FS-Memorandum

BLM-Instruction Memorandum No. OR-2012-036
Expires: 09/30/2012

To: Bureau of Land Management District Managers, Field Managers (Klamath Falls, OR; Arcata, Redding, and Ukiah, CA) and Forest Service National Forest Supervisors and Columbia River Gorge National Scenic Area Manager within the Northwest Forest Plan Area

Subject: Identification of Non-high Priority Sites: Four-step Process for Category C and D Species

On July 5, 2006, Information Bulletin No. OR-2006-047 was transmitted to the field providing direction on the identification of non-high priority sites. This memorandum supersedes that direction and provides updated contact information.

The 2001 “Record of Decision and Standards and Guidelines for Amendments to the Survey and Manage, Protection Buffer, and other Mitigation Measures Standards and Guidelines” (ROD S&Gs) provides for the local line officer to identify non-high priority sites on a case-by-case basis (2001 ROD S&Gs, page 10). Non-high priority sites are not needed for species persistence and do not require site management.

Attached is an overview of the four-step process for identifying category C and D non-high priority sites.

We will monitor the implementation of this process and adjust as necessary. If you have questions, please contact your respective agency Technical Contact:

- Bureau of Land Management: Rob Huff (503) 808-6479
- Forest Service Region 6: Carol Hughes (503) 808-2661
- Forest Service Region 5: Chrissy Howell (707) 562-8929

/s/ Nora B. Rasure /s/ Mike Mottice
for KENT CONNAUGHTON for EDWARD W. SHEPARD
Regional Forester, Region 6 State Director, Oregon/Washington
USDA Forest Service USDA Bureau of Land Management
Attachment

1 – Overview of the Four-Step Process for Identifying Category C and D Non-high Priority Sites (5pp)

cc:
FS, WO (Chris Iverson, Joseph Burns, David Pivorunas)
FS, R6 (Debbie Hollen, Sarah Madsen, Carol Hughes, Mark Skinner, John Laurence,
Suzanne Taylor, Tracy Beck, Sarah Crim, Eric Watrud, Lorette Ray, Jackie Andrew,
Lynn Burditt, Darci Pankratz, Michele Huffman)
FS-PDL R6 NR Survey and Manage Contacts
FS-PDL R6 NR Forest Wildlife Biologists
FS-PDL R6 NR Forest Botanists
FS-PDL R6 Forest Fisheries Biologists
FS-PDL R6 NR Forest Staff

FS, R5 (Deb Whitman, Barnie Gyant, Diane Ikeda, Joseph Furnish, MaryBeth Hennessy
Joshua Wilson, Kimberley Johnson, Mike Vandame, Dan Blessing, Jerry Bird,
Kimberly Anderson, Patti Krueger, Chrissy Howell)

BLM Distribution
WO200 (Ed Roberson, Marci Todd, Dave Goodman, Kathy Radigan, Rick Schultz,
Dwight Fielder, Peggy Olwell)
CA930 (Tom Pogacnik, Amy Fesnok, Nancy Haug, Lynda Roush, Richard Burns,
Gary Diridon, Jennifer Wheeler)
OR912 (Michael Campbell)
OR930 (Mike Haske, Debbie Pietrzak)
OR931 (Lee Folliard, Rob Huff, Dave Roche, Anita Bilbao, Bruce Hollen,
Kelli Van Norman, Mark Mousseaux, Al Doelker, Diane Stutzman)
OR933 (Kim Titus, Anne Boeder, Cindy Lou McDonald)
ORS000 (Rich Hatfield, Randy Herrin, Roy Price, Claire Hibler)
ORE000 (Richard Hardt, Alan Corbin, Eric Greenquist, Nancy Sawtelle)
ORR000 (Rex McGraw, Paul Ausbeck, Craig Kintop, Christopher Foster, Susan Carter)
ORM000 (Tony Kerwin, John Bergin)
ORCD00 (Steve Fowler, Jeff Davis, Carolyn Palermo, Tim Rodenkirk, Jennie Sperling)
ORL040 (Don Hoffheins, Shane Durant, Steve Hayner)
OVERVIEW OF THE FOUR-STEP PROCESS FOR IDENTIFYING CATEGORY C AND D NON-HIGH PRIORITY SITES

General Process

The 2001 “Record of Decision and Standards and Guidelines for Amendments to the Survey and Manage, Protection Buffer, and other Mitigation Measures Standards and Guidelines” (2001 ROD/S&Gs) allow managers to identify non-high priority sites for Category C and D species on a case-by-case basis. Categories C and D are comprised of species considered to be “uncommon,” with not all known sites requiring management in order to maintain the persistence of the species. The Standards and Guidelines (pages 10-12) contain direction to manage high priority sites for these species as follows:

Manage High-Priority Sites: High-priority sites will be managed according to the Management Recommendations for the species. Professional judgment, Appendix J2 in the Northwest Forest Plan (NWFP) Final Supplemental Environmental Impact Statement, and appropriate literature will be used to guide individual site management for those species that do not have Management Recommendations (MR). Until a MR is written addressing high-priority sites, either assumes all sites are high priority, or local determination (and project National Environmental Protection Act (NEPA) documentation) of non-high priority sites may be made on a case-by-case basis.

To make a local determination of non-high priority sites on a case-by-case basis, the four-step process listed on page 10 of the 2001 ROD/S&Gs must be followed and the results disclosed in the project-specific NEPA document. Documentation of this determination (Step 3 of the process) is intended to be a concise and complete record of the process used by the originating Bureau of Land Management (BLM) or Forest Service (FS) administrative unit, and should be no more than seven pages in length. The documentation should provide the rationale and scientific evidence for designating sites as non-high priority.

Four-step Process

The four steps outlined in the 2001 ROD are further clarified here:

Step 1. Guidance from the Technical Contacts

The BLM field manager/FS line officer (Originating Manager) originating the proposal notifies the Agency Technical Contact of his/her intent to initiate the process to identify non-high priority sites. Those Technical Contacts are:

- BLM: Rob Huff (503) 808-6479
- Region 6: Carol Hughes (503) 808-2661
- Region 5: Chrissy Howell (707) 562-8929

The originating office is responsible for completing all four steps of the process.
Step 2. Local Interagency Concurrence (BLM, FS, U.S. Fish & Wildlife Service (USFWS))

Although identified as Step 2 in the 2001 ROD, this step can only be initiated after Step 3 is completed. When the analysis outlined in Step 3 is completed with documentation supporting a non-high priority site determination, the Originating Manager will share the analysis and request review and written concurrence from local BLM field managers or FS line officers and USFWS field office managers (see Table 1 below for the list of USFWS contacts). If local concurrence cannot be reached, all supporting documentation, including responses from adjacent land managers, should be forwarded to the Technical Contact for review and assistance in gaining resolution. If a satisfactory resolution cannot be achieved with the Technical Contact’s assistance, a memo to that effect will be included in the administrative record, and the Originating Manager will consider modification or withdrawal of the non-high priority site proposal.

Step 3. Document consideration of the condition of the species on the originating administrative unit as well as other administrative units identified by the Technical Contact--typically adjacent units and others in the species range within the province.

Using the format outlined below, document the condition of the species by preparing a local scale analysis. The originating field unit may ask the Technical Contact to identify a taxa specialist if needed in preparing the analysis.

Introduction: (1/2 to 1 page) Briefly explain the reason for the non-high priority site proposal.

Analysis: (3 to 5 pages) Using the most recent scientific information available, including the agencies’ species databases, Annual Species Reviews, and Environmental Impact Statements, assess and determine the condition of the species. Briefly document the following for the species: life history, ecology, number and distribution of known sites, condition of known sites in close proximity to the proposed non-high priority site(s), and general habitat condition on the originating administrative unit and adjacent units within the province or other logical analysis unit that more appropriately addresses the species distribution (e.g., 5th field watershed). Describe the proposed non-high priority sites, and explain how this proposal will comply with species persistence objectives and persistence criteria on the originating administrative unit and adjacent units within the province or other logical analysis unit that more appropriately addresses the species distribution. Base the analysis on the following criteria where, locally, most of these criteria must be met:

Criteria Indicating Little or No Concern for Persistence (S&Gs, page 5)

- Moderate-to-high number of likely extant sites/records.
- High proportion of sites and habitat in reserve land allocations or limited number of sites within reserves, but the proportion or amount of potential habitat within reserves is high and there is a high probability that the habitat is occupied.
- Sites are relatively well distributed within the species range.
- Matrix S&G or other elements of the NWFP provide a reasonable assurance of species persistence.
Maps

- Prepare maps at two different scales to show distribution of proposed non-high priority sites in relation to: (1) all known sites in the field unit and (2) all known sites in the province or other logical analysis unit that more appropriately addresses the species distribution. These maps may be generated in ArcGIS using the Geographic Biological Observations (GeoBOB) database landscape-wide snapshot plus the merged regional dataset of Natural Resources Information System (NRIS) Wildlife and NRIS Threatened, Endangered, and Sensitive Plants (TESP) and Invasives. All site data used for these maps and associated analysis must be in the appropriate agency database, GeoBOB for BLM or NRIS for FS. Contact the appropriate agency GIS data manager for information on the location of this data.

- Clearly delineate the administrative unit boundary, project area boundary, suitable habitat, and all reserves and matrix land allocations on these maps. Copies of these maps will be included in the administrative record maintained by the field unit.

The originating office should send the completed analysis, supporting documentation and maps to the Technical Contact for a first level review prior to sending out for local interagency concurrence. The Technical Contact will work with the originating office to resolve issues that may arise during the review.

**Step 4. Identification of “Non-high Priority” Sites in the Appropriate Agency Species Database**

Once a site has been determined to be a non-high priority site, it should be designated as such in the appropriate agency species database. To assure that Step 4 has been met as required in the 2001 ROD S&Gs (page 10), the sites must be entered into and identified in the appropriate agency species database immediately after the signing of the NEPA decision document. The non-high priority sites will be included in the analysis process of any future Annual Species Reviews and in the creation of Management Recommendations identifying high-priority sites.

Enter the status and the date the site was identified as a non-high priority site into the appropriate agency species database as identified below:

- **NRIS TESP** – Follow the direction on how to record a “revisit” as identified on page 5 of the *TESP Element Occurrence Field Guide*, February 2008, or page 63 of the *TESP – Invasive Species User Guide*, October 2008. Enter **non-high priority site** into the **Population Comments** field in the **EO Data tab**. NOTE: When a query is conducted, it only searches within the first 200 characters of the comment field. Thus, please ensure you include **non-high priority site** typed exactly as prescribed here, within the first 200 characters of the comment field, or it will not be picked up during the query.

- **NRIS Wildlife** – Create **non-high priority sites** as NRIS Wildlife polygon sites. On the **New Site** data entry form, select **Use Area** as the **Site Category** and enter the date the site was identified as a **non-high priority site** in the **Established Date** field. Select **other** in the **Site Type** field. Enter **non-high priority site** in the **Reference** field.

Attachment 1-3
- GeoBOB – Enter **non-high priority** in the FASITE_SM_STATUS or FLSITE_SM_STATUS fields in the GS_FAUNA_SITES or the GS_FLORA_SITES attribute tables, respectively. Also, enter the date that the site was identified as a **non-high priority site** in the **Sites Form Comments** field. Please see instructions on adding data to attribute tables on the GeoBOB website support, documentation page.
<table>
<thead>
<tr>
<th>Field Office</th>
<th>Local Contact</th>
<th>Units Covered</th>
</tr>
</thead>
<tbody>
<tr>
<td>Arcata U.S. Fish &amp; Wildlife Office</td>
<td>John Hunter</td>
<td>Mendocino NF, Six Rivers NF; Arcata RA BLM, Redding BLM</td>
</tr>
<tr>
<td>1644 Heindon Road</td>
<td>Ph: (707) 822-7201</td>
<td></td>
</tr>
<tr>
<td>Arcata, CA 95521-5582</td>
<td></td>
<td></td>
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<tr>
<td>(707) 822-7201</td>
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<tr>
<td>Sacramento U.S. Fish &amp; Wildlife Office</td>
<td>Jeremiah Karuzas</td>
<td>Lassen NF</td>
</tr>
<tr>
<td>2800 Cottage Way Room W-2605</td>
<td>Ph: (916) 414-6737</td>
<td></td>
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<tr>
<td>Sacramento, CA 95825-1846</td>
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<tr>
<td>(916) 414-6600</td>
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<tr>
<td>Yreka U.S. Fish &amp; Wildlife Office</td>
<td>Laura Finley</td>
<td>Klamath NF, Shasta-Trinity NF</td>
</tr>
<tr>
<td>1829 South Oregon Street</td>
<td>Ph: (530) 842-5763</td>
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<tr>
<td>Yreka, CA 96097</td>
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<td>(530) 842-5763</td>
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**Oregon**

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<tr>
<th>Field Office</th>
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<tbody>
<tr>
<td>Oregon U.S. Fish &amp; Wildlife Office</td>
<td>Bridgette Tuerler</td>
<td>Willamette NF, Siuslaw NF, Mt. Hood NF; Eugene District, Salem District BLM; Columbia River Gorge National Scenic Ar.</td>
</tr>
<tr>
<td>2600 SE 98th Ave, Ste. 100</td>
<td><a href="mailto:bridgette_tuerler@fws.gov">bridgette_tuerler@fws.gov</a></td>
<td></td>
</tr>
<tr>
<td>Portland, OR 97266</td>
<td>Ph: (503) 231-6179</td>
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<td>(503) 231-6179</td>
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<tr>
<td>Bend Field Office</td>
<td>Jennifer O’Reilly</td>
<td>Deschutes NF</td>
</tr>
<tr>
<td>20310 Empire Ave, Ste. A100</td>
<td><a href="mailto:jennifer_oreilly@fws.gov">jennifer_oreilly@fws.gov</a></td>
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<tr>
<td>Bend, OR 97701</td>
<td>Ph: (541) 383-7146</td>
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<td>(541) 383-7146</td>
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<tr>
<td>Roseburg Field Office</td>
<td>Scott Center</td>
<td>Umpqua NF; Roseburg BLM</td>
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<tr>
<td>2600 NW Stewart Parkway</td>
<td><a href="mailto:scott_center@fws.gov">scott_center@fws.gov</a></td>
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<tr>
<td>Roseburg, OR 97470</td>
<td>Ph: (541) 957-3472</td>
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<td>(541) 957-3470</td>
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<tr>
<td>Klamath Falls U.S. Fish &amp; Wildlife Office</td>
<td>Elizabeth Willy</td>
<td>Modoc NF, Fremont-Winema NF; Klamath Falls Resource Ar. BLM</td>
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<tr>
<td>6610 Washburn Way</td>
<td>Ph: (541) 885-2505</td>
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<tr>
<td>Klamath Falls, OR 97603</td>
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<td>(541) 885-8481</td>
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<tr>
<td>Western Washington U.S. Fish &amp; Wildlife Office</td>
<td>Kent Livezey</td>
<td>Olympic NF Mt. Baker-Snoqualmie NF</td>
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<tr>
<td>510 Desmond Drive SE</td>
<td>Ph: (360) 753-4372</td>
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<tr>
<td>Lacey, WA 98503</td>
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<tr>
<td>(360) 753-9440</td>
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<tr>
<td>Wenatchee Field Office</td>
<td>Jeff Krupka</td>
<td>Okanogan-Wenatchee NF</td>
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<tr>
<td>215 Melody Lane, Suite 119</td>
<td>Ph: (509) 665-3508</td>
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<td>Wenatchee, WA 98801</td>
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