United States Department of Agriculture Forest Service	United States Department of Interior Bureau of Land Management	United States Department of Interior Fish and Wildlife Service	United States Department of Commerce National Marine Fisheries Service

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Route To:

TO: USDA Forest Service, Regional Foresters and Forest Supervisors
Regions 1, 4 and 6, in Klamath and Columbia River Basins

USDI Bureau of Land Management, State Directors, OR/WA, ID, and MT
District Managers, OR/WA, ID and MT, in Klamath and Columbia River Basins

USDI Fish and Wildlife Service Regional Directors and Project Leaders;
Regions 1 and 6, in Klamath and Columbia River Basins

USDC National Marine Fisheries Service, Regional Administrator, Northwest Region

SUBJECT: Interagency Implementation Team Evaluation of Accomplishment of Requirements in August 14, 1998 Biological Opinion on Continued Implementation of Land and Resource Management Plans to Bull Trout in the Klamath and Columbia River Basins

This memorandum provides a status report from the Interagency Implementation Team (IIT) on the accomplishment of requirements in the U.S. Fish and Wildlife Service (FWS) August 14, 1998 biological opinion (Opinion) on the subject actions. The Opinion was issued to complete Endangered Species Act (Act) section 7 consultation in response to a June 16, 1998, biological assessment (BA) evaluating effects on bull trout of 24 U.S. Forest Service (USFS) and 16 Bureau of Land Management (BLM) land and resource management plans (LRMPs) in the states of Washington, Oregon, Idaho, Montana and Nevada.

In a June 19, 1998 letter to the FWS, the USFS and BLM adopted commitments in implementing the aquatic conservation strategies (ACS) contained in PACFISH and INFISH. The agencies requested that these commitments be amended to the BA for the LRMPs. Through the Opinion, the FWS coordinated with USFS and BLM to develop reasonable and prudent measures and terms and conditions to reduce the overall level of incidental take which may result from continued implementation of LRMP management direction.

The IIT is an interagency group created shortly after issuance of this Opinion. The IIT is charged with directing and overseeing implementation of the various requirements of this Opinion, and a Biological Opinion issued by the National Marine Fisheries Service (NMFS) on June 22, 1998 evaluating effects on listed salmon and steelhead of continued implementation of LRMPs in the Upper Columbia and Snake River basins. This team has met regularly since August 1998, and has held candid, productive discussions to highlight and clarify the tasks in the Opinions and ensure they are implemented. The IIT has developed a strategy to implement the Opinions which includes: 1) creating task teams (TT) to accomplish specific tasks; 2) directing and coordinating with management units to accomplish other tasks; and 3) tracking accomplishments with monthly meetings of the IIT and task team leaders, and through regular reports from the field units. The details of this strategy are described in the IIT charter, which was approved December 11, 1998 by the regulatory and management agency executives.

The NMFS Opinion requires that every six months, NMFS evaluate the action agencies? accomplishment of the requirements contained in the Opinion. The IIT developed an initial evaluation of the NMFS Opinion February 5, 1999, and provided it to NMFS for their use in completing the semi-annual evaluation. Although not specifically required in the FWS Opinion, the IIT also agreed to develop a semi-annual evaluation of implementation of that Opinion, as well. Tables designed to facilitate completion of these evaluations were developed. Results of this first evaluation for the agency commitments and terms and conditions are provided in tabular summary in Tables 1 and 2. This report reflects implementation efforts made up to May 26, 1999. Specific areas where additional focus on implementation is needed are discussed below.

Summary of Significant Findings and Recommended Actions Where Additional Focus is Needed

1. *Missed time lines* ? Some time lines identified in the agency commitments and the terms and conditions have not been met.

Action ? IIT members from the FS, BLM and FWS met to identify the ?missed? time lines, and develop tasks and/or schedules to meet them. Special focus was given to term and condition #1, and agency commitments #1 (restoration strategy) and #3 (key/priority watershed networks). After discussion, the IIT established due dates, where relevant, for all the commitments where they were not currently described (see Table 1). In addition, the IIT agreed to develop target completion dates for other terms and conditions, consistent with those contained in the NMFS June 1998 Opinion, wherever possible (Table 2). These target dates are not mandated in the Opinion, but are a goal for accomplishing the term and condition as a means to assure progress in implementing the Opinion.

2. *Implementation by field units* - No definitive information about implementation of agency commitments and terms and conditions by field units is available.

Action ? The IIT agreed to develop and distribute a reporting mechanism for completion by the field units for use in future reports. This reporting mechanism has been distributed to the field units (5/25/99) and will be completed twice annually, beginning in summer 1999. This information will be included in future reports.

3. *Restoration strategy* ? Initial development of the restoration strategy was not completed.

Action ? This task is in progress, although somewhat behind schedule. The Restoration TT has targeted July 2, 1999 for completion of the initial restoration strategy.

4. *Inventory of roadless and low density areas ?* A review and inventory of existing roadless and low density areas was completed (4/29/99). An assessment of their importance to listed species habitat is needed.

Action ? The IIT has directed efforts to staff a group to meet this requirement.

5. *Roads guidance* ? The Roads TT has not begun development of guidance for use by the administrative units for minimizing/reducing effects of road management programs on bull trout.

Action ? The Roads TT should prioritize development and distribution to the field units of this guidance.

6. *Stratified monitoring plans* ? Significant progress was made in developing implementation monitoring for grazing programs. However, a summary of other management program areas to address, and a schedule for development of stratified monitoring approaches for those actions is also needed.

Action ? The Monitoring TT should develop this summary and schedule for presentation to the IIT.

Progress in Implementing Requirements of the Opinion

General Comments

Perhaps the most significant progress in implementing requirements of the Opinion was the establishment of the IIT. The IIT was formed to provide accountability and oversight in implementation of the Biological Opinions at higher levels within the management agencies. The IIT felt it was important to have high level line officer involvement to broaden the agencies? understanding of and support for implementation of the Opinions. The IIT has met regularly since summer 1998, has defined its work with a charter, and has embarked on an implementation strategy which includes task teams (TT) and coordination with management units. The IIT has been functioning well, with good representation from all agencies involved.

The IIT focused initial efforts on the NMFS steelhead Opinion, as it was completed first (June 1998). Many of the mechanisms and commitments in the NMFS steelhead Opinion are similar to, or overlap the commitments and terms and conditions in the FWS bull trout Opinion (those similar tasks are noted in italics in Tables 1 and 2). Therefore, some of the work done for steelhead has and will continue to apply to the requirements in the FWS Opinion as well.

Agency Commitments

The June 19, 1998 agency commitments focused on seven general areas. These areas, and the progress in meeting them, are briefly discussed here.

1. Restoration and Improvement. The Restoration Task Team (TT) developed some initial guidance to USFS and BLM units to ?earmark? money for integrated restoration of priority watersheds in the Columbia River basin for fiscal year 1999 (FY 99). This positioned the agencies to be more effective in funding restoration projects when the multi-year strategies are developed. In addition, the Roads TT coordinated compilation of the top 10 priorities for each USFS unit for FY 99.

The Restoration TT has been meeting since January to formulate restoration strategies, and coordinating with other task teams whose products will be used to develop the restoration strategies. Initial development of the strategy was planned for March 1, 1999, and a draft strategy was prepared by that date. Substantial progress has been made, and the Restoration TT has a July 2, 1999 date for completion of the initial strategy.

2. Standards and Guidelines. Field units have been directed to assure implementation of PACFISH and INFISH standards for road evaluation and planning through consultation at the local level. A reporting mechanism has been distributed to the field units for future reporting of progress on this, and other commitments.

Compilation of road inventory data has been accomplished at the local management units. The December 14, 1998 due date was met. The Roads TT reviewed available information on roads and found that, due to the large volume of information and variety of electronic and paper formats, it was unable to provide a single useable compilation of this material. The Roads TT therefore proposed, and the IIT agreed, that in the short term road inventories would be kept at the management unit offices and would be available to the FWS on request. The Roads TT will continue working on the long-term strategy to have this information in an electronic database, once technology makes this feasible.

3. Key and Priority Watershed Networks. A Key and Priority Watershed TT has been established, and criteria have been developed to re-examine the network of watersheds that was originally developed prior to the bull trout listing. These draft criteria were used to identify special emphasis watersheds, to ensure a comprehensive refugia network is established. To date all data has been assembled and a draft map is complete. In the process of creating this map, some mapping errors were encountered. These errors will need to be resolved before this map can be used by all units involved. The target date for completion is July 16, 1999.

4. Watershed Analysis. This is a future task which will be prioritized and conducted by the field units.

5. Monitoring. A Monitoring TT has been established. Initial efforts focused on development of a grazing implementation monitoring module for use by all field units. The TT will now focus on developing approaches for grazing effectiveness monitoring. In addition, there are plans for PACFISH/INFISH field implementation reviews beginning in summer 1999. These efforts also address the majority of the monitoring requirements laid out in Term and Condition #4 in the Opinion.

6. Long-term Conservation and Recovery. A summary of progress made in this commitment is contained in item 1, above.

7. Consultation at the Watershed Scale. Consultation is underway by the Section 7 Level 1 ?streamlining? consultation teams. A reporting mechanism has been distributed to the field units (5/25/99) and will be completed in summer 1999, and then twice annually, on a regular basis.

Terms and Conditions

Many of the terms and conditions mirror, or are consistent with the agency commitments, so progress made in implementing those similar tasks is discussed above.

Implementation of some of the tasks detailed in the terms and conditions of the Opinion occurs at multiple land management units. The IIT is responsible for ensuring implementation of those tasks, through the efforts of the Task Teams. Implementation of some of the tasks occurs at the individual land management unit (#2, 3, 5b., 6-14). On May 25, 1999, a mechanism was distributed to the field units for use in reporting their progress in implementing those requirements. The IIT is aware of some individual units who have already compiled that information on their own volition, but there is no standardized approach at this time. Compilation of this information, using the new standard format, will be done twice a year after this, and will be a focus of the next report to the IIT.

The progress of the Monitoring TT was discussed above. The Opinion (term and condition 4) required the FS and BLM to ?develop stratified monitoring plans to evaluate impacts of management actions to bull trout. The management program areas to address and a schedule for their development will be agreed to...? The IIT agreed to initially focus the efforts of the Monitoring TT on grazing implementation and then effectiveness monitoring. A list of the other management program areas to address, together with the schedule for development of monitoring approaches for them, will be a focus of the Monitoring TT in the next several months (12/1/99 target date).

The Opinion also directs the development and implementation of guidance for use by administrative units for minimizing and reducing the effects of road management programs on bull trout (Term and condition 5). This task has been assigned to the Roads TT, who has not yet had an opportunity to begin work on that effort. A related task, to assess the importance of unroaded and low density areas for habitat needs, has also not been initiated, primarily due to difficulties in convening an interagency technical team of experts to assist in these efforts. This is an area where focused effort is needed in the future. An October 1999 target date has been agreed to for these efforts.

Summary

The IIT believes that a solid, productive interagency approach exists to implementing the Opinion. Some elements of implementation have proved challenging; however, the IIT will continue to move forward with positive solutions to meet each requirement of the Opinion, and to continue to build solid working relationships between the agencies, which will be critical for both interim and long term approaches to recovery of listed species.

/s/Gordon Haugen
GORDON HAUGEN
INTERAGENCY IMPLEMENTATION TEAM COORDINATOR
Signing for the INTERAGENCY IMPLEMENTATION TEAM

Enclosures

Table 1. Progress in implementing aspects of the interagency memorandum to amend the Biological Assessment for the PACFISH/INFISH LRMP Section 7 consultation on bull trout, June 19, 1998 (commitments).

Note: Dates in ?Due Date? column with an asterisk (*) were developed through discussion and agreement by the IIT to meet term and condition #1. Tasks which are similar to NMFS 6/22/98 steelhead opinion are noted in italics (in the status column).

Commitment	Due Date	Status
1. Restoration and improvements. The FS and the BLM, in cooperation with the NMFS and the FWS, will develop and implement strategies that will integrate and coordinate restoration, protection and evaluation measures (construction/maintenance, flood repair, watershed, and fish habitat improvements, etc.) to expeditiously achieve restoration objectives at multiple scales (DPS, metapopulation watershed). Restoration opportunities will be identified through an agreed upon approach using existing funding, information and programs, and incorporating new information as it becomes available. Initial strategy development will be completed by **March 1, 1999**.	3/1/99; established in commitments	In progress. Restoration TT developed guidance re ?earmarking? funds for integrated restoration of watersheds in FS 99. Roads TT coordinated compilation of top 10 priorities for each FS unit for FY 99. Restoration Task Team (TT) has developed draft restoration strategy, which is under review. Target date for completion of initial strategy is 7/2/99.
2. Standard and guidelines: The FS and BLM will complete prior commitments in the PACFISH and INFISH decisions, and use the conclusions in the PACFISH/INFISH reviews and the land management plan Biological Assessment for bull trout and suckers. Prior commitments to be emphasized are:	? ?	? ?
2.a. Road Evaluation and Planing (PACFISH and INFISH standards RF-2 and RF-3). Implementation of these existing standards in PACFISH/INFISH is necessary to understand and begin reducing impacts from roads on streams with habitat for ESA listed and proposed fish. Achievement of PACFISH/INFISH RF-2 and RF-3 will be a priority.	Report twice annually: May 15 and November 15*	Application of these criteria is taking place in project design and assured through Section 7 consultation. A reporting mechanism has been distributed to the field units (5/25/99), and will be completed twice annually, beginning summer ?99. This information will be included in future reports.

2.a.i. Using existing information and road definitions, the FWS will be provided with road inventories on the management units in the three bull trout DPSs **within 120 days of BO signature**. This information should include a description of road definitions and survey methodology used. Information gaps will be identified and a schedule will be developed to provide information to the FWS **within 2 years**.	12/14/98 (120 days after BO) 12/14/00 (within 2 years)	Done. Data currently cannot be compiled in electronic format useable by FWS, but resides at the management units. Regulatory agencies have access to the data at those units. IIT agreed this met the intent of this requirement. Long term objective is to have this information in an electronic database, once technology makes this feasible. *(NMFS Mech. 2b.1.)*
2.a.ii. As part of watershed analyses, road inventories, and other appropriate information will be used to collaborate with NMFS and FWS in developing restoration strategies. Restoration strategies will be used to identify key processes needing attention, prioritize key locations and project types, address implementation and scheduling issues, and provide a preliminary estimate of costs. These strategies will serve as the primary framework for implementation of integrated restoration activities.	3/1/99 (initial approach)*	In progress. Restoration TT has developed draft strategy; final targeted for 7/2/99 (see commitment #1) *(NMFS Mech. 5b)*
2.a.iii. Continue updating the road inventories. Incorporate new information consistent with 2.a.i. (above)	No due date needed; continuing effort*	See 2.a.i. *(NMFS Mech. 2)*
2.b. To complete the commitments made in the aquatic strategies for culvert replacement, fish passage, grazing facilities in RHCAs, recreation facilities, and minerals management the implementation of these existing standards in PACFISH/INFISH are necessary to understand and begin reducing impacts from these management activities on streams with habitat for ESA listed and proposed fish. Achievement of PACFISH/INFISH RF-4 and RF-5, GM-2, RM-1, and MM-2 will be a priority.	Report twice annually: May 15 and November 15*	Application of these criteria is taking place in project design, and assured through Section 7 consultation. A reporting mechanism has been distributed to the field units (5/25/99), and will be completed twice annually, beginning summer ?99. This information will be included in future reports.
3. Key and priority watershed networks: reexamine the structure and function of INFISH priority and PACFISH key watershed networks to ensure the protection and recovery of bull trout and listed sucker metapopulations.	? ?	? ?

3.a. Identify and clarify the primary functions of key, priority, and special emphasis watershed.	7/16/99*	In progress, and partially completed. Product will be based on outcome of 3.b.
3.b. Identify special emphasis watersheds **(within 60 days of BO signing)** to ensure a comprehensive refugia network for the protection and recovery of bull trout and listed suckers.	10/14/98 (60 days after BO)	In progress. A Key and Priority Watershed TT has been established and criteria have been developed to re-examine the network of watersheds that was originally developed prior to the bull trout listing. These criteria were used to identify special emphasis watersheds, to insure a comprehensive refugia network is established. To date all data has been assembled and a draft map is complete. In the process of creating this map, some mapping errors were encountered. These errors will need to be resolved before this map can be used by all units involved. Target date for completion is July 16, 1999.
3.c. Completing watershed analysis in existing INFISH priority watersheds, and special emphasis watersheds as identified in 3b above, is a priority (required in PACFISH and INFISH standards, TM-1, RF-2, RM-1). Project decisions will be guided by the results of watershed analysis.	Due dates will be established once 3.d. is completed.*	Future task to be completed by field units. A reporting mechanism has been distributed to the field units (5/25/99), and will be completed twice annually, beginning summer ?99. This information will be included in future reports.
3.d. Priorities and schedules for watershed analysis will be developed concurrently with #1 (above) and updated annually.	12/15/99 and annually there after.*	Initial schedule will be provided by 7/2/99 and by 12/15 annually thereafter. *(NMFS Mech. 5d)*
4. Watershed analysis: Watershed analysis will be conducted according to ?Ecosystem Analysis at the Watershed Scale?, Field Guide for Watershed Analysis, 1995, as updated. In general watershed analysis will not be project-driven but undertaken to generate an information base and recommendations for use in project planning.	No due date needed. Complete as needed.*	See 3.c.

5. Monitoring: To improve monitoring efforts, to make the level of monitoring commensurate with the level of on-the-ground activities, and to provide feedback on the effects of activities, the FS and BLM will develop a mechanism for improved monitoring accountability and oversight. Interagency collaboration in the development of this	? ?	? ?

mechanism is necessary to ensure a common understanding of expectations.		
5.a. Consider NMFS? expectations for monitoring in the 1995 LRMP Opinion (section IX.I. and Appendix A-10), when updating the PACFISH monitoring strategy.	No due date needed; continuing effort.*	Done. Monitoring TT is referring to this in updating the strategy. *(NMFS Mech. 1d.1)*
5.b. Activate the PACFISH interagency effectiveness monitoring subgroup including areas covered by INFISH, **(within 120 days of signature)** to develop a monitoring strategy including a range of monitoring alternatives commensurate with anticipated land management activity levels, funding, and staffing levels.	12/14/98 (120 days after BO)	Done. Monitoring TT established. *(NMFS Mech. 1d.2)*
5.c. Incorporate INFISH areas into PACFISH implementation monitoring efforts.	Spring ?99 and on-going.*	Done. INFISH areas included in monitoring effort. *(NMFS Mech. 1d)*
5.d. Improve the current implementation monitoring process by expanding regional/state level USFS/BLM line officer involvement in PACFISH/INFISH implementation oversight and review.	No due date needed; on-going effort.*	In progress. This is a goal of the IIT. Regional/State level involvement assured through participation in IIT. The PACFISH/INFISH field review team has been established and line officers are included. *(NMFS Mech 1d.3)*
6. Long-term Conservation and Recovery: FS and BLM will use their authorities in carrying out programs for the conservation of endangered and threatened species and consistent with Section 7a (1) of ESA.	? ?	? ?
6.a. Using PACFISH/INFISH watershed analysis and other information, develop a conservation approach to protect and restore existing high quality habitats and the connectivity between them. The FS and BLM will review existing roadless and low density areas (as defined in ICBEMP science assessment team) to assess their importance to listed species habitat.	10/1/99*	Roads TT compiled data on existing roadless and low density areas (4/29/99). An assessment of their importance to habitat needs to be completed. *(NMFS Mech. 3a)*

6.b. As a foundation for the development of a long-term conservation and recovery strategy, the FS and BLM will develop a mechanism for improved accountability and oversight to ensure PACFISH and INFISH direction is fully implemented. Interagency collaboration in the development of this mechanism is necessary to ensure a common understanding of expectations.	See 6.b.1	See 6.b.1

6.b.1. Provide a mechanism, **(within 120 days of signature)**, that ensures full implementation of programmatic aquatic conservation measures at all organizational levels for the bull trout addressed in the BA. (June 15, 1998)	12/14/98 (120 days after BO)	Done. Establishment of the IIT and task teams (chartered 12/11/98) meets this requirement. *(NMFS Mech. 1a)*
6.b.2. Provide a strategy which will be used if funding or priorities prevent full implementation of the aquatic conservation measures. Annually, upon receipt of the initial budget, review the fiscal year priorities and program of work for attainment of fish conservation measures. Identify highest priority work for available funds and identify and document significant shortfalls in funding or staffing.	By 3/1 each year.*	For 1999, some discussions have taken place at local levels. The IIT is developing a strategy for use by the field to ensure these discussions take place annually, using a consistent approach. This strategy will be completed by July ?99 for use beginning 3/1/00 and annually thereafter. *(NMFS Mech. 1c)*
7. The FS and BLM, in coordination with the FWS, will complete Section 7 consultation at the watershed level by **May 1999.** The watershed consultation will follow the approach agreed to in the January 27, 1998 letter of direction on bull trout conferencing, with modifications as agreed to by the agencies. After the effective date of the bull trout listing and until the watershed consultations are completed, all ongoing and proposed actions must conform to INFISH and PACFISH guidelines and these seven commitments.	5/99	Consultation is underway by the level 1 teams, utilizing this direction. Any modifications are agreed upon at the local level. A reporting mechanism has been distributed to the field units (5/25/99), and will be completed twice annually, beginning summer ?99. This information will be included in future reports.

Table 2. Progress in implementing terms and conditions of the Service biological opinion for the Effects to Bull Trout from Continued Implementation of Land and Resource Management Plan, August 14, 1998 (terms and conditions).

Note: The target date is a goal for accomplishing the term and condition, as agreed to in discussions by the IIT (in status column). Target dates are not mandated in the terms and conditions, but are agreed to by the agencies to assure progress in implementing the BO. Tasks which are similar to those in the NMFS 6/22/98 steelhead Opinion are noted in italics (in the status column).)

Terms and Conditions	Target date	Status
1. By December 1, 1998 the USFS and BLM will develop, in cooperation with the Service, time lines and a schedule for completion of aspects of the additional commitments contained in the June 19, 1998, amendment to the BA where they are not currently described.	12/1/98 specific due date included in terms and conditions.	Done. Due dates for completion of additional commitments were not set by 12/1/98. However, where appropriate, due dates were discussed and agreed to by the IIT, and have been included in this report to meet this requirement (see asterisked items in Table 1).
2. To ensure that proposed actions designed in accordance with relevant standards and guidelines are in fact consistent with PACFISH and INFISH ACS objectives, USFS and BLM decision makers will apply the results of watershed analysis and other relevant information to conclude that actions either ?meet? or ?do not prevent attainment? of the ACS objectives. The conclusion must be documented and supporting rationale provided. Examples of tools for the documentation include, but are not limited to materials provided at interagency workshops on the bull trout conference process (e.g. the bull trout matrix and outline for watershed BAs) and Adequate Documentation for Changes to ACS.	Through initial consultation, then continuing. Report twice annually: May 15 and November 15	Intent is that determination of consistency with ACS objectives will occur through the Section 7 level 1 consultation approach, and that the documentation is being provided through those consultation efforts. A reporting mechanism has been distributed to the field units (5/25/99), and will be completed twice annually, beginning summer ?99. This information will be included in future reports.
3. To ensure that an interagency, interdisciplinary process is used to implement management direction in the LRMPs, utilize the Level 1 team streamlining consultation process; the bull trout watershed consultation approach as outlined in the January 27, 1998, letter of direction and as updated by any new, revised interagency direction; and apply the bull trout Checklist and Matrix of Pathways and Indicators (USFWS 1998), or a similar agreed upon approach, to evaluate all proposed actions that may affect the bull trout.	Continuing Report twice annually: May 15 and November 15	Consultation is taking place at local levels through the level 1 Section 7 process, utilizing the ?matrix? or other agreed upon approaches. A reporting mechanism has been distributed to the field units (5/25/99), and will be completed twice annually, beginning summer ?99. This information will be included in future reports.
4. Through interagency coordination, develop stratified monitoring plans (e.g. at the watershed or subbasin scales) to evaluate impacts	Grazing stratified monitoring:	In progress. Monitoring (Task Team (TT) finished grazing implementation monitoring protocols, and is

of management actions to bull trout. The management program areas to address and a schedule for their development will be agreed to by the interagency team. The plans should address, at a minimum, both compliance and effectiveness monitoring.	Implementation **Spring 99**. Effectiveness **Fall 99**. Schedule for other program areas **12/1/99**	working on grazing effectiveness monitoring. Schedule will be developed to address other management program areas. *(NMFS Mech. 1d, 2)*
4.a. Develop these plans by subbasin, through use of an interagency group, to maximize the utility of monitoring information through a coordinated effort and a defensible sampling design. The interagency groups should establish objectives for the monitoring plans in accordance with PACFISH and INFISH.	Continuing	In progress. Initial focus of Monitoring TT on grazing implementation monitoring, then on effectiveness monitoring for that program. Products will be provided to field for use. See 4 above for future steps. *(NMFS Mech. 1d, 2)*
4.b. Goals for the monitoring plans should include maximizing the effectiveness of limited monitoring funds, identifying appropriate scales and levels of monitoring necessary to determine if management actions are meeting PACFISH and INFISH direction, allowing for flexibility as funding and activities change, and identifying how monitoring results should be used to make management adjustments.	Continuing	Done. These goals are included in the Monitoring TT approach (see 4 & 4a). Products will be provided to the field for use. *(NMFS Mech. 1d, 2)*
4.c. Fully implement the monitoring plans by ensuring monitoring schedules are developed and implemented, with agreement between the USFS, BLM, and the Service. If these mutually agreed upon schedules can not be followed, an alternative approach will be developed and agreed to by the interagency group.	Initial schedules by 12/1/99. Updated annually thereafter.	Done. Monitoring TT is interagency group. Schedules will be developed jointly and agreement reached. *(NMFS Mech. 1d, 2)*

5. In collaboration with the Service, the USFS and BLM will develop and implement guidance for use by administrative units for minimizing/reducing effects of road management programs on bull trout. Issues that should be addressed in this guidance document include, but are not limited to, road construction, reconstruction, removal, obliteration and decommissioning as well as an assessment of unroaded and low density roaded areas in relation to conservation of bull trout. The exact scope, format and detail of this guidance document should be decided through interagency discussions. Following are items for consideration in completing this task:	Date for development of road management guidance document needs to be determined.	Roads TT has been identified. These issues are part of their task list. No work has started on guidance document at this point.

5.a. Convene an interagency technical team of experts and research scientists to guide an assessment of road construction and management, including unroaded and low density roaded areas in relation to conservation of bull trout.	10/1/99	Little progress. Roads TT compiled data on existing roadless and low density areas (4/29/99). A team has now been identified to work on an assessment of their importance to habitat needs. *(NMFS Mech. 3a &b)*
5.b. Provide descriptions, location, and maps of unroaded and low density roaded areas, and existing information on the relative habitat value of the areas for bull trout.	10/1/99	See 5.a.
5.c. The technical/research team will summarize and review existing management direction and make recommendations to senior agency managers regarding at a minimum: need for additional habitat protection; risks to bull trout from developmental activities; priority for subbasin assessments and watershed analyses connectivity between areas; and restoration priorities.	10/1/99	Will be developed based on work products above. *(NMFS Mech. 3c)*
5.d. Provide a mutually agreed upon strategy to accomplish any additional habitat protections recommended by the technical/research team.	10/1/99	Will be developed based on work products above. *(NMFS Mech. 3d)*
6. For mining operations on BLM-administered lands that are not required to have an approved Plan of Operation (see CFR §3809.1-4), respond to all mining notices within 10 calendar days by advising the operator that the mining activity shall not cause take of bull trout unless the operator has first obtained an incidental take permit under section 10 of the ESA. BLM will advise the operator of what actions are needed to prevent adverse impacts to bull trout and their habitat.	As needed through consultation. Report twice annually: May 15 and November 15	Unknown. The IIT has not yet sought information to confirm this is occurring. A reporting mechanism has been distributed to the field units (5/25/99), and will be completed twice annually, beginning summer ?99. This information will be included in future reports.

7. Provide documentation of information and criteria used to design and prioritize actions to demonstrate that the timing of in-channel work associated with the subject projects will minimize short-term adverse effects to aquatic habitat, and to demonstrate compliance with applicable objectives and standards and guidelines of the ACSs.	As needed through consultation	The intent is for this task to be addressed through the Section 7 level 1 consultation process. A reporting mechanism has been distributed to the field units (5/25/99), and will be completed twice annually, beginning summer ?99. This information will be included in future reports.
8. To ensure that proposed actions are designed to provide for long-term habitat benefits while avoiding, minimizing or reducing short-term impacts, utilize information and recommendations from completed watershed analysis reports, the most current watershed	See item 7	See item 7.

scale environmental baseline and the determination of effects of proposed actions using the bull trout Matrix and Checklist, or an agreed upon approach.		
9. To avoid or minimize incidental take associated with the adverse effects of road construction, reconstruction and maintenance on water quality, flow and hydrology, and channel condition and dynamics, each administrative unit shall apply the pertinent standards and guidelines for road construction and decommissioning as described in the LRMPs, as amended by PACFISH and INFISH.	See item 7	See item 7
10. New roads (temporary, semi-permanent or permanent) in RHCAs shall be minimized to the greatest extent possible, and shall be constructed only where watershed and analyses have been completed to document that the roads would not prevent attainment of ACS objectives.	See item 7	See item 7.
11. When reviewing and modifying grazing actions to minimize/reduce incidental take, amend livestock grazing annual operating instructions, term grazing permits or leases to incorporate appropriate criteria for evaluating ecological conditions of affected areas to ensure attainment of ACS objectives. The evaluation criteria should be developed by USFS and/or BLM range and other interdisciplinary specialists, in coordination with the Service through Level 1 teams.	See item 7	See item 7

12. Implement management actions, as appropriate, to minimize the impact of livestock grazing in known bull trout spawning areas. Some actions which may be considered include numbers of animals, timing and duration or grazing, herding, fencing or riparian areas, or upland water sites.	See item 7	See item 7
13. For mining operations where the administrative unit has discretion to require a Plan of Operations, require such a plan if the mining operation has the potential to adversely affect bull trout. Ensure that the plan complies with applicable minerals management standards and guidelines for the ACS.	See item 7	See item 7.
14. Analyze, design, and implement timber harvest activities to meet the requirements of PACFISH and INFISH, and such	See item 7	See item 7.

additional measures as needed to minimize/reduce incidental take of bull trout, through incorporation of the following terms and conditions as appropriate for site specific conditions:		
14.a. Evaluate effects to bull trout and develop mitigation measures.	See item 7	See item 7.
14.a.i. Utilize the indicators for bull trout habitat needs contained in the bull trout matrix (Appendix 2), or a similar evaluation tool agreed upon by the agencies;	See item 7	See item 7.
14. a. ii. Utilize information from: the scientific literature; models, validated with local data wherever possible; and on-site studies to evaluate slope stability, and landslide hazard and risk;	See item 7	See item 7.
14.b. Develop and implement approaches that address and minimize potential incidental take of bull trout from fuel storage and transportation associated with timber harvest actions.	See item 7	See item 7.

Note: Terms and conditions 7 through 14 become mandatory when and where found appropriate through formal consultation, and prescribed, by the Service, in a site-specific biological opinion.