

PACFISH/INFISH FIELD REVIEW
Jarbidge Sub-basin
October 2005

Field Review Team Members

If you have comments and questions, please contact: Dorothy Mason,
Dorothy_Mason@or.blm.gov, 541-523-1308.

Review Team Member

Dorothy Mason	OR/WA BLM	Natural Resources
Lee Jacobson	FS Region 4	Natural Resources
Susan Giannettino	ID BLM	Deputy Team
Tim Burton	ID BLM	Fisheries
Kerry Overton	FS RMRS	Fisheries
Rick Henderson	PIBO Monitoring	Fisheries
Alison Beck Haas	USFWS	Natural Resources

Other Participants:

Jim Harvey	HTNF	Fisheries
Jim Klott	Jarbidge FO	Wildlife
Maija Meneks	HTNF	Fisheries
Melissa Schnier	Burley FO	Fisheries
Jeff Steele	Jarbidge FO	Area Manager
Tom Stephani	HTNF	Range
Selena Werdon	USFWS Reno	Fisheries
Jim Winfrey	HTNF	Acting District Ranger

General Field Review Objectives

1. Determine if the Biological Opinions have been implemented in accordance with the mechanisms, terms and conditions.
2. Determine if on-the-ground management decisions are consistent with the Biological Opinions, and PACFISH and INFISH Goals and Objectives.
3. Determine if PACFISH and INFISH Standards and Guides have been correctly interpreted and implemented on the ground.
4. Determine if grazing implementation monitoring activities have been evaluated to eliminate duplication between the PACFISH/INFISH Grazing Implementation Monitoring Module and other grazing implementation monitoring activities.

5. Improve communication and coordination between agencies. Strengthen interagency commitment to watershed management under the management direction of PACFISH/INFISH.

Specific Local Objectives

To address issues related to the Jarbidge Road reconstruction and other local issues associated with implementation of INFISH.

FINDINGS

Fish and Wildlife Service – Reno

Commendations: It is a significant advantage having a Service biologist who has knowledge of the listed species, local threats, and factors limiting habitat. Selena's participation in the road projects is invaluable in the implementation of ESA requirements in this area, protection and restoration of the listed species, and the application of INFISH. Selena and Jim Klotts dialogue on consultation for emergency fire response and stabilization/rehabilitation is a good example of the positive interagency cooperation. It was important for Selena to participate in the review and we appreciate her supervisor allowing her to attend.

FINDINGS

Jarbidge Ranger District – Forest Service

Commendations: Use of INFISH standards and guidelines for implementation of the Charleston-Jarbidge road project was well done. There has been an excellent working relationship with the Fish and Wildlife Service on this project. Jim Harvey and Maija's efforts to organize the field review and their preparation of presentations and knowledge of local fish issues is commendable. We were impressed with their understanding and knowledge of Jarbidge bull trout and road issues.

OBSERVATIONS AND PRELIMINARY RECOMMENDATIONS

Observations:

- 1) The broad-scale implementation of INFISH on the Humboldt-Toiyabe National Forest (HTNF) did not occur until after some elements of the IIT Implementation Strategy had already been completed (e.g. Road density analysis).
- 2) Only a small portion of the Forest falls under the requirements of INFISH – that portion that drains into the Columbia Basin, a relatively small part of Nevada.
- 3) While the 1998 Bull Trout BO covered all National Forest Plans under the INFISH Decision, including that portion of Nevada within the Columbia Basin, an additional BO for the HTNF Forest Plan was completed in 2003. It is identical to the 1998 Bull Trout BO in requiring the application of INFISH.

Observation: We observed a perception from the Forest that implementation of INFISH standards would depend upon the terms and conditions of local formal consultations for ongoing actions.

Recommendation: Implementation of INFISH should not rely on local ESA consultation requirements. INFISH has been in place since it amended Forest Plans in 1995 and is the subject of the 1998 and 2003 Biological Opinion. Consultation for new and ongoing actions should fully incorporate INFISH requirements.

Observation: It does not appear that INFISH is well known and understood among staff, managers, and specialists on this District, with the exception of the fishery biologists.

Recommendation: Management and staff should be accountable for meeting the minimum requirements of the INFISH direction. Training is needed to help local line officers and staff understand the importance of implementing the INFISH direction and the basic science that supports the riparian goals, objectives, standards and guidelines. The INFISH Implementation and Effectiveness Monitoring needs to be understood and used to document where grazing activities (available for all land use activities) are occurring, the relation of the activity to listed fish or watershed areas and potential habitat, and documentation that the best management practices (Standards and Guidelines) were implemented.

Slide Creek Grazing Allotment

Observation: There has been little or no monitoring to meet the IIT implementation monitoring (IM) module requirements.



It did not appear that Category 1 pastures had been identified. Designated Monitoring Areas (DMA's) had not been located in 1) Category 1 pastures or 2) pastures within watersheds sampled by the Effectiveness Monitoring program. Implementation monitoring data was not being collected and reported. The Forest primarily monitors livestock utilization rates within riparian areas for livestock grazing.

Recommendation: The Forest should follow the Implementation Monitoring

Directive, select DMA's according to the protocol in the IM Monitoring Manual (See "2005 Grazing Monitoring Support Documents" at the PACFISH/INFISH Web Site: http://www.fs.fed.us/rm/boise/teams/techtran/projects/pac_infishhome.htm), and work with the Effectiveness Monitoring Team to assure that IM occurs at the same location as Effectiveness Monitoring (a UTM value is required for the downstream location of the IM DMA site). The IM Monitoring Manual suggests that the most reliable measures of livestock use effects on the Riparian Management Objectives (RMO's) are stubble height, bank alteration, and woody browse of the first vegetation communities above the

stream channel (the greenline). Information on these annual use measures can be found in the “2005 Grazing Monitoring Support Documents”.

Observation: The Slide Creek grazing use standard in the upper portion of the drainage allows for greater use than would occur in bull trout occupied habitat downstream. This resulted from application of existing stream categorizations in the Forest Plan which split the occupied downstream reach from the unoccupied upstream reach. Stream categorizations in INFISH and the IM module are different than the stream categories in the Forest Plan, which has led to confusion.



Recommendation: The standards in unoccupied tributary reaches need to be

appropriate to attaining the RMO’s in the occupied reach. Therefore, standards in pastures that are unoccupied by a listed species may or may not differ from standards in downstream occupied reaches. You should consider the proximity to occupied reaches, downstream propagation of effects, and other factors related to attaining the RMO’s. Upstream tributaries, especially perennial streams, can deliver sediments, nutrients, and warmer waters to downstream reaches. Grazing use standards within the upstream meadow on Slide Creek should be selected in order to attain RMO’s in the downstream occupied reaches. It was our observation that the upper portions of Slide Creek appear to lack woody regeneration and are unstable and eroding in places. Improved riparian condition here may enhance the RMO’s downstream in occupied habitat. This upstream meadow is a Category I pasture use area under the IM Module and would require a DMA and appropriate IM Monitoring

Observation: Measurements to determine whether RMO’s are being achieved were not described in the East Fork Jarbidge Watershed Analysis nor did it appear that they had been measured since.

Recommendations: Surveys should be conducted to determine whether stream habitat conditions in reaches occupied by bull trout meet the RMO’s. This will help when evaluating whether current BMP’s (eg. grazing use standards) are resulting in the desired outcome. Incorporating current conditions should be used to help evaluate grazing use standards within the Range Recision EIS currently being drafted. The watershed analysis and/or EIS could be the vehicle for the ID Team to modify RMO’s and establish the appropriate BMP’s (S&G’s) to meet the intent of INFISH.

Water Diversion on Jim Bob Creek

Observation: The analysis of downstream effects caused by the Jim Bob diversion was notable in that it was creative and thorough, and outcomes were unexpected. Such an analysis could be used as a template for future diversions of this type. Because Jim Bob Creek is non-fish bearing in this reach and because it regains streamflow downstream of the diversion, effects to RMO's were determined to be insignificant. While the analysis focused on affects to the fishery, there may be other reasons not to dewater a stream. Resources dependant upon riparian vegetation



and water would be affected and could be important in other analyses.

Recommendation: The diversion analysis could be made available for use by other field offices facing similar issues involving water diversion effects on stream temperature and flow.

Road Maintenance and Reconstruction

Observation: The mitigations associated with the Charleston-Jarbidge road are an apparent result, at least in part, of the South Canyon Road issue. Those mitigations are well thought-out based on our observations of the road management plan. We find the road management plan consistent with INFISH and likely to provide benefits to bull trout habitat. The plan also acknowledges that road maintenance is a long-term commitment.

Observation: The West Fork Jarbidge River has flashy hydrology and high flows in the mainstem with mud/rock debris flows from the steep side canyons delivering sediment to the channel. Maintenance of this road is obviously expensive and unpredictable. The team observed the results of recent debris flows--destruction of the road bed and delivery of this large and small material to the channel. It was apparent that the road management plan had taken this into account and acknowledged that this will be a chronic problem.



Recommendation: Opportunities to replace culverts with low water crossings within the framework of the Jarbidge Road

Management ROD may exist. This may limit the extent of road bed failures during future debris flows, minimize delivery of fines from the road surface, and improve upstream passage for fish using the tributaries.

Observation: Snow removal along the Jarbidge road will focus on avoiding deposition of snow and sediment into the river.

This is consistent with INFISH which requires that road activities avoid sediment delivery. The road management plan calls for removal efforts to direct snow toward the inboard side of the road. In situations where this is not possible, removal crews will use outriggers that leave a 2 inch snow surface on the road and /or use a front-end loader and dump truck to move snow to a designated stockpile. End-hauling snow will likely be difficult and expensive.



Recommendation: If end-hauling snow proves uneconomical and ineffective in reducing sediment delivery to the Jarbidge River, other alternatives should be considered. Implementation monitoring should be conducted to provide information on the effectiveness of current management and for adaptive road maintenance designs in the future.

Observation: The proposal in the road management plan to pull road fills back away



from stream and construct and vegetate new floodplain terraces is a good step towards channel and bank stabilization adjacent to the road. Vegetation is always better than rock rip-rap as edge for fish habitat.

Recommendation: The road plan calls for bio-technical revetments to stabilize these locations. We suggest using coir logs and willow / dogwood cuttings to form the biotechnical revetments in these channel terraces. This approach has been very successful in projects of this nature

and result in streambanks that are covered with a dense revetment of live woody vegetation. Check the literature and those with substantial background on this technique for more information.

FINDINGS

Jarbidge Field Office – BLM

Commendations: We observed good hands-on management of the issues. The Field Office took appropriate and decisive action to achieve some positive actions for bull trout, including recreation site improvements and restoration of the Jack Creek barrier. Melissa's initiative to meet with the Three Creek Road District is very good at a time when road management is a significant issue in the drainage. She did a good job providing handouts and organizing the field tour on Wednesday. Jim Klott's presentations were excellent. His background and knowledge was very useful to the review, and his presentations were well organized, interesting, and helpful.

OBSERVATIONS AND PRELIMINARY RECOMMENDATIONS

Poison Butte Grazing Allotment

Observations:

- 1) Permittees have requested creating a separate allotment from the Dave's Island pasture. A fence, separating the private lands in Dave's Island from the BLM is discussed as an action item in the existing BO for ongoing actions. We are not sure that the permittee's request is the same as the division fence described in the BO. Neither has been built. This has implications for future consultation, NEPA, and RMP revisions. More allotments may mean more NEPA, re-initiation of consultation, and potentially a new round of litigation.
- 2) Consultation on the proposed new grazing permit decision for the Poison Butte Allotment was initiated with the preparation of a draft BA. The USFWS responded to the draft BA with a request for additional information in relation to the BA. Although that analysis has been done, the completion of the BA has been stalled as a result of the changes in permittees, changes in proposals for grazing systems and/or seasons of use within the allotment and litigation.
- 3) Unauthorized livestock use was evaluated and addressed during the allotment consultation. The BA and BO for ongoing actions also addressed private land grazing within the Dave's Island pasture. Unauthorized use can result from cattle drifting back from the adjacent allotments, including an allotment on the National Forest. The BA assessed this affect and concluded with a measure to monitor and maintain fences at key access points. The BO reiterated that approach. This approach minimizes the potential for unauthorized use, but does not eliminate it.



With respect to private land grazing, the private lands within Dave Creek contain important bull trout spawning habitat. Grazing use on federal lands influences use on the private lands. When cattle are present on BLM, they have access to the private portion and vice versa.

- 4) Selena discussed inconsistencies related to livestock movement and management on FS, BLM, and private lands. For example, cattle may be required to leave bull trout habitat on BLM lands by August 15th while the FS may allow grazing after August 15th. She would like to see a more coordinated management approach among the agencies. The litigation and land sales may complicate this issue. Sub-basin assessment may help develop the strategic plan, but the grazing decision won't occur until after plan revisions. This does not mean that there has not been good interagency coordination, just that the management strategy between land ownerships has been inconsistent and not well coordinated. This also relates to the issue of unauthorized use. Are the cattle in the best place at the right time with respect to bull trout and riparian management?

Observation: Grazing management within the Poison Butte Allotment is complex. Complicating factors are particularly numerous along Dave Creek, a stream which is necessary to maintain bull trout populations. Issues within the Dave's Island pasture include Temporary Non-renewable use, litigation, and private lands on Dave Creek, unauthorized cattle use and access, permittee changes over time, etc. The BLM has placed a lot of the burden on the permittees for the solution to these issues. It was difficult to discern who was in the driver seat regarding individual grazing management decisions – the permittee or the agency.

Recommendation: Permittees have the responsibility to propose solutions to problems that may have been found through the standards and guides assessment and determination. The BLM has the responsibility to make the final decision based on input from permittees and others, and be consistent with laws and policy. The review team did not feel that it was the BLMs responsibility to continue adjusting the management plan based on evolving proposals by the permittee. The BLM should set the sideboards necessary to meet the desired conditions and reconsider the existing BO (for example, Dave Creek – cattle off by 8/15; light use on the stream bottoms; controlled use of Morgan Draw).

Observation: The BA for ongoing actions included reference to the IIT IM and EM monitoring requirements and linkages. We observed that the IM monitoring site was not located at the same point as the EM monitoring site on Dave Creek.

Recommendation: Assure quality controls in the monitoring program so that DMA's are properly located and at the exact same reach as the EM monitoring site. The Field Office could have the monitoring coordinator implement a QA/QC check. The Monitoring Core team needs to address this issue and make recommendations to the Deputy Team, as this is a recurring problem.

Biological Assessment for Ongoing Activities

Observation:

- 1) The effort made to quantify substrate conditions in the Ongoing Activities BA was good. Knowing the limiting factors helps to understand the overall aquatic objectives and helps to implement INFISH Standards and Guides.

Observation: The question was asked, what is driving your management more – INFISH or outcomes of local consultation? It was the review team’s observation that consultation was the primary driver for many of the actions we reviewed.

Recommendation: Management actions should be driven by local concerns, issues (e.g. necessary habitat, current conditions versus desired conditions), or needs. The standards and guidelines in INFISH were developed to provide default general best management practices based on case studies and relevant science for management actions to protect, maintain and restore (Passive Restoration) stream-riparian environments. In the decision making process, the land management unit needs to not only indicate that a management action is consistent with INFISH (the checklist), but explain how it is consistent (Lodge decision). It is important to document the rationale for specific management actions (e.g. watershed analysis or site level analysis to establish more appropriate best management practices for current conditions). The IM Module would be the appropriate documentation tool for capturing this information and tracking management actions over time. Consultation should be the end product of a collaborated effort on the proposed management action and should adequately resolve specific management issues. Consultation should not drive management decisions.

Observation: The review team was impressed with the upgrades to recreation sites along the East Fork Jarbidge River.



However, INFISH requires that a watershed analysis be conducted for activities conducted within Riparian Habitat Conservation areas.

Recommendation: A watershed analysis is needed for future activities within the RHCAs. Appendix A includes the 2004 Directive from the Deputy Team clarifying this requirement. Please note that the Directive includes the following relevant statement: “Line managers guiding the analysis are responsible

for balancing the number and scope of the issues addressed in a given iteration that is dependent on available staffing and funding”. We want to emphasize that watershed analyses can be a very simple and straightforward process taking a few days or weeks to develop or a complicated process. In the case of recreation development within a RHCA, the issues may be limited to just those associated with the effect of the development on the local stream and its riparian area. The 6-step process would be applied to the

immediate project and related issues, and very likely would parallel, in scope and extent, the analyses prepared for the Biological Assessment. This kind of analysis is particularly applicable to lands administered by BLM, where such areas do not always encompass entire watersheds, but rather discreet reaches of stream.

Observation: Fish habitat inventories (R1/R4) were conducted upstream and downstream of tributary junctions to determine whether management within tributary watersheds was impacting conditions within the mainstem Jarbidge River. The primary concern was that tributaries may contribute additional fine sediment into bull trout migration and overwintering areas.

Recommendation: Monitoring to detect changes in fine sediment requires a rigorous sample design, precise methods, and is usually costly. The sampling approach used may detect large increases in fine sediment but would be unlikely to detect moderate to small increases, which is what we would expect given the management activities within the tributary watersheds. Therefore, we question whether this was the appropriate monitoring design and suggest caution when interpreting the results.

Observation: The monitoring requirements and objectives in the BA were not clearly articulated. It was difficult to understand the monitoring questions, the sampling design being used to address the questions, how to analyze the information, and how to use the monitoring results to determine the success/failure of the management action. The review team was concerned that 1) without clearly defined questions we could be monitoring for the sake of monitoring and 2) that implementing the monitoring actions would be costly.

Recommendation: The goal of monitoring is to address concerns about a management action for the purpose of making informed and defensible management decisions. The monitoring requirements should clearly state monitoring objective(s) in the form of resource-outcome or impact related questions answered by the monitoring information. An adaptive management approach should be implemented to improve decision making in relation to livestock grazing. A similar approach could apply to other complex management issues.

FINDINGS

Both BLM and FS

OBSERVATIONS AND PRELIMINARY RECOMMENDATIONS

Observation: Further coordination is needed between the USFWS, BLM, FS, Idaho Department of Fish and Game, Nevada Department of Wildlife, and permittees for management activities within the Jarbidge sub-basin.

Recommendation: The review team suggests that all groups coordinate on developing a subbasin assessment. Kerry discussed the sub-basin planning process currently being used by the FS and how it would apply in this situation. This process would identify roles of these various entities in a strategic plan, like the RMP or a subbasin Plan, or by updating the ongoing BO per the RCI lawsuit conclusions. The product would provide a



transparent-documented framework for strategically planning within the sub-basin. Outcomes include: (Step 1) Current subbasin(s) population status and distribution; (Step 2) Desired population distribution over time (e.g., connectivity of necessary life stages; (Step 3) List of Extinction Risks and Threats for the populations and/or habitats and supporting science; (Step 4) Analysis tools and relevant science to assist in evaluating existing or proposed management actions; (Step 5) A Conservation and Restoration

Strategy that describes treating risks and threats with a prioritized design to expand and secure populations; and, (Step 6) Inventory, monitoring and research needs to address data gaps (provide strategic plan for monitoring and inventory), assumptions, and provide an adaptive management strategy to track management effectiveness and highlight needed changes. If done in the near-term, it could be incorporated within and provide consistency between the bull trout recovery plan, BLM Resource Management Plans and FS Forest Plan revision, range recision NEPA, and the BLM BA for ongoing activities within the Jarbidge Resource Area. The Humboldt-Toiyabe NF is using this framework for their Forest Plan revision efforts. The Jarbidge subbasins for completion of Steps 1-3 could progress rapidly with a dedicated effort on the part of FS, BLM and USFWS .

Observation: Local field offices are using the IIT IM module database to a limited extent.

Recommendation: The IM module database was updated this year and is ready for download and use from the PACFISH/INFISH Web Page. It is user-friendly and has locked fields to ensure complete data are recorded, incorporates the latest grazing monitoring support documents for livestock management indicators and parameters for setting riparian objectives, requires UTM's for DMA's to assist with linkage to EM sampling, and provides a local form for additional or modified monitoring requirements and documentation. A contractor and team are currently working on canned report mechanisms and linkage to assist the field in user-friendly reporting. The goal is to generate web reports to eliminate paper reporting between the various affected agencies. The advantages will not be available if the agencies do not enter data into it. The IM module is designed as an electronic checklist and covers all land uses with current PACFISH/INFISH standards and guidelines, and is adaptable to adding additional agency or BO requirements. We suggest that the agencies fully incorporate this module into their monitoring programs. The database and instructions on its use can be found by using the left hand PACFISH/INFISH button at:

<http://www.fs.fed.us/rm/boise/teams/techtran/projects.htm>

Observation: Forest and BLM staff are still learning about INFISH and its implementation. It appears that agency managers and staff other than fisheries biologists are not aware of INFISH or making its implementation a priority. The Columbia Basin portion of the HTNF has not emphasized INFISH implementation, particularly where livestock grazing is concerned. Most of the Jarbidge Field Office is outside of the range of bull trout, to which INFISH is relevant for the BLM. The agencies need to place higher priority on implementing INFISH.

Recommendation: Fishery biologists should not be solely responsible for implementing INFISH. It takes management support to make INFISH a priority management application and useful at any field office. Even after it is replaced by land use plan revisions, the basic concepts of aquatic conservation will still be present, as required by the aquatic framework under the Interior Columbia Basin strategy. Understanding INFISH and improving upon it in Plan revisions, will improve implementation and compliance. Direction and support should come from the Regional and State Offices to local line managers to do that.

Observation: Practitioners do not always completely understand the monitoring, the relevant science, and other technical requirements associated with implementation of INFISH. To be held accountable, perhaps a training certification should be required. This would require an intensive level of training and considerable investment in time. But the outcome would assure a better, more qualified workforce that accomplishes the monitoring and assessments more efficiently and effectively.

Recommendation: The Deputy Tteam should consider a certification training program for field practitioners.

Observation: Preparation for, and conduct of the review could have been better. Neither agency completed the feedback questions. A detailed agenda was not provided, so it was difficult to know where the review was going each day. This was the first review that did not involve the IIT; instead, representatives of the Deputies team participated. While the IIT members had set rules for their interaction; these were not shared with the Deputies who participated in the review.

Recommendation: It would have been helpful to have a facilitator who keeps the discussion on point, explains the agenda to the group at the beginning of each day, and when the group stops, gathers everyone together and gives a complete explanation of the purpose of the stop before the presenter begins. It should be the responsibility of the field unit to provide the facilitator. One of the most successful past reviews was facilitated by the Forest Supervisor who did essentially all of the above. Facilitation by the line officer sent a message that this subject is important to the field unit. The feedback questions need to be sent to, and explained to the field units well before the review, so that they have time to prepare the response. Local managers should support the review and be accountable for assuring it is well planned and carried out. The review team and review organizers should review communication to the field to be sure that purpose and expectations for the review are clear to local agency representatives. The feedback questions need to be sent to, and explained to the field units well before the review, so that they have time to prepare the response. It was helpful to have a Deputy at the review. Deputies should be required to be present at the review to elevate the importance

of this subject and participate in the close-out. Deputies need to have clearly defined roles and set expectations for the review (as the IIT members did).

RECOMMENDATIONS TO THE DEPUTY TEAM

Recommendation: We recommend that the Deputy Team consider a certification training program for field practitioners conducting implementation monitoring. Practitioners do not always completely understand the monitoring, relevant science, and other technical requirements associated with implementation of INFISH. This would require an intensive level of training and considerable investment in time. But the outcome would assure a better, more qualified workforce that accomplishes the monitoring and assessments more efficiently and effectively.

Recommendation: The field reviews have served as an important accountability and feedback mechanism for the implementation of the INFISH / PACFISH aquatic conservation strategies. The Deputy Team needs to consider how to conduct future reviews as LMPs and RMPs are revised and new strategies adopted under the Columbia Basin Strategy. The Deputy Team should examine the review process and questions addressed by the field units in order to make recommendations for the structure of future reviews.

Recommendation: There is a need to re-invigorate the IM monitoring requirements. Not all field units are submitting data to the IIT Monitoring Module. Implementation monitoring under the PIBO is mostly being done, but not being consistently reported.

Recommendation: The field units should receive review direction from their Deputy in order to get proper organization of reviews. Deputies should be required to be present at the review to elevate the importance of this subject.

Recommendations: Support the FS RMRS technology transfer unit in providing sub-basin assessment direction for the Jarbidge sub-basin.

Recommendations: The field units are unclear on the due dates for the different components of the IIT monitoring process. We recommend that the Deputy Team issues a directive immediately stating the December 15th deadline for reporting 2005 IM data and the deadline for line officer certification.

Recommendations: There is a need to reemphasize the goals of the IM and EM program to ensure it is completed as directed, training is supported, and all agencies become proficient at using the reporting structure to eliminate redundant monitoring activities and reports. The Monitoring Core Group needs to make recommendations to improve the efficiency and utility of the use of the IM/EM data.

FEEDBACK FROM THE UNITS TO THE REVIEW TEAM AND THE IIT

Comment: Several managers expressed a concern that some of the recommendation contradicted language in existing management plans, decision, or agreements.

Response: This was not the objective of the review team. Instead, we view these recommendations as being applicable when managers have the flexibility to address an issue. We focus on the adaptive management process and stress the importance of retaining the necessary flexibility to make changes based on experience, monitoring, and new science.

Comment: There is a need to educate line officers and managers on the application of and requirements associated with INFISH.

Response: The review team will make a recommendation to the Deputy Team for line officer / manager training on INFISH (see above). The science based goals, objectives, standards and guidelines are often times not known (e.g. RHCA's, two site potential trees is based on maintaining structure and function within stream-riparian environments such as moisture, nutrients, shade, humidity, wind speed, large woody debris [major channel/habitat forming feature], small woody debris [organic aquatic organism food base] and bank/channel stability).

Comment: The review team did not discuss other components of the BO's (with the exception of monitoring) such as how they developed priority watersheds.

Comment: The field units would like a better understanding of the sub-basin assessment process and how it could be incorporated into upcoming documents (bull trout recovery plan, HTNF RMP, range recision, and BA's).

Response: Kerry Overton agreed to meet with the field units, discuss sub-basin assessments, and help initiate the process.

APPENDIX A

Reply to: 2670(FS)/6841(BLM)

Date: July 29, 2004

FS/BLM-Memorandum

Subject: Clarification of NMFS and USFWS 1998 Biological Opinion Requirements for completing Watershed Analysis (PACFISH, INFISH) and Subbasin Assessments (PACFISH only)

To: Forest Supervisors/District Managers (with PACFISH/INFISH or INFISH amended Management Plans)

At the February 20, 2004 Interior Columbia Basin Deputy Regional Executive Team (Forest Service, Bureau of Land Management, NOAA Fisheries, and Fish & Wildlife Service) meeting, the Deputies adopted with modification, the June 2003 Interagency Implementation Team's (IIT) recommendation that the requirements under the 1998 NMFS and USFWS Biological Opinions (PACFISH, INFISH) for watershed analysis and subbasin assessments remain in place until Land Management Plans (LMPs) are amended or revised. Both the 1998 NMFS and USFWS Opinions require the use of the 1995 Federal Guide (Version 2.2) for watershed analysis. Only the 1998 NMFS Biological Opinion, covering the 1995 PACFISH amendment to existing plans, requires that one watershed analysis and one subbasin assessment each be completed per year on each administrative unit (National Forest, BLM District).

The purpose of this letter is to review the 1998 Opinion requirements, clarify the objectives of these assessments, and highlight the flexibility inherent in the assessment procedures. We encourage all of you to work with your counterparts in the streamlining process to develop both a schedule and list of priorities for completing watershed analyses, and where applicable, subbasin assessments.

Please refer to the enclosed attachment for the clarification as outlined above. If you have any questions or comments, please contact your respective agency IIT representative.

/s/ Kathy McAllister KATHY McALLISTER Deputy Regional Forester, Northern Region USDA Forest Service	/s/ Mike Mottice MIKE MOTTICE Deputy State Director, WA/OR USDI Bureau of Land Management
/s/ Susan Giannettino SUSAN GIANNETTINO Deputy State Director, ID USDI Bureau of Land Management	/s/ William P. LeVere BERT KULESZA Deputy Regional Forester, Intermountain Region USDA Forest Service
/s/ Claire Lavendel (for) JIM GOLDEN Deputy Regional Forester, Pacific Northwest Region USDA Forest Service	

Preliminary Draft

CC:	<u>BLM Distribution List</u>
Cal Joyner, FS Cindy Swanson, FS William LeVere, FS Jim Morrison, FS Mike Crouse, NOAA-Fisheries Terry Rabot, FWS Don Martin, EPA	OR-930 (Mike Mottice, Paula Burgess) ID-930 (Susan Giannettino) ID-931 (Jon Foster, Tim Burton) OR-931 (Michael Haske, Dorothy Mason, Joe Moreau, Al Doelker)

ATTACHMENT

Watershed Analysis

What is it?

Watershed analysis is a procedure used to characterize the human, aquatic, riparian, and terrestrial features, conditions, processes, and interactions (ecosystem elements) within a watershed. It provides a systematic way to understand and organize ecosystem information.

What are the objectives of Watershed analysis and associated benefits to Line Managers?

1. Evaluate cumulative watershed effects - *watershed analysis enhances the ability to estimate direct, indirect, and cumulative effects of management activities*
2. Define watershed restoration needs, goals and objectives – *provides guidance on the general type, location, and sequence of appropriate activities within a watershed.*
3. Monitor the effectiveness of watershed protection measures – *iterative process for adaptive management feedback loop.*
4. Provide sufficient watershed context for understanding and carrying out land use activities within a geomorphic context – *important tool used in meeting ecosystem management objectives*

What is the appropriate methodology(s) for conducting Watershed Analysis?

As described in the 1998 Biological Opinions (NMFS, USFWS), administrative units should continue to rely on the 1995 Federal Guide for Watershed Analysis, Version 2.2. (rev. August, 1995) titled [Ecosystem Analysis at the Watershed Scale](#)¹ until FS and BLM Land Management Plans are amended or revised. EAWS or the Six-Step Process is a “tool box” of analytical methods and techniques designed to help address various aspects of watershed analysis and meet the aquatic goals and objectives described in PACFISH, INFISH, and requirements of the 1998 Opinions.

What are the expectations for Line Managers in completing Watershed Analyses?

- Each National Forest and BLM District Manager is responsible for completing one watershed analysis per year* until PACFISH is replaced through Plan revision or amendment and ESA Section 7 consultation is completed. {*NMFS’s 1998 Opinion requirement to complete one subbasin assessment per year on each unit ONLY applies to National Forest and BLM Districts with anadromous fish where plans have been amended by PACFISH and the 1998 anadromous fish biological opinion is applicable*}. Updates to existing watershed analyses meets this requirement.

¹ The links go to www.fs.fed.us/r6/fish and www.icbemp.gov/implement/example.shtml

- Use an Interagency (states, tribes, public stakeholders as appropriate) and/or Interdisciplinary team, as appropriate.
- Although use of the 1995 Federal Guide is required for all watershed analyses, line managers will define the scope, intensity, and depth of analyses based on the complexity of the management or resource issues.
- The 1995 Federal Guide provides line managers with the flexibility to focus the analysis as appropriate. Line managers guiding the analysis are responsible for balancing the number and scope of the issues addressed in a given iteration that is dependent on available staffing and funding. We want to emphasize that watershed analyses can be a very simple and straightforward process taking a few days or weeks to develop or a complicated process. The complexity is intertwined with the issues and questions being addressed.

Subbasin-Scale Assessment (Required for Administrative Units with Anadromous Fish ONLY)

What is it?

A subbasin-scale assessment provides the perspective necessary to determine which watersheds should be prioritized for subsequent watershed analysis.

What are the objectives of Subbasin-scale assessments and associated benefits to Line Managers?

1. Provides an appropriate ecological and social (place-based) context for identifying priority watersheds for integration of multiple resource objectives, and the conservation and restoration of aquatic and terrestrial species and habitats. *This objective is consistent with the Interior Columbia Basin Strategy (e.g., use of hierarchical analysis consistent with ICBEMP Science step-down process)*
2. Development of goals and objectives that can be incorporated into action plans at the watershed scale. *Provides a mechanism for identifying multiple resource goals and objectives that can be integrate, maximizing efficiencies at the watershed scale in planning and implementation*
3. Enhanced linkage with other state and tribal assessment efforts at this scale, including the NW Power and Conservation Council's Subbasin Planning effort, in setting priorities across administrative boundaries for restoration of aquatic and terrestrial habitats needed for recovery of ESA-listed species.

What is the appropriate methodology(s) for conducting Subbasin Assessments?

NMFS's 1998 Opinion required that subbasin assessments adhere to defined protocols, mutually agreed upon by the USFS, BLM, and NMFS. Protocols identified in the 1998 Opinion (p.90) for subbasin assessments included (1) [South Fork Clearwater River assessment methods and procedures](#) , (2) procedures developed by [Kerry Overton \(FS-RMRS, Yankee Fork\)](#), or (3) other jointly agreed upon procedures.

This third category would apply where a unit Level 1 or 2 Team has agreed to an alternate procedure that meets subbasin-scale assessment goals and objectives OR, for fiscal year 2004, where Line Managers or their staff participated in the NW Power and Conservation Council's Subbasin Planning process.

What are the expectations for Line Managers in completing Subbasin Scale Assessments?

- Each National Forest and BLM District Manager is responsible for completing one subbasin assessment per year² until PACFISH is replaced through Plan revision or amendment and ESA Sec 7 consultation is completed. {*NMFS's 1998 Opinion requirement to complete one subbasin assessment per year on each unit ONLY applies to National Forest and BLM Districts with anadromous fish where plans have been amended by PACFISH and the 1998 anadromous fish biological opinion is applicable*}. Updates to existing subbasin assessments can be used to meet this requirement.
- Use an Interagency (states, tribes, public stakeholders as appropriate) and/or Interdisciplinary team, as appropriate.
- Line Managers will use the results of subbasin assessments to prioritize watersheds for further analysis and identify goals and objectives at the watershed scale.

² For scattered tracts of BLM and NFS lands, the majority landowner should collaborate with the other federal land management agency to complete watershed analysis and subbasin assessments. For small tracts of federal lands associated with high value salmonid habitats, we encourage use of a focused analysis at the reach, watershed, or subbasin scales using approaches described in this attachment.