

Eastside Township Fuels and Vegetation Project



May 2008

Cottonwood Field Office



It is the mission of the Bureau of Land Management to sustain the health, diversity, and productivity of the public lands for the use and enjoyment of present and future generations.

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United States Department of the Interior
BUREAU OF LAND MANAGEMENT



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Dear Reader

Enclosed for your information is the Record of Decision (ROD) for the Eastside Township Fuels and Vegetation Project located near Elk City, in Idaho County, Idaho. The ROD includes the provisions of the selected decision to implement the vegetation/fuels and restoration treatments on the Eastside of the Elk City township. The decision is based on the Final Environmental Impact Statement (FEIS), entitled "Eastside Township Fuels and Vegetation Project." The decision best reflects agency analysis and public involvement throughout the process, including initial scoping to identify issues of concern, and public comments on the Draft and Final EISs.

The FEIS was released on April 27, 2007 after publication of a Notice of Availability in the *Federal Register*, which commenced a 30-day public availability period. The public comment period concluded on May 28, 2007, with three comments received. As the lead agency the BLM has published a Notice of Availability of the Record of Decision in the Lewiston Tribune, announcing the selection of the alternative to be implemented. The Nez Perce National Forest (NPNF) is a cooperating agency. While there are no treatments on Forest Service (FS) land, use of existing roads and construction of one temporary road on the NPNF is included.

While the BLM and NPNF operate under different laws, regulations and policies, this ROD provides a jointly developed framework for management of the project area. Each agency's approval applies only to those portions of the project for which it has statutory authority.

I would like to thank the individuals and organizations who provided input to and reviewed this project and to those who attended the public meetings.

Sincerely,

Stephanie Connolly

Field Manager

Record of Decision
Eastside Township Fuels and Vegetation Project
May 2008

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Designation:

Record of Decision (ROD) for Final Environmental Impact
Statement (EIS)

Privacy Advisory

Any protests or appeals on this Record of Decision must be made as outlined in this document. In accordance with the Privacy Act, before including your address, phone number, e-mail address, or other personal identifying information in your protest, be advised that your entire comment –including your personal identifying information –may be made publicly available at any time. While you can ask us in your comment to withhold from public review your personal identifying information, we cannot guarantee that we will be able to do so.

Summary

In this Record of Decision (ROD), the Bureau of Land Management (BLM) and the Nez Perce National Forest (NPNF) adopts and approves implementation of the Selected Alternative, a combination of alternatives analyzed in the April 2007 Final Environmental Impact Statement (FEIS). Each agency's approval applies only to those portions of the project for which it has statutory authority. The Selected Alternative is considered to be the environmentally preferable alternative. It would implement a range of vegetation and fuels treatments along with restoration actions.

The Draft and Final EISs assessed four alternatives based upon the major issues identified during scoping:

1. Alternative A (No Action) would continue the current level of management.
2. Alternative B (Proposed Action-Preferred Alternative) was developed in response to the purpose and need and public comments.
3. Alternative C was developed in response to concerns that the Proposed Action included too many temporary roads; should include more road decommissioning; and the access issues raised by the public.
4. Alternative D was developed in response to the concerns that the Proposed Action included too many temporary roads; additional roads should not be considered for decommissioning but should be converted to ATV trails; the main subdivision access road along the American River should be left as is; road construction in Nez Perce National Forest "unroaded" areas should not be considered; and other access issues raised by the public.

The Selected Alternative incorporates most of Alternative B, parts of Alternatives C and D and considered comments received on the Draft and Final EISs. The Selected Alternative allows for vegetation and fuels treatments within a wildland urban interface (WUI) while providing opportunities for restoration and protection of natural resources.

Overall, the FEIS predicted no adverse impacts to air quality, groundwater, non-target vegetation, geology and soils, land use, noise, cultural resources, or socioeconomics and environmental justice from any of the alternatives. Potential adverse impacts associated with the Selected Alternative include short-term effects to water quality, and aquatic species.

The FEIS is available on the BLM website at <http://www.blm.gov/id/st/en/fo/cottonwood.html>. The Biological Assessment and the Biological Opinions from both National Marine Fisheries and U. S. Fish and Wildlife Service are available on the BLM website at <http://www.blm.gov/id/st/en/fo/cottonwood.html>.

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1. Introduction

The April 2007 Final Environmental Impact Statement (FEIS) for the Eastside Fuels and Vegetation Project presented an array of proposals to manage the vegetation, fuels and restoration treatments on the Bureau of Land Management (BLM) lands in a portion of the Elk City Township. This Record of Decision (ROD) presents the BLM's Selected Alternative for implementation. This ROD was developed in accordance with Council on Environmental Quality (CEQ) regulations at 40 CFR 1505.2, and all BLM and Department of the Interior guidance for implementing the National Environmental Policy Act (NEPA). This decision is based on information contained in the FEIS and project record for the Eastside Fuels and Vegetation Project.

The Nez Perce National Forest (NPNF) is a Cooperating Agency for this project because access across National Forest System (NFS) lands is needed to implement 97 acres (8.4 percent) of the Selected Alternative. While there are no proposed treatments on NFS land, implementation of the decision is based upon the use of existing roads and the construction of one temporary road (0.26 miles) on NFS land.

The project area is located in north central Idaho, near the southern part of the Idaho Panhandle. The project is located in Idaho County, near the small, isolated town of Elk City, Idaho. The Eastside Township Fuels and Vegetation Project (Eastside Project) lies within American River watershed, which is part of the larger, upper South Fork Clearwater River watershed. The Elk City township is completely surrounded by NFS lands.

The forest vegetation in the Elk City area is dominated by lodgepole pine that established following wildfires in the late 1800s and early 1900s. These stands are well into the cycle where mountain pine beetles attack and kill individuals and groups of trees. The mountain pine beetle activity is currently intense and expanding. Dead trees are accumulating as standing and down fuels which is expected to continue. The potential risk of high-intensity stand replacing fires within the project area, and potential to impact the wildland urban interface (WUI) is considered high and increasing. The associated risk to firefighter and public safety is also increasing. The fuels reduction activities proposed in this project will reduce this risk potential.

Fire suppression has limited the extent of wildfire in the area in the past 70 years. The resultant stands have an excessively dense, small tree component of shade tolerant trees (i.e., grand fir, subalpine fir) with multi-storied conditions creating a fuel ladder situation. The dead and dying lodgepole pine, combined with the dense small trees, creates conditions conducive for intense fires. In order to reduce the likelihood of high-intensity wildland fires, these stand conditions need to be changed. This would reduce the potential for intense fire behavior and create a forest stand that is more resilient to insects, disease, and other forest disturbances.

Fish habitat in portions of the analysis area is currently below the desired future condition identified in the Chief Joseph Management Framework Plan (MFP) Addendum 1. Streams in the area support both resident and anadromous fisheries, including two species listed as threatened (steelhead and bull trout) and BLM sensitive fish species (spring/summer chinook salmon, westslope cutthroat trout, and Pacific lamprey). Aquatic and riparian conditions in the area, particularly fish habitat, have been degraded through a variety of human uses, primarily historic mining activities. Natural recovery in these systems is very slow, although several actions are ongoing or have been implemented by the BLM and NPNF to improve these conditions. Watershed restoration actions are needed to accelerate the upward trend by improving the fish habitat conditions from poor/fair.

The BLM, along with other federal and state agencies and partners participated in the development of the South Fork Clearwater Total Maximum Daily Load (TMDL) Implementation Plan (South Fork Clearwater Watershed Advisory Group, 2006). The restoration actions in the Eastside Project are consistent with the pollutant control strategies included in Table 2 of that plan.

Although the Bennett Forest Industries mill has closed, Elk City is still a community heavily dependent on forest management and recreation due to the remoteness of this area and the large federal land ownership surrounding the town. Revenues generated from the federal lands support the community, schools, and other businesses. The BLM and NPNF play a major role in the future of Elk City. Wildland fires have the potential to destroy private property and the resources Elk City relies upon. The effects from a wildland fire would be felt for many years into the future. BLM chooses to implement the MFP by actively managing the public land resources (i.e., forest, wildlife, fisheries, recreation, weeds) in a manner that will benefit the resources and the local economy.

2. BLM Decision – Selected Alternative

2.1 Implementation of Decision

The BLM, through this ROD, adopts and approves for implementation the Selected Alternative which is a combination of the action alternatives considered and analyzed in the April 2007, FEIS. This alternative includes treatments and restoration activities on BLM administered land; limited temporary road construction; use and maintenance of existing roads on private lands; and limited temporary road construction, use and maintenance of existing roads on FS land.

The project would treat about 1,155 acres of public land to manage current and future forest conditions. Treatments would: remove surface and ladder fuels; reduce crown and stand density; reduce the amount of area dominated by lodgepole pine; increase the proportion of Douglas-fir, western larch, and ponderosa pine in current stands and planting these species following fuel treatments. Methods for accomplishing the project include: combinations of commercial timber harvest; understory thinning; prescribed burning and hand or machine piling and burning; and biomass utilization.

An important part of the project involves watershed restoration activities designed to accelerate and support an upward trend toward fair to good condition in the long term for riparian/aquatic habitats within the American River watershed. The project includes riparian tree and shrub planting; streambank re-contouring; reconnecting Queen Creek (a 1.35 mile fish-bearing stream) with the American River; replacing river and stream fords with ATV bridges or circumventing by trails and decommissioning the fords; and some existing roads along the American River will be downsized to ATV trails, or decommissioned.

Implementation of the Eastside Project is expected to begin in 2008 and could take five to ten years to complete, depending on available funding. Restoration work will take place concurrently with vegetation and fuels treatments.

Timing of some portions to the project will be closely coordinated with the NPNF and implementation of their American and Crooked River Project, which involves similar treatments. Seasonal road closures, road construction, restoration work, and restrictions on entry frequencies in some subwatersheds will require the most coordination.

The project will be implemented through a combination of traditional service contracts, timber sale contracts, stewardship contracts (exchanging goods for services) and a local assistance agreement.

2.2 Selected Alternative

The BLM has decided to implement actions identified in Alternatives B, C, and D of the Eastside Township Fuels and Vegetation Project FEIS. The NPNF has decided to construct a short segment of temporary road that occurs on NFS land providing BLM with access. The description of the Selected

Alternative is followed by the rationale for the decision. Maps 2, 3, and 4 Appendix A, in this ROD display the Selected Alternative.

The Selected Alternative was chosen to meet the purpose and need and in response to public comments. This alternative will treat approximately 1,155 acres of BLM public land. It will reduce existing and potential fuel loads through a combination of vegetation manipulation and fuels treatments. Vegetation manipulation includes removing predominantly lodgepole pine and increased spacing of residual overstory trees and live ladder fuels in both lodgepole pine and mixed conifer stands. Fuels treatments include biomass utilization, piling and burning and prescribed burning.

This action will create and maintain improved stand conditions by reducing the amount of area dominated by lodgepole pine; increasing the Douglas-fir, western larch and ponderosa pine component of current and future stands; and reducing the stand density of current treated stands. This will be accomplished by implementing silvicultural prescriptions that target lodgepole pine dominated stands, mainly removing lodgepole pine from mixed conifer stands, and reducing residual stand densities. Planting Douglas-fir, western larch and ponderosa pine in limited areas will follow fuels treatment. Information on treatments and harvest methods can be found in Table B.3 Appendix B, and Maps 2-3 in Appendix A.

Actions planned for improvement of vegetative/fuel condition include regeneration treatments that will reserve single and groups of trees including: approximately 454 acres will be irregular shelterwood, 270 acres will be shelterwood, 266 acres will be seed tree, 133 acres will be commercially thinned, and 32 acres will be salvaged with precommercial thinning.

Roads will be needed to access the treatment units but no new permanent road will be constructed. Roads needed include 2.94 miles of existing road on private land including 2.65 miles in an existing permanent easement and 0.29 miles requiring a temporary easement. Use will also include 7.37 miles of existing road across the NPNF. An additional 10.0 miles of new temporary roads will be required which includes 9.55 miles across BLM, 0.19 miles across private, and 0.26 miles across NFS land. Refer to Table B.5 Appendix B in this ROD for additional details.

This alternative will implement watershed restoration actions (See Table B.6 Appendix B and Map 3 and Appendix A). Riparian tree and shrub planting will occur on reaches of the American River where there is a current deficit of woody vegetation. It will be done using adapted native species and will include the seeding or planting of grasses, sedges, forbs, shrubs, or trees on approximately 4.8 miles.

Streambank re-contouring along with riparian tree and shrub planting (included in the 4.8 miles noted above), will occur on reaches of the American River. Streambank re-contouring will include the creation of a small terrace or floodplain (approximately 8–10 feet in width), immediately adjacent to or above mean high water line. This will occur on 1.2 miles.

Queen Creek (a 1.35 mile fish-bearing stream) will be reconnected with the American River. This action will include the excavation of a stream channel and installation of a culvert on the existing American River road. Instream structures will be installed in the channel consisting of woody debris and small rock check dams to provide instream cover and create pool habitat. At the road crossing, a culvert (approximately seven to eight feet wide), will be installed with substrate placed inside the culvert to simulate a natural stream bottom.

Two fords (one on Lower American River and one on Kirks Fork) will be closed and replaced with ATV bridges.

One ford, on the Middle American River, will be decommissioned. The road approaches to the current crossing will be closed and restored with native vegetation.

This alternative will downsize 2.4 miles of existing roads occurring adjacent to American River to an ATV trail. Segments of road (approximately 0.3 miles) occurring adjacent to American River will be obliterated when an existing grown over toeslope road will be converted to an ATV trail. Minor trail

reconstruction or construction will occur in localized areas, to avoid riparian habitats or stream channel encroachment.

Approximately 1.5 miles of road will be decommissioned in various locations, primarily in Riparian Habitat Conservation Areas. Road decommissioning applies to existing roads and will include treatments ranging from abandonment to re-contouring.

Project Design Measures as outlined in Table 2.3.1 in the FEIS are necessary to implement this alternative and are included in Appendix C of this ROD.

Monitoring requirements are outlined in Appendix E of the FEIS are necessary to evaluate project implementation and adaptive management of Design Measures. These have been included in Appendix D of this ROD.

3. Alternatives

Four alternatives, including the No Action Alternative (Alt. A), responded to the major issues identified through scoping and were considered in detail in the FEIS. Table 3.5.1 displays the activities for the three action alternatives (Alternatives B, C, and D). Alternative B (Proposed Action) was the agency's preferred alternative in the FEIS.

3.1 Elements Common to All Action Alternatives _____

The following discussion outlines elements of project design that are common to all action Alternatives. Specific required management criteria include:

- Avoid activities in high hazard landslide prone areas.
- Address State of Idaho TMDL limiting factors.
- Implement watershed restoration activities designed to meet the Chief Joseph Management Framework Plan (MFP) requirements to have a concurrent upward trend in aquatic habitat conditions for prescription watersheds that are below objectives.
- Address the effectiveness of fuel reduction activities.
- Maintain shade and large woody debris within the standards and guidelines prescribed in the PACFISH Strategy, including their application to Riparian Habitat Conservation Areas (RHCAs).

In addition, the following framework items were used as guides in the design of the project.

The treatment activities will entail changing forest conditions to maintain or increase forest stand resilience to low intensity fire, and insects and disease outbreaks by applying a prescription comprising regeneration, salvage harvests; pre-commercial and commercial thinning; and prescribed burns.

Timber harvest will be done through silvicultural systems that are grouped by regeneration or intermediate stand treatments. Examples of regeneration harvests include irregular shelterwood treatments where trees will be reserved singly or in groups of trees in all sizes. Seed tree and shelterwood are treatments where trees will be reserved in a somewhat even distribution across an area, primarily made up of larger trees. Commercial and pre-commercial thinning are intermediate stand treatments removing only a portion of the trees; leaving trees well distributed throughout. Salvage concentrates on removing dead and dying trees.

Logging systems will be dictated by topography, economics and the need to protect residual stands. Logging systems will range from ground-based with hand and/or mechanized felling; cable systems with hand felling; to helicopter systems with hand felling or limited mechanized felling.

Logging and fuels treatment access will use existing roads or new temporary roads. Temporary roads constructed for the project will be decommissioned within three years of construction. Temporary roads are needed across NFS land and on private property (an existing permanent easement), and are part of this project.

Fuels treatments will be designed to move the distribution of fuel conditions away from fuel model 10 (potentially very intense burning conditions) towards a fuel model 8 thereby decreasing high-intensity fire conditions. Treatments include whole tree yarding; mechanized piling of slash concentrations; hand piling in selected areas; underburning (protecting reserve tree groups or single trees); and broadcast burning where residual tree survival is of limited concern.

Slash will be treated with prescribed fire and/or grapple piling or be available for biomass utilization.

Appendix B in this ROD contains a detailed table of all the fuels/vegetation treatment types by unit for Alternatives B, C, D and the Selected Alternative.

3.2 Alternative A (No Action) _____

Both BLM and Council on Environmental Quality (CEQ) regulations require the development of the No Action alternative. This alternative serves as the baseline for comparison of the effects of all action alternatives.

Under this alternative, there would be no change in current management direction or in the level of ongoing management activities within the project area. No fuel reduction/vegetation treatments associated with this project would be implemented. BLM would not be able to enter certain subwatersheds due to the entry frequency criteria identified in BLM and NPNF land use plans. These frequency guidelines as described in the FEIS, Appendix H, would limit entries to once or three times per decade for certain subwatersheds. Since the NPNF is implementing the American and Crooked River Project, the opportunity to treat much of the area except on a limited basis would be lost for another 10 years. Also the restoration portion of the project would not be implemented. Other projects previously planned that are within and/or adjacent to the project area would still occur as separate projects (FEIS, Chapter 3; Table 3.1, Projects considered for cumulative effects).

3.3 Alternative B (Proposed Action) _____

This Alternative B, the Proposed Action, was the original proposal developed to meet the purpose and need for the project.

See Table 3.5.1 for a comparison of activities and outputs for the alternatives and Tables B.3 and B.5 Appendix B for a detailed comparison of fuels/vegetation treatments and road management.

3.4 Alternative C _____

This alternative was developed in response to the concerns that the Proposed Action has too many temporary roads; should include more road decommissioning; and automobile access issues raised by the public. To address these items:

- Aerial logging methods were considered instead of cable logging methods in much of the project, thus temporary road miles are less than in the Proposed Action (10.5 miles instead of 15.1 in Alt. B).
- A 1.1 mile road segment along the American River with a ford (a chronic sediment source) is included for decommissioning. Alternative B called for hardening of the ford only.

- This alternative also considers 0.56 miles of new permanent road (80% outside the Riparian Habitat Conservation Area (RHCA) and an automobile bridge over the American River, to replace 1.1 miles of road described above.

See Table 3.5.1 below for a comparison of activities and outputs of the alternatives and Tables B.3 and B.5 Appendix B for a detailed comparison of fuels/vegetation treatments and road management.

3.5 Alternative D

This alternative was developed in response to the concerns that the Proposed Action has too many temporary roads; additional roads should not be considered for decommissioning but should be converted to ATV trails; the main subdivision access road along the American River should be left as is; road construction in NPNF “unroaded” areas should not be considered; and other automobile access issues raised by the public and the NPNF. To address these items:

- Aerial logging methods were considered instead of cable logging methods in much of the project, thus temporary road miles are less than the Proposed Action (10.7 miles instead of 15.1 in Alternative B).
- Some treatment areas were dropped that were included in both Alternatives B and C.
- A 1.1 mile road segment along the American River with a ford (a chronic sediment source) is included for conversion to an ATV trail for most of its length, circumventing a short segment (that would be decommissioned) and the ford by improving an existing 0.5 mile ATV trail (a trail not currently designated by the BLM). Alternative B called for hardening the ford only; it was decommissioned in Alternative C.
- This alternative also considers a shorter, new permanent road (80% outside the RHCA) and bridges of the American River, to replace the road described above, and provide treatment areas access along a different route than Alternatives B and C.
- Two new permanent road segments that would be constructed to replace portions of the main subdivision access road are excluded.
- Two temporary roads in NPNF “unroaded” areas would not be constructed.

See Table 3.5.1 below for a comparison of activities and outputs of the alternatives and Tables B.3 and B.5 Appendix B for a detailed comparison of fuels/vegetation treatments and road management.

Table 3.5.1 Comparison of Activities and Outputs by Alternative

Proposed Activity–Vegetation/Fuels		Alt B (Proposed)	Alt C	Alt D	Selected Alternative
Acres of Treatment	Tractor Yard/Excavator Pile or Biomass Utilization	770	761	728	559
	Tractor Yard/Burn	31	31	27	0
	Cable Yard/Burn	298	194	135	200
	Helicopter Yard/Burn	0	244	238	238
	Helicopter Yard/Hand Pile	54	54	43	58
	Helicopter Yard/ Excavator Pile	0	0	0	100
	Slash/Burn Fuels Treatment Only	140	0	0	0
	Total Acres Treated	1293	1284	1171	1155
	Percent Regeneration	82	83	84	87
Percent Partial Cut/Thin	18	17	16	13	
Temporary road construction (miles) ¹		15.1	10.5	10.7	10.0
Road improvement (for timber harvest) (miles) ²		2.4	2.4	2.4	2.4

Estimated Green Volume Harvested (MMBF)	9.7	11.1	10.4	10.0
Estimated Dead Volume Harvested (MMBF)	4.1	4.1	3.6	3.4
Proposed Activity–Restoration	Alt B (Proposed)	Alt C	Alt D	Selected Alternative
Miles of decommissioned roads ³	1.9	2.9	1.5	1.5
Miles of American River Stream Bank Re-contour	1.2	1.2	1.2	1.2
Miles of New Permanent Road	0.6	1.1	0.6	0
New Automobile River Crossing (Bridge)	0	1	1	0
Number of sites of Watershed Trail Improvements ⁴	2	2	3	3
Stream crossing improvements ⁵	3	2	2	2
Stream crossing closures ⁶	0	1	1	1
Miles of riparian vegetation planting	4.8	4.8	4.8	4.8
Miles of Recreation and Trail improvements	0	0.2	0.2	0.5
Miles Queen Creek re-connect to American River and increased fish habitat access ⁷	1.35	1.35	1.35	1.35
Access change for vehicle use–Automobile use to ATV restricted use (miles) ⁸	1.6	1.6	2.4	2.5
Acres of Mine Site Reclamation	0.5	0.5	0.5	0.5

¹ Temporary roads will be decommissioned within one to three years of construction.

² Road improvement covers a range of activities, such as surface blading, drainage repair, and roadway brushing with occasional culvert installations, slump repairs, and stabilization work. Road widening could occur with major reconstruction. Road improvements stated in this table are not to be considered or confused with routine road maintenance that may include but is not limited to road prism brushing, clearing, or hazard reduction activities.

³ Road decommissioning for this project covers a range of activities, from re-contouring to abandonment due to grown-in conditions. Some decommissioned roads would be replaced by new permanent road in Alt B & C.

⁴ This is the replacement of two ATV fords with bridges (one on American River, one on Kirks Fork) with rocking of approaches, +ATV trail crossing Alt D and the Selected Alternative.

⁵ Stream crossing improvements include upgrading or improving culverts and bridges to improve fish passage and peak water flows and are listed as the number of sites, or ford hardening to remove chronic sediment sources.

⁶ This is an access change that closes the current ford on the American River in Section 2.

⁷ This is the miles of anadromous fish habitat that will be reconnected to the American River.

⁸ This is an access change, which reduces the running surface width and restricts use to two wheeled vehicles or snowmobiles over snow or, all terrain vehicle use (ATV) from previous automobile use. Some roads would be replaced by new permanent trail.

3.6 Environmentally Preferable Alternative

Environmental preferability is judged using the criteria suggested in the NEPA, and guided by the CEQ. The CEQ has stated that,

“The environmentally preferable alternative is the alternative that will promote the national environmental policy as expressed in NEPA’s Section 101. Ordinarily, this means the alternative that causes the least damage to the biological and physical environment; it also means the alternative which best protects, preserves, and enhances historic, cultural, and natural resources.”

(Forty Most Asked Questions Concerning CEQ’s National Environmental Policy Act Regulations. #6a.)

The NEPA, Title I, Section 101(b) establishes the following broad policy goals for all Federal plans, programs, and policies (42 USC § 4331):

- (a) fulfill the responsibilities of each generation as trustee of the environment for succeeding generations;

- (b) assure for all Americans safe, healthful, productive, and esthetically and culturally pleasing surroundings;
- (c) attain the widest range of beneficial uses of the environment without degradation, risk to health or safety, or other undesirable or unintended consequences;
- (d) preserve important historic, cultural, and natural aspects of our national heritage, and maintain, wherever possible, an environment which supports a diversity and variety of individual choice;
- (e) achieve a balance between population and resource use that will permit high standards of living and a wide sharing of life's amenities; and
- (f) enhance the quality of renewable resources and approach the maximum attainable recycling of depletable resources.

The identification of the environmentally preferable alternative involves judging the balance of environmental values as expressed by various sources. These sources include the Chief Joseph Management Framework Plan (MFP) as amended; the collaborative efforts initiating the project; and comments on the Draft and Final EIS from the public, governmental agencies, groups, individuals, and the Nez Perce Tribe.

In terms of direct impacts to the local biological and physical environment from fuels/vegetation and restoration actions, Alternative A (No Action) would have the least short-term effects, since it creates no new disturbances. However, it fails to meet the purpose and need and does not look at opportunities to improve conditions over time and reduce the potential impacts from future fire events within the WUI and surrounding area.

Alternative B meets the purpose and need for the project. It does remain within the impact thresholds established in the MFP while improving the conditions over time and reducing the potential impacts from future fire events on the largest number of acres within the WUI and surrounding area.

Some comments would suggest that Alternative C should be the environmentally preferable alternative because it includes less temporary road construction than either Alternatives B or D and decommissions the greatest amount of existing road. These two items involve tradeoffs. Alternative C is economically deficient in revenues to cover all the costs, including restoration. The extra miles of decommissioning come at the expense of constructing more permanent roads and an automobile bridge over the American River.

Some comments would suggest that Alternative D should be the environmentally preferable alternative because it impacts the fewest acres, and includes less temporary road construction than Alternative B and just slightly more than Alternative C. Also temporary roads would not be constructed in the adjacent NPNF area with unroaded characteristics. Again tradeoffs have to be weighed. Alternative D is economically sufficient in revenues to cover all the costs, including restoration, but less so than Alternative B. This alternative has the least amount of road decommissioning through the conversion of more roads to trails and also includes constructing a permanent road and an automobile bridge over the American River.

However, with respect to better protecting, preserving, and enhancing historic, cultural, and natural resources, the Selected Alternative was determined to be the environmentally preferable alternative, based on the following rationale. The Selected Alternative best meets the laws, regulations, policies, and treaty responsibilities; is responsive to many public comments; and is in conformance with the MFP as amended. This alternative meets the goals of Section 101(b) of the NEPA, as stated above, by treating 1,155 acres of hazardous fuels to reduce the risks of resource damage from wildfire.

The Selected Alternative includes:

- No temporary road construction in the Middle American River subwatershed (from Alt D);

- All restoration actions of Alternative B except 0.4 miles of road decommissioning that was part of the American River subdivision road relocation (from Alt D); and
- The additional ford closure in the Middle American River subwatershed (same as Alt C & D) plus an additional 0.9 miles of conversion of road to trail (from Alt D).

3.7 Alternatives Considered but Eliminated From Detailed Study

The Interdisciplinary Team considered the past, current, and potential future conditions within the project area; developed the purpose of and need for the management actions; and analyzed a variety of possible vegetation treatments and alternatives. The following alternatives were considered but eliminated from detailed analysis for the reasons stated in Section 2.2.1 of the FEIS.

- Treat More Acres of Hazardous Fuels than the Alternatives Carried Forward in the FEIS.
- “Restoration Only” and/or “No Timber Harvest”.
- Defensible Space.
- No Road Access across Forest Service Land.

4. Rationale for the Decision – Selected Alternative

All of the action alternatives analyzed in the FEIS meet the purpose of this project which is to:

- Reduce the risk of high-intensity wildland fire to life, property, and natural resources in the Elk City and surrounding WUI area;
- Manage forest stands to create conditions that will contribute to sustaining long-lived fire tolerant tree species;
- Design a public transportation system that provides safe travel routes for the public, while meeting watershed and fisheries management goals, in a cost effective manner;
- Create an upward trend in fish habitat condition;
- Contribute to the economic and social well being of area users and local residents; and
- Implement intensive forest management decisions from the MFP.

The framework for the development of the alternatives includes the discussion noted previously in Section 3.1 of this ROD. Also common to all action alternatives are the design measures found in Appendix C of this ROD. Therefore, all of the action alternatives would be in conformance with and allowed by the MFP, as amended.

All of the action alternatives provide for an upward trend in aquatic habitat conditions of the American River. Differences among alternatives relate to the amount of improvement over the long-term. All action alternatives have some local, short-term negative effects, including those in Whitaker and Queen Creeks which are expected to measurably impair existing water quality of fish habitat conditions for a short time, returning to pretreatment levels within five years. All action alternatives protect and enhance aquatic conditions in the long term.

In looking at the major issues, the project development framework and the purpose of the project, there are four main factors to consider. This decision is based on the comparison of these factors.

Acres of Vegetation/Fuels Treatment

The alternative that would treat the most acres within the constraints of the project would appear to best meet the purpose and need of the project. Alternative B treats the most acreage with the greatest economic value return. Also, capturing that value before more trees die and logging more acreage would provide more funding for restoration work on this and future projects. However, time has passed since initiation of the project and values continue to decrease. The primary issues of environmental concern raised were regarding roads; their proposed location on NPNF unroaded land, the miles of temporary road, and the amount of permanent road construction. This decision recognizes the need to provide a balance between managing our natural resources while minimizing environmental impacts.

The Selected Alternative treats 1,155 acres; 138 acres less than the Proposed Action (Alternative B). This alternative addresses current and future stand conditions that would be prone to intense wildland fires. The Selected Alternative incorporates treatment and logging methods from Alternative B with the following exceptions which address the issues noted above:

- Converting the fuels only treatments of units 37, 38 and 51 (134 acres, Map 2 Appendix A) to irregular shelterwoods with helicopter logging (included in Alternatives C and D).
- Converting units 2, 4, 6, 9 (reduced in size), 11 and 13 (included in Alternative C) from tractor to helicopter yarding. These units could utilize a ground-based mechanized feller-buncher to pre-bunch the logs prior to helicopter yarding. Units 3, 5, 7 and 8 are changed from cable to helicopter logging (included in Alternative C). Units 10 and 12 are changed from cable to helicopter. Total change from tractor and cable to helicopter is 202 acres (Map 2 Appendix A).

Refer to Table 3.5.1 in this ROD for a comparison of activities and outputs for the action alternatives including The Selected Alternative.

Restoration Activities

The alternative that has the most aggressive restoration package would appear to best meet the purpose and need of the project. Alternative C has the most aggressive restoration package in terms of treatments and number. All the alternatives provide for an upward trend; however this alternative provides the greatest long-term watershed improvement.

Several concerns were expressed regarding possible changes to the current transportation system. Several issues dealt with changes to the 1.06 mile road in the Middle American River. First was that conversion of the road to an ATV trail should be considered in lieu of full decommissioning of the 1.06 road miles in the Middle American River. The concern was that there continues to be a decrease in areas open to ATV use on federal property. Second was that this road should be retained as a safety route in case of an intense wildfire event. Issues were also raised that moving the 0.42 mile portions of the existing road in the Lower American River subwatershed out of the riparian area to the toe of the slope would be counterproductive and would result in difficult ingress and egress for the local residents and provide minimal watershed improvement as road maintenance could not be guaranteed. The concerns were the current location is relatively stable and maintenance free, while the new location would be shaded in winter and require more maintenance. Other commenters raised issues that there should be more restoration (particularly road decommissioning).

The need for restoration and complying with the South Fork Clearwater River Total Maximum Daily Load (TMDL) Implementation Plan is recognized as is the BLM's limited opportunity to affect and implement wholesale changes within the American River due to the limited public land ownership.

The Selected Alternative incorporates the entire restoration package of Alternative D into the implementation decision, which is less than Alternative C. The selected alternative considered what is practical, i.e. what would have the highest probability of success as well as the merits of the concerns expressed by the public.

Transportation

The alternative that provides safe travel routes for the public, access for land management activities, while meeting watershed and fisheries management goals, in a cost effective manner would appear to best meet the purpose and need of the project. The management factors considered in the development of road access includes:

- Minimize new road construction and major reconstruction for timber harvest purposes within RHCAs.
- Minimize the amount of permanent road for timber harvest; use temporary roads as much as possible.
- Place roads on mid- and upper-slopes as much as possible to reduce the amount of project produced sediment entering reaches of the American River watershed.
- Avoid live water crossings.
- Avoid crossing multiple small parcels of privately owned property.
- Minimize the amount of money invested in permanent road upgrade.
- Relocate permanent roads along the American River away from the river where possible.
- Decommission roads not needed for administrative purposes.
- Close live water fords.

Alternative B would appear to best meet this framework for access development. However, following this framework, particularly avoiding live water crossings and private property, increased the number of miles of temporary road and required crossing NFS land that has unroaded characteristics. There were issues or concerns raised that Alternative B included an excessive amount of miles of temporary road. These included sediment impacts and keeping ATV usage out of these areas after the project is completed. Issues/concerns were raised about crossing NFS land with unroaded characteristics, included in Alternatives B and C. Issues/concerns were raised about closing the road in the Middle American River subwatershed to highway vehicles, (viewed as an escape route by some local residents) included in Alternative C. Constructing a permanent road and bridge in the Middle American River subwatershed eliminated this issue (included in Alternatives C and D), but generated some concern as it involved additional permanent road construction and a live water crossing.

This decision recognizes that tradeoffs are necessary and difficult to make. The implementation of the Selected Alternative will reduce the potential for intense wildfires in the area. The need for an alternate escape route will be lessened substantially by treating fuels on 1,155 acres in the project area as well as other BLM projects already implemented dealing with transportation corridors leading into the area. These efforts would minimize the need for the use of the new permanent road and bridge as an escape route for local residents. However, eliminating the new permanent road (along with associated temporary roads) reduces the area of hazardous fuels treatments. Eliminating the temporary roads across the NFS land with unroaded characteristics also reduces the area of hazardous fuels treatments. Both of these actions increase the difficulty and cost of treating the remaining area, and may make it logistically prohibitive.

Therefore, the Selected Alternative includes no new permanent or temporary road in the Middle American River subwatershed. It does include the conversion of existing road to ATV trail design for the Middle Fork American River from Alternative D, which minimizes the road improvement but still provides an escape route for local residents.

Water Quality / Aquatic Habitat

Water quality and aquatic habitat are recognized by the BLM, the public, state and federal agencies, and the Nez Perce Tribe as very important resources.

There are several factors, including sedimentation, temperature, and wetland conditions to be considered. An alternative that provides the smallest short-term increases and largest long-term decrease in sediment yield and provides the least risk or most improvement of streamside shade would best address the intent of the South Fork Clearwater River TMDL Implementation Plan. The alternative that has the most aggressive restoration package would appear to best meet the South Fork Clearwater River TMDL Implementation Plan. The need for restoration and complying with the South Fork Clearwater River Total Maximum Daily Load (TMDL) Implementation Plan is recognized as is the BLM's limited opportunity to affect and implement wholesale changes within the American River due to the limited public land ownership.

Vegetation and fuel reduction treatments and the associated roads increase sediment production. Project Design Measures (Appendix C of this ROD) have been developed specifically to limit the amount of sediment reaching live water. The transportation system has been designed so that sediment production is further removed from live water. It is recognized that the percent over base sediment increases are comparable for all subwatersheds in each action alternative, except in Whitaker and Queen Creek subwatersheds. All alternatives are within threshold levels set in the MFP, as amended. The percent over base sediment levels return to pre-project or lower levels in all subwatersheds within five years.

The effect on fish habitat (cobble embeddedness, summer and winter rearing capacity) is very similar among the action alternatives (+/- 3%) with the most impact occurring for winter rearing habitat in Whitaker and Queen Creeks under Alternative B and the Selected Alternative.

The Selected Alternative incorporates the entire restoration package of Alternative D. The project includes activities that directly improve habitat availability, i.e., the re-connect of Queen Creek to the American River. The Selected Alternative also reduces the total amount of road construction by 36 percent and reduces ground based yarding by 29 percent over the Alternative B (Proposed Action). The BLM, along with other federal and state agencies and partners participated in the development of the South Fork Clearwater Total Maximum Daily Load (TMDL) Implementation Plan (South Fork Clearwater Watershed Advisory Group, 2006). The restoration actions in the Selected Alternative are consistent with the pollutant control strategies included in Table 2 of that plan.

Conclusion

The BLM has determined that the Selected Alternative meets the purpose and need and responds to the significant issues identified during scoping, while conforming to applicable laws and regulations, and adhering to goals and objectives of the MFP, as amended. The Selected Alternative provides the best balance between environmental protection and fuels/vegetation treatments.

5. Findings Related to Environmental Laws and Regulations

The planning and decision making process for this project was conducted in accordance with all applicable laws, regulations, policies and plans. This section briefly describes our findings regarding the legal requirements most relevant to this project decision.

NATIONAL ENVIRONMENTAL POLICY ACT (NEPA)

We find the requirements of NEPA, as specified in 40 CFR Part 1500, have been fully applied through this project planning effort. The DEIS and FEIS, and the comprehensive analyses and public involvement steps which they incorporate, comply with the letter and intent of NEPA. The FEIS analyses a reasonable range of alternatives, including no action, and discloses the expected environmental effects of each

alternative within the context of identified issues. This ROD describes the selected actions and rationale for making these decisions. This project is in full compliance with the National Environmental Policy Act.

ALASKA NATIONAL INTEREST LANDS CONSERVATION ACT

As Forest Supervisor, I find that the selected alternative is in compliance with Alaska National Interest Lands Conservation Act (ANILCA). The ANILCA assures access to non-federally-owned lands within the boundaries of the National Forest System as is deemed adequate to secure reasonable use. The planned decommissioning of temporary road (0.26 miles) would not restrict access to non-federally owned land. Travel from non-federally owned land to federally owned land would not be changed from the existing access prescriptions for that road or trail.

CLEAN AIR ACT

We find that the project is consistent with the requirements of the Clean Air Act. Proposed burning activities on BLM land would comply with state and federal air quality regulations. Compliance with mitigation measures and smoke management plans would result in no long term impacts (FEIS Section 3.2.2.3). The decision to allow development of the temporary road and road use on Forest Service managed lands would not result in long term impacts and would comply with the rules, regulations, and permit procedures of the Environmental Protection Agency (EPA) and the Idaho Department of Environmental Quality (IDEQ), and the provisions of the Clean Air Act.

CLEAN WATER ACT

We find that the selected alternative is consistent with the requirements of the Clean Water Act based upon the analysis disclosed in the FEIS and subsequent sediment analysis. The objective of the Clean Water Act is to "...restore and maintain the chemical, physical, and biological integrity of the nation's waters." One of the Act's goals is to "...provide for the protection and propagation of fish, shellfish, and wildlife" and provide for "...recreation in and on the water" (33 U.S.C. 466 et seq., Title I, Section 101).

The project includes design measures, including best management practices, to ensure management activities maintain or improve watershed conditions (FEIS Section 2.3)

ENDANGERED SPECIES ACT AND MAGNUSON-STEVENS FISHERY CONSERVATION AND MANAGEMENT ACT

All federally listed species potentially occurring, or with habitat occurring in the analysis area, were identified and effects to them are described in the Biological Assessment (BA) and FEIS. Both documents can be viewed on the BLM website at <http://www.blm.gov/id/st/en/fo/cottonwood.html>.

Threatened and endangered species are designated under the Endangered Species Act (ESA). It is the policy of Congress that all Federal departments shall seek to conserve endangered and threatened species and shall utilize their authorities in furtherance of this purpose (ESA 1531.2b). The ESA also provides direction that federal agencies would consult on all activities that may affect listed species and/or their habitat.

The Magnuson-Stevens Act, Section 3, defines Essential Fish Habitat (EFH) as "those waters and substrate necessary for fish for spawning, breeding, feeding, or growth to maturity." Pursuant to Section 305(b) of the Magnuson-Stevens Act and its implementing regulations (50 CRF 600.920), Federal agencies must consult with the National Marine Fisheries Service (NMFS) regarding any of their actions that may adversely affect EFH. Federal agencies may incorporate an EFH Assessment into Biological

Assessments prepared for consultation under the Endangered Species Act. Assessment for the project was included in the BA which was submitted to NMFS.

We find that the project is consistent with the ESA. BAs were prepared for ESA-listed species that occur or could occur within the project area and potentially be affected by the project. Concurrence for the U.S. Fish and Wildlife Service (USFWS) and NFMS has been documented in Biological Opinions (BOs). Full text of these documents is located in the project file that can be viewed at the BLM Cottonwood Field Office. Both documents can be viewed on the BLM website at <http://www.blm.gov/id/st/en/fo/cottonwood.html>. The following determinations of effect have been made for the selected alternative (Table 5.1).

Table 5.1 Summary of Effects Determinations for Threatened and Endangered Species

	Species	Status	BA Determination of Effect
Fish	Snake River Steelhead Trout (designated critical habitat)	Threatened	May Affect, Likely to Adversely Affect
	Columbia River Bull Trout	Threatened	May Affect, Likely to Adversely Affect
Wildlife	Gray Wolf	Experimental – Nonessential ¹	Not Likely to Jeopardize Continued Existence
	Canada Lynx	Threatened	May Affect, Not Likely to Adversely Affect

¹ The gray wolf was delisted with an effective date of March 28, 2008.

The BO and concurrence from USFWS for the Eastside Township Fuels and Vegetation Project (December 13, 2007) includes reasonable and prudent measures to avoid or minimize take of bull trout (section VII.C), and the non-discretionary terms and conditions required to implement those measures (section VII.D). It also includes discretionary conservation recommendations (section VIII). The mandatory terms and conditions become required design or mitigating elements for this decision, and thus ensure project compliance with the ESA. The terms and conditions affect implementation and monitoring activities; and they have been accounted for in the decision and where applicable will be made a requirement of contracts, implementation and monitoring plans.

The BO and concurrence from NMFS for the project (January 22, 2008) includes reasonable and prudent measures to avoid or minimize take of steelhead, and the mandatory terms and conditions required to implement those measures. These terms and conditions also serve as the Essential Fish Habitat conservation recommendations required by the Magnuson-Stevens Act. These mandatory terms and conditions become required design or mitigating elements for this decision, and thus ensure project compliance with the ESA. The terms and conditions affect implementation and monitoring activities; and they have been accounted for in the decision and where applicable will be made a requirement of contracts, implementation and monitoring plans.

There are no ESA-listed, candidate, or proposed plant species or suitable habitats for these species occurring within the project area. A no effect determination was concluded and no formal or informal consultation or conferencing took place with USFWS regarding plant species.

ENVIRONMENTAL JUSTICE (EXECUTIVE ORDER 12898)

Executive Order 12898 (59 Fed. Register 7629, 1994) directs federal agencies to identify and address, as appropriate, any disproportionately high and adverse human health or environmental effects on minority populations and low-income populations. Executive Order 12898 requires an analysis of the impacts of the Proposed Action and alternatives to the Proposed Action on minority and low-income populations. It is designed in part "...to identify, prevent, and/or mitigate, to the greatest extent practicable, disproportionately high and adverse human health or environmental effects of United States Department of Agriculture (USDA) programs and activities on minority and low income populations." Based upon the

analysis disclosed in the FEIS Section 3.13, we find that the Selected Alternative will not disproportionately impact minority or low-income populations.

FLOODPLAINS AND WETLANDS (EXECUTIVE ORDERS 11988 & 11990)

Executive Orders 11988 and 11990 pertain to floodplain management and protection of wetlands. The Selected Alternative has project design and mitigation measures, and restoration activities that are expected to meet the intent and assist in the attainment of the objectives of these Executive Orders.

We find that the project is not expected to negatively change the functions or values of wetlands and floodplains as they relate to protection of human health, safety, and welfare; preventing the loss of property values; and maintaining natural systems. Direct and indirect effects would occur on wetland areas and within stream floodplains as part of the project restoration activities (See Table 3.5.1). The functionality and distribution of natural wetlands should be enhanced with these activities.

IDAHO FOREST PRACTICES AND STREAM CHANNEL PROTECTION ACTS

The Idaho Forest Practices Act regulates forest practices on all land ownerships in Idaho. Forest practices on BLM and NFS lands must adhere to the rules pertaining to the Act (IDAPA 20.02.01). The rules are also incorporated as best management practices (BMPs) in the Idaho Water Quality Standards.

The Idaho Stream Channel Protection Act regulates stream channel alterations between mean high water marks on perennial streams in Idaho. Instream activities on BLM and NFS lands must adhere to the rules pertaining to the Act (IDAPA 37.03.07). The rules are also incorporated as BMPs in the Idaho Water Quality Standards.

The Rules and Regulations Pertaining to the Idaho Forest Practices Act (IDAPA 20.02.01), Rules and Regulations and Minimum Standards for Stream Channel Alteration (IDAPA 37.03.07), and Forest Service Soil and Water Conservation Practices (FSH 2509.22)(for the development of the temporary road on NFS land) would be implemented.

We find the project complies with the Clean Water Act, as well as terms and conditions prescribed for the project in the Biological Opinions through the implementation of project restoration actions and design features (FEIS Section 2.3; Appendix C of this ROD) and meets State and Federal water quality regulations. Implementation of the Selected Alternative is expected to reduce existing sediment delivery to streams (in the long term). Based on the analysis in the FEIS and this ROD, the Selected Alternative is expected to be consistent with the intent of the South Fork Clearwater River TMDL to reduce human caused sediment yield and improve shade conditions (FEIS Sections 3.4, 3.6 and Appendix H).

MIGRATORY BIRD TREATY ACT (MBTA) AND MIGRATORY BIRD CONSERVATION EXECUTIVE ORDER (DATED JANUARY 10, 2001)

The project is in compliance and alignment with both the 1918 Migratory Bird Treaty Act (MBTA) and the Migratory Bird Conservation Executive Order (dated January 10, 2001) which authorizes activities including habitat protection, restoration, enhancement, necessary modification, and implementation of actions that benefit priority migratory bird species (Memorandum of Understanding Between USDA Forest Service and USFWS – 01-MU-11130117-128, January 16, 2001 designed to complement Executive Order 13186). We find the project complies with Executive Order 13186 because the analysis meets agency obligations. Despite the risks of limited, potential direct disturbance and localized impacts to nesting habitats of a few bird species within this landscape, the decision is consistent with current interpretation of the MBTA applicable to disturbance of nesting songbirds. This decision may however result in an “unintentional take” of individuals during use of the roads. However the project complies

with the U.S. Fish and Wildlife Service Director's Order #131 related to the applicability of the Migratory Bird Treaty Act to federal agencies and requirements for permits for "take".

If new requirements or direction result from subsequent interagency memorandums of understanding pursuant to Executive Order 13186, this project would be evaluated to ensure that it is consistent.

NATIONAL FOREST MANAGEMENT ACT (NFMA)

CONSISTENCY WITH FOREST PLAN GOALS, OBJECTIVES, AND STANDARDS

The Nez Perce Forest Plan provides overall management direction for the Nez Perce National Forest, including:

- Multiple-use goals and objectives, and management standards and guidelines to achieve them.
- Monitoring and evaluation requirements to determine whether goals, objectives, and standards and guidelines are being met.
- Direction for management areas with similar management emphasis.

Overall Consistency

As Forest Supervisor I find the decision to allow development of the temporary road and road use meets the goals and objectives of the Nez Perce Forest Plan, and is consistent with Forest-wide Standards (existing and amended).

NATIONAL FOREST MANAGEMENT ACT [AT 16 U.S.C. 1604(i)]

The National Forest Management Act and accompanying regulations require that several specific findings be documented at the project level. These are:

Forest Plan Consistency [16 U.S.C. 1604(i)] – All resource plans must be consistent with the Forest Plan goals, objectives and standards. This project is consistent with the Nez Perce Forest Plan.

Ecological Evaluation of Sustainability (FSH 1921.73)

The overall goal of the ecological element of sustainability is to provide a framework to contribute to sustaining native ecological systems by providing ecological conditions to support diversity of native plant and animal species in the plan area [36 CFR 219.10(b)].

1. *Ecosystem Diversity.* Analysis of ecosystem characteristics in the project area has been completed in the FEIS, Chapter III, Sections 3.5-Soils, 3.4 -Watershed, 3.6 -Fisheries, 3.1 –Fire and Fuels, 3.3 -Vegetation, 3.3.4 –Threatened, Endangered and Sensitive Plants, 3.3.5 -Weeds and 3.7 Wildlife. From these analyses, as Forest Supervisor I have determined development of the temporary road and road use would not affect ecosystem diversity over time in the Eastside project area.
2. *Species Diversity.* Analysis of fish, plants and wildlife are in the FEIS (Chapter III, Sections 3.6 - Fisheries, 3.3.4 –Threatened, Endangered and Sensitive Plants, 3.7 Wildlife). As required under the Endangered Species Act (ESA), Biological Assessments have been prepared for federally listed fish and wildlife. Biological Opinions and concurrence from the USFWS and NMFS have been received. Biological Evaluations have been prepared for sensitive species (fish, wildlife, plant). Based on conclusions made in the Biological Assessments, Biological Evaluations, Biological Opinions and concurrence from regulatory agencies, as Forest Supervisor I have determined that appropriate ecological conditions for threatened, endangered and sensitive species would be sustained overtime in the Eastside Fuels and Vegetation project area.

Sensitive species are addressed for fish, plants, and wildlife. Forest Service Manual (2670) provides direction for sensitive species management. The decision to allow development of the temporary road and road use will not lead to any species becoming federally listed as threatened or endangered.

Assessments for fish and wildlife species viability in the Eastside Fuels and Vegetation project area concluded short term changes in habitat were not expected to affect viability of any species.

National Forest Transportation System [16 U.S.C. 1608].

Unless the necessity for a permanent road is set forth in the forest develop road system plan, any road construction of the National Forest System in connection with a timber contract or other permit or lease shall be designed with the goal of reestablishing vegetative cover on the roadway and area where the vegetation cover has been disturbed by the construction of the road, within ten years after the termination of the contract, permit or lease either through artificial or natural means [16 U.S. C 1608(b)].

Roads constructed on National Forest System lands shall be designated to standards appropriate for the intended uses, considering safety, cost of transportation, and impact on land and resources [16 U.S. C 1608(c)].

A transportation plan, including a roads analysis process was completed with the Red River Ecosystem Analysis at the Watersheds Scale (EAWS). The analysis considered the current and future transportation needs. With this analysis tiered to the FEIS, Temporary roads would be decommissioned after use (within 3 years) and would be re-vegetated within ten years.

NATIONAL HISTORIC PRESERVATION ACT

We find that this project is consistent with the requirements of Section 106 of the National Historic Preservation Act and 36 CFR 800 regulations, based on the following factors:

- Formal consultation with the State Historic Preservation Office (SHPO) under Section 106 has been conducted and completed. Documentation of required cultural resource inventories and evaluations were submitted to the SHPO. Consultation was completed with the SHPO regarding the results of the inventory and design measures developed to achieve no adverse effect. The SHPO has concurred with the finding of no adverse effect. The final determination of effects was received from SHPO on January 06, 2006.
- Resource information was gathered and coordination completed through the Government-to-Government relationship with the Nez Perce Tribe. Consultation was engaged in with the Nez Tribe regarding the potential impacts according to the National Historic Preservations Act and associated legal requirements (FEIS Section 3.10.1.2).

NOXIOUS WEEDS MANAGEMENT (EXECUTIVE ORDER 13112)

Analysis and evaluation of invasive plants in the Eastside FEIS is based on direction contained in the Federal Noxious Weed law (1974) as amended, Executive Order 13112 for Invasive Species, Forest Service policy (2080), Northern Region Supplement (R1 2000-2001-1) Implementation of Integrated Weed Management on National Forest System lands in Region 1, and the Nez Perce National Forest Plan (II-7, II-20, II-26, III-6). In general, the BLM and the Forest are directed to implement an effective weed management program with the objectives of preventing the introduction and establishment of noxious weeds; containing and suppressing existing weed infestations; and cooperating with local, state, and other federal agencies in the management of noxious weeds.

The Selected Alternative includes design features (Appendix C, FEIS Table 2.3.1 Weeds) to limit and spread of invasive species.

FINDINGS RELATED TO OTHER LAWS OR POLICIES

Energy Requirements and Conservation Potential of Alternatives - With relation to national and global petroleum reserves, the energy consumption associated with the selected alternative would

consume an undetermined amount of fossil fuels in order to remove and transport products and to implement activities.

Federal Road Management Policy - Along with Federal regulations and Forest Service manual and handbook guidance, the Federal Road Management Policy (published in the Federal Register on January 12, 2001) defines agency policy regarding transportation systems. Terminology changes in the policy reflect the agency's emphasis on maintaining environmentally sound access. Additional elements of the policy direct agency officials to identify the minimum transportation system needed to administer and protect NFS lands, and to document this system through the use of road management objectives.

As Forest Supervisor I find the decision to allow development of the temporary road and road use across NFS land is consistent with this policy.

Forest Service Policies – As Forest Supervisor I find the existing body of national direction for managing National Forests remains in effect.

Minerals – We find that the selected alternative would have no effect on the availability of lands for mining under Federal mining laws and regulations.

Prime Range Land, Farm Land, and Forest Land – As Forest Supervisor I find that the decision to allow use of the road is in compliance with the Federal Regulations for prime land. The definition of "prime" forest land does not apply to lands within the National Forest System. The road to be used does not contain any prime range land or farm land. Under this decision, Federal lands would be managed with appropriate sensitivity to the effects on adjacent lands.

Wilderness and Roadless Areas – Congress, BLM and the Forest Service have identified Wilderness Areas and Inventoried Roadless Areas through past actions. None of the selected alternative's activities would occur within any Inventoried Roadless Area or Wilderness Area.

Wildlife - Proposed activities would not conflict with current or proposed Idaho Department of Fish and Game management plans.

6. Public Involvement

6.1 Scoping

In February of 2004, the BLM mailed letters to approximately 200 interested individuals, agencies, the Nez Perce Tribe, organizations, and adjacent landowners regarding the proposal to complete fuels treatments and forest management in the project area. Based on the comments received and further field review, it was determined that analysis using an EIS was appropriate due to the level of public interest and the timing of other projects in the analysis area.

The BLM participated in meetings held in the community of Elk City in March and April of 2005 to discuss the project. The meetings were open to all, and the sponsors invited several regional environmental groups. These meetings were attended by 25–30 local residents, landowners, and business representatives.

In July 2005, a Notice of Intent (NOI) to prepare an EIS was published in the *Federal Register*. Over 250 letters were sent to interested individuals, agencies, the Nez Perce Tribe, and organizations requesting to comment on the proposal. The BLM Field Office briefed the Nez Perce Tribe's Natural Resources Subcommittee on July 19, 2005. A public meeting and field tour were held on August 4, 2005. An additional field trip was conducted with representatives from the National Marine Fisheries Service, and the Nez Perce Tribe, and the Idaho Conservation League on August 30, 2005.

The Interdisciplinary (ID) Team analyzed the scoping comments and developed the list of issues and concerns raised about the proposed project. Many of the comments disagreed with, or debated the potential environmental impacts of the Proposed Action. As such, they influenced the design and evaluation of alternatives to the Proposed Action.

The Issues were assigned to one of three categories: major issues, other issues, and issues not analyzed in detail. Major issues were used to formulate alternatives, or project design elements to address the effects of proposed activities. The other issues included resources affected that did not lead to a new alternative but were analyzed in terms of environmental or project design consequences. Issues not analyzed in detail were considered to be outside the scope of the analysis; are confined by law, regulation, the MFP; or are mitigated as standard operating procedures.

6.2 Draft EIS Review and Public Meeting

On July 14, 2006, the draft became available for public review. A public meeting was held in Elk City, Idaho, in August 2006 with two attendees. The 60-day comment period ended on September 11, 2006, and correspondence was received from 10 individuals/groups or government agencies. In response to these comments clarifications were made in the EIS and additional data and analysis was completed and included in Appendix H of the FEIS. FEIS Section 4.5 contains copies of the original letters and the BLM response to those comments.

6.3 Final EIS Review and Public Meeting

In April 2007, the FEIS was released for public availability. A notice of availability was published in the *Federal Register* (April 27, 2007). The FEIS was distributed to those who commented on the Draft EIS including the Nez Perce Tribe, federal agencies and officials; state, county, and local agencies and officials; business and organizations; and individuals (FEIS Section 4.2). The FEIS was released without the Record of Decision to allow for public review. This time was also needed to complete the required consultation. The BLM received three letters on the FEIS during the 30 day availability period. Appendix E of this ROD contains copies of the original letters and the BLM response to those comments. These letters were reviewed for new significant information or issues which were not previously raised. It was determined that they contained neither.

7. Protest Opportunities

Two decisions are being made in this ROD; one for the BLM and one for the Forest Service. Each agency's protest and appeal methodology is outlined below.

7.1 Forest Service Decision

As Forest Supervisor for the Nez Perce National Forest, I have decided to allow the BLM to develop temporary road and use existing roads as described in this ROD on NFS lands.

This decision is subject to appeal pursuant to 36 CFR 215.7. A written Notice of Appeal meeting the requirements of Title 36 CFR 215.14 must be submitted (regular mail, fax, email, hand-delivery or express delivery) within 45 days of the date the legal notice of this decision is published in the Lewiston Morning Tribune (Lewiston, Idaho). It is the responsibility of the appellant to ensure their appeal is received in a timely manner. The publication date of the legal notice of the decision in the newspaper of record is the exclusive means for calculating the time to file an appeal. Appellants should not rely on date or timeframe information provided by any other source.

Notice of Appeal must be submitted to:

Mailing Address:

USDA Forest Service, Northern Region
ATTN: Appeal Deciding Officer
P.O. Box 7669
Missoula, MT 59807

Hand delivery or express delivery:

USDA Forest Service, Northern Region
Federal Building
ATTN: Appeal Deciding Officer
200 East Broadway
Missoula, MT 59807

Electronic appeals must be submitted to: **FAX:** (406) 329-3411
appeals-northern-regional-office@fs.fed.us

The office business hours for those submitting hand-delivered comments are: 7:30 a.m. and 4:00 p.m. Monday through Friday, excluding holidays.

In electronic appeals, the subject line should contain the name of the project being appealed, "Eastside Township Fuels and Vegetation Project". An automated response will confirm your electronic appeal has been received and acknowledge the agencies confirmation of receipt. If the sender does not receive an automated acknowledgement of the receipt of comments, it is the sender's responsibility to ensure timely receipt by other means. Electronic appeals must be submitted in a format such as an email message, plain text (.txt), rich text format (.rtf), or Word (.doc) to appeals-northern-nezperce-regional-officer@fs.fed.us. In the case where no identifiable name is attached to an electronic message, a verification of identity will be required. A scanned signature is one way to provide verification.

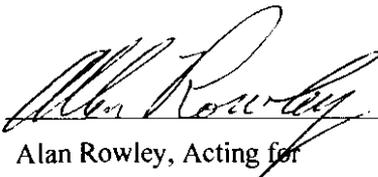
It is the appellant's responsibility to provide sufficient project- or activity-specific evidence and rationale, focusing on the decision, to show why my decision should be reversed. The appeal must be filed with the Appeal Deciding Officer in writing. At a minimum, the appeal must meet the content requirements of 36 CFR 215.14, and include the following information:

- The appellant's name and address, with a telephone number, if available;
- A signature, or other verification of authorship upon request (a scanned signature for electronic mail may be filed with the appeal);
- When multiple names are listed on an appeal, identification of the lead appellant and verification of the identity of the lead appellant upon request;
- The name of the project or activity for which the decision was made, the name and title of the Responsible Official, and the date of the decision;
- The regulation under which the appeal is being filed, when there is an option to appeal under either 36 CFR 215 or 36 CFR 251, subpart C;
- Any specific change(s) in the decision that the appellant seeks and rationale for those changes;
- Any portion(s) of the decision with which the appellant disagrees, and explanation for the disagreement;
- Why the appellant believes the Responsible Official's decision failed to consider the substantive comments; and how the appellant believes the decision specifically violates law, regulation, or policy.

If an appeal is received on this project there may be informal resolution meetings and/or conference calls between the Responsible Official and the appellant. These discussions would take place within 15 days after the closing date for filing an appeal. All such meetings are open to the public. If you are interested in attending any informal resolution discussions, please contact the Responsible Official or monitor the following website for postings about current appeals in the Northern Region of the Forest Service:

http://www.fs.fed.us/r1/projects/appeal_index.shtml.

Individuals or organizations that submitted comments during the comment period specified at 215.6 may appeal this decision.

Approved:  Date: 5/14/2008
 Alan Rowley, Acting for
 Jane L Cottrell
 Forest Supervisor

7.2 BLM Decision

As Field Manager for the Cottonwood Field Office, it is my decision to implement the Selected Alternative on BLM lands as described in this ROD.

This BLM forest management decision may be protested under 43 CFR 5003 – Administrative Remedies. In accordance with 43 CFR 5003.3, the decision for this action is subject to protest as follows:

43 CFR 5003.3 Clause	Corresponding BLM Details
(a) Protests of a forest management decision, including advertised timber sales, may be made within 15 days of the publication of a notice of decision or notice of sale in a newspaper of general circulation	The notice of decision will be published in the Lewiston Tribune. Protests must be received within 15 days of the newspaper publication.
(b) Protests shall be filed with the authorized officer and shall contain a written statement of reasons for protesting the decision.	BLM will accept only a hard copy protest with original signature(s) of the protesting party(ies) that are either hand delivered or post marked by the 15 th day of the protest period. Protest must be filed with: Stephanie Connolly, Field Manager Bureau of Land Management Cottonwood Field Office 1 Butte Drive, Cottonwood, ID 83522-9498
(c) Protests received more than 15 days after the publication of the notice of decision or the notice of sale are not timely filed and shall not be considered.	The protest period begins the first full day after publication of the notice in the local newspaper and ends close of business on the 15 th day. If the 15 th day is a Saturday, Sunday or Federal holiday, then the protest period closes on the next business day. Protests received after the 15-day period will not be considered.
(d) Upon timely filing of a protest, the authorized officer shall reconsider the decision to be implemented in light of the statement of reasons for the protest and other pertinent information available to him/her.	The Field Manager will reconsider the decision in light of the statement of reasons for the protest and other pertinent information available to him/her.

(e) The authorized officer shall, at the conclusion of his/her review, serve his/her decision in writing on the protesting party.	The Field Manager will provide a protest decision in writing to the protesting party (ies). Information on the subsequent appeals process will be provided with the decision.
(f) Upon denial of a protest filed under paragraph (a) of this section the authorized officer may proceed with implementation of the decision.	If a protest is denied, the Field Manager will proceed to implement the selected alternative on the Eastside Township Fuels and Vegetation Project.

Approved: Stephanie Connolly Date: 5/15/08
Stephanie Connolly
Field Manager

Concurrence: Gary D. Cooper Date: 5/19/08
Gary Cooper
District Manager

Appendix A – Maps

Map 1 Location

Map 2 Selected Alternative Logging Method

Map 3 Selected Alternative Restoration

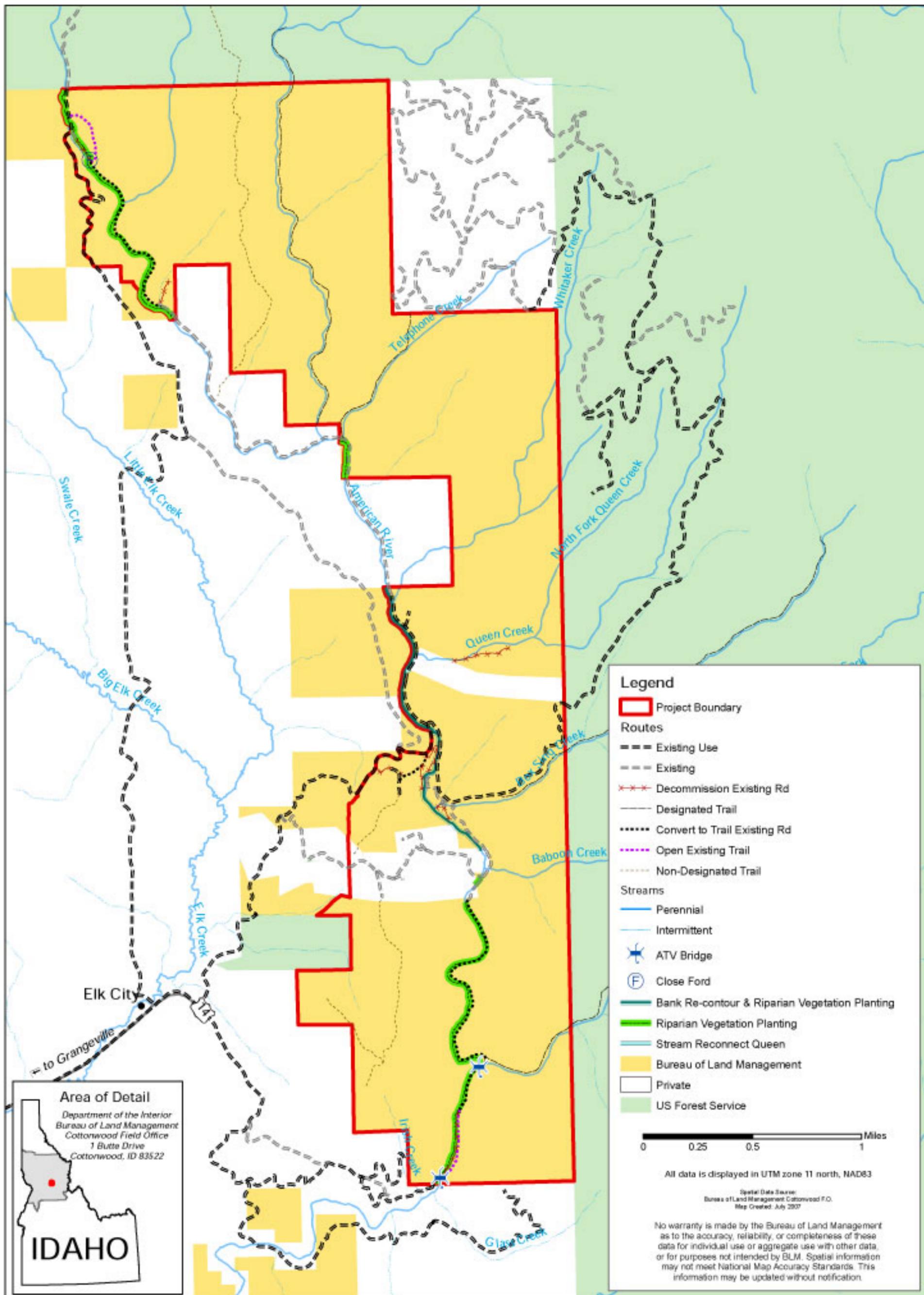
Map 4 Selected Alternative Treatment



EASTSIDE PROJECT AREA

Selected Alternative Restoration

Map 3

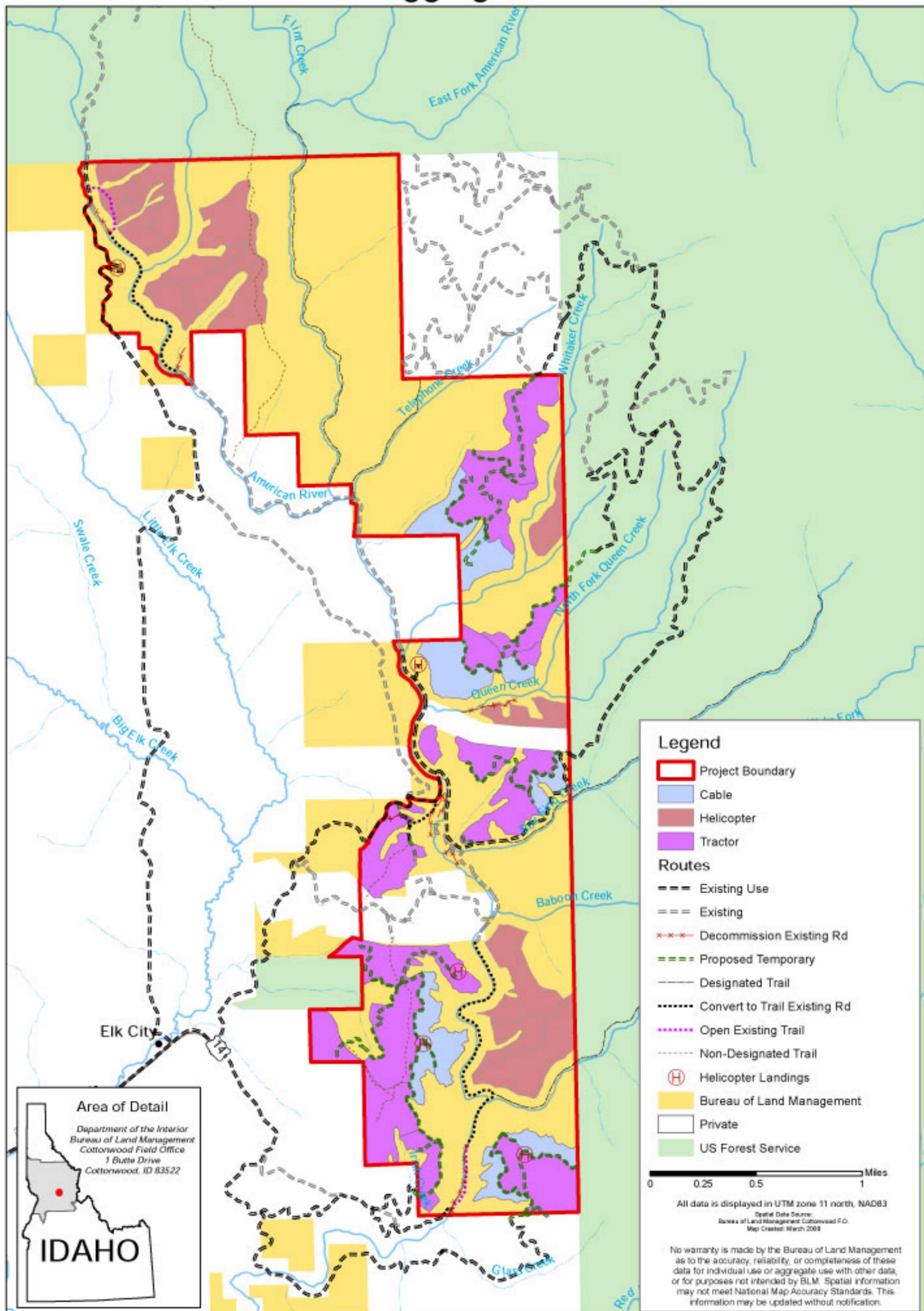




EASTSIDE PROJECT AREA

Selected Alternative Logging Methods

Map 2



Legend

- Project Boundary
 - Cable
 - Helicopter
 - Tractor
- Routes**
- Existing Use
 - Existing
 - Decommission Existing Rd
 - Proposed Temporary
 - Designated Trail
 - Convert to Trail Existing Rd
 - Open Existing Trail
 - Non-Designated Trail
 - H Helicopter Landings
 - Bureau of Land Management
 - Private
 - US Forest Service

0 0.25 0.5 1 Miles

All data is displayed in UTM zone 11 north, NAD83
 Spatial Data Source:
 Bureau of Land Management Cottonwood F.O.
 Map Created: March 2008

No warranty is made by the Bureau of Land Management as to the accuracy, reliability, or completeness of these data for individual use or aggregate use with other data, or for purposes not intended by BLM. Spatial information may not meet National Map Accuracy Standards. This information may be updated without notification.

Area of Detail

Department of the Interior
 Bureau of Land Management
 Cottonwood Field Office
 1 Butte Drive
 Cottonwood, ID 83522



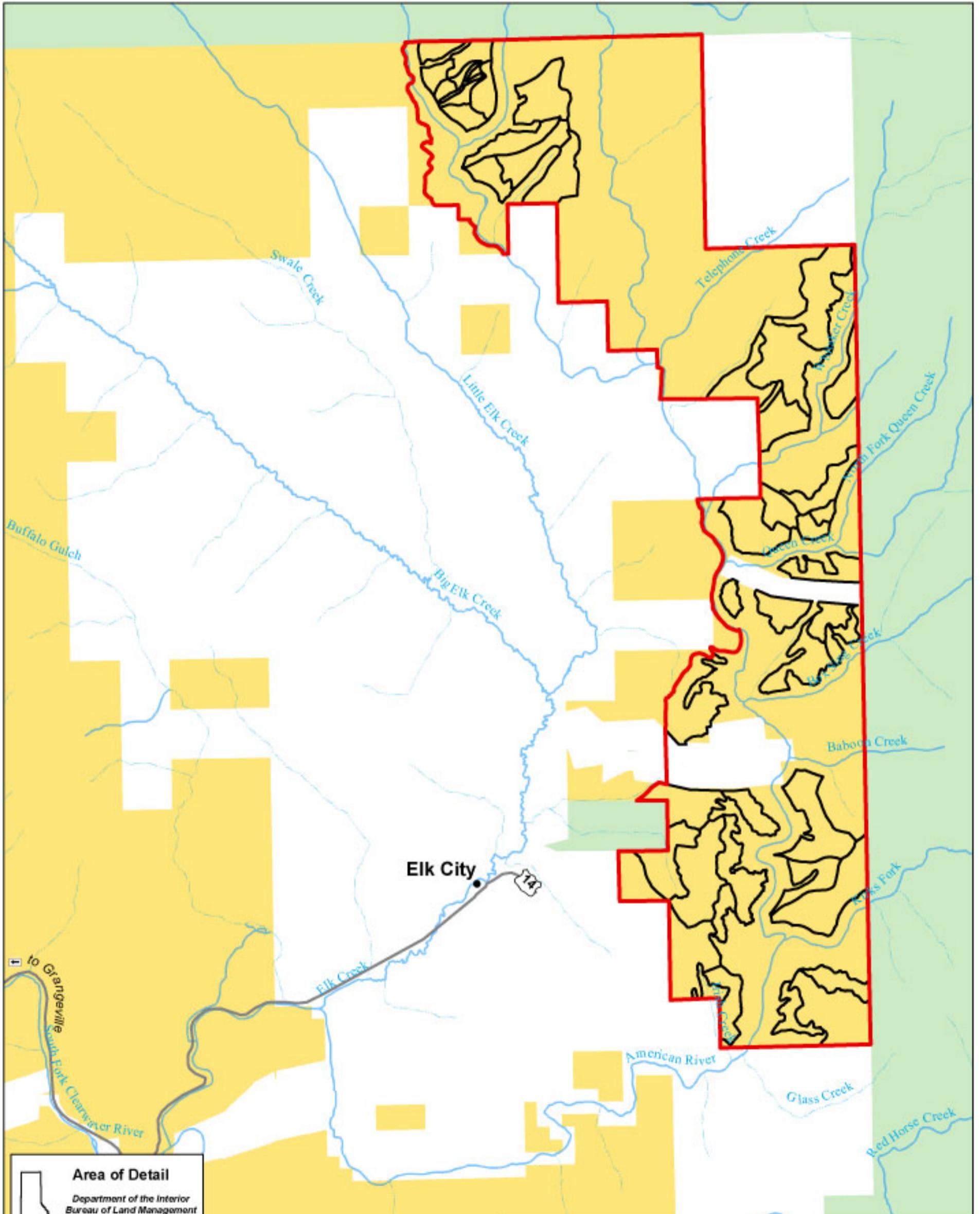
IDAHO



EASTSIDE PROJECT AREA

Vicinity Location Map

Map 1

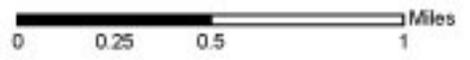


- Legend**
- Project Boundary
 - Prescription Units
 - State Hwy
 - Perennial
 - Intermittent
 - Bureau of Land Management
 - Private
 - US Forest Service

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All data is displayed in UTM zone 11 north, NAD83

Spatial Data Source:
Bureau of Land Management Cottonwood F.O.
Map Created: July 2007

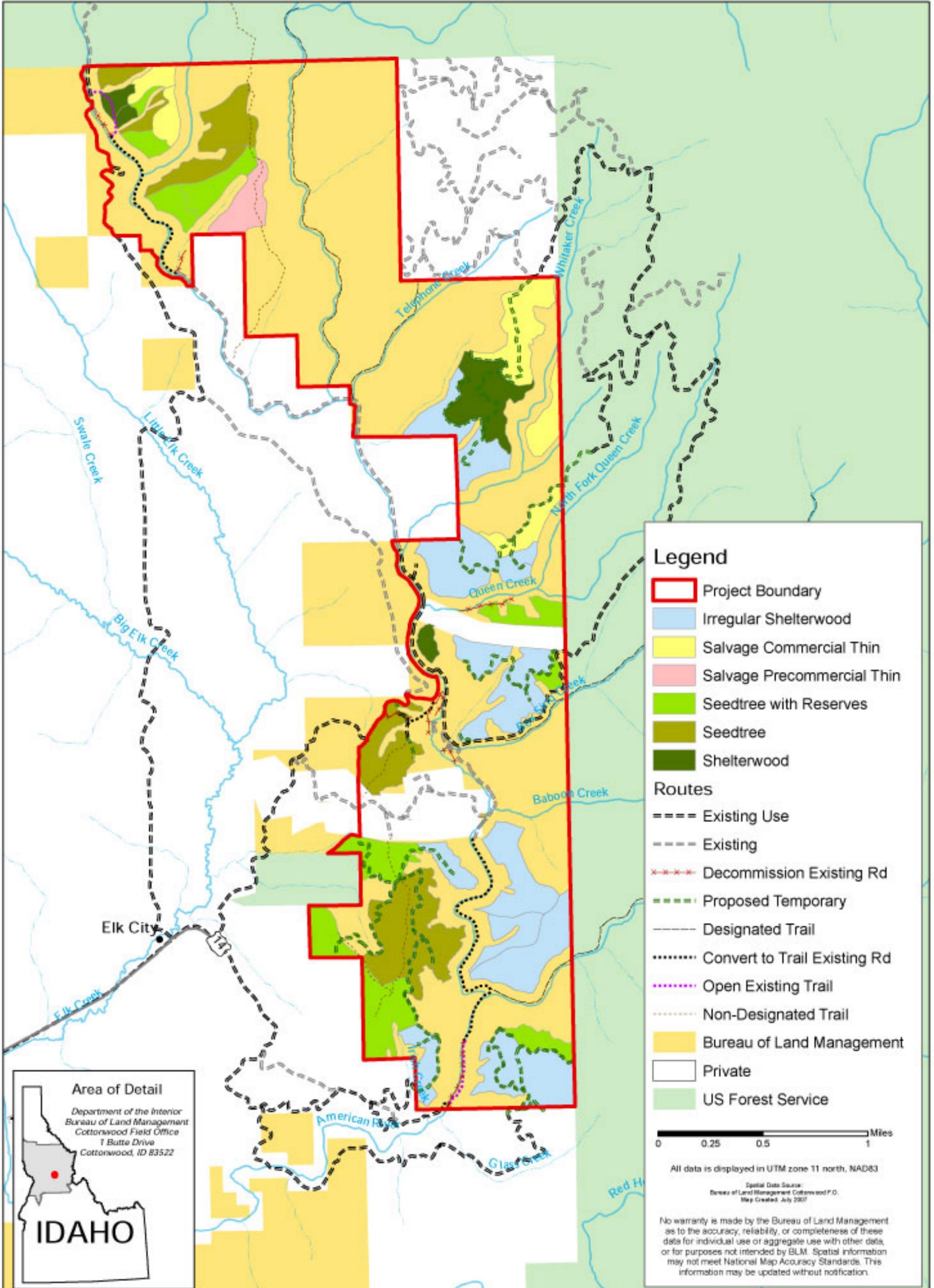




EASTSIDE PROJECT AREA

Selected Alternative Treatments

Map 4



Legend

- Project Boundary
- Irregular Shelterwood
- Salvage Commercial Thin
- Salvage Precommercial Thin
- Seedtree with Reserves
- Seedtree
- Shelterwood
- Routes**
- Existing Use
- Existing
- Decommission Existing Rd
- Proposed Temporary
- Designated Trail
- Convert to Trail Existing Rd
- Open Existing Trail
- Non-Designated Trail
- Bureau of Land Management
- Private
- US Forest Service



All data is displayed in UTM zone 11 north, NAD83
 Spatial Data Source:
 Bureau of Land Management Cottonwood F.O.
 Map Created: July 2007

No warranty is made by the Bureau of Land Management as to the accuracy, reliability, or completeness of these data for individual use or aggregate use with other data, or for purposes not intended by BLM. Spatial information may not meet National Map Accuracy Standards. This information may be updated without notification.

Area of Detail
 Department of the Interior
 Bureau of Land Management
 Cottonwood Field Office
 1 Butte Drive
 Cottonwood, ID 83522

IDAHO

Fuels and Vegetation Treatments by Alternative

The following tables represent the units for the project area. The unit is the number assigned to the stand being treated. The T Code is the prescription type. The codes are:

Table B.1

T Code	Treatment
4113	Clearcut
4114	Clearcut with reserves
4131	Shelterwood Cut
4133	Irregular shelterwood
4134	Seed tree cut with reserves
4220	Thinning
4230	Sanitation (Salvage)
4260	Human caused fire

Table B.2

Abbreviation	Fuels Treatment
Ex. Pile	Excavator piling of fuels throughout unit in preparation for burning
Underburn	A light broadcast burn under existing forest canopy, with limited damage to existing trees
Broadcast	A prescribed burn with no piling, wind rowing and limited concern for existing vegetation
Hand Pile	Hand piling of fuels throughout unit in preparation for burning

The percent (%) stands for canopy cover removed that was used for ECA and NEZSED modeling. Type = the logging system. Biomass utilization may occur in excavator pile units, lessening the amount of excavator piling needed. The alternatives are the associated actions that will be treated and the acres column is the size of the unit. If there is a blank in the Unit row under the alternative, this means that unit will not be treated under that alternative.

Table B.3

Alternative B					
Unit	T Code	Type	%	Fuels	Acres
1	4131	Helicopter	80	Hand Pile	11
2	4220	Ground	70	Ex. Pile	14
3	4131	Cable	80	Underburn	10
4	4134	Ground	80	Underburn	4
5	4134	Cable	80	Underburn	5
6	4220	Ground	70	Ex. Pile	16
7	4131	Cable	80	Underburn	8
8	4134	Cable	80	Underburn	11
9	4134	Ground	90	Ex. Pile	61
10	4131	Cable	80	Underburn	23
11	4134	Ground	80	Underburn	27
12	4134	Cable	80	Underburn	16
13	4230	Ground	50	Ex. Pile	32
14	4230	Ground	50	Ex. Pile	68
15	4230	Ground	50	Ex. Pile	9
16	4220	Ground	70	Ex. Pile	45
18	4131	Ground	90	Ex. Pile	60
19	4133	Cable	90	Underburn	28
20	4133	Cable	90	Underburn	26

Alternative C				
Unit	T Code	Type	Fuels	Acres
1	4131	Helicopter	Hand Pile	11
2	4220	Ground	Ex. Pile	14
3	4131	Cable	Underburn	10
4	4134	Ground	Underburn	4
5	4134	Cable	Underburn	5
6	4220	Ground	Ex. Pile	16
7	4131	Cable	Underburn	8
8	4134	Cable	Underburn	11
9	4134	Ground	Ex. Pile	61
10	4131	Cable	Underburn	23
11	4134	Ground	Underburn	27
12	4134	Cable	Underburn	16
13	4230	Ground	Ex. Pile	32
14	4230	Ground	Ex. Pile	68
16	4220	Ground	Ex. Pile	45
18	4131	Ground	Ex. Pile	60
19	4133	Helicopter	Underburn	28
20	4133	Helicopter	Underburn	26

Alternative D				
Unit	T Code	Type	Fuels	Acres
9	4134	Ground	Ex. Pile	61
10	4131	Cable	Underburn	23
11	4134	Ground	Underburn	27
12	4134	Cable	Underburn	16
13	4230	Ground	Ex. Pile	32
14	4230	Ground	Ex. Pile	68
16	4220	Ground	Ex. Pile	45
18	4131	Ground	Ex. Pile	60
19	4133	Helicopter	Underburn	28
20	4133	Helicopter	Underburn	26

Selected Alternative				
Unit	T Code	Type	Fuels	Acres
1	4131	Helicopter	Hand Pile	11
2	4220	Helicopter	Ex. Pile	14
3	4131	Helicopter	Underburn	10
4	4134	Helicopter	Ex. Pile	4
5	4134	Helicopter	Underburn	5
6	4220	Helicopter	Ex. Pile	16
7	4131	Helicopter	Underburn	8
8	4134	Helicopter	Underburn	11
9	4134	Helicopter	Ex. Pile	35
10	4131	Helicopter	Underburn	23
11	4134	Helicopter	Underburn	27
12	4134	Helicopter	Underburn	16
13	4230	Helicopter	Ex. Pile	32
16	4220	Ground	Ex. Pile	56
18	4131	Ground	Ex. Pile	60
19	4133	Cable	Underburn	28
20	4133	Cable	Underburn	26

Appendix B –Treatments by Alternative

Alternative B					
Unit	T Code	Type	%	Fuels	Acres
21	4220	Helicopter	70	Hand Pile	24
22	4220	Ground	70	Ex. Pile	24
23	4133	Ground	90	Ex. Pile	18
24	4133	Cable	90	Underburn	40
25	4133	Cable	90	Underburn	10
26	4133	Ground	90	Ex. Pile	6
27	4134	Helicopter	80	Hand Pile	19
28	4133	Cable	90	Underburn	25
29	4134	Ground	80	Ex. Pile	9
30	4133	Ground	90	Ex. Pile	21
31	4134	Cable	80	Underburn	8
32	4133	Cable	90	Underburn	7
33	4133	Ground	90	Ex. Pile	41
34	4131	Ground	80	Ex. Pile	57
35	4131	Ground	80	Ex. Pile	3
36	4260		90	Broadcast	6
37	4260		90	Broadcast	25
38	4260		90	Broadcast	57
39	4134	Ground	80	Ex. Pile	35
40	4133	Ground	100	Ex. Pile	14
41	4131	Ground	80	Ex. Pile	60
42	4131	Cable	80	Underburn	40
43	4131	Cable	80	Underburn	12

Alternative C				
Unit	T Code	Type	Fuels	Acres
21	4220	Helicopter	Hand Pile	24
22	4220	Ground	Ex. Pile	24
23	4133	Ground	Ex. Pile	18
24	4133	Helicopter	Underburn	40
25	4133	Helicopter	Underburn	10
26	4133	Ground	Ex. Pile	6
27	4134	Helicopter	Hand Pile	19
28	4133	Cable	Underburn	25
29	4134	Ground	Ex. Pile	9
30	4133	Ground	Ex. Pile	21
31	4134	Cable	Underburn	8
32	4133	Cable	Underburn	7
33	4133	Ground	Ex. Pile	41
34	4131	Ground	Ex. Pile	57
35	4131	Ground	Ex. Pile	3
36	4133	Helicopter	Broadcast	6
37	4133	Helicopter	Broadcast	25
38	4133	Helicopter	Broadcast	57
39	4134	Ground	Ex. Pile	35
40	4133	Ground	Ex. Pile	14
41	4131	Ground	Ex. Pile	60
42	4131	Cable	Underburn	40
43	4131	Cable	Underburn	12

Alternative D				
Unit	T Code	Type	Fuels	Acres
21	4220	Helicopter	Hand Pile	24
22	4220	Ground	Ex. Pile	24
23	4133	Ground	Ex. Pile	18
24	4133	Helicopter	Underburn	40
25	4133	Helicopter	Underburn	10
26	4133	Ground	Ex. Pile	6
27	4134	Helicopter	Hand Pile	19
29	4134	Ground	Ex. Pile	9
30	4133	Ground	Ex. Pile	21
31	4134	Cable	Underburn	8
32	4133	Cable	Underburn	7
33	4133	Ground	Ex. Pile	41
34	4131	Ground	Ex. Pile	57
37	4133	Helicopter	Broadcast	25
38	4133	Helicopter	Broadcast	57
39	4134	Ground	Ex. Pile	35
40	4133	Ground	Ex. Pile	14
41	4131	Ground	Ex. Pile	60
42	4131	Cable	Underburn	40
43	4131	Cable	Underburn	12

Selected Alternative				
Unit	T Code	Type	Fuels	Acres
21	4220	Helicopter	Hand Pile	24
22	4220	Ground	Ex. Pile	24
23	4133	Ground	Ex. Pile	18
24	4133	Cable	Underburn	40
25	4133	Cable	Underburn	10
26	4133	Ground	Ex. Pile	6
27	4134	Helicopter	Hand Pile	24
29	4134	Ground	Ex. Pile	8
30	4133	Ground	Ex. Pile	21
31	4134	Cable	Underburn	7
32	4133	Cable	Underburn	6
33	4133	Ground	Ex. Pile	33
34	4131	Ground	Ex. Pile	50
37	4133	Helicopter	Broadcast	25
38	4133	Helicopter	Broadcast	57
39	4134	Ground	Ex. Pile	35
40	4133	Ground	Ex. Pile	18
41	4131	Ground	Ex. Pile	60
42	4131	Cable	Underburn	37
43	4131	Cable	Underburn	12

Alternative B					
Unit	T Code	Type	%	Fuels	Acres
44	4134	Ground	80	Ex. Pile	49
45	4133	Ground	100	Ex. Pile	28
46	4134	Cable	80	Underburn	18
47	4133	Ground	90	Ex. Pile	59
48	4133	Cable	90	Underburn	11
49	4134	Ground	80	Ex. Pile	24
50	4133	Ground	90	Ex. Pile	17
51	4260		90	Broadcast	52
Eastside Total Acres					1293

Alternative C				
Unit	T Code	Type	Fuels	Acres
44	4134	Ground	Ex. Pile	49
45	4133	Ground	Ex. Pile	28
46	4134	Cable	Underburn	18
47	4133	Ground	Ex. Pile	59
48	4133	Cable	Underburn	11
49	4134	Ground	Ex. Pile	24
50	4133	Ground	Ex. Pile	17
51	4133	Helicopter	Broadcast	52
Eastside Total Acres				1284

Alternative D				
Unit	T Code	Type	Fuels	Acres
44	4134	Ground	Ex. Pile	49
45	4133	Ground	Ex. Pile	28
46	4134	Cable	Underburn	18
47	4133	Ground	Ex. Pile	59
48	4133	Cable	Underburn	11
49	4134	Ground	Ex. Pile	24
50	4133	Ground	Ex. Pile	17
51	4133	Helicopter	Broadcast	52
Eastside Total Acres				1171

Selected Alternative				
Unit	T Code	Type	Fuels	Acres
44	4134	Ground	Ex. Pile	50
45	4133	Ground	Ex. Pile	24
46	4134	Cable	Underburn	17
47	4133	Ground	Ex. Pile	59
48	4133	Cable	Underburn	16
49	4134	Ground	Ex. Pile	24
50	4133	Ground	Ex. Pile	16
51	4133	Helicopter	Broadcast	52
Eastside Total Acres				1155

Table B.4

Totals by T Code					
		Alt B	Alt C	Alt D	Selected Alt
4113	Clearcut				
4114	Clearcut with reserves				
4131	Shelterwood Cut	284	284	252	270
4133	Irregular shelterwood	351	491	460	454
4134	Seed tree cut with reserves	286	286	266	266
4220	Thinning	123	123	93	133
4230	Sanitation (Salvage)	109	100	100	32
4260	Man caused fire	140			

Route Treatments by Alternative

The following tables represent the roads & trails for the project area. The Route Number is the number assigned to the route being treated.

Table B.5

Route No	Owner	Miles	Description/Comments	ALT B	ALT C	ALT D	Selected Alt	Other
2541	BLM	0.12	Existing, Alt B Upgrade, Alt C,D & Selected Alt Decommission	Rock	Varied	Varied	Varied	Ford Approach
2541 R 10	BLM	0.27	Existing, Decommission	Abandon	Abandon	Abandon	Abandon	
2541 R 11	BLM	0.12	Existing, Decommission	Abandon	Abandon	Abandon	Abandon	
2541 R 12	BLM	0.11	Existing, Decommission	Varied	Varied	Varied	Varied	
2541 R 6	BLM	0.21	Existing, Decommission	Varied	Varied	Varied	Varied	
2541 R 8	BLM	0.06	Existing, Decommission	Abandon	Abandon	Abandon	Abandon	
2541 R 9	BLM	0.03	Existing, Decommission	Varied	Varied	Varied	Varied	
2544 G 2	BLM	0.03	Existing, Decommission	Varied	Varied	Varied	Varied	
2544 G 3	BLM	0.08	Existing, Decommission	Abandon	Abandon	Abandon	Abandon	
T25	BLM	0.32	Existing, Decommission	Recontour	Recontour	Recontour	Recontour	
T25 A	BLM	0.04	Existing, Decommission	Recontour	Recontour	Recontour	Recontour	
T25 B	BLM	0.04	Existing, Decommission	Recontour	Recontour	Recontour	Recontour	
2541	BLM	0.01	Existing, not used for haul route	Maintain	Maintain	Maintain	Maintain	

Route No	Owner	Miles	Description/Comments	ALT B	ALT C	ALT D	Selected Alt	Other
2541	BLM	0.20	Existing, not used for haul route	Maintain	Maintain	Maintain	Maintain	
2541	BLM	0.05	Existing, not used for haul route	Maintain	Maintain	Maintain	Maintain	
2541	BLM	0.15	Existing, not used for haul route	Maintain	Maintain	Maintain	Maintain	
2541	BLM	0.04	Existing, not used for haul route	Maintain	Maintain	Maintain	Maintain	
2541	BLM	0.05	Existing, Upgrade - not used for haul route	Rock	Rock	Rock	Rock	Recreation Access
2541 R 7	BLM	0.12	Existing	Maintain	Maintain	Maintain	Maintain	
2541 R 8	BLM	0.11	Existing, Upgrade - not used for haul route	Rock	Rock	Rock	Rock	Recreation Access
2541 R 9	BLM	0.01	Existing, Upgrade - not used for haul route	Rock	Rock	Rock	Rock	Recreation Access
T 25	BLM	0.05	Existing, not used for haul route	Maintain	Maintain	Maintain	Maintain	
2541	BLM	0.06	Existing, haul route	Rock	Rock	Rock	Rock	Queen Creek Culvert
2543	BLM	1.11	Existing, haul route	Maintain	Maintain	Maintain	Maintain	Groomed Snow trails
2541 R 12	BLM	0.02	Existing, Alt C haul route, Alt D & Selected Alt Decommission	NO	Upgrade	Varied	Varied	
2541 R 3	BLM	0.07	Existing, haul route	Varied	Varied	Varied	Varied	
2541 R 4	BLM	0.29	Existing, Alt B&C Decommission, Alt D & Selected Alt haul route	Varied	Varied	Rock	Rock	
2541 R 5	BLM	0.24	Existing, Alt B&C Decommission, Alt D & Selected Alt haul route	Varied	Varied	Rock	Rock	
2544 G	BLM	0.05	Existing, haul route	Varied	Varied	Varied	Varied	Minor Reconstruction Needed

Appendix B –Treatments by Alternative

Route No	Owner	Miles	Description/Comments	ALT B	ALT C	ALT D	Selected Alt	Other
2544 G	BLM	0.03	Existing, haul route	Varied	Varied	Varied	Varied	Minor Reconstruction Needed
2544 G	BLM	0.07	Existing, haul route	Maintain	Maintain	Maintain	Maintain	
2541 C	BLM	0.14	Proposed Temporary	Varied	NO	NO	NO	
2541 G	BLM	0.55	Proposed Temporary	NO	NO	Varied	NO	
2541 R 1	BLM	0.23	Proposed Permanent	Varied	Varied	NO	NO	
2541 R 2	BLM	0.35	Proposed Permanent	Varied	Varied	NO	NO	
2543 F	BLM	0.27	Proposed Temporary	Varied	NO	Varied	NO	
2543 F	BLM	0.71	Proposed Temporary	Varied	Varied	Varied	NO	
2543 F	BLM	0.15	Proposed Temporary	Varied	Varied	NO	NO	
2543 F	BLM	0.77	Proposed Temporary	Varied	NO	Varied	NO	
2543 F	BLM	0.24	Proposed Temporary	Varied	NO	NO	NO	
2543 F	BLM	0.14	Proposed Temporary	Varied	NO	NO	NO	
2543 F 1	BLM	0.08	Proposed Temporary	Varied	Varied	Varied	NO	
2543 F 1	BLM	0.20	Proposed Temporary	Varied	Varied	Varied	NO	
2543 G	BLM	0.10	Proposed Permanent	NO	Varied	Varied	NO	
2543 G	BLM	0.46	Proposed Permanent	NO	Varied	Varied	NO	

Route No	Owner	Miles	Description/Comments	ALT B	ALT C	ALT D	Selected Alt	Other
2543 H	BLM	0.49	Proposed Temporary	Varied	NO	NO	NO	
2543 H 1	BLM	0.24	Proposed Temporary	Varied	NO	NO	NO	
T2451	BLM	0.30	Improve Existing Trail	NO	NO	Run surface 55"	Run surface 55"	
T25	BLM	0.34	Improve Existing Trail	Run surface 55"	Run surface 55"	Run surface 55"	Run surface 55"	
2541 C	BLM	0.41	Proposed Temporary	Varied	Varied	Varied	Varied	
2541 C	BLM	0.25	Proposed Temporary	Varied	Varied	Varied	Varied	
2541 C	BLM	0.32	Proposed Temporary	Varied	NO	NO	Varied	
2541 C 1	BLM	0.08	Proposed Temporary	Varied	Varied	Varied	Varied	
2541 C 2	BLM	0.06	Proposed Temporary	Varied	Varied	Varied	Varied	
2541 D	BLM	0.41	Proposed Temporary	Varied	NO	Varied	Varied	
2541 D	BLM	0.38	Proposed Temporary	Varied	NO	NO	Varied	
2541 D	BLM	0.17	Proposed Temporary	Varied	NO	NO	Varied	
2541 D 1	BLM	0.18	Proposed Temporary	Varied	NO	NO	Varied	
2541 E	BLM	0.46	Proposed Temporary	Varied	Varied	Varied	Varied	
2541 E	BLM	0.65	Proposed Temporary	Varied	Varied	Varied	Varied	

Appendix B –Treatments by Alternative

Route No	Owner	Miles	Description/Comments	ALT B	ALT C	ALT D	Selected Alt	Other
2541 E 1	BLM	0.09	Proposed Temporary	Varied	Varied	Varied	Varied	
2541 E 1	BLM	0.28	Proposed Temporary	Varied	Varied	Varied	Varied	
2541 E 2	BLM	0.19	Proposed Temporary	Varied	NO	NO	Varied	
2541 E 2	BLM	0.03	Proposed Temporary	Varied	NO	NO	Varied	
2541 E 3	BLM	0.57	Proposed Temporary	Varied	NO	NO	Varied	
2541 E 3	BLM	0.02	Proposed Temporary	Varied	NO	NO	Varied	
2544 G	BLM	0.06	Proposed Temporary	Varied	Varied	Varied	Varied	
2544 G	BLM	0.10	Proposed Temporary	Varied	Varied	Varied	Varied	
2548 A	BLM	0.32	Proposed Temporary	Varied	Varied	Varied	Varied	
2548 A	BLM	0.64	Proposed Temporary	Varied	Varied	Varied	Varied	
2548 A	BLM	0.44	Proposed Temporary	Varied	Varied	Varied	Varied	
2548 A	BLM	0.52	Proposed Temporary	Varied	Varied	Varied	Varied	
2548 A 1	BLM	0.12	Proposed Temporary	Varied	Varied	Varied	Varied	
2548 A 2	BLM	0.14	Proposed Temporary	Varied	Varied	Varied	Varied	
2548 A 3	BLM	0.40	Proposed Temporary	Varied	Varied	Varied	Varied	
2548 A 3	BLM	0.03	Proposed Temporary	Varied	Varied	Varied	Varied	

Route No	Owner	Miles	Description/Comments	ALT B	ALT C	ALT D	Selected Alt	Other
2548 A 4	BLM	0.45	Proposed Temporary	Varied	Varied	Varied	Varied	
2548 A 4	BLM	0.12	Proposed Temporary	Varied	Varied	Varied	Varied	
2548 A 4	BLM	0.24	Proposed Temporary	Varied	Varied	Varied	Varied	
2548 B	BLM	0.33	Proposed Temporary	Varied	Varied	Varied	Varied	
2548 B	BLM	0.33	Proposed Temporary	Varied	Varied	Varied	Varied	
2548 B 1	BLM	0.10	Proposed Temporary	Varied	Varied	Varied	Varied	
2548 B 2	BLM	0.08	Proposed Temporary	Varied	Varied	Varied	Varied	
2548 B 2	BLM	0.56	Proposed Temporary	Varied	Varied	Varied	Varied	
2541	BLM	0.12	Existing, Alt C&D Decommission, Selected Alt convert to trail	NO	Varied	Varied	Run surface 55"	
2541	BLM	0.77	Existing, Alt C Decommission, Alt D & Selected Alt Convert to Trail	NO	Varied	Run surface 55"	Run surface 55"	
2544 G 1	BLM	0.06	Existing, convert to trail	Run surface 55"	Run surface 55"	Run surface 55"	Run surface 55"	
2544 G 2	BLM	0.13	Existing, convert to trail	Run surface 55"	Run surface 55"	Run surface 55"	Run surface 55"	
T25	BLM	1.36	Existing, convert to trail	Run surface 55"	Run surface 55"	Run surface 55"	Run surface 55"	
T25	BLM	0.07	Existing, convert to trail	Run surface 55"	Run surface 55"	Run surface 55"	Run surface 55"	

Route No	Owner	Miles	Description/Comments	ALT B	ALT C	ALT D	Selected Alt	Other
1818	IDCO	2.67	County Road, haul route					Groomed Snow trail
2543	IDCO	0.94	County Road, haul route					
2541 Coppernoll	PVT	0.04	Existing, not used for haul route	Maintain	Maintain	Maintain	Maintain	
2541 Greenly	PVT	0.05	Existing, not used for haul route	Maintain	Maintain	Maintain	Maintain	
T 25 Coppernoll	PVT	0.08	Existing, not used for haul route	Maintain	Maintain	Maintain	Maintain	
2541 Lynn 1	PVT	0.29	Existing, haul route	Maintain	Maintain	Maintain	Maintain	Minor Reconstruction Needed
2548 Bennet 1	PVT	0.55	Existing, haul route	Maintain	Maintain	Maintain	Maintain	Minor Reconstruction Needed
2548 Bennet 1	PVT	0.62	Existing, haul route	Maintain	Maintain	Maintain	Maintain	Minor Reconstruction Needed
2548 Bennet 2	PVT	0.25	Existing, haul route	Maintain	Maintain	Maintain	Maintain	Minor Reconstruction Needed
2548 Bennet 2	PVT	0.26	Existing, haul route	Maintain	Maintain	Maintain	Maintain	Minor Reconstruction Needed
2548 Bennet 3	PVT	0.97	Existing, haul route	Maintain	Maintain	Maintain	Maintain	Minor Reconstruction Needed
MADRE 2541	PVT	0.09	Existing, haul route	Maintain	Maintain	Maintain	Maintain	
2548 Bennet 4	PVT	0.08	Proposed Temporary	Varied	Varied	Varied	Varied	
2548 Bennet 5	PVT	0.04	Proposed Temporary	Varied	Varied	Varied	Varied	
2548 Bennet 6	PVT	0.03	Proposed Temporary	Varied	Varied	Varied	Varied	
2848 Bennet 2	PVT	0.04	Proposed Temporary	Varied	Varied	Varied	Varied	

Route No	Owner	Miles	Description/Comments	ALT B	ALT C	ALT D	Selected Alt	Other
9812	USFS	0.19	Existing, Alt B&C haul route	Maintain	Maintain	NO	NO	Groomed Snow trails
9812	USFS	1.26	Existing, Alt B&C haul route	Maintain	Maintain	NO	NO	Closed yearlong
9812F	USFS	0.24	Existing, Alt B&C haul route	Maintain	Maintain	NO	NO	Closed yearlong
9812F1	USFS	0.25	Existing, Alt B&C haul route	Maintain	Maintain	NO	NO	Closed yearlong
	USFS	0.02	Existing, Alt B&C haul route	Maintain	Maintain	NO	NO	Closed yearlong
1809	USFS	0.69	Existing, haul route	Maintain	Maintain	Maintain	Maintain	Open Yearlong
1809	USFS	1.29	Existing, haul route	Maintain	Maintain	Maintain	Maintain	Open Yearlong
1809	USFS	0.72	Existing, haul route	Maintain	Maintain	Maintain	Maintain	Open Yearlong
1809	USFS	1.16	Existing, haul route	Maintain	Maintain	Maintain	Maintain	Closed Yearlong
1809	USFS	1.06	Existing, haul route	Maintain	Maintain	Maintain	Maintain	Closed Yearlong
1809	USFS	0.29	Existing, haul route	Maintain	Maintain	Maintain	Maintain	Open Yearlong
1809B	USFS	0.66	Existing, haul route	Maintain	Maintain	Maintain	Maintain	Closed yearlong
1809B1	USFS	0.64	Existing, haul route	Maintain	Maintain	Maintain	Maintain	Closed yearlong
1809D	USFS	0.04	Existing, haul route	Maintain	Maintain	Maintain	Maintain	
1809D	USFS	0.80	Existing, haul route	Maintain	Maintain	Maintain	Maintain	
2543 F	USFS	0.56	Proposed Temporary	Varied	Varied	NO	NO	

Route No	Owner	Miles	Description/Comments	ALT B	ALT C	ALT D	Selected Alt	Other
2543 F	USFS	0.17	Proposed Temporary	Varied	Varied	NO	NO	
2543 F ¹	USFS	0.10	Proposed Temporary	Varied	Varied	NO	NO	
2543 H ¹	USFS	1.06	Proposed Temporary	Varied	Varied	NO	NO	
2541 D	USFS	0.26	Proposed Temporary	Varied	NO	YES	Varied	Queen Creek Access

Restoration Treatments by Alternative

The following table represent route restoration for the project area. The Route Number is the number assigned to the route being treated.

Table B.5

BLM No.	Activity (Project No.) ¹	Project Descrip.	Subwatershed	Alternative			
				B	C	D	Selected
T25	Convert road to ATV Trail (#1)–East Side	1.36 miles	Lower American R.	Yes	Yes	Yes	Yes
T25	Convert road to ATV Trail (#1)–West Side	0.07 mile	Lower American R.	Yes	Yes	Yes	Yes
---	American River ATV Bridge RM 6.3 (#1)	1 Bridge	Lower American R.	Yes	Yes	Yes	Yes
---	Decommission/Obliterate American R. Ford (#1)	1 Ford	Lower American R.	Yes	Yes	Yes	Yes
---	Kirks Fork ATV Bridge–Mouth (#1)	1 Bridge	Kirks Fork	Yes	Yes	Yes	Yes
---	Decommission/Obliterate American R. Ford (#1)	1 Ford	Kirks Fork	Yes	Yes	Yes	Yes
T25C	Decommission Road Paralleling American River. (New ATV Trail would utilize existing toeslope road #1B -0.34 mile).	0.32 mile	Lower American R.	Yes	Yes	Yes	Yes
T25D	New ATV Trail would Utilize Existing Toeslope Road (#1B)	0.34 mile	Lower American R.	Yes	Yes	Yes	Yes
T25 A	Decommission Existing Road–South of Ford	0.04 mile	Lower American R.	Yes	Yes	Yes	Yes
T25B	Decommission Existing Road - South of Ford	0.04 mile	Lower American R.	Yes	Yes	Yes	Yes
2544 G1	Convert road to ATV trail (#2)	0.06 mile	Lower American R.	Yes	Yes	Yes	Yes
2544 G2	Convert road to ATV trail (#2)	0.13 mile	Lower American R.	Yes	Yes	Yes	Yes
2541 R11	Decommission (abandon) existing road.	0.12 mile	Lower American R.	Yes	Yes	Yes	Yes
2541 R4	Decommission existing road (helicopter landing access road).	0.07 mile	Lower American R.	Yes	Yes	Yes	Yes
2541 R6	Decommission existing road, tailing road below bridge.	0.21 mile	Lower American R.	Yes	Yes	Yes	Yes

BLM No.	Activity (Project No.) ¹	Project Descrip.	Subwatershed	Alternative			
				B	C	D	Selected
2541 R8	Decommission (abandon) existing road.	0.06 mile	Lower American R.	Yes	Yes	Yes	Yes
2541 R9	Decommission existing road.	0.03 mile	Lower American R.	Yes	Yes	Yes	Yes
2544 G2	Decommission existing road.	0.03 mile	Lower American R.	Yes	Yes	Yes	Yes
2544 G3	Decommission existing road.	0.08 mile	Lower American R.	Yes	Yes	Yes	Yes
2541 R1	Relocate American River road (south road segment) to toeslope, new road construction (#3).	0.22 mile	Lower American R.	Yes	Yes	No	No
2541 R5	Decommission American River within riparian area (#3)	0.24 mile	Lower American R.	Yes	Yes	No	No
2541 R2	Relocate American River road (north road segment) to toe slope, new road construction (#4).	0.35 mile	Lower American R.	Yes	Yes	No	No
2541 R4	Decommission American River within riparian area (#4)	0.29 mile	Lower American R.	Yes	Yes	No	No
2541 R10	Decommission (abandon) existing road.	0.27 mile	Queen Creek	Yes	Yes	Yes	Yes
---	Construct a reconnect channel to Queen Creek to provide for fish passage. Increased fish access 1.4 miles.	Fish access 1.4 miles	Queen Creek	Yes	Yes	Yes	Yes
2541 R12	Decommission road.	0.11 mile	Middle American R.	Yes	Yes	Yes	Yes
---	Harden and stabilize upper American River ford (RM) (#5).	1 ford	Middle American R.	Yes	No	No	No
2541 B	Improve and gravel road crossing meadow, rehabilitate off road vehicle use in meadow area (#5).	0.12 mile	Middle American R.	Yes	No	No	No
---	Decommission and rehabilitate upper American River Ford (#6 and #7)	1 ford	Middle American R.	No	Yes	Yes	Yes

Appendix B –Treatments by Alternative

BLM No.	Activity (Project No.) ¹	Project Descrip.	Subwatershed	Alternative			
				B	C	D	Selected
2541 B	Decommission road crossing meadow area and rehabilitate off road vehicle use in meadow (#6 and #7).	0.12 mile	Middle American R.	No	Yes	Yes	Yes
2541	Decommission road that is adjacent to American River (#6).	0.77 mile	Middle American R.	No	Yes	No	No
2541	Convert road to ATV trail (#7)	0.77 mile	Middle American R.	No	No	Yes	Yes
T2541	Construct new ATV trail so that American River ford and road crossing meadow can be decommissioned (#7).	0.3 mile	Middle American R.	No	No	Yes	Yes
2543 G1	Construct new permanent road (west side American River) to provide additional access from the north for the American River subdivision. Road would connect with Ericson Ridge road (#6 and #7).	0.46 mile	Middle American R.	No	Yes	Yes	No
2543 G2	Construct new permanent road (east side of American River) to provide additional access from the north for the American River subdivision (#6 and #7).	0.1 mile	Middle American R.	No	Yes	Yes	No
---	Construct a new vehicle bridge across American River to provide additional access from the north for the American River subdivision (#6 and #7).	1 Vehicle Bridge	Middle American R.	No	Yes	Yes	No
2541 A	Decommission existing road adjacent to American River, new road construction for subdivision access will bi-pass this segment (#6 and #7).	0.12 mile	Middle American R.	No	Yes	Yes	Yes

Appendix C – Project Design Features

Design criteria associated with the fuels/vegetation treatments, and road construction and reconstruction were developed to avoid or reduce potential resource impacts. Public comments were considered when developing these measures. The following measures and management requirements were designed to apply to all action alternatives and will be applied to all contracts, agreements and partnerships.

#	Project Design Measure	Implementation Method	Effectiveness
Areas Excluded from Timber Harvest or Fuel Reduction Activities			
1	No timber harvest or mechanical fuel reduction activities would occur in RHCAs, or areas of high landslide risk.	Project Design, silviculture prescription and field prep.	High, based on inventory, and monitoring data
Vegetation			
2	Silvicultural prescriptions would be written for each unit, including slash treatment and burn guidelines to meet desired stand conditions of species composition and structure and watershed sediment guidelines	Silvicultural prescription, and burn plan	High, based on protocols for silvicultural and burn plan preparation
3	Livestock grazing will be restricted for two growing seasons or until reforestation and restoration objectives are achieved.	Grazing Lease coordination with lessees.	Moderate based on past experience.
Riparian Habitat Conservation Areas			
4	No cutting of trees would be allowed in PACFISH RHCAs, except restoration/habitat improvements, and to facilitate anchoring of cable yarding systems	Project Design, field prep., contract and contract administration/inspection	High, based on inventory and monitoring data

5	Post harvest burning will be designed and implemented with the intent of restricting burning to stay within the unit boundary. Fire that moves outside the external unit boundary will be suppressed if it poses a threat to riparian resources. On occasion fire will move into RHCA adjacent to the harvest unit. Fire will not be ignited within these areas, but may be allowed to back into these areas under conditions where fire intensity will be low and burning will not result in extensive reduction in canopy cover or exposure of bare soil in these RHCA inclusions.	Silvicultural prescription, burn plan , and BLM Fuels management	High, based on protocols for silvicultural, burn plan preparation, Research, PNW Lab, Starkey Project
6	Landslide prone areas are also considered Riparian Habitat Conservation Areas (RHCAs). No timber harvest would occur in areas of high landslide risk, as described in (1) above. If additional, unmapped landslide prone areas are found during project implementation, areas would be dropped or activities would be modified with watershed specialist oversight to protect slope stability.	Project Design, silviculture prescription and field prep.	High, based on landslide inventory data
Soils, Water, and Fish Habitat			
7	The State of Idaho Best Management Practices (BMPs) would be applied. These are incorporated by reference.	Contract and contract administration/inspection	High, based on past experience
8	Biomass utilization would be applied where feasible in lieu of excavator piling to reduce physical soil damage and to encourage natural regeneration.	NEPA project design, silviculture prescription, and contract	High, to the degree implemented; based on past experience
9	Temporary roads would be built, used, and decommissioned within a 1 to 3-year period, in order to reduce the amount of sediment production. Coordination of temporary road use and decommissioning with the NPNF American and Crooked River project would be required.	NEPA project design and contract administration	Moderate, based on implementation monitoring of timber sale contracts and Burroughs and King, 1989.
10	Construct slash filter windrows at the toe of fill slopes on newly constructed landings and roads concurrent with construction. Limit height of windrows to 3 feet. Provide breaks & limit length of windrow to allow easy passage of wildlife.	Contract and contract administration/inspection	Moderate (Burroughs and King, 1989; Cook and King, 1983)

11	Snow plowing will maintain a minimum of two inches of snow on the road, leave ditches and culverts functional, sidecast material will not include dirt and gravel, and berms will not be left on shoulder unless drainage holes are opened and maintained.	Contract and contract administration/inspection.	
12	Timber harvest, fuel reduction, and stream restoration activities would be limited or suspended when soils are wet, such that resource damage may occur, to reduce rutting, displacement and erosion. However, harvest could occur during frozen conditions. Frozen conditions are defined as greater than 4 inches of frozen ground, a barrier of snow greater than two feet in depth (unpacked snow), or one foot in depth (packed snow).	Contract and contract administration/inspection	Moderate, based on experience, and (USDA-FS, 1988, 1990, 1992, 1999, and 2003d).
13	Excavated skid trails and landings with cut slopes of more than 1 foot would be scarified and recontoured, replacing topsoil as feasible on all landings and trails.	Contract and contract administration/inspection	High (Plotnikoff et al., 1999; Sanborn et al., 1999a, Sanborn et al., 1999b)
14	Restore soil permeability on temporary roads and landings by scarifying compacted soils to a minimum of 16 inches, or depth of compaction. Excavator, winged subsoiler or similar equipment is preferred, to avoid mixing surface ash layer and subsoil. Partially recontour where needed, seeding with native species (including annual grasses), mulching where needed, and pull slash over the surface to achieve 50% ground cover prior to seasonal runoff events.	Contract and contract administration/inspection	High (Johnson, 1995; Luce, 1997)
15	Sediment and erosion control measures such as dewatering culverts, sediment barriers, rocking road surfaces and/or ditches, etc., would be used to protect fish habitat and water quality.	Contract and contract administration	High, based on literature, San Dimas, Road/Water Interaction
16	Activities including stream crossing road improvements would be conducted in fish bearing streams between July 1 and August 15 to avoid sediment deposition on emerging steelhead or chinook redds, or disturbance to bull trout moving to natal streams. These dates may be site-specifically adjusted through coordination with the Central Idaho Level I team and other agencies.	NEPA project design, contract and contract administration/inspection	Moderate to high, based on past experience

17	When designing new structures, consider and give preference to open-bottom arches, bridges and oversized culverts.	NEPA project design, contract and contract administration/inspection	High, based on literature, San Dimas, Road/Water Interaction
18	During restoration habitat improvement activities, tree felling in RHCAs would occur only where that activity would benefit Riparian Management Objectives	Contract and contract administration/inspection	High, based on past experience
19	Prior to instream habitat improvement activities, heavy equipment would be inspected to assure no leakage of oil, fuel, or hydraulic fluid.	Contract and contract administration/inspection	Moderate to high, based on past experience
20	A Spill Prevention Control and Countermeasures Plan (40 CFR 112) would be prepared and implemented that incorporates the rules and requirements of the Idaho Forest Practices Act Section 60, Use of Chemicals and Petroleum Products; and US Department of Transportation rules for fuels haul and temporary storage; and additional direction as applicable.	Contract and contract administration/inspection	High, based on past experience
21	For instream activities in fish-bearing streams that contain listed species, fish are expected to disperse from the activity area. If needed, additional measures would be used to ensure fish are not harmed or killed by instream activity. If electrofishing were necessary, it would be conducted in accordance with NOAA Fisheries electrofishing guidelines found at http://www.nwr.noaa.gov .	Contract and contract administration/inspection	Moderate, based on past experience
Air Quality			
22	Procedures outlined in the North Idaho Smoke Management Memorandum of Agreement would be followed, including restrictions imposed by the smoke management-monitoring unit.	BLM fuels management	High, based on burning approval required daily by smoke monitoring unit
23	Prescribed burning. Priority in scheduling would be given to units accessed by temporary roads scheduled for decommissioning.	BLM fuels management	High, based on past experience, and availability of burn windows and/or personnel

24	Additional restrictions, beyond those imposed by the smoke management monitoring unit, would be considered for prescribed burning for local air quality reasons, including visual.	BLM fuels management	High, based on past experience
Wildlife			
25	Should an active goshawk nest be discovered within 450 feet of timber harvest or fuel reduction activities, the nest tree will be protected, as well as a 10–15 acre no-treatment buffer area around the nest tree	Field prep, contract and contract administration/inspection	Moderate; based on IDFG et al., 1995, State Conservation Effort
26	The integrity of existing access management restrictions on NPNF roads would be maintained within the planning area for wildlife security purposes. No contractor or their representatives may use motorized vehicles to hunt or trap animals on a restricted road.	Contract and contract administration/inspection	High except close to roads; based on standard timber sale contract clauses and past results monitoring
27	Gates/closures will be installed on temporary roads as needed to restrict public vehicle use.	Project design, contract, contract administration.	Moderate, based on past experience.
Cultural Resources			
28	Avoid or protect known historic properties when possible.	Project design, contract administration	High, objective is to achieve a No Adverse Effect
29	When necessary to cross historic mine ditches the following will be implemented. Ditches will be approached perpendicular to the ditch to minimize the affect. The ditch crossing will be documented with photographs and GPSed. Logs, culverts, or other solid material will be laid horizontally up to the berm of the ditch. The harvest equipment or cable corridors will only use these designated areas to transport the logs across the platform. When the treatment operation is complete the material will be removed from the ditch. These crossings will be about 20 feet in width. When sections of ditch may be obliterated by road construction then the same documentation actions will be incorporated as well preparing cross-section profiles.	Project design, contract administration	High, objective is to achieve a No Adverse Effect

30	When historic mine dredge tailings will be impacted the site will be documented with photographs, measured, and GPSed in areas of potential impact.	Project design, contract administration	High, objective is to achieve a No Adverse Effect
31	If additional cultural resources are discovered during project implementation then all activities will cease in that area and the BLM archeologist notified and sites evaluated according to 36 CFR 800.	Contract Administration	Moderate based on contract inspector recognition of resource
32	Treatment activities in units 34 and 35 would be conducted using the frozen conditions noted in #10.	Contract and contract administration/inspections	Moderate, based on past experience.
Noxious Weeds			
33	Desirable vegetation would be promptly established on disturbed areas, such as log landings, road cuts and fills, skid trails etc., using native and non-native plant species as appropriate to reach restoration goals. The species used for restoration / revegetation will be determined by the appropriate Cottonwood FO personnel.	Contract and contract administration/inspection	Moderate based on experience
34	All seed utilized in revegetation will be certified weed free and documentation of the seed inspection test will be provided to the contract administrator. All straw and mulch, prior to being used for restoration or revegetation projects, would be certified as free of noxious weed seed.	Contract and contract administration and inspection	High; based on past experience
35	All mud, soil and plant parts would be removed from all equipment associated with the project before moving into the project area to limit the spread of noxious and other weeds.	Contract and contract administration and inspection	High; based on past experience
36	All private rock used for road surfacing would be county-certified as free of noxious weed seed. Borrow pits and stockpiles will not be used if it is determined, by the appropriate Cottonwood FO specialist, that it is infested with an invasive plant that is not found in the area where the material will be placed.	Contract and contract administration/ inspection	Moderate; based on past experience

37	Small outbreaks of invasive weeds within one mile of the project area, and along all haul routes leading to the project areas will be pretreated prior to ground disturbing activities under the existing weed management program.	Field prep, contract	High: based on past experience
38	Areas disturbed during project activities will be inventoried a minimum of two years post project to detect establishment of noxious weeds. The inventory data will then be forwarded to the weeds program manager for inclusion in the treatment program.	Post project monitoring	High; based on past experience.
39	New weed sites found during inventory efforts will be given a high priority for weed treatment to help prevent further spread.	Post project monitoring, BLM weed program protocols.	Moderate: based on past experience.
Sensitive Plants & Plants of Concern			
40	Candystick, a species of concern, occurs in some management units north of Whitaker Creek. Where live mature lodgepole are associated with candystick, groups of live mature lodgepole pine would be left to protect candystick from management activities.	Project design, field prep, contract and contract administration/ inspection	High based on past monitoring and experience
41	Idaho barren strawberry, a BLM sensitive plant species, occurs in some management units Core areas where it occurs would be protected in tractor skidding units. Areas will be avoided or logged when snow conditions are greater than two feet in depth (unpacked snow), or one foot in depth (packed snow).	Project design, field prep, contract and contract administration/ inspection	High based on past monitoring and experience
Grazing			
42	Any authorized range improvement (i.e., fences, spring developments) would be restored by the BLM if during the logging operation they were removed or damaged.	Contract and contract administration/ inspection	High: based on past experience

Appendix D – Monitoring Plan

Regeneration and Survival Success Monitoring

Program:	Forest Management
Monitoring Item:	Artificial regeneration
Objective:	To assess the survival and stocking rates following tree planting in regeneration units.
Parameters:	Regeneration establishment and survival checks.
Methodology:	Install and measure 1/100 acre plots per standard protocols.
Frequency/Duration:	First, third, and fifth year following planting
Data Storage:	Field office files
Analysis/Report:	Silvicultural and reforestation reports
Priority:	High
Personnel:	Forestry staff
Cost:	Average \$30/acre times the number of acres planted

Fuel Condition

Program:	Fuels Management
Monitoring Item:	Fuel condition; burn unit design; biomass utilization
Objective:	To assess the implementation of fuel reduction objectives, keeping prescribed fire within designated unit boundaries, and reducing excavator piling resulting from biomass utilization.
Parameters:	Post treatment fuel model; burned area survey; acres excavator-piled
Methodology:	Install and measure fuel inventory plots per standard protocols, patrol unit firelines, and observe and map actual burned area, evaluate biomass opportunities.
Frequency/Duration:	30 days following treatment
Data Storage:	Field office files
Analysis/Report:	Fuel reduction accomplishments (NFPORS)
Priority:	High
Personnel:	Fuels Staff
Cost:	Average \$30/acre times the number of acres planted

Vegetation

Program:	Noxious Weeds
Monitoring Item:	Inventory activity areas for weed occurrence
Objective:	To survey and document new and spreading populations of noxious weeds in the treatment area.
Parameters:	Weed occurrence
Methodology:	Visual survey of disturbed areas for weed occurrence
Frequency/Duration:	Two years following treatment
Data Storage:	Field Office Files
Analysis/Report:	
Priority:	High
Personnel:	All field staff
Cost:	Average \$30/acre times the number of acres planted

Water Quality

Program:	Water Quality
Monitoring Item:	Implementation of BMPs, project design features and mitigation
Objective:	To determine if stated measures were implemented and if they were effective as designed.
Parameters:	Were the BMPs, PDFs, and mitigation implemented and effective feedback information to IDTs for future project design?
Methodology:	Site visit, pre- and post-monitoring of site conditions
Frequency/Duration:	Before, during, and post implementation. Post implementation should continue for up to five years to track effectiveness.
Data Storage:	Field Office Files
Analysis/Report:	Provide summary reports and recommendations to IDTs developing future projects to ensure continually improving project design.
Priority:	High
Personnel:	Hydrologist, Biologist

Water Quality

Program:	Water Quality
Monitoring Item:	Temperature; turbidity; active erosion/sediment
Objective:	To determine change in condition over time.
Parameters:	Use standard DEQ protocol for monitoring turbidity at mixing zone.
Methodology:	Regularly record temperatures and prepare trend analysis for riparian restoration projects. During project implementation that involves actions below mean high water or instream activities that may affect turbidity, monitor during project implementation, and pre- and post-project turbidity levels. Monitor activities within riparian habitats where project related soil/vegetation disturbance has potential to reach water. Monitor implementation and effectiveness of erosion control design features. Continue monitoring existing permanent monitoring stations; install temporary monitoring stations for periodic evaluation. Document erosion control implementation and effectiveness.
Frequency/Duration:	Temperature is recorded daily and data retrieved monthly (summer months). Monitoring should continue for foreseeable future to discern trends. Turbidity monitoring conducted during, pre-, and post-project construction periods. Erosions control implementation and effectiveness monitoring conducted during project implementation and post-project monitoring as needed until appropriate site stabilization is achieved.
Data Storage:	Field office files
Analysis/Report:	Provide summary reports to track changes resulting and trend for project design and compliance with water quality standards.
Priority:	High
Personnel:	Fisheries Biologist

Roads

Program:	Restoration
Monitoring Item:	Decommissioned roads and fish habitat
Objective:	To ensure decommissioned roads are removed to designed standards and are, in fact, no longer passable, and to assess changes to fish habitat conditions and document trend.
Parameters:	Percent woody material on former surface, depth of decompaction, recontouring percent complete (if applicable)
Methodology:	On-site measurements and visual observation
Frequency/Duration:	Post implementation
Data Storage:	Field office files

Analysis/Report: Provide summary reports and recommendations to IDTs developing future projects to ensure continually improving project design. Provide feedback to regulatory agencies on effectiveness of treatments.

Priority: High

Personnel: Contract Administrator

Cultural

Program: Cultural Resource Protection

Monitoring Item: Installation of protective measures at ditch crossings, recording features prior to implementation

Objective: To protect documented resources.

Parameters: Parameters are provided in the design feature table.

Methodology: Visual observation

Frequency/Duration: During and post implementation

Data Storage: Field office files

Analysis/Report: Provide summary reports and recommendations to IDTs developing future projects to ensure continually improving project design. Provide feedback to regulatory agencies on effectiveness of treatments.

Priority: High

Personnel: Archeologist, Contract Administrator

Fish Habitat

Program: Fish Habitat

Monitoring Item: Fish habitat features: cobble embeddedness; LWD; pool:riffle; surface fines; width:depth

Objective: To assess changes to fish habitat conditions and document trend.

Parameters: Parameters are identified for each feature in the *Matrix and Pathways of Indicators*.

Methodology: Use standard protocols for each monitoring type.

Frequency/Duration: Before, during and post implementation. Post implementation should continue for up to five years to track effectiveness.

Data Storage: Field office files

Analysis/Report: Provide summary reports and recommendations to IDTs developing future projects to ensure continually improving project design. Provide feedback to regulatory agencies on effectiveness of treatments.

Priority: High

Personnel: Fisheries Biologist

Fish Habitat

Program: Fish Habitat

Monitoring Item: Stream channel morphology, stream bank condition, and riparian re-vegetation attributes following crossing replacement or ford decommissioning and restoration

Objective: To assess changes to fish habitat conditions and document trend.

Parameters: Parameters are identified for each feature in the *Matrix and Pathways of Indicators*.

Methodology: Use standard protocols for each monitoring type.

Frequency/Duration: Post implementation. Monitoring should continue periodically for up to ten years to track effectiveness.

Data Storage: Field Office Files

Analysis/Report: Provide summary reports and recommendations to IDTs developing future projects to ensure continually improving project design. Provide feedback to regulatory agencies on effectiveness of treatments.

Priority: High

Personnel: Fisheries Biologist

Fisheries

Program: Fish Genetics

Monitoring Item: Genetic testing of isolated/semi-isolated Westslope cutthroat trout populations

Objective: To assess the genetic composition and any changes that occur through following reconnection of the Queen creek channel to American River.

Parameters: Parameters are identified for collection of genetic material.

Methodology: Use standard protocols for each monitoring type.

Frequency/Duration: Pre- and post-implementation. Post-implementation should continue periodically to assess changes over time.

Data Storage: Field office files

Analysis/Report: Provide summary reports and recommendations to IDTs developing future projects to ensure continually improving project design. Provide feedback to regulatory agencies on documented impacts.

Priority: Moderate

Personnel: Fisheries Biologist

Wildlife Habitat

Program:	Wildlife Habitat
Monitoring Item:	Green tree, snag replacement, snags and down woody retention guidelines
Objective:	To assess changes to forest structure and assure conformance with developed guidelines.
Parameters:	Green tree retention parameters vary by treatment unit and would be derived from the silvicultural prescription. Snags guidelines are included in the MFP. Down woody material is based on recommendations in the Soils Section.
Methodology:	Use standard protocols for each monitoring type.
Frequency/Duration:	Post implementation
Data Storage:	Field office files
Analysis/Report:	Provide summary reports and recommendations to IDTs developing future projects to ensure continually improving project design.
Priority:	High
Personnel:	Forester

Wildlife Habitat

Program:	Wildlife Habitat
Monitoring Item:	Road restrictions for temporary roads
Objective:	To ensure gates, signs, and closures are effective to restrict public vehicle use or other non-authorized uses of temporary roads during the duration of the contract.
Parameters:	Document that gates are installed immediately after temporary roads are constructed. Monitor road closure facilities (gates, signs) are in place and functional during project duration.
Methodology:	Documentation of gate installation and effectiveness in project inspector's field notes/diary.
Frequency/Duration:	Project implementation
Data Storage:	Field office files
Analysis/Report:	Provide summary reports of gate/closure construction and periodic monitoring.
Priority:	High
Personnel:	Forester, Biologist

TES Plants

Program:	Threatened and Endangered Species
Monitoring Item:	Retention of live lodgepole pine near candystick populations
Objective:	To ensure habitat components are retained.
Parameters:	Green lodgepole pine retention should be implemented near documented populations or any newly discovered populations.
Methodology:	Visual observation
Frequency/Duration:	During and post implementation
Data Storage:	Field office files
Analysis/Report:	Monitoring report to FWS
Priority:	High
Personnel:	Forester, Botanist/Ecologist

Letter 1: Friends of the Clearwater

May 24, 2007

Robbin Boyce
Project Leader
BLM Cottonwood Field Office
1 Butte Drive
Cottonwood, ID 83522

RE: Eastside Township FEIS, Sent Via Email to robbin_boyce@blm.gov

Dear Mr. Boyce:

The following comments are submitted by Friends of the Clearwater (FOC), Alliance for the Wild Rockies (AWR), the WildWest Institute, Idaho Sporting Congress (ISC), and the Lands Council (TLC) on the Eastside Township final environmental impact statement (DEIS). Please incorporate our earlier comments on this project as well.

Not much has changed between the draft and the final EIS. As such, we incorporate by reference our earlier comments. In this comment we address three main topics.

Purpose and Need, Forest Types, and Fire and Fuels

1-1 | In our earlier comments, we pointed out that protection of structures is best done within 40 meters. We also pointed out that the logging would take place downwind of Elk City. Given the prevailing winds, it would seem logical to confine the project immediately to the west and south of the buildings in and around Elk City.

All the sophistry in the world can change that basic fact. The response to comments, which try to justify this timber sale as something other than what it really is, make little sense in light of basic scientific facts. The simple matter of fact is the desire to reduce fuel in the forest to prevent stand-replacing fires does not work in lodgepole pine forests. What can be effective is reducing fuel immediately adjacent to structures to save the structures. The purpose and need are confused on this important point.

1-2 | New research supports our contention about fire, fuels, and forest types. Noss et al. 2006 (see also the same authors whit paper for the Society for Conservation biology) suggests that thinning or logging in lodgepole pine doesn't significantly affect fire behavior because these stands experience infrequent, lethal fires. Baker et al 2007 suggest that in Douglas fir and ponderosa pine forests, the old model of frequent fires of low severity is inaccurate for this part of the world.

Water Quality/Fisheries/Soils

1-3 | One of the most important issues in the area is water quality, watershed health, and hydrological integrity and how they affect aquatic life forms including the listed and sensitive fish species. The FEIS is not clear on the cumulative impacts on these important values.

One of the main concerns is the lack of hard monitoring data. Apparent trend is not sufficient. For example, subjective observations of an increase in riparian vegetation do not substitute for hard data such as monitoring sediment by measuring cobble embeddedness. Approval of the non-restoration

Letter 1: Friends of the Clearwater

Comment: 1-1

Response: Cohen (1999) states that a structure can be threatened in several different ways, including direct exposure from flames, radiant heat, and airborne firebrands. He also states that to be effective, fuel management needs to significantly reduce firebrand production and extend for several kilometers away from homes.

The proposed treatments reduce firebrand production by limiting fire spread to surface fires and reducing flame lengths, thereby decreasing the maximum spotting distance. Treatments are designed so that, in the event of a large wildland fire, treatments on the landscape scale will make it easier for firefighters to control/contain fires, with less jeopardy to firefighter and public safety. Good fuels reduction plans focus on both treatments within 40 meters of structures and planning at the landscape scale like the cooperative efforts on-going in the Elk City Township.

The treatments areas also extend away from the private property boundaries; therefore, spotting would be contained within these areas.

Narrower treatment areas, such as one focusing purely on home ignitability, increases the probability of spot fires igniting either private land or BLM forest resources on either side.

The Purpose and Need for Action states that the purpose of the project is to reduce the risk of high-intensity wildland fire to property, and natural resources in the Elk City and surrounding WUI areas. The reduced fuel loading and stand densities following the treatments would decrease potential flame lengths and intensity and therefore decrease the risk to life, property, natural resources should a wildfire occur. The decreased rate of spread of a wildfire following treatments also allows fire suppression crews greater success, thereby, decreasing the risk to life, property, natural resources, and fire suppression crews.

We are working in partnership with the Idaho County Community Wildfire Protection Plan (CWPP) working group in support of reducing direct threats to structures from wildfire. The CWPP developed by private, county, state, and federal entities, outlines priorities for the Elk

Letter 1: Friends of the Clearwater

1-3
Cont'd

parts of the project--logging and road building--are in conflict with the MFP, FLPMA, the ESA, the CWA, and treaty obligations.

Roadless/Undeveloped Areas

The FEIS and response to comments miss this important issue. Our earlier comments address this topic in considerable detail.

1-4

We wish to point out that errors in the Forest Service inventories (past and the one ongoing for the forest plan) and the failure of BLM in the 603 wilderness review process. Case law in *Kettle Range Conservation Group v. USFS* makes it clear the on-the-ground situation is what determines roadless nature of an area, not inadequate roadless or wilderness analyses done by the Forest Service or BLM.

As our DEIS comments noted, there are wilderness areas with narrow boundaries in places, much narrower than the East Fork of the American River roadless country for example. In fact, the area the BLM proposes to log is included in HR 1975, the Northern Rockies Ecosystem Protection Act. Page 36 of that bill would designate Meadow Creek, including BLM-administered public land in two places--near Kirks Fork and the East Fork of the American River—as an addition to the Selway-Bitterroot Wilderness.

Sincerely,

Gary Macfarlane
Friends of the Clearwater
PO Box 9241
Moscow, ID 83843
-and-
Alliance for the Wild Rockies

Mike Petersen
The Lands Council
423 W. First Ave. Suite 240
Spokane, WA 99201

Jeff Juel
WildWest Institute
PO Box 7998
Missoula, MT 59807

Ron Mitchell
Executive Director
Idaho Sporting Congress
PO Box 1136
Boise, ID 83701

References

Letter 1: Friends of the Clearwater

City area that include this project, as well as work on all land ownership within the Elk City Township.

Comment: 1-2

Response: The effectiveness of fuel treatment is directly proportionate to the percent of ground being treated. The effectiveness of treatments that alter fire behavior and facilitate suppression and how often these treatments need to be maintained varies with forest type, climate, soils, landscape patterns and overall forest conditions. Despite these variations the bottom line is that fuels treatments reduce the threat of intense fires. Page 1 of Noss et al. 2006 which you reference clearly states that the focus of that paper is primarily on wildlands, rather than the wildland-urban interface, where ecological values may be secondary to the fire-risk mitigation to protect people and homes.

Comment: 1-3

Response: A full discussion of the effects of the project can be found in Sections 3.4 and 3.6 of the FEIS including information on cobble embedness. Additional upward trend information was included in Appendix H in the FEIS, specifically to respond, in part, to comment 9-16 of your letter on the Draft EIS. The reader is referred to Sections 1.5 and 1.7 in the FEIS regarding the MFP and FLPMA as well as the ESA. In addition as noted in this ROD, The Biological Assessment and the Biological Opinions from both National Marine Fisheries and U. S. Fish and Wildlife Service are available on the BLM website at <http://www.blm.gov/id/st/en/fo/cottonwood.html>.

Comment: 1-4

Response: Sections 3.8.4.1 through 3.8.4.3 address inventoried roadless areas and areas with unroaded characteristics. As stated BLM lands in this area do not fit into either category. The Selway-Bitterroot Wilderness is over 8 miles from the project area. As such it was not an issue analyzed in detail as outlined in Section 1.9.1. Also see response to your letter in the FEIS comment 9-32.

This bill is in the first stage of the legislative process where the bill is

Letter 1: Friends of the Clearwater

Noss, Reed F, Jerry F. Franklin, William L. Baker, Tania Schoennagel, and Peter B. Moyle. 2006. Managing fire-prone forests in the western United States. *Front Ecol Environ* 2006; 4(9): 481–487

Baker, William L, Thomas T. Veblen, and Rosemary L. Sherriff. 2007. Fire, fuels and restoration of ponderosa pine-Douglas fir forests in the Rocky Mountains, USA. *Journal of Biogeography* 2007 (34) 251-269

Letter 1: Friends of the Clearwater

considered in committee and may undergo significant changes in markup sessions. In the first step in the legislative process, introduced bills go first to committees that deliberate, investigate, and revise them before they go to general debate. The majority of bills never make it out of committee. The last action on this bill was on October 18, 2007.

GovTrack.us. H.R. 1975--110th Congress (2007): Northern Rockies Ecosystem Protection Act, GovTrack.us (database of federal legislation) <<http://www.govtrack.us/congress/bill.xpd?bill=h110-1975>> (accessed Apr 14, 2008)

Letter 2: Idaho Conservation League



wildidaho.org

Idaho Conservation League

PO Box 844, Boise, ID 83701 208.345.6933 Fax 208.344.0344

Robbin Boyce
BLM, Cottonwood Field Office
1 Butte Drive
Cottonwood, Idaho 83522

May 29, 2007

RE: Idaho Conservation League Comments Regarding the Eastside Township FEIS

Dear Robbin,

Thank you for considering our comments on the Eastside Township FEIS. For thirty years, the Idaho Conservation League has worked to protect Idaho's clean water, wilderness, and quality of life through citizen action, public education, and professional advocacy. For more information or to become a member, visit www.wildidaho.org. As Idaho's largest state-based conservation organization we represent over 9,000 members, many of whom have a deep personal interest in ensuring that logging projects are consistent with protecting our water, wildlands, and wildlife.

2-1 | After reviewing the FEIS, we remain concerned about the fact that more than 15 miles of temporary roads and more than 2 miles of new roads will be constructed as part of the Eastside Township project, with limited decommissioning. The road construction, coupled with legacy issues, high levels of sediment over natural conditions, and high values of equivalent clearcut area beg the question of whether or not the upward trend requirement will be met. We appreciate the proposed restoration activities in the project, however, given the presence of sensitive and listed fish species and the impaired state of the South Fork Clearwater River Subbasin, we continue to feel that additional restoration is needed to mitigate the effects of this project.

In general, our concerns and comments have not substantially changed. We continue to have concerns about impacts to unroaded areas, water quality, endangered species, soils, wildlife and fuels.

2-2 | Regarding unroaded areas, the FEIS few additions to the information presented in the American and Crooked River Project FEIS. Simply reiterating faulty analysis does not make it any more acceptable. At the same time we are opposed to the construction of a new stream crossing and encourage you to consider alternatives to either approach. In addition, there continues to be no analysis of the impacts to the BLM unroaded area (which lie adjacent to the FS unroaded areas).

2-3 | Finally, in light of new information on the impacts associated with climate change, we are concerned that the project fails to incorporate best-available-science. According to some peer-reviewed articles, the assumptions that long-lived seral tree species will persist may be flawed. Because this is one of the primary underlying assumptions for the project, it is especially pertinent. Specifically Rehfeldt et al

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Comment: 2-1

Response: The descriptions of Alternatives B, C, and D can be found in Sections 2.2.4-2.2.6 and compared in Table 2.2.1 in the FEIS. Alternative C has 10.5 miles of temporary road. Alternative D has 10.7 miles of temporary road. The Selected Alternative as outlined in this ROD calls for 10.0 miles of temporary road and 0.0 miles of permanent road. As we stated in the FEIS response to your letter on the DEIS, no alternative analyzed included more than 1.13 miles of permanent road. Restoration opportunities were discussed in detail in the FEIS; pages 41-43, and pages 171,172,181,181,187 and appendix H; and responses to your previous comment 4-1 in the FEIS.

As noted in Section 3.4.3.3 the ECA has been relatively stable to declining for the last 50 years. The cumulative effect of the project and foreseeable actions is a slight temporary increase in ECA, i.e. approximately 1 percent.

Comment: 2-2

Response: Alternative D as described in Section 2.2.6 does not include roads in the area of NFS land with unroaded characteristics. The construction of temporary roads in this area has been dropped from the Selected Alternative as outlined in this ROD. Sections 3.8.4.1 through 3.8.4.3 in the FEIS address inventoried roadless areas and areas with unroaded characteristics. As stated BLM lands in this area do not fit into either category. Temporary roads have been dropped from this area as well in the Selected Alternative as outlined in this ROD. Alternative B (Preferred Alternative) as described in Section 2.2.4 does not include a new automobile bridge crossing of the American River. No new automobile bridge crossing of the American River is included in the Selected Alternative as outlined in this ROD.

Comment: 2-3

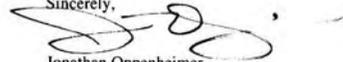
Response: We acknowledge the research on unmitigated global warming. As noted in the conclusions of that research “the models provided intuitively reasonable predictions but brought to the forefront as many questions as answers. Despite the availability of these powerful models, a thorough assessment of the effects of global warming is still distant. “

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(2006) found that models indicate that Western Larch and Ponderosa Pine may no longer be well suited for Idaho's climate in the foreseeable future based on the likely and occurring effects of climate change¹.

Once again we thank you for the opportunity to submit additional comments on the Eastside Township FEIS. Please send us any subsequent documents for this project. We look forward to continuing to work with the Cottonwood Field Office on this and other projects in the future.

Sincerely,



Jonathan Oppenheimer
Senior Conservation Associate

¹ Rehfeldt, G. et al. 2006. Empirical Analyses of Plant-Climate Relationships for the Western United States. *Int. J. of Plant Science*. 167(6):1123-1150. University of Chicago, Illinois.

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This issue is beyond the scope of analysis for this project. However, as noted in this article the results are in conflict with other research by predicting a decline in ponderosa pine and no change in the area of Douglas-fir, rather than a decrease. In light of this research it seems intuitive to manage for tree species better adapted to warmer environments such as Douglas-fir and ponderosa pine than for the current species cover types in the project area. Currently as stated in Section 3.3.2, 39 percent of the area is dominated by grand fir, and 53 percent is dominated by lodgepole pine. Also in light of this research, it seems likely that the amount of dead and down fuels will only worsen in the future given the current stand structure and species composition.

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Idaho Conservation League Comments Regarding the Eastside Township FEIS

NEPA

2-4 The alternatives considered in the FEIS failed to represent a suitable range of alternatives to meet the purpose and need for the project. Further, the project's purpose and need were so narrowly constructed as to preclude the development of a broad range of alternatives. As a result, the difference in logged area between action alternatives varied by less than 10%. As a result, the BLM has not considered an adequate range of alternatives.

Fire Risk

2-5 The FEIS fails to disclose the potential for the Eastside Township Project to increase fire risk in the area as a result of slash. This despite the recognition in the recognition on page 9 that the highest severity fire that occurred during the 2005 Blackerby Fire occurred in logged areas. The proximity of such increased fire risk to homes calls into question the ability of the project to meet the purpose and need. At a minimum, the FEIS should disclose how long elevated fire risk conditions are expected to occur and what steps will be taken to mitigate this risk.

Watershed

Upward Trend Requirement

2-6 Pursuant to the upward trend requirements for BLM lands in the Eastside Township, the project proposal includes efforts to restore riparian areas along the American River. While these riparian restoration efforts are warranted, given past activities in the watershed that have been highly detrimental, the proposed project contains several aspects that contradict (and even negate the restorative aspects) the upward trend requirement.

Specifically, the Eastside Township proposes to construct up to 15.1 miles of temporary roads, 2.12 miles of permanent roads, and would only result in the decommissioning of up to 3 miles of existing roads. As part of ICBEMP, road densities were categorized as follows: very low, 0.02 – 0.1 mi/mi²; low, 0.1 – 0.7 mi/mi²; moderate, 0.7 – 1.7 mi/mi²; high, 1.7 – 4.7 mi/mi²; and extremely high, 4.7 + mi/mi².² Using these road density categories, Lee et al. found that non-anadromous salmonids such as bull trout and westslope cutthroat are less likely to be found in watersheds with moderate to high road densities or are less likely to exist as strong populations compared to low or very low road densities.³ Furthermore, Lee et al suggest that "There are no

² Quigley, T.M., Haynes, R.W., and R.T. Graham. 1996. Integrated scientific assessment for ecosystem management in the interior Columbia Basin and portions of the Klamath and Great Basins. GTR. PNW-GTR-382. Portland, OR. USDA, Forest Service, Pacific Northwest Research Station.

³ Lee, D.C., Sedell, J.R., Rieman, B.E., Thurow, R.F., and J.E. Williams. 1997. Broad-scale assessment of aquatic species and habitats. In T.M. Quigley and S.J. Arbelvide. Eds. An assessment of ecosystem components in the

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Comment 2-4

Response: NEPA requires consideration of a range of reasonable alternatives, including those eliminated from detailed analysis and the “no action” alternative. Refer to FEIS Chapter 2, pages 18-26 for a Description of Alternatives. The purpose (goals and objectives) and need (underlying problem or opportunity) were developed in response to the comments identified through scoping (internal and public). The purpose and need statement helps clarify why and how BLM is proposing an action and is intended to be brief, unambiguous and specific. The purpose and need statement dictates the range of alternatives because action alternatives are not “reasonable” if they do not respond to the purpose and need for the action. The action alternatives respond to the problem or opportunity described in the purpose and need statement, providing a basis for eventual selection of an alternative in a decision.

Comment 2-5

Response: On page 9 of the FEIS, the sentence reads [emphasis added], “Maps of fire severity made following the fire [Blackerby] illustrate that most of the impact occurred in harvested areas with residual slash on private lands, and in areas that have not had any type of fuels/vegetation treatments for several years or not at all.”

The harvested areas in the Eastside project will either have the biomass removed or the slash treated as shown in Table 2.2.1, and Table D-3 in Appendix D. The results of these actions are described in the Environmental Effects throughout Section 3.1 and clearly shown in Tables 3.1.3, Table 3.1.5 and 3.1.7.

Comment 2-6

Response: The effects analysis is contained in FEIS Sections 3.6.3, 3.4.2.2. Appendix H of the FEIS provides additional discussion regarding aquatic trend analysis and has been supplemented in the FEIS in response comments on the DEIS. It is acknowledged that short term sediment impacts would occur from project implementation. However, long

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logical reasons to expect anadromous fishes to be immune to the effects of habitat change from roads evident in the non-anadromous species.”

At the subwatershed level, all action alternatives would result in moderate road densities in three subwatersheds and high road densities in four subwatersheds.⁴ Based on ICBEMP research, which covers a wide, and therefore representative geographical sample, the condition of the subwatersheds in the American River drainage following implementation of this project will not be conducive to ideal salmonid habitat. Although there are roads associated with private property, which the BLM and the Forest Service can do nothing about, impacts on public lands in and adjacent to the township have also experienced excessive impacts from past activities in the American River Watershed.

The high level of temporary road construction and the resultant effects accompanying this project proposal are downplayed by the BLM with Design Measure #8, in which temporary roads would be decommissioned within 1 – 3 years following construction.⁵ However, the most severe impacts of road construction on fisheries and watershed resources occur in the short-term. Given the existing impaired condition of the American River Watershed, both new and temporary road construction should be avoided as much as possible in order to accomplish the upward trend requirement in the American River Watershed. All stream fords should be removed through road decommissioning or bridge and culvert placement.

Sediment

It is unclear how the proposal meets direction from Addendum 1: BLM Fisheries/Water Quality Objectives by Prescription Watershed Supplement to Chief Joseph Management Framework Plan (1989). According to the Addendum, the number of years that sediment yield guidelines can be approached or equaled is limited to between 1-3 years. In some of the prescription watersheds, current conditions exceed sediment yield objectives, indicating that the BLM is not abiding by the Addendum, and therefore stands in violation of its own MFP. Therefore, without an amendment to the MFP, it is unclear how the proposed activities can proceed.

Further, for most of the prescription watersheds in the project area, elevated levels of sediment are one of, if not the, primary limiting factor to fisheries habitat and water quality. The BLM anticipates an upward trend as a result of modeled sediment additions, but has not shown an upward trend in the past. The models utilized do not account for all sediment entering the subwatersheds, and the BLM makes no attempt to estimate the % of sediment that is not modeled. As a result, the sediment and water quality judgments are speculative and the upward trend determination is presumptive. Instead, we encourage BLM to undertake restoration actions in advance of any new ground-disturbing activities (i.e. logging, road construction, etc.).

Inadequacy of the NEZSED Model

interior Columbia Basin and portions of the Klamath and Great Basins. GTR. PNW-GTR-382. Portland, OR. USDA, Forest Service. Pacific Northwest Research Station.

⁴ FEIS, p. 92.

⁵ Ibid, p. 26.

2-6
 Cont'd

2-7

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term benefits would occur from a reduction in chronic sediment sources and riparian/aquatic restoration efforts.

Also see response to comment 2-1 which states the correct miles of new proposed permanent road analyzed by Alternative in the FEIS.

BLM lands often do not comprise a large majority of the subwatershed and mixed ownership patterns, BLM opportunities are often limited in many subwatersheds. Consequently, BLM opportunities to reduce road densities in many subwatersheds are very limited.

Development of the road and access alternatives are based on a combination of criteria as stated in Section 3.8.1.3. Table 3.8.1 illustrates miles of road by owner and Map 15 in Appendix A their location. The ability to decrease existing roads is extremely limited due to lack of ownership by the BLM, few roads occurring on BLM lands in several subwatersheds, and ingress and egress needs of adjacent owners.

The road densities noted by this comment are not the “result” of the Eastside project. These density classifications exist at present, and the Eastside project actually decreases the lower American river from a High to a Moderate using these criteria. See table 3.4.2 and 3.4.3.

The Selected Alternative as described in this ROD calls for less road construction than any of the other Action Alternatives, i.e., 10.0 miles of temporary road. This is 5.1 miles less than the Preferred Alternative in the FEIS. Also the Selected Alternative includes 0.0 miles of permanent road construction. As described in this ROD and shown in Table 3.5.1, all fords of the American River and Kirks Fork will be closed. See Comment 3-1 for additional details.

Comment: 2-7

Response: Table 3.6.1 page 126 shows the Sediment Yield Guideline (% Over Baseline) figures by subwatershed. Table 3.4.8 page 100 illustrates the Percent Over Base Sediment Yield, Cumulative Effects. As illustrated, current and projected levels are within guidelines. Therefore, an amendment to the MFP is not necessary. As you point out there is an anticipated decrease with time in sediment illustrated in Table 3.4.8. In

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response to several comments on the DEIS, additional information on trend and trend monitoring was incorporated into Appendix H. As this comment is the same as in your letter on the DEIS, please refer to pages H-22 – H-26 in the FEIS that illustrate observed upward trend. Please refer to Tables 3.0.1 and H.6 that discuss restoration actions already accomplished in the American River Watershed, as well as foreseeable actions.

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2-8 | As part of the watershed analysis in the FEIS for the Eastside Township project, the BLM relied upon the NEZSED model. The NEZSED model has a general tendency to underestimate sediment yield⁶. Accordingly, the BLM should assume that sediment yields modeled by NEZSED are *not* adequate or conservative estimates. For the sake of sensitive, threatened, and endangered salmonids in the American and South Fork Clearwater Rivers, intense caution is warranted to avoid adverse effects to these species and trend toward an upward improvement in habitat conditions. Further the purpose of NEZSED is for alternative comparison, as opposed to positively determining sediment yield.

2-9 | To compound the problems associated with the NEZSED model in general, the analysis for the Eastside Township FEIS did not model increases in sediment yield associated with: 1) traffic increases that will result from new and temporary road construction; 2) increased sediment yield associated with newly designated OHV trails; and 3) increased, short-term sediment yield associated with riparian restoration aspects of the project⁷. This is particularly true concerning logging and road construction in the Whitaker, Queen, and Box Sing Creeks where current % over natural sediment yield is at or near the thresholds established in the Management Plan Framework supplemental guidance.⁸ Given the inadequacy of NEZSED, it is reasonable to assume that the 60% over natural threshold will be exceeded, also impairing the ability of the BLM to comply with the upward trend requirement.

2-10 | Additionally, there is no assurance that the BLM will comply with the Clean Water Act (CWA), TMDLs, and state water quality standards based on insufficient models. The South Fork Clearwater River is listed pursuant to section 303(d) of the CWA for sediment and temperature for its entirety, the TMDL mandates a 25% reduction in human-caused sediment⁹. Since both the Red and American Rivers converge to form the South Fork Clearwater River, the cumulative effects of sediment yield in the American and Red Rivers occur in the South Fork Clearwater. Therefore the BLM and the Forest Service have an obligation to reduce sediment yields, which the analysis for the Eastside Township has not adequately demonstrated will occur as a result of implementing this project, much less to reduce existing levels by 25% to comply with the TMDL.

2-11 | Furthermore, without a drastic reduction in the proposed new and temporary road construction, adjustments to the yarding methods and logging treatments, and without more aggressive restoration in the American River riparian areas, beneficial uses in the American River will continue to remain impaired. These include: cold water biota, salmonid spawning, primary contact recreation, domestic water supply, and special resource water.¹⁰ While about 80% of the road decommissioning proposed in this project would occur in RHCAs¹¹ helping to reduce that source of sediment, remaining high levels of % over natural sediment, detrimental disturbance,

⁶ Ibid, p. 89.

⁷ Ibid, pp. 98, 99.

⁸ Ibid, p. 101.

⁹ Ibid, p. 87.

¹⁰ Ibid, p. 91.

¹¹ Ibid, p. 93.

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Comment: 2-8

Response: We concur that NEZSED should be used in conjunction with monitoring and professional judgment. The model limitations are presented in Appendix H, pages H-9 and H-10. As discussed on page 89, NEZSED has been tested using locally collected sediment yield data. Results of the individual tests varied, with predictions being over, under and close to observed values. The model has a general tendency to under-predict, but has been determined to be a reasonably realistic tool for alternative assessment (Gloss, 1995; Gerhardt, 2005). The MFP and supplemental guidance sets the standard of the use of this tool in our analysis of effects.

Comment: 2-9

Response: Potential increases in sediment yield not covered by the NEZSED model, including sediment from increased traffic, are addressed in other ways. As stated on page 99, potential impacts from increased traffic “will be reduced through road maintenance where needed and contract provisions to minimize resource damage during wet periods.” Please refer to Table 2.3.1 (pp27-32), and Appendix C of this ROD for specific project design measures and their relative effectiveness. Applicable measures to address these concerns would include, but not be limited to, design measures # 7, 11, 12, 14, and 15.

Regarding the upward trend concern, Whittaker and Queen are meeting objectives and do not trigger the upward trend requirement – see Section 3.6.2.2 pages 147-148. The BLM is not proposing to conduct riparian restoration or designate new OHV trails in Whitaker, Queen, and Box Sing Creeks.

Comment: 2-10

Response: An implementation plan for the South Fork Clearwater River TMDLs was completed in 2006, and the BLM has been a cooperator in this process. No single project will be expected to achieve the entire TMDL sediment reduction goal. This project is predicted to result in a net decrease in sediment yield to the South Fork Clearwater River over time

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2-11
 Cont'd

and equivalent clearcut area will retard the ability of the BLM to demonstrate an upward trend in the American River watershed, absent more aggressive restoration efforts.

Equivalent Clearcut Area (ECA)

2-12

We are especially concerned about the level of impacts in smaller watersheds, such as Box Sing, Whitaker, Queen Creeks. The proposed logging treatments in the Whitaker and Queens Creeks will result in levels of ECA exceeding 15%.¹² However, the BLM suggests that the 1995 Biological Opinion (Biop) for a number of Land and Resource Management Plans guiding the management of forests with anadromous fish habitat is irrelevant because these two streams do not contain listed or sensitive fish.¹³ The BLM relies upon PACFISH to insure that logging in these watersheds will not adversely affect salmonids and water quality.

However, the 1995 Biop does not specify the HUC code at which the 15% ECA standard should be applied. Specifically the Biop states with regard to ECA:¹⁴

In many watersheds, peak flows appear to rise in a curvilinear fashion with increased timber harvest (Grant 1988), rather than failing to change until after a threshold of forest clearing has been reached. Hydrologic impacts may appear when less than 20% of a watershed is clearcut. For example, peak winter storm flows increased 13% after 19% of a coastal British Columbia watershed was clear-cut (Golding 1987). However, related effects such as sediment mobilization and channel modification may not be evident until a threshold has been reached (Grant 1988; Satterlund and Adams 1992). An ECA level of no more than 15% of a watershed in young age classes (defined as stands less than 30 years old by McCammon (1993)) should confer a low risk of hydrologic effects on streams based on the cumulative effects procedure developed by McCammon (1993) and studies reviewed by Satterlund and Adams (1992). (emphasis added).

Exceeding the 15% ECA level in the Biop in any watershed will result in the potential for significant adverse effects in that watershed. High levels of ECA will change the timing, volume, and duration of peak flows. As a result, water temperatures in the watershed will be elevated since the peak flows will occur earlier rather than when summer temperatures begin to rise and will occur for a shorter duration of time. Increases in water temperature in tributaries of the American River will translate into increased water temperatures in the American River, further impairing the beneficial uses of both the tributaries and the American River.

2-13

Secondly, the increased velocity of the peak flows will increase the potential for changes in channel morphology. In watersheds exceeding the 15% ECA in the Biop as a result of this project, the BLM has not analyzed whether or not there will be any change in channel morphology or not.

2-14

Thirdly, the change in ECA has the potential to alter timing of peak flows and runoff. This is likely to affect temperature in streams. Even if no logging is conducted in RHCA's, if snowmelt is coming off quicker, there will be increases in stream temperature after the spring melt. This has the real potential to exceed temperature guidance established in the TMDL.

¹² Ibid, pp. 94, 96.

¹³ Ibid, p. 170.

¹⁴ NOAA-NMFS. 1995. Biological Opinion on the Land and Resource Management Plans for the Boise, Challis, Nez Perce, Payette, Salmon, Sawtooth, Umatilla, and Wallowa-Whitman National Forests.

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(refer to tables 3.4.7 and 3.4.8, and Figure 3.4.5).

The South Fork Clearwater River TMDL target reduction of 25% for sediment does not identify a specific time frame or mandate project specific reductions of such. Consequently, the Eastside Project would not be expected to achieve the entire TMDL sediment reduction.

Achievement of TMDL objectives would be accomplished with a variety of management and restoration actions. The BLM is currently conducting and proposing other restoration actions that would also support achievement of TMDL targets for the South Fork Clearwater River.

Again, because BLM lands comprise only 13 percent of the American River watershed and 2 percent of the South Fork Clearwater River subbasin, BLM restoration opportunities are often limited in many subwatersheds.

Comment: 2-11

Response: See response to comment 2-1 regarding roads. Also the Selected Alternative calls for 33.6 percent of the harvest to be accomplished by helicopter, more than any of the other Action Alternatives. This is an increase of 98 acres over any Alternative analyzed in the FEIS

Even with limited BLM land in the American River watershed (see comment 2-9), BLM is conducting and pursuing active restoration measures. In addition to restoration actions identified in the Eastside Project, the BLM is currently undertaking and is proposing other restoration efforts to support upward trend. See Appendix H Table H.6 in the FEIS for additional information.

Comment: 2-12

Response: We are also concerned about impacts to the smaller watersheds. Pages 145-148, provide an overview of these three watersheds, including the fish species present. The FEIS does not infer that ECA concerns are irrelevant or that these drainages do not have sensitive fish. For analysis of ECA refer to pages 176 – 178, and Appendix H, pages H-8 – H-9.

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2-15

High levels of ECA will result in lower levels of both above- and below-ground biomass. Above-ground biomass reduces surface erosion through the interception of precipitation. Below-ground biomass reduces the potential for both surface erosion and landslides. Therefore high values of ECA in the tributaries of the American River will prove difficult toward meeting the upward trend requirement and state water quality standards, particularly with regard to the mandated reductions in sediment and temperature in the South Fork Clearwater TMDL.

2-16

The assumption that 15% of the American River watershed, which is composed of Lodgepole pine, will add to the ECA is inaccurate. This fails to account for any trees in the understory (notably grand fir and Douglas fir) that are already established and would continue to grow.

Riparian Restoration

2-17

The Eastside Township project should incorporate additional restoration in riparian areas and the stream channel of the American River. We appreciate the fact that riparian restoration is accompanying this project, however we feel that more must be accomplished in order to meet requirements of the MFP and Refinements. Re-establishing the floodplain and recontouring the channel will drastically improve the habitat conditions in the 1.2 miles of proposed riparian channel restoration. The riparian planting will also help to improve habitat and reduce water temperatures in the American River.

However, increasing the number of stream miles where dredge piles and the channel would be manipulated to restore the floodplain and sinuosity of the river would drastically improve habitat conditions for sensitive and listed species while simultaneously helping to meet the upward trend requirement.

2-18

We also appreciate the fact that 1.35 miles of fish habitat in Queen Creek would be reconnected to the American River by culvert or bridge placement. Whichever crossing type is used, the crossing should accommodate 100-year flood events. All fords should either be closed and decommissioned, or the impacts of these fords should be reduced through the placement of culverts or bridges. Leaving fords in place will continue to result in erosion and sediment delivery, impacting fish and other aquatic life.

2-19

When riparian restoration occurs, all fish should be captured using electro fishing and should be relocated. Additionally, nets could be placed downstream to prevent sensitive and listed fish from entering reaches of the American River where restoration is taking place to reduce mortality.

2-20

The BLM should also recreate pool habitat and place coarse woody debris throughout the American River. Pool habitat is basically absent from the river, and pool habitat and coarse woody debris would significantly improve habitat for sensitive and listed fish species.

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In response to your same comment on the DEIS, we further clarified the water yield analyses procedures in Appendix H, page H-9 of the FEIS.

Comment: 2-13

Response: Channel morphology has been assessed in those watersheds where ECA is predicted to exceed 15% as described on page 176-178. See response to comment 2-12.

Comment: 2-14

Response: The FEIS identifies that the greatest potential to exceed temperature guidance attributed to BLM management actions would be associated with potential impacts to riparian habitats and shading (see pages 103 – 105, 137 – 138, 174 -177). Refer to Appendix H, pages H-8 – H-9, for additional discussion in regards to ECA. This project’s restoration efforts and no timber harvest in RHCAs support the South Fork Clearwater River temperature TMDL guidance. Also see comment 2-10.

Comment: 2-15

Response: See response to comments 2-12 (ECA) and 2-14 (temperature) and Table 0.2 (page ix), summary assessment of water yield, and pages 96-102 for sediment analysis and trend information.

Comment: 2-16

Response: As indicated on page 94 (Indicator 2 – Water Yield) “Dead and dying lodgepole pine will continue to contribute to ECA over the next two decades. Also on page 94, third paragraph under Alternative A, we discuss dead and dying lodgepole pine and the effects to ECA. While we acknowledged that small existing trees in the understory would eventually recover ECA conditions as the stand matures, this would likely take several decades.

Comment: 2-17

Response: We acknowledge the importance of watershed restoration efforts in the upper South Fork of the Clearwater River and specifically the American River watershed. Within these areas, we have conducted or are proposing to

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conduct a wide variety of restoration actions without logging (See Table 3.0.1).

Many of the actions noted in Table 3.0.1 have or will occur in the current Eastside Project area, specifically American River Instream Improvements, Box Sing Creek channel re-connect and fish barrier removal, and American River Restoration Projects (fish barrier removal and instream habitat improvement).

The bank re-contour and riparian vegetation planting along the American River are included in all of the Eastside Project action alternatives, including the Selected Alternative in this ROD. As shown in Appendix A, the treatments occur on all of the BLM ownership in the project area.

Comment: 2-18

Response: The Queen Creek channel reconnect is designed to accommodate fish passage and a 100-year flow event (See FEIS Appendix I). Queen Creek reconnect design criteria are described under Alternative B on page 20. FEIS Section 3.8.1.3 discusses ford's treatment alternatives. Page 263 clearly describes the current situation and what is planned for fords. As discussed, all existing active live water fords on BLM land will either be hardened or closed as shown in FEIS Table 3.8.3 and Table 3.5.1 in this ROD.

Comment: 2-19

Response: Refer to Appendix I, for a description of proposed restoration measures. Refer to FEIS Table 2.3.1; Project Design Measures (adopted as part of this ROD, Appendix C) Number 21, for additional information regarding instream work in fish-bearing streams. Relocating fish (e.g., electrofishing) out of areas where riparian restoration takes places would not be practical in a stream the size of the American River, primarily because of stream flow conditions and low conductivity. The riparian restoration primarily involves re-contouring streambanks; and seeding and planting of riparian vegetation. The restoration efforts would primarily occur in areas above the mean high water level.

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2-21 While restoration activities occur, the BLM should monitor turbidity levels. The lethal concentration for 50% of Chinook salmon (LC50) in confined laboratory settings is 488 mg/L for 96 hours.¹⁵ The BLM should insure that the LC50 concentration is not exceeded.

Soil Resources

Roads, OHV Trails, & Skid Trails

2-22 As reiterated throughout these comments, the most concerning aspect of the project is the high number of proposed new and temporary roads. The BLM's own analysis indicates that roads are the current primary source of sediment in the watershed.¹⁶ Yet the project proposal for the Eastside Township logging project includes up to 15.1 miles of temporary roads, 2.12 miles of permanent roads, would designate up to 2.39 miles of OHV trails, and would only result in the decommissioning of up to 3 miles of existing roads. Although most of the road-related aspects of this project would involve temporary roads, drastic, short-term sediment yield occurs within the first year or two following construction of a road, as well as during decommissioning of the temporary roads.

2-23 Furthermore, roads are predominately used to facilitate the types of yarding methods that result in high levels of soil disturbance compared to helicopter yarding. A review of the ecological effects of roads and skid trails by Trombulak and Frissell showed that soil resource impacts related to skid trails in northeastern California persisted 40 years after the logging concluded.¹⁷ If the BLM is to conform with the upward trend requirement in the MFP, road-related and management-related sediment must be drastically reduced. Decreasing the amount of new and temporary road construction, increasing the proportion of helicopter yarding, and increasing the amount of road decommissioning in the project area would help to reduce the effects of this project and meet the upward trend requirement.

2-24 At the very least the BLM should avoid the proposed road construction involving soils rated high for erosion potential.¹⁸ As Trombulak and Frissell point out in their review, roads are the responsible catalyst for the majority of slope failures and gully erosion in steep, forested landscapes where logging activities have occurred.¹⁹ Ideally, all unauthorized OHV routes should be closed and rehabilitated, any skid trails should be designated, proposed new and temporary road construction should be reduced, the proportion of helicopter logging should be increased, and more roads should be decommissioned. As the BLM's own analysis points out, additional sediment delivery into the American River may adversely affect listed and sensitive fish species.

¹⁵ NOAA-NMFS. 2005. Endangered Species Act - Section 7 Consultation Biological and Conference Opinion Magnuson-Stevens Fishery Conservation and Management Act Essential Fish Habitat Consultation for the American and Crooked Rivers Project, Nez Perce National Forest. Citing Stober et al. 1981; Newcombe and MacDonald 1991; Waters 1995.

¹⁶ FEIS, p. 114.

¹⁷ Trombulak, S.C., and C.A. Frissell. 2000. Review of ecological effects of roads on terrestrial and aquatic communities. *Conservation Biology*. 14(1): 18-30.

¹⁸ FEIS, p.118.

¹⁹ Trombulak, S.C., and C.A. Frissell. 2000. Review of ecological effects of roads on terrestrial and aquatic communities. *Conservation Biology*. 14(1): 18-30.

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Comment: 2-20

Response: We agree with your comment. Table 3.0.1 and Section 3.6.3.4-Cumulative Effects (page 172), identifies past projects BLM has undertaken to create pool habitat and place large woody debris. The BLM also plans to create pools and place woody debris in dredge mined stream reaches in American River (*American River Restoration Projects USDI-BLM 2006*), which includes stream segments within the project area.

Comment: 2-21

Response: We acknowledge that turbidity should be monitored (see FEIS Appendix E-Monitoring Plan, page E-5). By complying with state water quality standards the LC50 concentration (488 mg/L for 96 hours) will definitely not be exceeded from any proposed BLM management actions. As stated on page E-5, there is a turbidity monitoring requirement for riparian and channel restoration actions (pre-, during, and post-) to ensure that potential project attributed turbidity or sediment impacts are minimized to native and special status fish. This monitoring plan has been incorporated into this ROD as Appendix D.

Comment: 2-22

Response: A full discussion on sediment is disclosed in the FEIS Section 3.4. The effects of the new permanent roads and the use of temporary roads are disclosed along with the effects (including beneficial) of the restoration actions. The short- and long-term effects as well as cumulative effects of the action alternatives were considered in making the decision outlined in this ROD.

Also see our responses to comments 2-1, and 2-11 that address these concerns.

Comment: 2-23

Response: The majority of temporary roads proposed for construction occur in areas that have low sediment delivery potential to streams. A full discussion on sediment is disclosed in the FEIS Section 3.4. A discussion on upward trends and the effects of the project is disclosed in FEIS Appendix H. Also see response to comment 2-1.

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The Selected Alternative as outlined in this ROD calls for less road construction than any of the other Action Alternatives, i.e., 10.0 miles of temporary road and 0.0 miles of permanent road. The Selected Alternative calls for 33.6 percent of the harvest to be accomplished by helicopter, more than any of the other Action Alternatives.

Comment: 2-24

Response: Proposed road locations are chosen based on a combination of criteria as stated in Section 3.8.1.3. As table 3.5.3 page 118 illustrates acreages involved are relatively small and there are differences between alternatives (reflecting the differences in the amount of helicopter logging).

The Eastside Project action alternatives are not proposing to log, burn, or build roads on slopes susceptible to slope failure (e.g., landslide prone).

Design criteria have been developed for this project and adopted in this ROD as Appendix C to limit detrimental soil physical disturbance of temporary roads, skid trails and landings and rehabilitation following use. Section 3.8.2 in the FEIS contains a full discussion of road decommissioning.

These and other factors were considered in alternative formulation and the decision outlined in this ROD.

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Delineation of PACFISH Buffers

2-25 | There was some discussion of whether or not the dredge ponds should be used in the delineation of PACFISH buffers. If peak flows in the American River are at a high enough volume such that overland flow occurs from the river into the dredge ponds or from the dredge ponds into the river, PACFISH buffers should be delineated from the outside edge of these ponds. If management- or logging-related sediment is delivered into the dredge ponds an overland flow occurs, sediment could conceivably be delivered from the dredge ponds into the American River. This conservative approach is warranted given the presence of sensitive and listed fish in the American and South Fork Clearwater Rivers.

Slopes

2-26 | One conservative approach toward avoiding detrimental impacts in the project is the fact that the BLM will be applying PACFISH to all areas with high landslide hazard and mass failure potential. However, there is not a standard or guideline to be applied regarding steep slopes. The BLM should, for example, avoid logging on all slopes >35%, or at the very least avoid ground-based skidding. Reducing both above- and below-ground biomass will increase the potential for erosion and mass failure. Above-ground biomass intercepts precipitation and reduces the volume and force with which precipitation hits the soil surface. Below-ground biomass is important for holding soil in place. Therefore both above- and below-ground biomass are important on steep slopes, warranting the avoidance of logging in such locations.

Treatments

Yarding Methods

2-27 | The yarding methods associated with accessing treatment units via logging roads exacerbate the effects of the roads themselves due to soil and surface disturbances. In a review of 16 different studies, Megahan et al. found that helicopter yarding resulted in an average of 4% soil disturbance compared to 9.1% for skyline, 23.9% for cable, and 33.5% for tractor yarding.²⁰ Where silvicultural treatments are absolutely necessary, helicopter logging should be employed to reduce soil and ground disturbance to limit erosion and sediment delivery. Where helicopter logging is not possible, winter logging could be applied to reduce soil disturbances when snow pack exceeds 2 feet. Furthermore, increased soil disturbance creates seed beds for the establishment of noxious weeds and invasive plants.²¹ Helicopter yarding and winter logging also have the added benefit of reducing impacts to threatened, endangered, and sensitive plants such as Macfarlane's four-o'clock, Spalding's catchfly, Idaho barren strawberry, Payson's milkvetch, Case's corydalis, and Candystick.

²⁰ Megahan, W.F. 1981. Nonpoint source pollution from forestry activities in the western United States: Results of recent research and research needs. P. 92-151 in Proc. U.S. forestry and water quality: What course in the 80's? Water Pollution Control Federation. Washington, D.C.

²¹ Trombulak, S.C., and C.A. Frissell. 2000. Review of ecological effects of roads on terrestrial and aquatic communities. *Conservation Biology*, 14(1): 18-30.

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Comment: 2-25

Response: As explained to this same comment on the DEIS (FEIS comment 4-21) this does not pertain to the Eastside DEIS. This was a topic of discussion on the Whiskey South project field trip conducted in June 2006. However, PACFISH standards are used in the Eastside Project RHCA delineations. Mean high flow connected American River dredge ponds are considered in the delineation of PACFISH buffers (i.e., RHCAs). No Eastside Project logging is proposed to occur within RHCA buffers.

Comment: 2-26

Response: PACFISH buffers should minimize potential for adverse sediment delivery to live waters (see pages 158-159). Table 2.3.1 contains Project Design Measures (Adopted in this ROD as Appendix C) that deal with landslide prone and slope concerns. Items 1 and 5 deal specifically with landslide prone. The MFP on page II-4 limits the use of ground based yarding systems on slopes exceeding 35%. The yarding design of the Eastside project is in conformance with the MFP. Item 6 incorporates the State of Idaho Best Management Practices, several of which relate to slope and logging practices and can be viewed at www.idl.idaho.gov/Bureau/forasst.htm. The project was designed so that sustained slopes >35% are either cable or helicopter yarded.

Comment: 2-27

Response: The range of alternatives was developed in response to the Purpose and Need for the Action and issues identified through scoping. (Refer to FEIS Chapters 1 and 2). In response to comments the Selected Alternative calls for 33.6 percent of the harvest to be accomplished by helicopter, more than any of the other Action Alternatives. The Federally listed MacFarlane's four-o'clock and Spalding's catchfly do not occur, and no suitable habitat exists for these species within the project area. No logging is proposed to occur in RHCA buffers, which would protect known populations of Case's corydalis and suitable habitats (i.e., riparian).

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Feathering & Diameter Limits

2-28

The main purpose for the Eastside Township logging project is to reduce hazardous fuels in the township and the Wildland Urban Interface (WUI). According to the BLM, effective fuels treatments include reducing the continuity of the forest canopy²². While increasing crown spacing will reduce the potential ability of a fire to “crown” and create a high intensity fire, it is not necessary to maintain space between every crown. If every single tree crown is spaced from neighboring trees, the logging units will be left with a uniform, plantation-style appearance.

As part of the Eastside Township project, the BLM should consider employing some diameter limits. For example, 20 inches for ponderosa pine, 20 inches for Douglas-fir, 21 inches for Engelmann spruce, and 21 inches for grand fir. Individual trees of each respective species with these diameters or larger should be sufficiently self-pruned that ladder fuels are not present to carry a fire into the crown. Trees with these diameters or larger are also more likely to survive a fire. These diameter limits will retain the fire-resistant individuals, will produce a more naturally appearing treatment, and will still accomplish the objectives of the project. Although not all individuals will be uniformly spaced, “clumps” of individuals should be spaced such that a crown fire would not carry in the logging units.

2-29

Near the edge of the units, removal of individual trees should be reduced to produce a “feathered” appearance rather than an “edge” effect. This practice will not only benefit wildlife by reducing edge effects but will also result in a more aesthetically pleasing appearance.

2-30

In lodgepole pine stands, the BLM should be particularly cautious about uniform crown spacing. This practice will make lodgepole pine vulnerable to blow down during high winds. Clumping or avoiding logging in lodgepole pine altogether will maintain low levels of blow down.

OHVs

2-31

The proposal to designate up to 2.39 miles of additional OHV trails²³ as part of this project is very concerning. High road densities in this area have the real potential to encourage irresponsible OHV and motorcycle use. Spur roads lead OHV users to dead-end locations where they are more likely to pioneer new unauthorized or illegal routes. Gated roads also have the effect of encouraging OHV users to go around gates to find out what the agency is trying to prevent them from accessing. Higher densities of motorized trails coupled with irresponsible motorized use fragments wildlife habitat and incurs undue wildlife energy expenditures.

2-32

Motorized recreation also conflicts with other forms of recreation. These include hiking, mountain biking, scenic and wildlife viewing, primitive hunting, and horseback riding.

2-33

OHVs also increase the potential for the spread of noxious weeds and invasive plants. Although the BLM exercises BMPs to inspect and clean equipment before entering the field, the agency cannot reasonably expect users to inspect and clean their own equipment voluntarily.

²² FEIS, p. 54.

²³ *Ibid.*, p. 266.

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No known populations of Payson’s milkvetch are in proposed logging areas. The Project Design Measures Table 2.3.1 includes actions to mitigate impacts to Candystick (item 40) and Idaho Barren strawberry (item 41) as well as addressing noxious weeds (items 33-39). Refer to Section 3.3.4 Threatened, Endangered and Sensitive Plants for additional information.

Comment: 2-28

Response: Fuels reduction includes reducing the forest canopy as well as decreasing surface fuels, lowering fuel bed depth and increasing fire-resistant species. As described in the Alternatives (2.4.4 - 2.4.6) a variety of treatment methods are proposed. The intent of treatments is to obtain the best results from a silvicultural standpoint, using a variety of treatments to fit the area. Treatments, including irregular shelterwood cuts, would achieve these variations and all action alternatives favor retention of large trees. Appendix D, Table D.4 displays the different treatment types and acreage for each alternative, based on the current size and species composition of the stands. The Treatment maps in Appendix A are illustrative of where the different methods would be applied. Section 3.3.3.2 (pages 70-71) discloses the effects to tree size class distribution which is comparable to the Historic range (see page 250).

Comment: 2-29

Response: We agree and have included irregular shelterwood treatments as part of our project. Refer to irregular shelterwood descriptions in Appendix B page B-15.

Comment: 2-30

Response: We agree with you and this is why individual stands have varying treatments prescribed. See Comment 2-29.

Comment: 2-31

Response: As analyzed in Alternative D, we proposed to convert 2.39 miles of existing roads to ATV trails as shown on Table 3.8.3. The road to trail conversion would reduce the running surface of the roads, allow for reduction of chronic sediment sources (e.g., closing fords, constructing ATV bridges), and restrict full size vehicle use of these roads while

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allowing for a safety exit of the area.

Comment: 2-32

Response: Thank you for your comment on the Eastside DEIS.

Comment: 2-33

Response: Using BMPs is expected to help reduce the spread of noxious weeds. We will continue public outreach efforts. Off-route vehicle use is not proposed under any of the action alternatives. Also see comment 2-31.

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2-34 | Lastly, OHVs increase the threat of human-related fire starts. Most off-road vehicles do not have spark arresters. The fact that OHVs lead to soils disturbances, heighten the potential for the spread of noxious weeds, and increase the potential for fires indicates the clear need for a reduction in road densities in the Eastside Township Project area.

Wildlife

2-35 | The main concern with wildlife also relates to the number of new roads, temporary roads, and the relative lack of road decommissioning in the Eastside Township project. As the BLM points out in its own analysis, roads in the project area will increase human/wolf interactions and reduce elk security²⁴ in addition to general wildlife habitat fragmentation. This is just one more reason for additional reductions in road densities in the project area.

2-36 | With regard to goshawks, the BLM suggests that the guidelines for goshawks in Reynolds et al²⁵ are not appropriate because habitat conditions are different in the Northern Region compared to the Southwest Region.²⁶ However, given the absence of any management recommendations for the Northern Region, the BLM should apply the guidelines from Reynolds et al to reduce impacts to goshawks.

2-37 | There is also a lack of design features in the project to reduce impacts on species that depend upon structural diversity including snags and downed woody debris. The BLM correctly points out that the lack of structural diversity is not conducive to fishers, and the removal of both green and dead trees will reduce black-backed woodpecker habitat.²⁷ The BLM should impose diameter limits to recruit snags and downed woody debris and implement the Forest Service, Region 1 Snag Protocol for the sake of these and other wildlife species in the project area.

Roadless Area Impacts

2-38 | As part of the project proposal for the Eastside Township project the BLM is proposing to construct up to 1.89 miles of road within unroaded lands adjacent to the Meadow Creek Inventoried Roadless Area (IRA)²⁸. The BLM should avoid road construction and logging in these unroaded areas in order to maintain the natural integrity and wildlife habitat found there. Although the unroaded lands managed by BLM are under a different jurisdiction than the Meadow Creek IRA, the adjacency of these two areas encompasses a larger, intact area without roads. Road construction and logging in the unroaded areas will do little to meet the purpose and need of the project since the unroaded BLM land and the Meadow Creek IRA are farther from

²⁴ Ibid, pp. 202, 251.

²⁵ Reynolds, R.T., Graham, R.T., Reiser, M.H., Bassestt, R.L., Kennedy, P.L., Boyce, D.A. Jr., Goodwin, G., Smith, R., and E.L. Fisher. 1992. Management recommendations for the northern goshawk in the southwestern U.S.. GTR-RM-217. Fort Collins, CO: USDA, Forest Service, Rocky Mountain Forest and Range Experiment Station.

²⁶ FEIS, p. 211.

²⁷ Ibid, pp. 226, 242.

²⁸ Ibid, p. 270.

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Comment: 2-34

Response: OHVs are currently using the roads that are proposed to be converted to ATV trails. Under all action alternatives, a decrease in road density and motorized routes would occur in the long term (refer to Chapter 2, and Appendix I and J). Also see response 2-31.

Comment: 2-35

Response: The ability to decrease existing roads is extremely limited due to the limited BLM landownership, low amount of BLM roads in subwatersheds, and ingress and egress needs of adjacent landowners. Implementation of any of the action alternatives would reduce road densities in the long term. It is acknowledged that short term (1 – 3 years) increase in road densities would occur from action alternatives and use of temporary roads. However, public road closure actions would restrict public motorized use of these temporary roads (and are a design feature for the project). Long term reduction in elk security is slightly lower than existing conditions, and is primarily attributed to opening up of timber stands and size of the units and not an increase in motorized vehicle routes. The gray wolf population has steadily increased and no land use restrictions are required (see pages 200 and 201) due to wolf recovery. Page 201, states, “Watershed restoration actions, and post-harvest slash treatments are not expected to negatively impact wolves, elk or their habitats considerably regardless of alternative.”

Comment: 2-36

Response: There is a conservation strategy for Idaho (Patala et al. 1995) that is being used for the Eastside Project. See page 212, regarding specific goshawk management guidance and analysis of such. No additional mitigation is deemed necessary to maintain goshawk viability in the project and analysis area, because suitable habitat is 205 percent of historical amounts in the American River watershed (USDA-FS, 1998b).

Comment: 2-37

Response: We will implement the snag management guidance in the BLM Chief Joseph MFP (1981), as amended, and the North Idaho Timber

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Management EIS. All action alternatives include a variety of treatments that include snag retention and recruitment. The project treats approximately 40% of the area and retains structure (not clear cuts). There will be approximately 2,045 acres untreated with increasing numbers of snags and down woody debris.

Also see response to comment 2-28.

Comment: 2-38

Response: The 1.89 miles of analyzed temporary road are on the Nez Perce National Forest. They comprise less than six acres of disturbance. Much of the areas have not retained high unroaded characteristics due to past activities in the area and are within the community protection area for the Erickson Ridge Subdivision.

The NPNF is currently revising the Land and Resource Management Plan (Forest Plan), and edits to the July 9, 2005 Draft Roadless Area Inventory maps have been completed. The January 2006 Proposal does not include this area in the “Areas Under Consideration for Recommendation as Wilderness (Draft Roadless Inventory)”. They are still classified as Generally suitable for timber production, where timber production is a management objective, as delineated in the current Forest Plan.

The construction of temporary roads in the area noted in this comment has been dropped from the Selected Alternative. Also see comments 2-2 and 2-39.

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Elk City than other parts of the project area. The BLM should maintain the natural integrity and wildlife values in the unroaded area.

The inclusion of the cursory analysis of unroaded impacts from the American and Crooked River Project failed to recognize the flaws from that FEIS. As pointed out in our appeal over the American and Crooked River Project, the unroaded areas should have been included in both the 1987 Forest Plan, as well as preliminary documents related to the ongoing Plan Revision.

The analysis found that logging of uninventoried roadless areas does not harm their roadless character. This is contrary to agency history and case law, which firmly declares logging roadless areas (whether inventoried or not) is an irreversible and irretrievable commitment of resources.

The FEIS and ROD for the American and Crooked River Project failed to look at the impacts of logging on future wilderness suitability as required by law. See *California v. Block*.

The decision to log a Roadless area, whether inventoried or not, precludes the area from being added via the ongoing revision of the Forest Plan. The fact that it was erroneously withdrawn from the 1987 Forest Plan is important, yet the plan revision is much more critical.

In *National Audubon Society v. Lyons*, 46 F.3d 1437 (9th Cir. 1993) the court ruled:

"The Audubon Society alleges the Forest Service completely ignored the roadless nature of the timber sales when it prepared the environmental assessments. In its defense, the Forest Service repeats its argument that, under the OWA, it was not required to consider the roadless nature of the four timber sales. We again reject this argument, and we agree with the district court that the decision to harvest timber on a previously undeveloped tract of land is "an irreversible and irretrievable decision" which could have "serious environmental consequences." See California v. Block, 690 F.2d 753, 763 (9th Cir. 1982). National Audubon at 1448. (Emphasis added)."

In *Kettle Range Conservation Group v. USFS*, 971 F. Supp 480 (DCt. OR, June 17, 1997) the court again held logging in roadless areas, including ones that are uninventoried, is an "irretrievable commitment of resources." In this case, the logging units were alleged to constitute an uninventoried roadless area next to the Thirteenmile Roadless Area thus violating NEPA. *Id* at 481. This is similar to the situation in the American and Crooked River and now the Eastside Township Projects.

This finding is not new. In *Wyoming Outdoor Coordinating Committee v. Butz*, 484 F.2d 1244 (10th Cir. 1973) the 10th Circuit's quote of *Sierra Club v. Butz* 3 ELR 20071 (N.D. Cal.), allows: "no timber cutting, road building or acts that would change the wilderness character of such areas." Under this language, timber cutting (logging) changes roadless and wilderness character.

All cases are applicable here. The Forest and BLM fail to recognize, as case law requires, that logging Roadless areas are an irretrievable commitment of resources. This is in direct contradiction to the court findings and past agency policy.

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Comment: 2-39

Response: The areas described are not a part of the West Meadow Creek Inventoried Roadless Area (IRA). The boundaries of the IRA were defined in the Forest Plan and used in the FEIS. This is the only official boundary of the IRA and, as such, the areas with unroaded characteristics are not a part of the IRA. IRAs and Areas with Potential Unroaded Characteristics were analyzed in Section 3.8.4.3. Also see responses to comments 2-2 and 2-38.

2-39

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Furthermore, the agency itself has found that logging (including helicopter logging) alters Roadless areas and wilderness character. On the Payette and Boise National Forest, salvage sales as a result of the salvage rider, which included helicopter logging, the agency concluded that the Roadless area would be negatively affected by helicopter logging under similar circumstances.

On the Middle Fork Timber Sale on the Nez Perce National Forest, the FEIS concluded logging (much of which was helicopter logging) results in irreversible and irretrievable commitments of resources. (Middle Fork FEIS, page 3-94, October 1997, Moose Creek Ranger District, Nez Perce National Forest).

There is no analysis on the shape of the area. There is no quantification of the impacts (no chart or map are included in FEIS) to Roadless areas in terms of integrity, size, naturalness, wildness, or other roadless values. How long will the impacts last from project (clearcuts, temporary roads, versus other kind of logging proposed for the area).

In essence, the cumulative effects analysis does not enlighten us on the impacts to Roadless areas because it is based upon an erroneous assumption that there are no irretrievable and irreversible commitments of resources. As such, there is no analysis to the impacts on Roadless areas.

California v. Block 690 F.2d 753 (9th Cir. 1982) laid out specific requirements for analysis of Roadless areas. *Idaho Conservation League v. Mumma*, 956 F.2d 1508 (9th Cir. 1992) made those applicable to site-specific analysis. In summary, they are:

- a) Comprehensive descriptions of Roadless areas including the areas' unique characteristics: landmarks, rare and endangered species;
- b) Assessment of wilderness value: tourism, sales of wilderness oriented recreational equipment, conservation of wildlife and flora populations, soil conservation and stability, watershed protection, clean air and water;
- c) Discussion of impact of Nonwilderness designations upon each area's wilderness characteristics and values: primary and secondary impacts, methods of mitigation, and environmental damage;
- d) Consideration of the effect of development on future opportunities for wilderness classification: the effect upon the benchmark characteristics identified in the Wilderness Act; and
- e) An attempt to balance economic benefits of Nonwilderness designation for an area against the consequent environmental loss.

Both the American and Crooked River Project FEIS and Rod, and now the Eastside Township FEIS are inadequate in this analysis.

The above noted court cases require an analysis of the impacts on the areas wilderness characteristics and suitability.

It is the Forest Service itself that set up the policy of site-specific EISs on development of Roadless area in the agency appeal decisions and subsequent court decisions on the Idaho

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Panhandle and Flathead National Forests. In the court decision on the IPNF Forest Plan the court concluded a site-specific analysis is where the irreversible and irrevocable decision is made (*Idaho Conservation League v. Mumma*, 956 F.2d 1508 (9th Cir. 1992))

The above referenced case is the result of a challenge to the forest plan's analysis/evaluation/allocation of Roadless areas. The court determined that it was the site-specific decision, not the forest plan, that analyzed the impacts of development on the Roadless area and was, hence, the background document for a decision on the fate of Roadless areas. Yet here, the FEIS concludes that the value of these lands for wilderness designation won't be considered in this analysis or the ROD.

The action agencies are required to analyze the site-specific impacts to Roadless areas. The American and Crooked River Project FEIS and Eastside Township FEIS defer this decision to a broader planning stage (Forest Plan Revision), yet precludes that, by logging and building roads in these areas. This stands in contrast to what the law requires.

Finally, the FEIS fails to identify any unroaded areas adjacent to existing Forest Service roadless areas. As laid out in the 1998 PACFISH Biological Opinion, "Wilderness, unroaded, and large blocks of primitive lands contain most of the best available remaining habitat for steelhead and salmon (Frissell 1993; Thomas et al. 1993; Eastside Forests Scientific Society Panel 1994; Rhodes et al. 1994; and Quigley and Arbelvide 1997)."

Grazing

The analysis of the existing condition and the impacts from grazing in the Eastside Township FEIS needs to incorporate a more thorough description of how grazing has influenced the American River Watershed. Disclosure and analysis of grazing in the watershed is necessary to adequately describe the cumulative effects and discern whether or not changes in grazing management are necessary. Exclusion of grazing should occur within PACFISH buffers in the project area in order to improve riparian habitat and comply with state water quality standards and TMDLs. Areas where riparian restoration is to take place should be excluded from grazing to facilitate a more rapid recovery and improve salmonid spawning and rearing habitat.

2-40

2-41

Letter 2: Idaho Conservation League

Comment: 2-40

Response: See response to comment 2-2. The FEIS provides a description and analysis of the areas having possible unroaded characteristics. Refer to Sections 3.8.4.3, pages 266-270 and Map 15 in the FEIS.

Comment: 2-41

Response: The issue analyzed in the FEIS was the effect the vegetation and fuels project would have on livestock grazing as an authorized use. Effects of livestock grazing within the project area were not identified as a major issue because there are only two grazing allotments on BLM land involving 60 AUMs of use. Grazing impacts to various resources is included in the description of existing conditions and impacts analysis.

Section 3.6.2 (pages 140-154) discloses the existing conditions that include the impacts of grazing as well as other uses. Section 3.12 (page 282) describes the current grazing uses and states that livestock grazing can be limited to avoid conflicts with the project. A design feature that calls for livestock restrictions following restoration activities is included in Table 2.3.1, that has been adopted as Appendix C of this ROD.

Letter 3: US Environmental Protection Agency



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
 1200 Sixth Avenue
 Seattle, WA 98101

RECEIVED
 JUN - 1 2007

May 29, 2007

Reply To
 Attn Of: ETPA-088

Ref: 05-038-BLM

Robbin B. Boyce, Project Lead
 Bureau of Land Management
 Cottonwood Field Office
 1 Butte Drive
 Cottonwood, ID 83522-5200

Dear Mr. Boyce:

The U.S. Environmental Protection Agency (EPA) has reviewed the final Environmental Impact Statement (EIS) for the **Eastside Township Fuel and Vegetation Project** (CEQ No. 20070163) in Idaho County, in northern central Idaho. Our review was conducted in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act. Section 309 specifically directs EPA to review and comment in writing on the environmental impacts associated with all major federal actions.

In our comments on the draft EIS for this project in September 2006, EPA expressed environmental concerns about the project due to its anticipated impacts to water quality. We recommended that the assessment of cumulative impacts include other watershed restoration activities and that additional helicopter logging be considered to reduce sediment yields to streams.

EPA appreciates Bureau of Land Management responses to comments on the draft EIS. We understand and appreciate the cost balance considerations laid out in Table 3.13.3. Because of continued concerns about impacts of short term sediment yields to listed streams, we recommend that additional measures be taken to reduce sediment loading and that these be included in the Record of Decision. We still believe that, among other measures that can be taken, increased use of helicopter logging and/or decrease in temporary road construction would contribute significant reductions in sediment yields, thus helping to improve water quality in the project area.

Thank you for the opportunity to provide comments on the final EIS for this project. If you have questions regarding this letter, please contact Theo Mbabaliye at (206) 553-6322 or myself at (206) 553-1601.

Sincerely,

Christine B. Reichgott, Manager
 NEPA Review Unit

3-1

Letter 3: US Environmental Protection Agency

Comment 3-1

Response: While none of the streams in the project area are listed streams for sediment, we recognize that they do feed into the South Fork Clearwater River which is listed for sediment. This was considered in the rationale for the decision outlined in this ROD. Please see the description of the Selected Alternative and Table 3.5.1 in this ROD.

An implementation plan for the South Fork Clearwater River TMDLs was completed in 2006, and the BLM is a continuing cooperator in this process. No single project is expected to achieve the entire TMDL sediment reduction goal. This project is predicted to result in a net decrease in sediment yield to the South Fork Clearwater River over time (refer to Tables 3.4.7 and 3.4.8, and Figure 3.4.5 in the FEIS).

The Selected Alternative calls for less road construction than any of the other Action Alternatives, i.e., 10.0 miles of temporary road. This is 5.1 miles less than the Preferred Alternative in the FEIS. Also the Selected Alternative includes 0.0 miles of permanent road construction. The Selected Alternative reduces the amount of tractor and cable yarding acreage by 202 acres compared to the Preferred Alternative. The acres of vegetation/fuels treatments in the Selected Alternative is 138 acres less than in the Preferred Alternative in the FEIS.