



# United States Department of the Interior

BUREAU OF LAND MANAGEMENT

Oregon State Office  
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Portland, Oregon 97208



**In Reply Refer to:**  
6840 (OR-931) P

July 25, 2007

EMS TRANSMISSION 07/26/07  
Instruction Memorandum No. OR-2007-072  
Expires: 9/30/2008

To: All District Managers

From: State Director, Oregon/Washington

Subject: Update to State Director's Special Status Species List

DD: 08/31/2007

**Program Area:** Special Status Species (SSS)

**Purpose:** The purpose of this Instruction Memorandum (IM) is to issue an updated State Director's SSS List for the Oregon/Washington (OR/WA) Bureau of Land Management (BLM) and to transmit final interagency criteria for development of Special Status and Sensitive species lists. Also, Districts should submit any updates to or assignments of suspected and documented determinations in one consolidated response to the State Director via their District Managers by the August 31, 2007.

**Policy/Action:** The Interagency Special Status/Sensitive Species (ISSSS) Program staff, the Forest Service (FS) Region 6 (R6) staff, and the BLM OR/WA staff developed new criteria for the determination of species included within the BLM SSS and FS Sensitive Species Programs. The new criteria are designed to make the two agencies (OR/WA BLM and R6 FS) more consistent in their approaches to the development of lists of species with conservation concerns. The staffs developed criteria for two categories of SSS: Sensitive and Strategic. A draft of the proposed criteria was reviewed by both FS and BLM field units last year. The comments received helped to clarify the criteria and also contributed to two substantial changes:

- 1) In the final criteria, Fungi may be Sensitive or Strategic, rather than being restricted to Strategic as in the draft criteria; and
- 2) For Strategic Species, ISSSS Program staff will provide leadership for collection of information to remove uncertainties concerning the status of these species, yet collection of information will be coordinated with the field.

Following this review, the criteria was finalized and jointly approved by the R6 Regional Forester and the BLM OR/WA State Director. Effective with transmittal of this IM, the previous SSS categories of Bureau Assessment and Bureau Tracking no longer exist. In addition, the old criteria for the creation of Bureau Sensitive species are replaced by the criteria in Attachment 1.

All attachments, including the final updated State Director's SSS List, are available for download from the ISSSS website at: <http://www.fs.fed.us/r6/sfpnw/issssp/agency-policy/>. Attachments 2 and 3 include the Sensitive Species list while Attachments 4 and 5 include the Strategic Species list.

Please provide a consolidated set of **written** updates and assignments by close-of-business on the due date **using the attached form** (Attachment 6). **Please do not send copies of the spreadsheets with edits or comments.** All submissions require District Manager approval and signature.

When reviewing the lists, please report the following information in Attachment 6:

**“Documented” or “Suspected” information for your District.** Definitions of “documented” and “suspected” are included in Attachments 2-5 on the “Acronym” worksheet. This is an opportunity to: a) provide updated information for those species which had previously been within SSS and, b) provide documented or suspected information for species newly added to the OR/WA BLM SSS List. For species you want to update to the “Documented” or “Suspected” status, please explain why the status is not correct (for example, if your District botanists or biologists have determined that the species is not documented or suspected, but should be). For species newly added to the list, please provide a Documented (D) or Suspected (S) determination for each. For those newly added species that you have determined are neither documented nor suspected, please denote as Neither Documented Nor Suspected (N). For those species previously denoted on your unit, please confirm this determination or change to the appropriate Documented or Suspected determination. Species Fact Sheets and Conservation Assessments for some species are available for assisting you in the Documented or Suspected occurrence determination on the ISSSSP website: (<http://www.fs.fed.us/r6/sfpnw/issssp/planning-documents/>). In addition, the State's Natural Heritage program's websites provide some general information on occurrences by county, and can be accessed at: <http://oregonstate.edu/ornhic/> and <http://www.dnr.wa.gov/nhp/>.

In accordance with the OR/WA SSS Policy (6840 A.2), there may be rare situations where a field unit wishes to nominate a species for addition to or deletion from this final SSS List. In these exceptional situations, the District Manager should provide a written, concise rationale for each recommended addition/deletion. The ISSSS staff will follow up with the OR/WA Heritage Program staff to conduct a review of the species' status to determine if the recommendation is warranted.

**Timeframe:** The new list is effective immediately. However, there is a phase in for implementation of pre-project clearances for the new species listed as Bureau Sensitive in Attachments 2 and 3. Where pre-project clearances have already been conducted for a project, there are no requirements to conduct pre-project clearances or address the newly added Bureau Sensitive species in your National Environmental Policy Act of 1969 (NEPA) project. If pre-project clearances for the project have not yet occurred, pre-project clearances and NEPA documentation must occur for the newly added Bureau Sensitive species.

The district updates and corrections should be submitted via the Attachment 6 comment form by August 31st. Please send response to the attention of the State Director.

**Budget Impact:** None

**Background:** Development of consistent SSS list criteria for OR/WA BLM and FS R6 is a key goal of the ISSSS Program established in December 2005 via executive decision. The State Director's SSS List is a critical component of the BLM's SSS Program, which is a proactive approach for meeting our

obligations under the Endangered Species Act (ESA) and national policy direction as stated in the 6840 section of the BLM Manual. These laws and policies direct us to conserve species and prevent trends toward listing under the ESA.

IM No. OR-91-57, OR/WA SSS Policy, established the state policy on SSS management, expanding on the requirements in BLM Manual Sections 1734 (Inventory and Monitoring Coordination), 6600 (Inventory and Monitoring), and 6840 (SSS Management). At that time, the IM designated sensitive species for OR/WA under the category Bureau Sensitive and established two additional categories of plant and animal species (Assessment and Tracking).

The BLM's Manual Section 6840 (SSS Management) directs that actions requiring authorization or approval by the BLM are consistent with the conservation needs of the SSS and do not contribute to the need to list any SSS, either under the provisions of the ESA or other provisions of the manual (BLM Manual 6840.02). The BLM Manual provides overall direction and criteria for designating Bureau Sensitive species; it states the designation is normally used for species that occur on BLM-administered land for which the BLM has the capability to significantly affect the conservation of the species through management (6840.06E). The Manual also requires coordination with the States in the designation of Bureau Sensitive species. The State Director maintains final discretion for designating SSS.

In March 2003, the State Director reissued the policy, with clarification, in IM No. OR-2003-054. The IM states that districts are responsible for determining the documented and suspected status of species on their respective units and that district are responsible for applying policy to species that are documented and suspected on their BLM-administered lands. This IM also provided clarification on techniques for review of effects of proposed actions and for conservation and management measures for species.

The Manual, Policy, and IM No. OR- 2003-054 can be found at: <http://www.fs.fed.us/r6/sfpnw/issssp/>.

**Manual/Handbook Sections Affected:** 6840 Special Status Species Bureau Manual; 6840 Special Status Species OR/WA Policy

**Coordination:** OR 931, Branch of Biological Sciences; OR/WA Districts

**Contact:** Carol Hughes, ISSSS Program Assistant, at 503-808-2661; Barbara Hill, BLM State Office SSS Biologist, at 503-808-6052; or Joan SeEVERS, BLM State Office Botanist, at 503-808-6048.

**Districts with Unions** are reminded to notify their unions of this Instruction Memorandum and satisfy any bargaining obligations before implementation. Your servicing Human Resources Office or Labor Relations Specialist can provide you assistance in this matter.

Signed by  
Linda B. Stelzer  
Acting Associate State Director

Authenticated by  
Paj Shua Cha  
Records Section

6 Attachment(s)

1 - [Final Interagency Special Status/Sensitive Species List Criteria](#) (1p)

- 2 - [State Director's Sensitive Species List including Federally Listed Species: Oregon](#) (32pp)
- 3 - [State Director's Sensitive Species List including Federally Listed Species: Washington](#) (26pp)
- 4 - [State Director's Strategic Species List: Oregon](#) (17pp)
- 5 - [State Director's Strategic Species List: Washington](#) (8pp)
- 6 - [Review of Final State Director's Special Status Species](#) List (2pp)

Distribution w/attachments:

Harriet Allen, WA Dept. of Fish and Wildlife  
 Charles Bruce, OR Dept. of Fish and Wildlife  
 John Gamon, WA Natural Heritage Program  
 Jimmy Kagan, OR Natural Heritage Information Center

w/o attachments:

CA-930 (Ed Lorentzen)  
 OR-125 (Bill Hudson)  
 OR-930 (Michael Mottice)  
 OR-931 (George Buckner, Steve Calish, Al Doelker, Michael Haske, Barbara Hill, Rob Huff, Joe Lint,  
 Joe Moreau, Adrienne Pilmanis, Joan SeEVERS, Kelli VanNorman)  
 OR-933 (Janis VanWyhe)  
 OR BOTANY ALL  
 OR WILDLIFE ALL  
 Russell Holmes, Forest Service, R6  
 Carol S. Hughes, Forest Service, R6  
 Sarah Madsen, Forest Service, R6  
 Darci Pankratz, Forest Service, R6  
 Elaine Rybak, Forest Service, R6  
 Scott Woltering, Forest Service, R6