



United States Department of the Interior

IDAHO FISH AND WILDLIFE OFFICE

1387 S. Vinnell Way, Room 368

Boise, Idaho 83709

Telephone (208) 378-5243

<http://www.fws.gov/idaho>



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Michael S. Francis
Chief, Environmental Compliance Section
Department of the Army
Corps of Engineers
201 North Third Avenue
Walla Walla, Washington 99362-1876

Subject: Ahsahka Stewardship Project—Clearwater County, Idaho—Concurrence
352.0000 14420-2011-I-0019

Dear Mr. Francis:

This letter transmits the Fish and Wildlife Service's (Service) concurrence on determinations for listed species as documented in the Biological Assessment (Assessment) for the proposed Ahsahka Stewardship Project (Project) in Clearwater County, Idaho. In a letter dated October 19, 2010, and received by the Service on October 25, the Corps of Engineers (Corps) requested concurrence with effects determinations under section 7 of the Endangered Species Act (Act) of 1973, as amended, that the proposed Project may affect, but is not likely to adversely affect the bull trout (*Salvelinus confluentus*) and designated bull trout critical habitat. The Corps also determined that the Project will not affect the Canada lynx (*Lynx canadensis*), the grizzly bear (*Ursus arctos horribilis*), and is not likely to jeopardize the continued existence of the gray wolf (*Canis lupus*). The Service acknowledges these determinations.

The Corps proposes to conduct a stewardship project to protect, preserve, and conserve natural resources through the application of ecosystem principles on selected Corps administered forestlands encompassing a portion of Dworshak Dam and Reservoir, the lower North Fork Clearwater River (below Dworshak Dam), and the Lower Clearwater River, Clearwater County, Idaho. The Project area encompasses approximately 1,738 acres. The Project consists of the following elements: timber harvesting, slashing, prescribed burning, and road building.

Selective timber harvest will occur on approximately 1,273 of the total acres in the Project area, in areas that are uncharacteristically overstocked with trees. Harvest will entail thinning stands to a canopy coverage of 30 to 50 percent, consisting of larger dominant and co-dominant trees. Helicopter logging will be used on slopes greater than 40 percent. Logging slash will be scattered and broadcast burned (prescribed burning) or piled and burned. Prescribed burning will be used on select portions of the Project area

to achieve desired future conditions. No fires will be ignited in riparian habitat conservation areas (RHCAs). Burning will occur between September 1 and November 15. Prescribed burning will occur after thinning and timber harvest.

The proposal includes constructing 5.1 miles of new roads and improving 5.7 miles of existing roads. Road work will require the installation of 12 culverts on intermittent non-fish bearing streams. The Corps will use Impact Minimization Measures (IMMs) and Best Management Practices (BMPs) to reduce resource impacts. These IMMs and BMPs include, but are not limited to, prohibiting harvest in RHCAs; seeding roads, skid trails, and landings; using erosion control measures such as berms, water bars, cross-drains, diversions, sediment traps, and/or silt fences; scattering slash material; and closing work sites during heavy rains and snowfall. Refer to the Assessment for a complete Project description, including IMMs and BMPs.

Service concurrence that the Project may affect, but is not likely to adversely affect bull trout or bull trout critical habitat is based on the following rationales presented in the Assessment:

1. The risk of any effects to spawning bull trout resulting from Project implementation is discountable because no bull trout spawning has been documented in the Project area.
2. Adult bull trout overwinter and juveniles reside year-round in Dworshak Reservoir, and adult and subadult bull trout use the North Fork Clearwater River (below the reservoir) and Lower Clearwater River for feeding, migrating, and overwintering. Effects to bull trout in Dworshak Reservoir and the North Fork Clearwater and Lower Clearwater River from Project implementation are expected to be insignificant due to the implementation of Project IMMs and BMPs. Specifically, sediment inputs into the reservoir and Clearwater River will be minimized through limiting harvest treatments and burn prescriptions to areas outside of RHCAs; reseeding roads and landings after Project completion; using helicopter logging on slopes greater than 40 percent; using erosion control measures such as silt fences and sediment traps; and closing work sites during periods of heavy rain or snowfall. Any sediment effects to bull trout habitat in Dworshak Reservoir from the Project will be insignificant in comparison to baseline conditions associated with reservoir drawdowns for flow augmentation. The Project proposes only selective harvest with a goal of leaving 30 to 50 percent canopy coverage outside of RHCAs. By using selective harvest and by not allowing any harvest in RHCAs, effects to water temperature and large woody debris recruitment in the action area will be minimized.
3. Similarly, the effects of the Project on the primary constituent elements of designated bull trout critical habitat in Dworshak Reservoir, the North Fork Clearwater (below the reservoir) and the Lower Clearwater River are anticipated to be insignificant or discountable due to the implementation of the IMMs and BMPs incorporated into the Project.

This concludes informal consultation on the proposed Project under section 7 of the Act, as amended. If the proposal addressed in this letter is modified, environmental conditions change, or additional information becomes available regarding potential effects on listed species, you should verify that your conclusions are still valid.

Thank you for your interest in the conservation of threatened and endangered species. Please contact Clay Fletcher at (208) 378-5256 if you have questions concerning these comments.

Sincerely,

A handwritten signature in black ink that reads "Brian T. Kelly" followed by the word "for" written in a cursive style.

Brian T. Kelly, State Supervisor
Idaho Fish and Wildlife Office

cc: IDFG, Region II, Lewiston (Hennekey)
NOAA Fisheries, Grangeville (Brege)