



**UNITED STATES DEPARTMENT OF COMMERCE**  
**National Oceanic and Atmospheric Administration**  
**NATIONAL MARINE FISHERIES SERVICE**  
West Coast Region  
800 E. Park Blvd, Plaza IV, Suite 220  
Boise, Idaho 83712

Refer to NMFS No: WCRO-2021-02845

November 24, 2021

Lt. Col. Richard T. Childers  
U.S. Army Corps of Engineers  
Walla Walla District  
201 N. Third Avenue  
Walla Walla, Washington 99362

Re: Endangered Species Act Section 7(a)(2) Biological Opinion and Magnuson-Stevens Fishery Conservation and Management Act Essential Fish Habitat Response and Concurrence for the Proposed Residential Lot Development Tract 467 Stanley Annex and Tract 1161 Stanley Annex, including Permittee Responsible Mitigation (Two Projects)

Dear Lieutenant Colonel Childers:

This letter responds to your August 26, 2021, request for initiation of consultation with the National Marine Fisheries Service (NMFS) pursuant to Section 7 of the Endangered Species Act (ESA) for the subject action. Your request qualified for our expedited review and analysis because it met our screening criteria and contained all required information on, and analysis of, your proposed actions and its potential effects to listed species and designated critical habitat. The U.S. Army Corps of Engineers (COE) determined the proposed action may affect, but is not likely to adversely affect (NLAA) Snake River (SR) spring/summer Chinook salmon (*Oncorhynchus tshawytscha*), SR Basin steelhead (*O. mykiss*), SR sockeye salmon (*O. nerka*), and designated critical habitat for SR Basin steelhead. The COE also determined the proposed actions may affect, and are likely to adversely affect (LAA) designated critical habitat for SR spring/summer Chinook and SR sockeye salmon. This letter addresses each of these determinations.

We reviewed the COEs consultation request and related initiation package. Where relevant, we have adopted the information and analyses you have provided and/or referenced but only after our independent, science-based evaluation confirmed they meet our regulatory and scientific standards. We adopt by reference the following sections of the COEs August 26, 2021 final biological assessment (BA) (COE 2021), Section 2.0 (proposed action); Section 3.0 species occurrence and critical habitat; Section 4.0 (environmental baseline); and Section 5.0 (effects of the action). Details regarding the proposed permittee responsible mitigation (PRM) included in



the COE's proposed action, are outlined in individual plans for each application (see Sawtooth Environmental Consulting 2021a, 2021b). These documents' descriptions of mitigation actions and general location information are also adopted. A detailed description of baseline conditions in the Yankee Fork drainage, where PRM is proposed, can be found in the U.S. Bureau of Reclamation's Bonanza Area Reach Assessment (BOR 2012), which we reviewed and adopted. The referenced BA and other documents we have adopted are available in their entirety in our official project record, available at NMFS' Boise Office or by contacting Chad Fealko (chad.fealko@noaa.gov).

The COE submitted a consultation initiation package to NMFS on March 5, 2021. After our review, we requested additional information by email on April 14, 2021. NMFS continued to coordinate with the COE and the BA author (primarily by phone) until the final BA (COE 2021) and request for ESA consultation was received by email on August 26, 2021.

As disclosed in the final BA, the two actions being considered are the COE's proposed authorization of wetland fill under section 404 of the Clean Water Act (CWA) to facilitate residential construction on two private residential lots in Stanley, Idaho: Tract 467 and Tract 1161, Stanley Annex. The two lots are located on the banks of the Salmon River and are about 1,500 feet apart. Different and unrelated parties own the lots. The two actions are assessed together because of physical proximity and concurrent application submissions. They have no dependency or other relation to each other. Proposed development on Tract 467 requires filling approximately 0.18 acres of wetlands adjacent to the Salmon River to construct two residences while development on Tract 1161 requires filling approximately 0.32 acres of wetlands to construct three small cabins. Development includes residence construction, road access routes, and installation of associated utility and other infrastructure elements (e.g., parking, landscaping, driveways, etc.). No instream work is proposed or required to complete either action. Additionally, no landings, bank stabilizations, or berms are planned as part of either project.

For Tract 467, of the 0.18 acres of proposed wetland fill, approximately 0.09 acres will occur in the 100-year floodplain, 0.17 acres within 300 feet of the Salmon River, and about 0.01 acres will be more than 300 feet from the river. Impacts within 300-feet of the Salmon River are relevant as the critical habitat designations for SR spring/summer Chinook and sockeye salmon include this area. The designation for SR Basin steelhead critical habitat is limited to the area below the ordinary high water mark (OHWM) and will not be directly affected. On Tract 1161, all 0.32 acres of wetland fill will occur within 300 feet of the Salmon River and approximately 0.22 acres will occur in the 100-year floodplain.

Because the COE determined the level of wetland impact will result in a loss of wetland functions and values in the project area, they required compensatory mitigation. Mitigation is part of the proposed action considered since it would not occur in absence of the two proposed fills. For Tracts 467 and 1161, PRM will restore 0.2 acres and 0.316 acres of emergent (PEM) and scrub-shrub (PSS) wetland resources, respectively. Mitigation is proposed at a minimum 1 to 1 ratio. The mitigation site is in the Yankee Fork Salmon River sub-basin. The PRM site is associated with an ongoing reach-scale fish habitat restoration project (Bonanza Reach), and is

located within historic placer mine gravel tailing piles and located off-channel. More details regarding aspects of the mitigation actions can be found in Sawtooth Environmental Consulting 2021a and 2021b.

Because the COE determined the proposed actions would NLAA any of the three ESA-listed species in the action area, we did not formally evaluate the status of the species in this letter. The BA (pages 14-17) included background information on the species and section 4.0 (pages 18-21) provided information regarding which species and life stages utilize the action area. The COE also determined the actions would NLAA designated critical habitat for SR Basin steelhead. Our concurrence with these determinations is documented later in this letter.

Because the COE determined the proposed actions are LAA SR spring/summer Chinook and sockeye salmon designated critical habitat we examined the condition of critical habitat throughout the designated area and discuss the function of the physical or biological features (PBFs) essential to the conservation of the species that create the conservation value of that habitat. Section 4.0 of the BA, pages 18-28, discuss environmental baseline conditions within the action area that are critical to understanding potential effects of the action. We have supplemented this information with critical habitat information for SR spring/summer Chinook salmon and SR sockeye salmon at the scale of the ESA listings in Table 1. Table 1 is based on the detailed information on the status of critical habitat throughout the designation area provided in the recovery plan for each species (NMFS 2015; NMFS 2017), and the status review (NMFS 2016), which are incorporated by reference here.

Table 1. Critical habitat, designation date, Federal Register citation, and status summary for critical habitat considered in this opinion.

Species	Designation Date and Federal Register Citation	Critical Habitat Status Summary
Snake River Spring/summer Chinook salmon ( <i>Oncorhynchus tshawytscha</i> )	10/25/99; 64 FR 57399	Critical habitat consists of river reaches of the Columbia, Snake, and Salmon Rivers, and all tributaries of the Snake and Salmon Rivers (except the Clearwater River) presently or historically accessible to this evolutionarily significant unit (ESU) (except reaches above impassable natural falls, and Dworshak and Hells Canyon Dams). Habitat quality in tributary streams varies from excellent in wilderness and roadless areas, to poor in areas subject to heavy agricultural and urban development (NMFS 2017). Reduced summer stream flows, impaired water quality, and reduced habitat complexity are common problems.
Snake River Sockeye salmon ( <i>O. nerka</i> )	12/28/93; 58 FR 68543	Critical habitat includes the migration corridor from the Pacific Ocean upstream through and including the Columbia River to the Snake River upstream to the Salmon River upstream to the five Sawtooth Valley lakes (including the lake inlets and outlet streams). Habitat quality in the five lakes is generally excellent as most headwater areas are designated wilderness. Habitat quality through most of the migration corridor has been heavily degraded from irrigation withdrawals, hydropower development, floodplain and estuary losses in urban areas, and impaired water quality (NMFS 2015).

NMFS describes critical habitat in terms of essential PBFs of that habitat to support one or more life stages (e.g., sites with conditions that support spawning, rearing, migration, and foraging). For SR spring/summer Chinook and SR sockeye salmon, PBFs include spawning gravel, water quality, water quantity, food (juvenile migration only), access (sockeye only), riparian vegetation, water temperature, substrate, water velocity, cover/shelter, space (Chinook only), and safe passage. Across the designations, the current ability of PBFs to support the species varies from excellent in wilderness areas to poor in areas of intensive human land use. Climate change and its influence on PBFs such as water quality, water quantity, temperature, and safe passage are expected to exacerbate current conditions for salmon, limiting future run timing (due to reduced adaptability) and thus increasing the difficulty of species recovery. A synthesis of current literature pertinent to these species' future habitat conditions can be found in NMFS' recovery plans (NMFS 2015, 2017) and recent climate vulnerability assessments (Crozier et al. 2019).

For both species, the construction and operation of water storage and hydropower projects in the Columbia River basin, including the run-of-river dams on the mainstem lower Snake and lower Columbia Rivers, have altered biological and physical attributes of the mainstem migration corridor for juveniles and adults. However, several actions taken since 1995 have reduced the negative effects of the hydro system on juvenile and adult migrants. Examples include providing spill at each of the mainstem dams for smolts, steelhead kelts, and adults that fall back over the projects; and maintaining and improving adult fish way facilities to improve migration passage for adult salmon and steelhead (NMFS 2020).

“Action area” means all areas to be affected directly or indirectly by the Federal action and not merely the immediate area involved in the action (50 CFR 402.02). Page 12 of the BA defined the action area adopted in this letter as a 28-acre area inclusive of Tract 467, Tract 1161, and 1.15 miles of the Salmon River between two existing bridges located upstream and downstream of the affected lots (see Figure 1). The action area also includes the PRM site located in the Yankee Fork Salmon River (see maps in Sawtooth Environmental Consulting 2021a and 2021b).

The “environmental baseline” refers to the condition of the listed species or its designated critical habitat in the action area, without the consequences to the listed species or designated critical habitat caused by the proposed action. 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 impacts of all proposed Federal projects in the action area that have already undergone formal or early section 7 consultations, and the impact of State or private actions which are contemporaneous with the consultation in process. The consequences to listed species or designated critical habitat from ongoing agency activities or existing agency facilities that are not within the agency's discretion to modify are part of the environmental baseline (50 CFR 402.02). BA sections 4.0 through 4.9 (pages 18-28) describe the Environmental Baseline that is adopted here. The action area principally serves as a migratory corridor for adult and juvenile salmon and steelhead. As such, water temperature, forage, cover, and water quantity are important PBFs of critical habitat here. NMFS' recovery plans (NMFS 2015, 2017) identify general habitat recommendations at the major population group (MPG) and individual

population level, which are pertinent to the action area. Recommendations include calls for improving riparian function, connectivity, water quality (particularly temperature), and water quantity (particularly for Chinook salmon rearing habitat). Implementing these measures is expected to provide resilience to expected influences of climate change.

Under the ESA, “effects of the action” are all consequences to listed species or critical habitat that are caused by the proposed action, including the consequences of other activities that are caused by the proposed action. A consequence is caused by the proposed action if it would not occur but for the proposed action and it is reasonably certain to occur. Effects of the action may occur later in time and may include consequences occurring outside the immediate area involved in the action (see 50 CFR 402.17). In our analysis, which describes the effects of the proposed action, we considered 50 CFR 402.17(a) and (b).

The BA provides a detailed discussion and comprehensive assessment of the effects of the proposed action in Sections 5 and 6, and is adopted here (50 CFR 402.14(h)(3)). NMFS has evaluated these sections and after our independent, science-based evaluation determined it meets our regulatory and scientific standards.

Designated critical habitat for SR spring/summer Chinook and sockeye salmon will be adversely affected by the proposed action (COE 2021). The designations include the area within 300 feet of the OHWM and nearly all proposed work authorized or otherwise facilitated by the COE’s permits occurs within this zone. Construction activities will permanently convert 0.49 acres of ground within 300 feet of the Salmon River to residences, parking areas, roads, or other associated developments. Nearly all of the 0.50 acres (i.e., 0.49 acres) of cumulative wetland fill is also within this zone. Floodplain functionality and processes will be permanently lost in the areas affected by the two proposed fills and subsequent residential development adjacent to the Salmon River. Total loss of area within the 100-year floodplain will be 0.31 acres, accounting for about 0.1 percent of the action area’s total 100-year floodplain area. The opposite bank of the Salmon River is undeveloped and protected by a conservation easement held by the Sawtooth National Forest. The effects of these losses are discussed in the detail in the final BA (see pages 28-30 and 32-34). The BA also accurately summarizes the effects to individual critical habitat designations in section 5.6. The natural channel here is relatively confined and the opposite shoreline (east) has an accessible and undeveloped/undevelopable floodplain area. Floodplain area on the east shore may increase imperceptibly following implementation of the proposed actions (final BA page 29). Because the losses are minor and better habitat exists on the opposite shoreline the actions are not expected to generate a rise in flood flow elevations within the action area. Loss of 0.31 acres of floodplain function is a small quantity of the action area’s habitat. Functions lost from the actions may include minor reductions in groundwater storage and recharge, flood flow attenuation, and riparian vegetation (which influences complex habitat development, shading, bank stabilization, forage contributions, etc.).

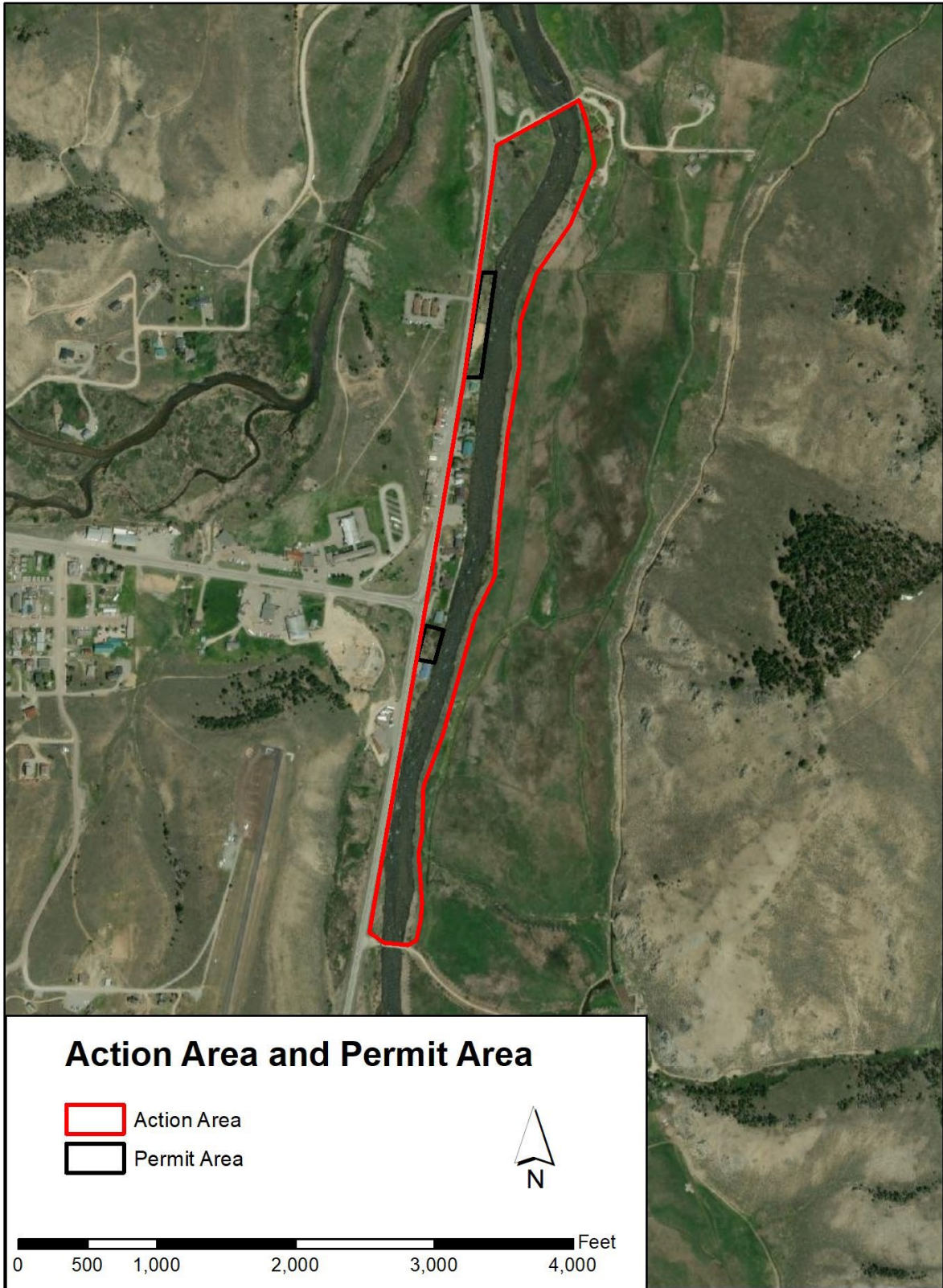


Figure 1. ESA action area for proposed COE authorization of wetland fill in Tracts 467 and 1161, Stanley Annex.

Proposed mitigation in the Yankee Fork Salmon River will facilitate minor improvements in wetland processes in that sub-basin. However, those benefits occur in a different area and to a large extent, benefit a different population of spring/summer Chinook salmon than where the adverse effects of the two actions will occur. Mitigation also does not directly benefit critical habitat for SR sockeye, as it is not present in the Yankee Fork Salmon River. The loss of 0.31 acres of floodplain habitat and 0.5 total acres of wetland habitat is measurable at the site-scale but this impact represents a small amount of the total amount of action area habitat (0.1 percent) and a much smaller portion of the available habitat at the ESU scale. Proposed PRM will offset wetland impacts on a one to one ratio, but occur outside the sub-basin affected by the two proposed actions. Nonetheless, the PRM will enhance floodplain and wetland functions/processes in the area mitigation will occur.

“Cumulative effects” are those effects of future state or private activities, not involving Federal activities, that are reasonably certain to occur within the action area of the Federal action subject to consultation (50 CFR 402.02 and 402.17(a)). Future Federal actions that are unrelated to the proposed action are not considered in this section because they require separate consultation pursuant to section 7 of the ESA. Section 5.4 of the final BA addressed cumulative effects from future maintenance of existing homes and businesses along the Salmon River, maintenance of State Highway 75, agricultural activities that may occur on the east side of the Salmon River, and continued recreation activities. Future residential development was not considered, as existing wetland presence appears likely to trigger additional COE permitting requirements under the CWA and thus future ESA consultation on future potential lot developments. No effects not already discussed in the environmental baseline were identified.

The Integration and Synthesis section is the final step in our assessment of the risk posed to species and critical habitat as a result of implementing the proposed action. In this section, we add the effects of the action to the environmental baseline and the cumulative effects, considering the status of critical habitat, to formulate the agency’s biological opinion as to whether the proposed action is likely to appreciably diminish the value of designated or proposed critical habitat as a whole for the conservation of the species.

In summary, the two proposed actions would have localized habitat effects that would permanently eliminate or modify (conversion to roads, driveways, lawns, etc.) a total 0.49 acres of wetland within critical habitat for SR spring/summer Chinook and sockeye salmon. The lost habitat includes 0.31 acres within the 100-year floodplain, all above the OHWM. Following development, imperceptible increases in floodplain area may occur on the opposite (east) shoreline, which is protected by a permanent conservation easement. Expected impacts will add to the floodplain impact existing development on the west shore of the Salmon River has caused. The floodplain disturbance from these two projects represents about 0.1 percent of the action area’s floodplain. This level of degradation, although measurable, is insufficient to alter the conservation role of the habitat at the scale of the designation. The action area reach is straight, confined, and incised due to its location on the terminus of a glacial moraine. As such, floodplain interaction here is relatively low naturally. After reviewing and analyzing the current status of the designated critical habitats, the environmental baseline within the action area, the effects of

the proposed action, the effects of other activities caused by the proposed action, and cumulative effects, it is NMFS' biological opinion that the proposed action is not likely destroy or adversely modify the affected critical habitats.

## **INCIDENTAL TAKE**

Section 9 of the ESA and Federal regulations pursuant to section 4(d) of the ESA prohibit the take of endangered and threatened species, respectively, without a special exemption. "Take" is defined as to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture or collect, or to attempt to engage in any such conduct. "Harm" is further defined by regulation to include significant habitat modification or degradation that actually kills or injures fish or wildlife by significantly impairing essential behavioral patterns, including breeding, spawning, rearing, migrating, feeding, or sheltering (50 CFR 222.102). "Harass" is further defined by interim guidance as to "create the likelihood of injury to wildlife by annoying it to such an extent as to significantly disrupt normal behavioral patterns which include, but are not limited to, breeding, feeding, or sheltering." "Incidental take" is defined by regulation as takings that result from, but are not the purpose of, carrying out an otherwise lawful activity conducted by the Federal agency or applicant (50 CFR 402.02). Section 7(b)(4) and section 7(o)(2) provide that taking that is incidental to an otherwise lawful agency action is not considered to be prohibited taking under the ESA if that action is performed in compliance with the terms and conditions of this ITS.

Incidental take is not expected to occur and thus no take is exempted in this opinion.

## **Reasonable and Prudent Measures**

"Reasonable and prudent measures" are nondiscretionary measures that are necessary or appropriate to minimize the impact of the amount or extent of incidental take (50 CFR 402.02).

In the absence of expected incidental take, NMFS has not identified any reasonable and prudent measures for these two actions.

## **Conservation Recommendations**

Section 7(a)(1) of the ESA directs Federal agencies to use their authorities to further the purposes of the ESA by carrying out conservation programs for the benefit of the threatened and endangered species. Specifically, conservation recommendations are suggestions regarding discretionary measures to minimize or avoid adverse effects of a proposed action on listed species or critical habitat or regarding the development of information (50 CFR 402.02).

1. The COE should notify the applicants of the risks of development in floodplains and the potential for future property damage and environmental impacts, encouraging as little impact as possible in all cases.
2. The COE should encourage the applicants to reduce the proposed road access footprint on Tract 467 by providing individual house access off Highway 75.



3. The COE should require the applicants to plant as much native riparian vegetation as possible on the subject lots and avoid any additional wetland and riparian impacts during construction and during long-term occupancy of the properties.
4. The COE should develop future wetland mitigation proposals in collaboration with NMFS and strive to mitigate wetland impacts within the specific watersheds affected by those actions. Targeting local mitigation will better mitigate impacts to ESA-listed species and their habitats and ensure all populations affected by a permit action are fully mitigated.

### **Reinitiation of Consultation**

Under 50 CFR 402.16(a): “Reinitiation of consultation is required and shall be requested by the Federal agency or by the Service where discretionary Federal involvement or control over the action has been retained or is authorized by law and: (1) if the amount or extent of incidental taking specified in the incidental take statement is exceeded; (2) if new information reveals effects of the action that may affect listed species or critical habitat in a manner or to an extent not previously considered; (3) if the identified action is subsequently modified in a manner that causes an effect to the listed species or critical habitat that was not considered in the biological opinion or written concurrence; or (4) if a new species is listed or critical habitat designated that may be affected by the identified action.”

### **“Not Likely to Adversely Affect” Determinations**

The COE’s BA concluded the proposed actions may affect, but are NLAA SR spring/summer Chinook, SR Basin steelhead, and SR sockeye salmon (pages 40-41). The absence of in-channel work and proposed conservation measures (see BA, section 2.2) preclude direct effects to species or stream habitat. Indirect effects to species and designated critical habitat for SR Basin steelhead could result from alteration and loss of floodplain and wetland habitat upslope of the Salmon River. These effects are discussed in the adopted BA (pages 31-32). Effects to species should be insignificant due to: the infrequent occurrence of flood flows and small impact of lost fish habitat during those times; the small size of the proposed floodplain fills relative to the size of the action area’s total floodplain; higher quality floodplain habitat available on the east bank; proposed fill being located on the floodplain fringe; and proposed conservation measures expected to effectively minimize sediment delivery and future riparian alterations. For these reasons, effects to individuals of all three species being considered should be insignificant.

Designated critical habitat for SR Basin steelhead is limited to the area below OHWM and proposed actions will only occur upslope of the OHWM, avoiding direct effects to SR Basin steelhead critical habitat. Loss of small identified amounts of floodplain habitat (0.32 acres) could alter the quality of habitat below the OHWM but the minor level of impact, the confined channel with limited timing of floodplain activation, and high quality alternative available floodplain habitat on the east bank combine to make these effects insignificant (see BA section 5). After our independent review of the information provided in the initiation package, we concur

with the COE's determinations that the proposed actions may affect, but will NLAA the three species considered and designated critical habitat for SR Basin steelhead.

NMFS also reviewed the proposed action for potential effects on essential fish habitat (EFH) designated under the Magnuson-Stevens Fishery Conservation and Management Act (MSA), including conservation measures and any determination you made regarding the potential effects of the action. This review was conducted pursuant to section 305(b) of the MSA, implementing regulations at 50 CFR 600.920, and agency guidance for use of the ESA consultation process to complete EFH consultation. In this case, NMFS concluded the action would not adversely affect EFH. The actions' direct impacts are located outside of EFH (i.e., above the OHWM) and the effects on habitat below the OHWM are expected to be so minor as to not appreciably reduce the value of the habitat in the river channel for Chinook salmon. Thus, we have no EFH Conservation Recommendations to provide at this time and consider the consultation process under the MSA to be concluded.

This letter underwent pre-dissemination review using standards for utility, integrity, and objectivity in compliance with applicable guidelines issued under the Data Quality Act (section 515 of the Treasury and General Government Appropriations Act for Fiscal Year 2001, Public Law 106-554. The biological opinion will be available through NOAA Institutional Repository (<https://repository.library.noaa.gov/welcome>). A complete record of this consultation is on file at NMFS' Snake River Basin Office.

Please direct questions regarding this letter to Chad Fealko, Salmon Field Office at 208-768-7707.

Sincerely,



Michael P. Tehan  
Assistant Regional Administrator  
Interior Columbia Basin Office

cc:

W. Schrader – COE  
S. Fisher - USFWS  
C. Colter – SBT  
J. Richards - IDFG

## REFERENCES

- BOR (US Bureau of Reclamation). 2021. Bonanza Area Reach Assessment Yankee Fork of the Salmon River, Upper Salmon Sub-basin. Pacific Northwest Regional Office, Boise, Idaho. 222 pgs. Available at:  
<https://www.usbr.gov/pn/fcrps/habitat/projects/upperalmon/reports/upperalmon/bonanza.pdf>
- COE (US Army Corps of Engineers). 2021. Batch Biological Assessment for Residential Lot Development Tract 467 Stanley Annex and Tract 1161 Stanley Annex for Snake River Spring/Summer Chinook Salmon, Snake River Basin Steelhead, Snake River Basin Sockeye Salmon, and Columbia River Basin Bull Trout. By Stewart Consulting. August 2021. 48 pgs.
- Crozier LG, McClure MM, Beechie T, Bograd SJ, Boughton DA, Carr M, et al. 2019. Climate vulnerability assessment for Pacific salmon and steelhead in the California Current Large Marine Ecosystem. PLoS ONE 14(7): e0217711.  
<https://doi.org/10.1371/journal.pone.0217711>
- NMFS (National Marine Fisheries Service). 2015. ESA Recovery Plan for Snake River Sockeye Salmon (*Oncorhynchus nerka*). West Coast Region, Portland, OR.
- NMFS (National Marine Fisheries Service). 2016. 2016 5-Year Review: Summary & Evaluation of Snake River Sockeye, Snake River Spring-Summer Chinook, Snake River Fall-Run Chinook, Snake River Basin Steelhead. Portland, OR. 128 pgs. Available at:  
<https://repository.library.noaa.gov/view/noaa/17050>
- NMFS (National Marine Fisheries Service). 2017. ESA Recovery Plan for Snake River Spring/Summer Chinook Salmon (*Oncorhynchus tshawytscha*) & Snake River Basin Steelhead (*Oncorhynchus mykiss*). West Coast Region, Portland, OR.
- NMFS (National Marine Fisheries Service). 2020. Endangered Species Act Section 7(a)(2) Biological Opinion and Magnuson-Stevens Fishery Conservation and Management Act Essential Fish Habitat Response for the Continued Operation and Maintenance of the Columbia River System. West Coast Region, Portland Oregon. Available at:  
[https://s3.amazonaws.com/media.fisheries.noaa.gov/dam-migration/2020\\_crs\\_biological\\_opinion.pdf](https://s3.amazonaws.com/media.fisheries.noaa.gov/dam-migration/2020_crs_biological_opinion.pdf)
- Sawtooth Environmental Consulting. 2021a. Clark – Tract 467 Stanley Annex Permittee Responsible Mitigation Conceptual Wetland Mitigation Plan, As Part of Yankee Fork Salmon River Bonanza Floodplain Reconnection Project. Ketchum Idaho.
- Sawtooth Environmental Consulting. 2021b. Clark – Tract 1161 Stanley Annex Permittee Responsible Mitigation Conceptual Wetland Mitigation Plan, As Part of Yankee Fork Salmon River Bonanza Floodplain Reconnection Project. Ketchum Idaho.