees in campgrounds, is not considered a habitat-disturbing activity (S&G's page 22), and thus does not trigger pre-disturbance surveys. Use standard methods to evaluate hazards. Treatment of hazard trees in campgrounds has two

separate aspects: felling and removal. With public safety being a chief concern, address the safety issue and then determine what to do with the log on the ground. Treatment of the fallen tree should be done consistent with the operations and maintenance management plan for the campground.

58. *Q. Does the felling and removal of hazard trees through a timber sale contract require pre-disturbance surveys for survey and manage species?*

A. If falling and removal of hazard trees is considered to be routine maintenance of the improvement or existing structure, then surveys are not required. A timber sale contract may be one way of dealing with this situation.

59. *Q: How about culvert work, is this routine maintenance?*

A. Keeping a road development safe, clean, and stable at frequent re-occurring intervals is usually considered routine maintenance. Additionally, culvert work is typically within a disturbed road prism area, which receives various routine maintenance activities.

#### MANAGE KNOWN SITES

60. *Q. ISMS instructions set minimum distances between separate detections that consider closer ones to be the same site. The S&M ROD glossary (S&G page 83) describes a site as "the polygon described by connecting nearby or functionally contiguous detections at the same location". Are the ISMS distances the same ones we must use to decide when nearby sites are "functionally contiguous"?*

A. Use professional judgment to determine if sites are functionally contiguous based on MR's for the species. The distances currently used in ISMS may be used as a general guide but these distances are not standards. Document your reasoning where it differs from the ISMS glossary.

61. *Q. The 1994 NFP S&G's page C-4 permit use of the actual Klamath/Siskiyou National Forest boundary when an S&G is different in Oregon than it is in California. Can the same logic be applied to Table 1-1, so the administrative units don't have to manage differently in the few acres across the border? For example, can the Siskiyou NF consider blue-gray tail-dropper off of S&M on its entire forest, including the section or two it has just across the border? Can the Klamath NF not manage for blue-gray tail-dropper on its land in Oregon?*

A. S&M ROD page 7, second paragraph, says that other S&G's in the NWFP remain unaffected by the S&M ROD. Page C-4 in the 1994 ROD is still valid and states: "Where standards and guidelines vary between northern California and Oregon, management along administrative unit boundaries instead of the state line is acceptable as long as it is consistent, is stated as the intent of the unit, involves only a slight fraction of the unit, and does not violate a clear assumption of these standards and guidelines." All managers may agree upon whether the administrative unit boundaries are used or the state line is used for Admin units with boundaries crossing the state line. For consistent application of the S&M S&G's, adjoining BLM and FS field

units should all agree to use the selected boundary (Admin unit boundary or state line) for all species and for all administrative units involved. Species where the California/Oregon boundary is used follow:

<u>Taxa Group</u>	<u>Species</u>	<u>CA Category</u>	<u>OR Category</u>
Fungi:	<i>Gomphus floccosus</i>	F	off
Lichens:	<i>Lobaria oregana</i>	A	off
Bryophyte:	<i>Ptilidium californicum</i>	A	off
Mollusk:	<i>Prophysaon coeruleum</i>	A	off
Vascular plant:	<i>Bensoniella oregana</i>	A	N/A

Note, the option of administrative boundary or state line can NOT be applied to *Sarcosoma mexicanum* or *Usnea longissima* as Table 1-1 incorporates southern Oregon counties as well as the state line indicating more specifically the area where the categories apply.

62. *Q. Since official Management Recommendations for salamanders are not approved, the S&M ROD provides direction for Del Norte Salamander site management: 40% canopy closure (S&G page 40). The Final SEIS (page 359), though, states there is conflicting guidance. It states that 40% canopy closure is likely too low for salamander survival. It further suggests that a denser canopy closure of 70% provides suitable habitat for this species. Additionally local field units have collaborated in local MR's that recommends 60% canopy closure. In implementing the ROD, are local line officers more vulnerable to challenge by using the 40% canopy closure standard rather than a higher level?*

A. S&G page 38 states "follow the former Northwest Forest Plan Protection Buffer direction... latest information (including that displayed in the November 2000 Survey and Manage FSEIS), and best professional judgment until a Management Recommendation is approved." Since the FSEIS indicates 40% canopy closure is likely to be too low indicating a higher canopy closure is appropriate, a higher closure should be followed. Follow the recommendations from the November 2000 FSEIS and local "best professional judgment".

63. *Q. On page S&G 24, there is a discussion of "Application of Manage Known Sites Direction" to sites found after the NEPA decision. The statement says management of known sites is "typically applied to additional sites of rare species". Is this a requirement?*

A. It is not a requirement, however, it is expected that in most situations management of these known sites would be applied. If a field unit is considering to not manage a rare site found after a NEPA decision is signed, document your rationale in the case file.

64. *Q. Does the application of "typically applied" in the above question require any review by REO or S&M Program Manager?*

A. No. "Typically" managing these sites does not require REO or Program Manager review.

65. *Q. During the course of our 1999 and 2000 timber sale surveys, we recorded the presence of component "3" & "4" species in the timber sale unit, but did not record the specific location of the species. The species location shows in ISMS as a central point within a timber sale unit polygon but is not the actual location. Some of these species that had not previously required known site management (Component 3 and 4) are now in categories that do (Categories B or*

*D). These sales were advertised March 1, which is after the effective date of the S&M ROD. If we didn't flag them on the ground or record their position, should they be considered known sites or not?*

A. No. The definition of known site (S&G page 76) indicates that known sites do "... not require additional species verification or survey by the Agency to locate the species." The definition of "site (as in occupied site)" (S&G page 83) includes the "location where a specimen ... was located, observed ... based on indicators described in the Survey Protocol or Management Recommendation. Also, the polygon described by connecting nearby or functionally contiguous detections at the same location." Your examples are not "known sites" if you cannot locate the sites from existing records or notes (including any indications you may have in your field notes) without doing additional field survey. If field notes do provide more precise location information, see "Application of Manage Known sites Direction" section on S&G page 24.

*66. Q. What happens to "previously managed" sites if the species is not removed from Survey and Manage but instead moved to a category that does not require management of the sites. For example, the snail, Megomphix hemphilli, moved to Category F, the direction for which says "manage known sites is NOT required". Does this direction allow us to assume that already existing management "may cease" even though the species is not "removed from Survey and Manage"?*

A. Yes it does, but not for the species you mention. Although *Megomphix hemphilli* (and *Monadenia churchi*) are in category F, footnote 5 in Table 1-1 (S&G page 51) references S&G page 32 that states, "these two mollusk species require management of sites known as of 9/30/99". For all other Category F species, your assessment is correct, and known sites in new actions are released for other management, the same as if the species had been removed from Survey and Manage. Following the transition language on ROD pages 17-19 and appurtenant agency transition interpretation memos (FS 1920/2430 and BLM IM OR-2001-036), this generally means activities without signed decisions need not include management of any of these sites. This may mean loss of some sites that were managed prior to the 2001-ROD.

#### CATEGORY "C" OR "D" - SPECIES AND HIGH PRIORITY SITES

*67. Q. Although no "high priority sites" have been determined for Categories C and D yet, other than manage all sites, is it necessary to manage new sites of these species (e.g. red tree voles) found after the NEPA decision has been signed but before the project has been awarded?*

A. No you are not required to provide for management of these sites, unless managers, in consultation with staff biological specialists, determine that the level of concern for the species warrants management at that site. Whether to manage new sites for uncommon species is at the discretion of the manager and should be made after considering species-specific factors affecting the level of concern for persistence of the species and its habitat in and adjacent to the area (See S&G page 24, "Application of Manage Known Sites Direction"). It would be good practice to document the rationale in the case file. The above answer does not apply to sites known prior to the NEPA decision (S&G p.10-12).

68. *Q: When is REO review required for local determination of non-high priority sites for Category C species?*

A. Refer to the bottom two paragraphs on page 10 of the S&G's. These two paragraphs address two distinctly different cases.

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The first paragraph applies where there are no Management Recommendations specifically addressing high priority sites. In this case, it must be assumed either that all sites are high priority or there is a four-step process to determine on a case-by-case basis those sites that can be considered non-high priority sites. This process of determining non-high priority sites does not require REO review, but does involve guidance from the Interagency Survey and Manage Program Manager and local interagency concurrence. {See September 21, 2001 memoranda from FS (2630) and BLM (IM OR-2001-036).}

The second paragraph on page 10 pertains to situations where high-priority sites have been designated through a MR. "Professional judgment, coupled with locally specific information and advice from taxa specialists about the species, may be used to identify occasional high-priority sites not needed for persistence. These exceptions will be reviewed by the REO."

69. *Q. Which species will have management recommendations completed (or at least started) this year for high-priority site selection?*

A. For Category C and D species, draft MR's to determine high-priority sites for at least these species will be underway this FY: Del Norte and Siskiyou salamanders; red tree vole; *Hemphillia malonei*; great gray owl; and *Cypripedium fasciculatum*.

70. *Q. What is the expected date for completion of the "final" Management Recommendations for the Del Norte Salamander? A MR for high-priority sites?*

A. Completion of the version 2.0 Management Recommendation for the five salamanders is one of the top priorities for the taxa team this year, and is currently being finalized. In addition, a draft Management Recommendation for High Priority Sites has been initiated, with the final completion due by the end of the fiscal year.

71. *Q. Once mollusk habitat areas are delineated for a project, are they there indefinitely? Or once the new MR's come out that identify high priority sites, can we adjust or remove these habitat areas?*

A. In answer to your first question, habitat or management areas are not necessarily present indefinitely. Management areas (or in this case, mollusk habitat areas) for all Category C and D species are intended to be in place until MR's for high priority sites are developed, an exception is granted, or the species category is changed or dropped from S&M through the Annual Species Review process. With regard to your second question, the new MR's determining high priority sites could allow for sites managed within an already completed project to be managed differently in the future. Some sites previously protected during a project's implementation may not need to be maintained in the long term to provide for continued persistence. If a new project is proposed

within the area where a site was previously managed under the old MR, the new MR or current approved S&M category would then be applied.

## STRATEGIC SURVEYS

*72. Q. For Category B species listed in Table 1-1 of the S&M ROD and habitat-disturbing activities in old-growth forest, what is the actual date in FY 2006 (S&G page 9) that triggers equivalent effort surveys needing to be done?*

A. The wording on page 9 of the Standard and Guidelines states " ... in fiscal year 2006 and beyond..." Any NEPA document signed on or after October 1, 2005 would fall within fiscal year 2006, and would need to comply with the Management Direction in the Strategic Surveys section of S&G page 9.

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## BAT ROOST S&G

*73. Q. There are roost types other than those identified in the S&G's that contribute to the viability for these bat species. When the Management Recommendations given on S&G pages 37-38 are revised, can they include the other important roost types and still be within the scope of the ROD? If revised Bat Roost MR's cannot include additional roost types, what is the appropriate vehicle for providing guidance on other roost types to ensure bat species viability?*

A. The S&G's did not include all roost types used by bats and are clear in identifying the particular roost structures that were considered under the Northwest Forest Plan to be of concern. Inclusion of roost types beyond those identified in the 1994 Northwest Forest Plan ROD and the 2001 S&M ROD S&G's cannot be done in revisions of the Management Recommendations for the S&G on page 37. The Effects Analysis in the November 2000 S&M FSEIS considered the protection of the identified structures in addition to the other mitigations in the 1994 ROD. The conclusion in the Effects Analysis of the FSEIS was that under all alternatives to the No Action alternative, bats would be stable and distributed in a pattern similar to their historic distribution and would continue to be widespread throughout the Northwest Forest Plan area. No additional roost types were identified to need protection in the context of the Northwest Forest Plan. Bat roosts are a S&G separate from S&M and the species review process does not pertain to include bat roost structures. Other agency programs (e.g.: General wildlife, special status species, or threatened, endangered, and sensitive species programs) may have opportunities to provide management of additional roost types as well as species related considerations.

*74. Q. Is the process for Bat Roost MR revisions the same as that on S&G pages 18-21?*

A. Yes, the process for revisions is the same. This includes a requirement for REO review. The revised MR is not required to comply with all of the requirements for Survey and Manage MR's listed on page 19-21, as long as they meet the requirements described on page 37.

*75. Q. Page S&G 37 lists six kinds of considerations to include as guidelines in Management Recommendations for Bat Roost. The sixth consideration is: "... (6) other guidelines to help site-specific management needs." How should the sixth item be interpreted?*

A. The S&G pertains to specific roost structures not to the bats themselves. Number 6 pertains to management needs specific to the site (i.e. the location of the structure type identified in the S&M S&G's). For example, this could include considerations of airflow or groundwater as they relate to maintaining temperatures in the structure needed to maintain suitability of the structure as continued roosting habitat.

#### DATA MANAGEMENT - ISMS

76. *Q. What is the guidance for entering species sites into ISMS for species that are no longer on the S&M list?*

A. Information collected after the species has been removed from the Survey and Manage program officially (through the February 12, 2001 FSEIS, or in future years, through REIC approval) need not be entered into ISMS. However, it would be

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wise to retain hard copies of any future field data collected on the species. All information collected prior to the species being dropped from the Program must be input into ISMS.

#### PLANNING

77. *Q. For the Forest Service and their new regulations: How do we ensure consistency with new viability regulations for non-vertebrates when amending National Forest plans, local Forest Plans?*

A. As noted at ROD page 51 and S&G Pages 3-4, we're expecting the species information and conclusions in the FSEIS to support findings for S&M species, once new regulations are in place. On May 10, 2001, USDA Secretary of Agriculture Ann Veneman signed an interim final rule extending for 1 year the May 9, 2001 date by which all land and resource management plan amendments and revisions will be subject to the requirements of the planning rule adopted November 9, 2000. The interim final rule provides that until May 9, 2002, a responsible official may elect to continue or to initiate amendments or revisions under the 1982 planning regulations or they may do so under the new planning rule. In addition the Department has directed the agency to review the new planning rule and recommend ways to address concerns raised by it. There is a high likelihood that a new rule will be developed.

78. *Q. In future years, adaptive management changes can be appealed only in the individual project decisions when they apply the new categories. Our project EAs need to identify the version of Table 1-1 with species and categories that applies to our decision. We also need boilerplate legal language for our EAs that incorporates the Species Review Process records into our EAs as supporting documentation for those species category decisions.*

A. The REIC approval of the results of the Annual Species Review will document changes to the S&M list/table. This approval will be transmitted to the Northwest Forest Plan administrative units. You should refer to that approval in your Decisions.

Additionally, the following could be used as "boiler plate language": "This decision complies with (name of land use plan) as amended by the January 2001 Record of Decision and Standards and Guidelines for Amendments to the Survey and Manage, Protection Buffer, and other Mitigation Measures Standards and Guidelines. It incorporates, by reference, the records and results of the species review process, effective (date)." It is crucial that field units also a) list the species for which surveys or management are required b) summarize the specifics regarding the project relative to the species including habitats present, surveys performed, results of surveys, and describe the site management for the species. The goal is site-specific NEPA disclosure.

79. *Q. Will the agencies need REO review for amendments to National Forest Plans or BLM District Plans that make minimal modifications to the Survey and Manage ROD and S&G's?*

A. REO review is not required. Proposed modifications should be consistent with the direction provided on ROD page 58, item 9, which specifically addresses this issue.

80. *Q. How will changes in categories following the annual species review process be addressed from a planning standpoint, i.e. plan maintenance versus planning amendment?*

A. ROD page 8 states, "It is not anticipated that changes made pursuant to the annual Species Review Process will require annual NEPA documentation" Consideration as to whether further NEPA is required for species category changes will be

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done in accord with ROD pages 8-9, and S&G pages 18-19. For the BLM, it is anticipated that when the new list is approved and transmitted the State Directors will include a statement to the effect that these changes are in conformance with the S&M ROD and constitute plan maintenance for BLM RMP's within the affected planning areas. The Forest Service will likely simply send out the list with the effective date.

#### MISC.: MINIMIZE INADVERTENT LOSS

81. *Q. What does "minimize inadvertent loss of undiscovered sites" for Category A species mean (S&G pages 7 and 8)?*

A. "Minimize inadvertent loss of undiscovered sites" (as used in the "Objective" statement for Category A species on page S&G page 7), is accomplished through the performance of pre-disturbance surveys for Category A species. By surveying prior to disturbance, the sites that could otherwise be lost if surveys were not conducted would now be identified and managed according to management recommendations.

#### MISC.: ARTHROPODS

82. *Q. Arthropods are now under Category 1F. When can we expect strategic surveys being required? FY 2002 or FY 2003?*

A. The general regional surveys for arthropods, which have been underway as implementation of Component 4 surveys under the 1994 NWFP ROD, are continuing as strategic surveys.

#### MISC.: CAVITY NESTERS

83. *Q. Both the ROD and S&G's say that the S&M S&G's apply to all land allocations. However, the Management Recommendation for cavity nesters at S&G page 34 says: "These guidelines apply to the forest matrix outside designated habitat for the northern spotted owl and Riparian Reserves." Which do we follow?*

A. The S&G on cavity-nesters applies to all land allocations, as stated on S&G page 2: "These standards and guidelines apply to all land allocations". The direction in the Management Recommendations on S&G page 34 does not supercede the page 2 S&G. The Effects Analysis for the November 2000 S&M FSEIS (page 368) considered the effects to cavity-nesters based on the application of these Management Recommendations on all land allocations.