



United States
Department of
Agriculture

Animal and
Plant Health
Inspection
Service

Plant Protection
and Quarantine

Airport Business Center
N.E. 80th Avenue Suite A
Portland, OR 97218-4033
503-326-2140

Mike Tehan
Branch Chief, Habitat Branch
NOAA Fisheries
525 NE Oregon, suite 500
Portland, Oregon 97323

May 6, 2004

Dear Mr. Tehan:

The U.S. Department of Agriculture's Animal and Plant Health Inspection Service (APHIS), in conjunction with Federal, State, and local cooperators, is preparing for possible grasshopper suppression programs on rangeland in eastern Oregon again this year. No programs were undertaken by APHIS in Oregon, in 2003. However grasshopper outbreaks are unpredictable and APHIS must respond to land manager requests for assistance. The purpose of this letter is to request an informal exchange of Section 7 consultation information between NOAA Fisheries and APHIS to ensure that any grasshopper suppression programs conducted by APHIS are in full compliance with the Endangered Species Act.

A new APHIS Rangeland Grasshopper and Mormon Cricket Suppression Program Final Environmental Impact Statement was released in 2002 (2002 FEIS) (available at <http://www.aphis.usda.gov/ppd/es/gh.html>). The 2002 FEIS includes an analysis of three chemicals available to APHIS for grasshopper suppression. They are diflubenzuron, carbaryl, and Malathion. Also analyzed in the 2002 APHIS FEIS is the use of the Reduced Agent and Area Treatment (RAATS) methodology. This strategy utilizes lower than traditional doses of insecticides in combination with an application strategy that leaves untreated areas between each swath of applied insecticide. By leaving untreated areas, this strategy provides refuges for naturally occurring biological control agents and facilitates an economical integrated management approach for dealing with damaging populations of grasshoppers on rangeland.

Grasshopper suppression programs will only be conducted when potentially economically damaging populations of grasshoppers occur, funding exists, and at the written request of the land manager(s). Historically these outbreaks could occur, on any rangeland. APHIS will consider programs in Baker, Crook, Deschutes, Gilliam, Grant, Harney, Hood River, Jefferson, Lake, Klamath, Malheur, Morrow, Sherman, Umatilla, Union, Wallowa, Wasco, and, Wheeler counties in Oregon. One or more Environmental Assessment(s) (EA) are being prepared by APHIS to address site specific issues with respect to potential grasshopper suppression programs in the above proposed area. If needed to protect rangeland, suppression treatments could begin as early as May, but generally take place in June and July. Treatment programs must follow strict guidelines set forth by the Agency. A copy of the 2004 Grasshopper Program Guidelines and Operational Procedures is attached.

APHIS and Oregon Department of Agriculture conduct annual adult grasshopper survey to assist land managers in predicting where problems may arise the following year. A summary and map of the 2003 survey result is attached. No treatments are anticipated this year in areas inhabited by the species considered here. However, as mentioned, grasshopper outbreaks are unpredictable, and APHIS must consider all rangeland as having the potential for an outbreak.



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In consultation with your Agency, APHIS will prepare a biological assessment to address the following four species (nine subspecies) which occur in the proposed area:

Chinook salmon (*Oncorhynchus tshawytscha*) lower Columbia River, Threatened August 2, 1999, and Snake River, Threatened April 22, 1992

Chum salmon (*Oncorhynchus keta*) Columbia River, Threatened August 2, 1999

Sockeye salmon (*Oncorhynchus nerka*) Snake River, Endangered January 3, 1992

Steelhead (*Oncorhynchus mykiss*) lower Columbia River and Snake River, Threatened June 17, 1998, middle Columbia River, Threatened August 2, 1999.

Your cooperation and timely response in assisting APHIS to meet its Endangered Species Act responsibilities are appreciated.

This letter is intended to request a consultation on the mitigation measures to protect the listed species and arrive at a determination of No Effect or Not Likely to Adversely Affect in the forthcoming biological assessment. If you have any questions regarding these requests, please contact me at (503) 326-2814 x239.

Sincerely,

Gary W. Brown

Gary W. Brown
PPQ Officer
USDA, APHIS, PPQ
Portland, Oregon

w/enclosures

cc: Mitch Nelson, APHIS State Plant Health Director, Portland, OR
Charles Brown, APHIS Environmental Documentation, Riverdale, MD
Eric Murray, NOAA Fisheries, La Grande, OR
Brett Farman, NOAA Fisheries, La Grande, OR