

# United States Department of the Interior



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October 11, 2006

M 19 Rock Creek Mine

Paul Bradford, Forest Supervisor  
Kootenai National Forest  
1101 Highway 2 West  
Libby, Montana 59923

Dear Mr. Bradford:

This document transmits the Fish and Wildlife Service's (Service) final biological opinions based on the Service's review of the proposed Revett Silver Company's Rock Creek Copper/Silver Mine Project (Rock Creek Mine) and associated mining operations. The proposed Rock Creek Mine is located in the Rock Creek drainage which is a tributary to Cabinet Gorge Reservoir on the lower Clark Fork River in Sanders County, Montana. The opinions describe effects of the proposed action on the threatened grizzly bear (*Ursus arctos horribilis*), bull trout (*Salvelinus confluentus*), and bull trout critical habitat. The opinions have been prepared in accordance with Section 7 of the Endangered Species Act of 1973, as amended (Act) (16 U.S.C. 1531 et seq.).

The Service prepared these documents in response to the Kootenai National Forest (Forest) request and the accompanying Biological Assessment (BA) dated July 31, 1998, (USDA 1998) amended May 13, 1999 (USDA 1999) for the bull trout.

The biological opinions are based on information provided in the BA, the environmental impact statement, telephone conversations with Forest personnel, and other sources of information. A complete administrative record of this consultation is on file in the Montana Ecological Services Field Office in Helena. If you have any questions, please contact Mark Wilson at 406-449-5225 extension 205.

Sincerely,

R. Mark Wilson  
Field Supervisor  
Montana Field Office

Endangered Species Act  
Section 7 Consultation

**BIOLOGICAL OPINION**

on the

**Effects to Grizzly Bears, Bull Trout, and Bull Trout Critical Habitat from the  
Implementation of  
Proposed Actions Associated with Plan of Operation for the  
Revett RC Resources Incorporated Rock Creek Copper/Silver Mine**

as proposed by the

U.S. Forest Service, Kootenai National Forest

U.S. Fish and Wildlife Service  
Montana Ecological Services Field Office

**October 11, 2006**

## SUMMARY

### PART A -GRIZZLY BEARS

In 2005, as a result of a lawsuit, the court set aside and remanded the 2003 biological opinion on the Rock Creek Mine project back to the Service for reconsideration. This biological opinion is based on further consideration in accordance with the 2005 court Order and on new information related to the Cabinet-Yaak Ecosystem (CYE) grizzly bear population that became available from 2003 to the present. Potential adverse effects of the proposed Rock Creek Mine are human-caused grizzly bear mortality, displacement of grizzly bears from key habitat due to disturbances caused by the mine and associated activities, and fragmentation of habitat in the narrow CYE. The new information included additional grizzly bear mortality and scientific models that predicted a high likelihood of extinction for grizzly bears in the CYE, unless a number of recommended actions were taken.

The Service reexamined the proposed action and analyzed its effects given the new information, and engaged in further consultation with the Forest during 2005 and 2006. As a consequence, the Forest incorporated additional conservation measures to the mitigation plan to address the new information regarding the CYE grizzly bear population status, and to address the concerns raised by the court. We re-analyzed the revised mitigation plan and concluded that it includes a suite of measures that adequately address the adverse effects, and would ultimately have a net positive impact on grizzly bears and grizzly bear habitat in the CYE. The revised plan more aggressively addresses the adverse impacts of the incidental take expected as a result of development of the mine, as well as the existing conditions in the CYE that lead to human-caused grizzly bear mortality. An Oversight Committee, with technical input and advice from the Service, would work cooperatively to ensure the implementation of the numerous measures in the Forest's mitigation plan. Through implementation of the conservation measures in the mitigation plan, we expect the effects of the proposed action on the CYE grizzly bear population would include the following:

- a reduction in human-caused grizzly bear mortality rates - accomplished by improved education and outreach to mine employees and CYE communities at large, improved attractant storage and management, and effective prevention and/or resolution of conflicts between grizzly bears and people;
- conservation of grizzly bear habitat that might otherwise be developed in the future;
- continued augmentation of grizzly bears into the Cabinet Mountains; and
- continued and enhanced research related to grizzly bear ecology in the CYE and connectivity between the Yaak and Cabinet portions of the CYE.

This improved condition over baseline is anticipated to offset and fully mitigate the impacts of the incidental take anticipated as a result of mine development.

To accomplish the above, over the course of a 35-year period Revett would be required to fund conservation measures including, but not limited to:

- the purchase of or perpetual conservation easement on 2450 acres of high quality grizzly bear habitat in the CYE that is at risk of being developed;
- two Montana, Fish, Wildlife and Parks grizzly bear management specialists over the life of the mine;
- one law enforcement officer over the life of the mine;
- grizzly bear information, education and outreach programs and projects, in cooperation with Montana Fish, Wildlife and Parks and the Forest Service;
- monitoring and research efforts specifically targeting the CYE grizzly bear population, including augmented grizzly bears;
- the purchase of grizzly bear-resistant garbage containers for all mine employees living in or near grizzly bear habitat, and additional containers for the public at large;
- the conversion of the Sanders County garbage transfer station and others in the CYE over time, to be grizzly bear resistant; and
- bear resistant garbage receptacles at Forest Service campgrounds.

Collectively, the conservation measures are reasonably expected to prevent the loss of more than one grizzly bear over the 30-year life of the mine, thus more than offsetting the loss we anticipate from the project (one grizzly bear). The measures in the mitigation plan required of the Forest and Revett, if implemented, would result in a net reduction in future human-caused grizzly bear mortality rates, even with development and operation of the proposed mine. The conservation measures include actions that are known to prevent conflicts between people and grizzly bears, and/or resolve conflicts that do occur in ways that avoid the removal or mortality of grizzly bears. This reduction in human-caused grizzly bear mortality would occur concurrently with Montana Fish, Wildlife and Parks' augmentation of grizzly bears into the CYE. Research indicated that augmentation of small grizzly bear populations combined with a reduction in human-caused mortality had both short- and long-term positive effects on growth rates (Proctor et al. 2004).

Further, construction of the mine would be deferred until at least six female grizzly bears were augmented into the Cabinet Mountains (two of which have already been augmented) and monitored. The addition of six female grizzly bears to the existing population in the CYE prior to construction of the mine would further assure that the potential loss of a female grizzly bear due to the effects of the proposed mine, if such loss were to occur, would be offset (Kasworm et al. 2006b). Although Montana Fish, Wildlife and Parks' augmentation program is independent of the proposed action, Revett would fund a grizzly bear monitoring and research effort in the southern Cabinet Mountains during the operational life of the mine, which would ensure funds for monitoring all augmented bears. This funding would allow the Service to monitor augmented bears, which is essential to the Montana Fish, Wildlife and Parks' continuance of their program. Funding for CYE grizzly bear monitoring to date has been tenuous and not guaranteed, dependent on available annual government funding. Revett has also agreed to provide funding for actual augmentation, in the event that such funding is needed.

The Service anticipates that some low level of take would occur as a result of disturbance-related displacement of one or two female grizzly bears from key habitat due to noise and human activity in the Rock Creek drainage, once construction of the mine begins. Under the project's mitigation plan, grizzly bear displacement would be offset through the purchase of 2,450 acres of

land (over a five-year period) located in or near the southern portion of the Cabinet Mountains Wilderness. This land would be secured and protected from future development through purchases by Revett followed by either conveyance in fee or perpetual conservation easement to the benefit of the Forest. The effects of displacement on the grizzly bear population would be more than offset by the combination of the land acquisition, the existing and improved access management on the Forest, the net reduction in existing and anticipated future human-caused grizzly bear mortality rates, and augmentation of the CYE grizzly bear population. No other grizzly bear ecosystem has received this level of concerted and coordinated effort to reduce conflicts between grizzly bears and people, to enhance population growth, and to reduce the potential for human-caused mortality of grizzly bears. We expect that over time, the combined measures in the mitigation plan would contribute to stabilization and growth of the CYE grizzly bear population.

After reviewing the current status of the grizzly bear, the environmental baseline for the action area, the effects of the proposed Rock Creek Mine and the cumulative effects, it is the Service's biological opinion that the Rock Creek Mine as proposed, is not likely to jeopardize the continued existence of the listed entity of grizzly bears. No critical habitat has been designated for this species, therefore none would be affected.

## **PART B- BULL TROUT**

The adverse effects of the Rock Creek Mine on bull trout, as proposed, are anticipated to be caused by sedimentation and confined to the Rock Creek watershed and Cabinet Gorge Reservoir. Sedimentation is expected to occur during the 5-year construction period and for 2 years afterward. Sediment delivered to Rock Creek could temporarily degrade spawning and rearing habitat and negatively affect water quality. However, after this period the quality of habitat conditions is expected to improve as sediment delivery subsides and sediment transport conditions return to pre-project watershed conditions. Revett would be required to monitor fine sediment and if fine sediment levels approach or exceed specified thresholds in spawning areas or in total in the watershed, corrective actions would be required to address known or potential sources of delivery.

The Service had concerns that over the 35-year operating period and beyond, mining activities may cause chemical contamination in Rock Creek and possibly Cabinet Gorge Reservoir if MPDES standards are exceeded. There is also a concern that mining activities may intercept sources of groundwater that could result in changes in surface flows and stream temperatures in Rock Creek. Although adverse effects are not anticipated at this time, the effectiveness of the proposed mitigation measures over the life of the project is uncertain. Consequently, Revett will be required to provide long-term monitoring designed to detect changes in water chemistry and changes in stream temperature and stream flows. If monitoring results indicate an elevated risk of adverse impacts to bull trout, the Service would request re-initiation of consultation.

Revett would be required to develop final monitoring and mitigation plans prior to project startup. The regulatory agencies would review and approve the plans as an interagency team. The Service would participate on issues and plan development relative to bull trout, bull trout critical habitat,

water use, water quality, groundwater, sediment, and watershed assessment. The Service would have approval authority of these plans, assessments, and evaluations.

After reviewing the current status of the bull trout and bull trout critical habitat, the environmental baseline, the effects of the proposed Rock Creek Mine and the cumulative effects, it is the Service's biological opinion that the Rock Creek Mine as proposed, is not likely to jeopardize the continued existence of the listed entity of bull trout nor adversely modify critical habitat for this species.

## Introduction

This document represents the U.S. Fish and Wildlife Service's (Service) biological opinion on the proposed Revett Silver Company (formerly Sterling Mining Company) Rock Creek Copper/Silver Mine project located in the Rock Creek drainage, a tributary to the lower Clark Fork River in western Montana, near Noxon. Portions of the mine would occur on the Kootenai National Forest (Forest), which occurs in Lincoln and Sanders Counties. This biological opinion addresses the effects of the proposed action on the threatened grizzly bear (*Ursus arctos horribilis*) and threatened bull trout (*Salvelinus confluentus*). Formal consultation for the proposed action was initiated on August 3, 1998 when the Service received the biological assessment (BA)(USDA 1998b) for this project.

Section 7(b)(3)(A) of the Endangered Species Act of 1973 (Act) requires that the Secretary of Interior issue biological opinions on federal agency actions that may affect listed species or critical habitat. Biological opinions determine if the action proposed by the action agency is likely to jeopardize the continued existence of listed species or destroy or adversely modify critical habitat. Section 7(b)(3)(A) of the Act also requires the Secretary to suggest reasonable and prudent alternatives to any action found likely to result in jeopardy or adverse modification of critical habitat, if any has been designated.

This biological opinion only addresses impacts to federally listed species and does not address the overall environmental acceptability of the proposed action. This biological opinion refers only to the potential effects of the proposed action on threatened grizzly bears and bull trout. The Service has reviewed the proposed action as analyzed in the biological assessments and concurs with the Forest's determinations that the project would not likely adversely affect threatened bald eagles (*Haliaeetus leucocephalus*) or Canada lynx (*Lynx canadensis*) or endangered wolves (*Canis lupus*).

Following the "Description of the Proposed Action" section, this biological opinion is separated into two Parts, for convenience and ease of interpretation. Part A addresses the grizzly bear and Part B addresses bull trout.

**Consultation history - Rock Creek Mine project** A complete consultation history of this project up to the time the final BA was issued (August, 1998) is summarized in Appendix 3 of the BA. On May 20, 1999, the Service received a May 13, 1999, amendment to the BA addressing the effects of the proposed action on bull trout (USDA 1999). The Service received another BA amendment dated April 4, 2000, addressing Canada lynx. On October 3, 2000, the Service received a summary of the preferred alternative (Alternative V), which included mitigation factors. Additional information related to the proposed action was collected through correspondence, phone discussions, electronic mail and during meetings. The complete administrative record for the consultation on this project is found in the Service's Montana Field Office in Helena.

The Service completed a biological opinion for the Rock Creek Mine project on December 15, 2000 (USDI 2000c). The Service concluded that the proposed action would jeopardize grizzly bears, and therefore included a reasonable and prudent measure that would preclude jeopardy to

the species. We also concluded that the proposed action would not jeopardize the continued existence of bull trout. The Forest and the Montana Department of Environmental Quality (MDEQ) jointly completed the FEIS for this project (MDEQ and USDA 2001). As a result of the consultation process, the Forest and MDEQ incorporated additional stipulations in the preferred Alternative V description. A partial summary of changes are addressed in the Summary FEIS (MDEQ and USDA 2001, page S-20). A Record of Decision (ROD) followed the FEIS and incorporated the Rock Creek Mine biological opinion.

A Complaint for Declaratory and Injunctive Relief was filed August 27, 2001, challenging the validity of the 2000 biological opinion. The Service withdrew the biological opinion in March, 2002, and the Forest subsequently withdrew the ROD. Additional consultation on grizzly bears and bull trout occurred during 2002 to 2003.

On December 23, 2002, we received updated access management baseline information from the Forest (USDA in litt. 2002b) related to the Rock Creek Mine project, and on December 31, 2002, we received the revised and clarified grizzly bear mitigation plan for the project (USDA in litt. 2002a).

On May 9, 2003 the Service issued a biological opinion that concluded that the proposed Rock Creek Mine would not likely jeopardize grizzly bears, would not likely jeopardize bull trout, would not likely adversely modify proposed bull trout critical habitat, and would not likely jeopardize Canada lynx, based upon updated information (USDI 2003). The proposed action included a mitigation plan for grizzly bears that incorporated the substantive provisions of the reasonable and prudent alternative in our December 15, 2000 jeopardy biological opinion.

An amended Complaint for Declaratory and Injunctive Relief was filed on July 10, 2003, pertaining to the 2003 biological opinion. On March 28, 2005, the court set aside and remanded the 2003 biological opinion back to the Service for reconsideration. This biological opinion is based on further consideration in accordance with the March 28 court Order and on new information related to the CYE grizzly bears population and bull trout that became available from 2003 to the present.

In December 2004, the Forest and Service reinitiated consultation on the proposed Rock Creek Mine based on new information that revealed effects of the action that may affect grizzly bears in the Cabinet-Yaak Ecosystem to an extent not previously considered (USDI in litt. 2004b). This information included the discovery of a human-caused mortality of an adult female grizzly bear that was killed in 2002. One of her female cubs had already been discovered dead in 2003. The adult female had had two additional cubs and they were now also presumed dead. These four grizzly bear mortalities occurred in 2002 but were not known prior to 2004, and therefore were not considered in the analysis of human-caused mortality in the 2003 biological opinion. Additional new information included studies and publications related to population viability (Proctor et al. 2004) and trend (Wakkinen and Kasworm 2004) of the Cabinet-Yaak Ecosystem grizzly bears. This biological opinion completes this consultation process.

In 1993, the Service had completed a biological opinion on the Noranda Mineral Corporation's (Noranda) request to the Forest for the proposed Montanore Mine project (USDI 1993b). This



proposed mine was to be located in the Cabinet Mountains almost directly east of the currently proposed Rock Creek mine site, across the Cabinet Mountains divide. At that time, consultation on the Rock Creek mine had not occurred and so the Rock Creek mine was not considered in the environmental baseline for the Montanore project. The Montanore mine was to be constructed and operated by Noranda. Our 1993 biological opinion concluded that the proposed Montanore mine was likely to jeopardize grizzly bears and we included a reasonable and prudent alternative to preclude jeopardy. The proposed action was not implemented.

In a letter dated March 6, 2001, the Service informed the Forest that the March 1993 biological opinion on the Montanore Mine project, as proposed by the Forest and Noranda, would require re-initiation of consultation prior to that project proceeding (USDI in litt. 2001). Significant changes in the baseline information used in the biological opinion had occurred since its completion more than eight years earlier.

On October 24, 2002 the Forest sent us four letters from Noranda, dated September 2002, informing us of the applicant's (Noranda) decision to "abandon the Montanore copper-silver project" and relinquish its "authorization to construct and operate the Montanore Project as set forth in the Plan of Operations, which was never implemented." The letters also requested termination of permits related to air quality and the tailings impoundment (USDA 2002). The section 7 environmental baseline for the proposed Rock Creek Mine changed significantly with the abandonment of plans by Noranda to develop the Montanore Mine. Any new proponent of the development of a mine at the Montanore site would require a new application to the Forest for approval of a Plan of Operations pursuant to 36 CFR, part 228. The removal of the Montanore project from the environmental baseline is consistent with section 7 regulations (50 CFR 402.02)(FR 51, No. 106, 19932) and the Service's Endangered Species Consultation Handbook (March 1998). The preamble to the regulations states that "impacts [which have been reviewed under section 7] will continue to be considered as part of the environmental baseline unless the Service receives notice from the Federal agency that the proposed action will not be implemented or unless the biological opinion on the proposed action is no longer valid because re-initiation of consultation is required." Both conditions were met in this situation. Therefore, the Montanore mine project was not considered part of the environmental baseline for the proposed Rock Creek mine biological opinion in 2003.

In December 2004, Mines Management Incorporated submitted a new application to the Forest for approval of a Plan of Operations for a new mine at the Montanore site. Mines Management Inc. contacted the Service this year on reinserting the Montanore mine project into the environmental baseline. After re-examining the issue and our original rationale, we conclude that our original decision to remove the Montanore mine project from the environmental baseline is correct and therefore, impacts from Mines Management Incorporated's proposed Montanore Mine are not included in the baseline of the biological opinion. If we receive a request for consultation from the Forest on the new application for proposed mining operations at the Montanore site, we will complete consultation on that project and it will become part of the environmental baseline at that point.

According to 50 CFR 402.02, the environmental baseline "includes the past and present impacts of all Federal, State, or private actions and other human activities in the action area, the

anticipated effects of all proposed Federal projects in the action area that have already undergone formal or early section 7 consultation, and the impact of State or private actions which are contemporaneous with the consultation in progress.” Recent correspondence between Mines Management Inc., and the Service (letters dated August 10, 2006 and September 12, 2006) indicated that Mines Management Inc. had acquired some permits, but not all permits needed to develop a mine, through their acquisition of Noranda and Noranda’s Montanore project. To date, Mines Management Inc., under its State operating permit, has only been allowed to remove the temporary adit plug at the Libby adit to sample water within the adit. This specific activity is considered a private action, which is contemporaneous with the consultation in progress because it does not require federal approval. Because of the minor nature of the impacts of the activity conducted thus far, it was not likely to have had adversely affected listed species in the area. Therefore, there was no need to add these impacts to the baseline. This activity is now complete. Thus, the impacts of this activity are not included in the environmental baseline for the consultation in progress.

It is also our understanding from correspondence from Mines Management Inc. dated September 12, 2006, that the State is requiring additional review and approval prior to the implementation of further activity at this site, including exploration and drilling activities. Some of these activities may also require Forest Service authorization or approval, and would not be included in the baseline until they are reviewed as part of the anticipated Forest Service section 7 consultation. As mentioned above, once we receive a request from the Forest for consultation, and then complete the consultation, that project will then become part of the environmental baseline in accordance with 50 CFR 402.02.

**General description of the proposed action** The Forest proposes to allow Revett Silver Company to develop and operate Rock Creek Mine on portions of the Forest. Rock Creek Mine would be a 10,000-ton-per-day underground copper and silver mine in northwestern Montana. The mine, mill, and other facilities would occur in Sanders County, about 13 miles northeast of the town of Noxon (Figure A1). The mine originally was proposed by ASARCO Incorporated, but was sold to the Sterling

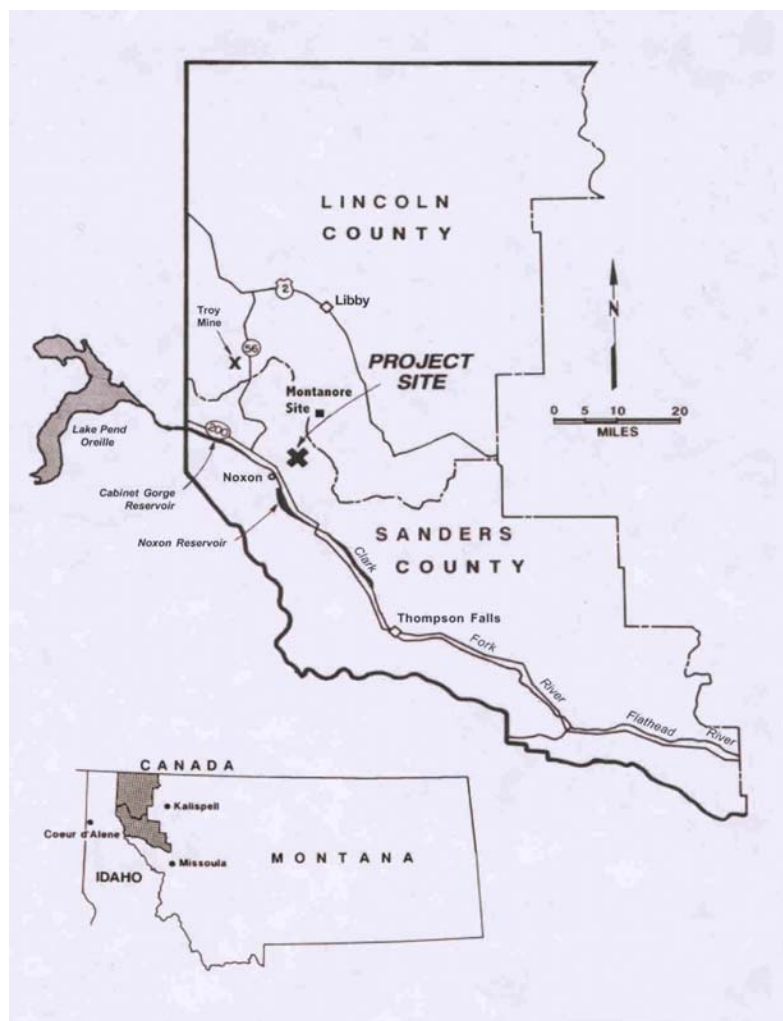


Figure A1. Proposed Rock Creek Mine project site (from MDEQ and USDA 2001).

Mining Company in 1999. In October of 2003 the company changed its name from Sterling Mining Company to Revett Silver Company, a Montana Company, followed by the incorporation of its wholly owned subsidiary RC Resources Inc. (Revett) also a Montana Company and the new project proponent.

The proposed action is Alternative V (Appendix A), the Forest’s preferred alternative to Revett’s proposed mine plan. The complete description of the proposed action is provided in the FEIS (MDEQ and USDA 2001). Here we summarize only major features of the proposed action. The proposed action for the mine includes the development of an evaluation adit, a 5.5-year construction period, a 27.5-year operation/production period, and a 2-year reclamation period, for a total period of approximately 35 years (Table A1).

<b>Project Year</b>	<b>Activity</b>
1 – 3	Evaluation adit construction
2 – 3	Mine development <sup>1</sup>
4 - 5.5	Mine development <sup>1</sup> /surface facilities construction <sup>2</sup>
5.5 – 6	Start-up/limited production
7 – 33	Production
34 – 35	Reclamation

<sup>1</sup> Waste rock will be hauled mid-August through May during mine development period.  
<sup>2</sup> Includes construction of the mill site, wastewater treatment plant, paste plant, and utilities corridor.

The proposed action would result in construction of an evaluation adit, mine, mill, tailings paste facility, rail loadout, reverse osmosis and passive biotreatment facility, and various pipelines and access roads. A “bottom-up” construction option for the paste facility would be used and final design would incorporate measures to meet visual impact mitigation and reclamation goals. Some mine water would be stored in underground workings during mine operation, but most excess water would be treated and discharged to the Clark Fork River.

Several check points are built into the development of the mine to address specific conditions as they develop. For example, initial exploration involves developing an evaluation adit to further investigate and define the underground ore body. Results of the evaluation adit may result in various scenarios described in the proposed action, Alternative V. For example, should acid-forming rock be located, certain constraints would be required that would not be necessary if no acid-forming rock is encountered. Several similar check points and contingency plans occur throughout the life of the mine and will not be specifically addressed here (see FEIS, Alternative V (MDEQ and USDA 2001)).

The Rock Creek Mine’s proposed permit boundary would encompass approximately 1,560 acres: 483 acres would be directly impacted by mining activity and 1,078 would remain undisturbed (Table A2). Land encompassed by the proposed permit boundary is 48 percent private land and

52 percent national forest lands (Table A2). As shown in Figure A2, the project area is located near the southern boundary of the Cabinet-Yaak Ecosystem (CYE), south and west of the Cabinet Mountains Wilderness area. Except for a possible ventilation adit that would disturb about 800 square feet, all ground disturbance would occur outside of the wilderness. Of the total 483 acres disturbed, 342 acres (71 percent) are privately owned by Revett and 141 acres (29 percent) are on public lands administered by the Forest. The project area contains existing roads providing public access to the wilderness area and nonwilderness Forest lands for recreation, and to areas logged in the past.

<b>Table A2. The proposed surface disturbance and features associated with the Rock Creek Mine project (from USDA 1998b).</b>	
<b>Project Feature</b>	<b>Area in Acres</b>
Analysis area	198,394
Hard rock mine permit area	1,561**
Total area of surface disturbance	483
Tailings impoundment*	368
Mill site*	41
Exploration adit & support facilities	10
Roads	64
Road construction	3.54 miles
Road reconstruction	5.43 miles
Total road construction/reconstruction	8.97 miles
* Estimated surface disturbance includes all the features associated with the tailings impoundment and mill site.	
** Corrected permit area acres from MDEQ, December 2000. From Appendix A, Alternative V description	

The initial analysis for the proposed Rock Creek Mine project predicted construction of the mine would begin in 2000 (USDA 1998b). Therefore, the calendar years identified during the analysis no longer correspond with the actual implementation of the project. The life of the mine may be shorter or longer than predicted, depending on the quality, quantity and accessibility of the ore body, market values of the minerals recovered and other factors that cannot be predicted at this time.

**Conservation measures and mitigation plans** The Rock Creek Mine proposal includes a suite of conservation measures and mitigation plans developed during informal and formal consultation periods and through the public National Environmental Policy Act (NEPA) review process. The original 2000 mitigation plan for grizzly bears, as analyzed in the 2000 biological opinion (USDI 2000c), was revised (USDA 2002a) during the consultation process to incorporate concerns of the Service. In 2005 and 2006, during the consultation process for this current biological opinion, additional measures were added to the mitigation plan to address concerns raised by the court and issues raised by new information. The 2006 mitigation plan for grizzly bears (USDAb) is found in its entirety in Appendix B of this biological opinion and

discussed in Part A of this biological opinion. Mitigation and monitoring plans for bull trout are described fully in Appendix K of the FEIS (MDEQ and USDA 2001) and discussed in Part B of this biological opinion.