USDI, Bureau of Land Management
Three Rivers Resource Area, Burns District
Hines, Oregon 97738

Decision Record
for

Otis Mountain/Moffet Table Fuels Management Project
Environmental Assessment

OR-06-025-056

DECISION RECORD

DECISION: Having considered the risks and effects analyzed within the Otis Mountain/Moffet Table Fuels Management EA, it is my decision to implement a portion of the proposed action. It is my decision to implement all of the rangeland burning and silvicultural thinning outside of the Rudy treatment area in the northeastern corner of the project area. A portion of the silvicultural thinning treatments will be accomplished under stewardship contracting authority. Implementation of the rangeland prescribed burning portion of the proposed action on public lands and the privately owned lands of project cooperators within the Otis Mountain, Moffet Table, Birch Creek, Mule Creek, Newell Field, and Big Upson Field grazing allotments will occur over the next 12 years. It will accomplish the following objectives:

- Reduce the woody fuel loading within western juniper encroached mountain big sagebrush communities in the project area. Reduce 1-one hour and 10-hour time lag fuels[1] by a mean total of 90 percent and 100-hour fuels by a mean total of 75 percent.

- Move mountain big sagebrush/bunchgrass plant communities and hydrological conditions within the project area toward historic conditions by reducing live western juniper density by a mean total of 70 percent within burned areas.

- Reintroduce fire as a disturbance process in mountain big sagebrush/bunchgrass, low sagebrush/bunchgrass, and Wyoming sagebrush/bunchgrass communities within the project area.

- Reduce western juniper encroachment into key wildlife habitat dominated by bitterbrush, mountain mahogany, aspen, or riparian hardwoods by 90 percent within the project area while maintaining habitat values.

[1] **Timelag Class:** A method of categorizing fuels by the rate at which they are capable of moisture gain or loss, indexed by size class. One hour fuels typically dry within one hour and are ¼ inch or less in diameter. Ten hour fuels generally dry within 10 hours and are ¼ inch to one inch in diameter.

- Improve the quality of wildlife habitat within the project area. Big game and sage-grouse habitat values that have been degraded by juniper encroachment within the project area would be enhanced under the proposed action.

- Improve the quality and quantity of forage available to livestock within the project area.

Implementation of thinning actions in the Bluebucket treatment area and within the pine woodland stands scattered throughout the northern one half of the project area will accomplish the following objectives:

- Reduce fuel loading and continuity within ponderosa pine dominated forest and woodlands within the Bluebucket treatment area and scattered woodland stands within the project area. This includes reducing canopy closure of these pine stands to a mean of 30% across the landscape and raising the base canopy height to a mean of 20 feet above the ground surface. Surface fuels in these pine stands would be reduced from an average of seven tons per acre to three tons per acre.

- Improve the vigor and resiliency of pine forest in the Bluebucket treatment area and pine woodlands throughout the project area to wildland fire, insects, disease, and other disturbances. The structure and composition of these stands would be shifted toward historically prevalent conditions.

- Capture the economic value of cut trees as sawlogs and biomass where feasible. This would reduce treatment costs incurred by the agency and supply raw materials and jobs that contribute to community stability.

In addition, implementation of the proposed action would enhance watershed values, cultural resources and visual resources. Impacts on air quality, recreation, soils, noxious weeds, and water quality would be completely avoided or minimized through project design and monitoring.

Rationale for Decision: The decision to authorize the implementation of a portion of the Otis Mountain/Moffet Table Fuels Management Project proposed action has been made in consideration of all potential environmental impacts. The proposed action conforms with BLM planning directives and federal fire management policy, as described in the National Fire Plan (2000), A Collaborative Approach for Reducing Wildland Fire Risks to Communities and the Environment: Ten-Year Comprehensive Strategy (2001), and the local Harney County Community Wildfire Protection Plan (2005).

The proposed action will meet the fuels reduction objectives described in the purpose and need for action in the EA. It also meets the goals of providing greater protection to human life, reducing risk and cost of severe wildfires, sustaining the health and function of fire-adapted ecosystems, minimizing adverse effects of fire suppression while meeting other resource objectives.

The proposed action will move the structure and composition (spatial distribution) of ponderosa pine dominated forests and woodlands toward conditions that existed historically. Forest and woodland conditions that resemble conditions that existed prior to Euro-American settlement are more resilient to disease and insect outbreaks.

The proposed action would capture the economic value of cut trees as sawlogs or biomass through the use of stewardship contracting. Stewardship contracting allows private companies and individuals to retain forest products in exchange for services such as thinning trees and removing hazardous fuels. This would reduce costs incurred by the agency and contribute to the economy of the local community or region.

The proposed action would interrupt the transition of sagebrush-bunchgrass plant communities to juniper woodlands within the planning area. Fire would be restored as a key disturbance process within the planning area to an extent feasible under the constraints of human safety, private property values, and resource values.

The proposed action would enhance big game winter range and sage-grouse habitat within the project area.

The quality and quantity of forage available to livestock within the project area would be improved under the proposed action.

The proposed action would allow the BLM and owners of private lands within the project area to cooperatively address common fuels reduction and rangeland restoration goals.

Two action alternatives were considered but eliminated from detailed analysis. These included a prescribed fire only alternative, and an alternative that would reduce the influence of western juniper on rangelands through the use of herbicides. These alternatives were not fully analyzed because they would not likely meet project objectives for juniper mortality and fuels reduction; and may not allow for maintenance of certain resource conditions.

The No Action alternative was not selected because it does not meet the purpose and need of the proposed action. The No Action alternative would not conform with national and agency direction for fire and fuels management planning. The No Action alternative would be inconsistent with the Harney County CWPP.

PUBLIC INVOLVEMENT

Public involvement consisted of separate face-to-face meetings with all involved permittees, potential cooperators, the Harney County Circuit Court, and the Oregon Department of Fish and Wildlife. The proposed action was directly mailed to the Burns Paiute Tribal council for review in March of 2006 and a presentation concerning the project was made to tribal members in July of 2006.

On June 25th, 2007, a copy of the EA and appendixes and FONSI (Finding of No Significant Impact), were sent to 22 individuals, groups and agencies that had expressed an interest in the project. Also, a legal notice requesting public comment to the EA and FONSI

appeared in the *Burns Time Herald* newspaper of Burns. The EA and FONSI were released for public comment from June 19, 2007 to July 20, 2007. As a result of this scoping, two letters were received. The BLM response to these comments is contained in Addendum 1.

CONFORMANCE WITH LAND USE PLANS, POLICIES AND PROGRAMS

The proposed action is in conformance with the *Three Rivers Resource Management Plan, Record of Decision, and Rangeland Program Summary,* September 1992 (ROD/RMP). I have reviewed this ROD/RMP and determined that the Otis Mountain / Moffet Table Fuels Management proposed action conform to the land use plan terms and conditions as required by 43 CFR 1610.5 (BLM Handbook H1790-1, Illustration 3). The Otis Mountain / Moffet Table proposed action is designed to implement the ROD/RMP direction.

It is in conformance with Section 7(a)1 of the Endangered Species Act.

It is in compliance with Federal laws that mandate the management of public land resources (Federal Land Policy and Management Act of 1976).

It is in compliance with the various Federal laws, regulations, and Executive Orders dealing with cultural resources. In addition, the proposed action is in conformance with State, local, and Tribal land use plans, laws, and regulations.

The decision does not result in any undue or unnecessary environmental degradation.

ADMINISTRATIVE REVIEW

The decision described in this document is a forest management decision and is subject to protest by the public. In accordance with Forest Management Regulations at 43 CFR 5003, protests of this decision may be made within 15 days of the publication of a notice of decision in a newspaper of general circulation.

This notice of decision will be published in the *Burns Times Herald* newspaper on September 26, 2007. To protest this decision a person must submit a written protest to Joan M. Suther, Three Rivers Resource Area Manager, 28910 Highway 20 West, Hines, Oregon 97738 by the close of business (4:00 p.m.) on October 10, 2007. The protest must clearly and concisely state the reasons why the decision is believed to be in error.

If you wish to file a petition, pursuant to regulations 43 CFR 4.21, for a stay of the effectiveness of this decision during the time that your appeal is being reviewed by the Board, the petition for stay must accompany your notice of appeal. A petition for stay is required to show sufficient justification based on the standards listed below. Copies of the notice of appeal and petition for a stay must also be submitted to each party named in this decision and to the Interior Board of Land Appeals and to the Appropriate Office of the Solicitor (see 43 CFR 4.413) at the same time the original documents are filed with this office. If you request a stay, you have the burden of proof to demonstrate that a stay should be granted.

## Standards for Obtaining a Stay

Except as otherwise provided by law or other pertinent regulation, a petition for a stay of a decision pending appeal shall show sufficient justification based on the following standards:

1. The relative harm to the parties if the stay is granted or denied.

2. The likelihood of the appellant's success on the merits.

3. The likelihood of immediate and irreparable harm if the stay is not granted.

4. Whether or not the public interest favors granting the stay.

## IMPLEMENTATION DATE

If no protest is received by the close of business (4:00 P.M.) on October 10, 2007, this decision will become final and will be implemented as soon as project funding becomes available. If a timely protest is received, this decision will be reconsidered in light of the statements of reasons for the protest and other pertinent information available and a final decision will be issued.

## CONTACT PERSON

For additional information concerning this decision or the BLM administrative review process, contact Don Rotell, Three Rivers Resource Area, 28910 Highway 20 West, Hines Oregon 97738; telephone (541) 573-4400.

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Joan M. Suther — Date
Three Rivers Resource Area Field Manager

| Person/Group | Comment | BLM Response |
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| **Comment 1** | The EA says that temporary roads will be closed following the season of treatment. This should be clarified to say that temporary roads will be used for only one dry season and will be appropriately winterized before the onset of the wet season. | **Forestry – Roads would be closed by the following means: 1) tilling the road bed using an equipment drawn ripper to reduce existing compaction, and break up road contours 2) barricading road by: a) using large rocks, or b) a dirt berm and trench, or c) scattering debris or, preferably, by using a combination of a, b, and c, and 3) seeding ripped road bed to start vegetative recovery. All temporary roads and roads deemed unnecessary would be closed upon completion of project.** |
| **Comment 2** | We urge the BLM to be extra careful to ensure that the proposed treatments result in ecologically appropriate and esthetically pleasing landscapes. There may be large unroaded areas in the project area that could be wilderness someday and should be treated in such a way that they leave open the potential for wilderness designation. The Bluebucket Creek area has been visited by hundreds of attendees of the desert conference. | **Fire Ecology/Range/Visual Resources – A primary purpose of the project is to move fire dependent plant communities within the project area toward historic conditions (See page 6 of the Otis Mountain / Moffet Table EA).**<br><br>**Aesthetic values in the project area will improve over the long term as the compositional diversity of plant communities increases and the threats of large-scale, high severity wildfires are reduced (See page 76 of EA for effects to visual resources).**<br><br>**In 1980 an intensive inventory evaluating the presence of wilderness characteristics on the BLM-administered lands in Otis Mountain and Moffet Table Fuels Management Project Area found that wilderness characteristics were not present on these lands. In March of 2007 inventory maintenance was completed by an IDT who reviewed current conditions and documented changes that had occurred since the original inventory was completed. No changes to conditions were identified that would modify the findings of the 1980 inventory. Therefore wilderness** |

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| | | **characteristics were determined not to be present and this issue was not analyzed further in the EA.** |
| **Comment 3** | You are proposing to treat a very high percentage of the sagebrush types in the area. We think natural fire likely created more of a mosaic of burned and unburned areas. Please consider how to incorporate more of a balanced mix of treatments and untreated "skips." | **Range/Fuels Management - The proposed action will result in a mosaic of burned and unburned vegetation in sagebrush dominated plant communities by utilizing a combination of jackpot burning, pile burning, and cutting only treatments to retain shrubs and herbaceous components in areas that are not considered to be converted to a closed canopy juniper woodland. Objectives are to treat 40-60% of mountain big sagebrush communities in the mid to early phases of transition to juniper woodland and 90-100% of Wyoming sagebrush communities displaying any level of juniper encroachment with such treatments. Between 60-80% of low sagebrush communities would be treated with prescribed fire treatments designed to minimize total burned area under the proposed action (See pages 10-12 of the EA).**<br><br>**Large stands of mountain mahogany and bitterbrush in sagebrush ecosystems will be protected and enhanced under the proposed action (See page 12 of the EA).** |
| **Comment 4** | Lots of nutrients are held in juniper trees, so if they are killed the BLM should leave many of them on-site to retain the nutrients instead of removing or burning them. | **Fuels Management – Leaving downed juniper in place in mountain big sagebrush dominated sites within the project area will not meet the purpose and need of reducing the woody fuel loading and threats of extreme wildfire in these plant communities (See pages 5 and 6 of the EA).**<br><br>**Leaving cut juniper in place within stands of low sagebrush, Wyoming sagebrush, mountain mahogany/bitterbrush, and riparian areas is an option under the proposed action, but it would only be selected if fuels specialists determine that it would not result in fuels accumulation that would threaten public safety, property, or other resource values (See pages 11-12, and page 18 of the EA).** |
| **Comment 5** | The EA should have included more action alternatives to better highlight the differing consequences of the choices faced by managers. Action and no action oversimplifies a complicated situation. | **NEPA – The EA considers two additional action alternatives that were brought forward during public scoping but does not develop them in detail because they were not likely to meet project** |

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| | | **objectives or were not feasible due to safety concerns or high potential impacts on other resource values (See page 24 of the EA).** |
| **Comment 6** | The EA should have included maps showing the specific locations of proposed activities. | **Project Lead – The EA includes two maps of the silvicultural thinning treatment areas and the portions of pastures that would be affected by various types of prescribed fire (See figures 2.3 and 2.4, Proposed Action maps on pages 20 and 21 of the EA).** |
| **Comment 7** | **Consider the Effects of Livestock Grazing on Forest Health**<br><br>The project area is extensively grazed. The BLM should do more to integrate forest health and livestock programs. … so the NEPA analysis must consider the connected and cumulative impacts of livestock grazing.<br><br>This project does nothing to address the threat that livestock grazing causes to forest health. … The NEPA document describes the effects "on" range resources (e.g., fences and transitory range) but fails to disclose or analyze the effects "of" livestock on forest health and the desired future condition of vegetation composition.<br>Grazing reduces the density and vigor of grasses which usually outcompete tree seedlings, leading to dense stands of fire-prone small trees. … Grazing and logging cause cumulative effects that must be considered together in one NEPA document. | **Range Management/NEPA - The EA discloses the effects of the silvicultural thinning portion of the proposed action that are cumulative with previous and reasonably foreseeable land management actions, and analyzes the effects of a no action alternative for comparative purposes.**<br><br>**Potential impacts of the silvicultural thinning portion of the proposed action on soils and watershed values are minimized through project design elements (See pages 23 and 24).**<br><br>**The analysis of the past actions follows the Council on Environmental Quality guidance provided on June 24, 2005. The CEQ stated in its guidance that "Generally, agencies can conduct an adequate cumulative effects analysis by focusing on the current aggregate effects of past actions without delving into the historical details of individual past actions."**<br><br>**There is no need to exhaustively list individual past actions, compare, or describe the environmental effects of individual past actions in order to complete a broad-scale cumulative effects analysis for the Otis Mountain/Moffet Table Fuels Management Proposed Action.** |
| **Comment 8** | **General recommendations for fuel reduction thinning**<br>1. When conducting commercial thinning projects take the opportunity to implement other critical aspects of watershed restoration especially reducing the impacts of the road system and livestock grazing and establishing the ecological processes that will allow | **Forestry - Reducing fuels and restoring fire to the fire-dependent ecosystems within the Otis Mountain / Moffet Table project area will improve watershed values and the distribution of livestock in the Otis Mountain, Moffet Table, Mule Creek and Birch Creek grazing allotments. It will also mimic the natural fire regime.** |

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| | streams and fire regimes to recover. | |
| **Comment 9** | 3. Don't let logging economics determine restoration priorities. If we restore primarily those areas that have commercial sized logs and fail to treat the thousands of acres of areas lacking economic return, we will not be accomplishing real restoration which requires carefully and strategically choosing the subset of the landscape that can be treated to provide the greatest gain (both ecological and fire hazard reduction) for the least ecological "cost" in terms of soil, water, wildlife, and weeds. Allowing economics to drive these choices will result in greater ecological impacts and lower ecological gains. The NEPA analysis must honestly disclose what "needs" treatment vs. what is actually being proposed so the public can see what's being sacrificed. | **Forestry/Economics and Social - Treatment areas within the Otis Mountain / Moffet Table Project area were determined through consultation with BLM resource specialists and concerned members of the public. Although economics is not the foremost factor behind determination of restoration and fuels reduction priorities, capturing the economic value of cut trees and woody biomass generated by the project where possible is an objective of the project (See page 8 of the EA).** |
| **Comment 10** | 5. New evidence indicates that far more of the "dry" forests, rather than being typified low severity fire regimes, were in fact dominated by mixed severity fire regimes (including significant areas of stand replacing fire), so mixed severity fire is an important part of the historic range of variability that should be restored. The goal should not be a uniform low severity fire regime, but rather a wide mix of tree densities in patches of varying sizes. This objective can often be met by allowing natural fire regimes to operate, or by leaving significant areas untreated when planning fuel reduction projects. | **Forestry - The proposed action calls for retaining a mix of tree densities with variable spacing. Following treatment, residual trees of various sizes will be arranged in clumps and patches configured with an average spacing of 22 feet apart. Although the treatment would promote the largest and most well-formed ponderosa pine trees in stands, it would also retain patches of young trees and trees of intermediate sizes with variable spacing (See pages 9 and 10 of the EA).** |
| **Comment 11** | 6. Prioritize treating dry forest types at low elevation and on south slopes. Treatments in the wildland urban interface may also be a priority, but don't define the WUI too broadly, because fire hazard can be reduced by treating the area immediately adjacent to structures and this home ignition zone is usually on no-federal lands. Treatments in forests with naturally mixed-severity fire regimes should be carefully scrutinized to ensure those areas are really outside of the HRV and treatments are really needed. Treatments in mixed severity fire regimes should be more patchy and leave behind more structure, more snags and large dead wood. | **Forestry/Fuels and Fire Management - Although not included as WUI in the Harney County Community Wildfire Protection Plan (CWPP), there are six to seven residences or dwellings within the project area. Project activities may occur on privately owned lands under cooperative agreements. It is a primary purpose and need of the project to reduce the likelihood of an intense crown fire occurring on federal or privately owned lands in the project area (See page 5 of the EA).** |
| **Comment 12** | 7. Prioritize treatment of the dense young stands that are most "plastic" and amenable to restoration. Another priority is to carefully plan and narrowly target treatments to protect specific groves of fire-resistant, old-growth trees that are threatened by ingrowth of small fuels, but don't focus on rigid density reduction targets. Leave all medium and large trees that show old-growth characteristics. | **See response to Comment 10.** |

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| **Comment 13** | 8. Thin from below, retaining the largest trees, or use "free thinning" with a diameter cap so that some trees of all size classes are retained. Retain all large trees and most medium sized trees so they can recruit into the larger classes of trees and snags. Regardless of size, retain all trees with old-growth characteristics such as thick bark, yellowing bark, flat top, asymmetric crown, broken top, forked top, etc. These trees have important habitat value and human values regardless whether they are 21" dbh. Allow natural processes of succession and mortality turn some of these medium and large trees into ecologically valuable snags and down wood. | **See response to Comment 10 in regards to thinning recommendation. It is a project design element to protect all conifers with old growth characteristics and/or snags and large downed wood during implementation of thinning and underburning (See pages 22 and 23 of the EA).** |
| **Comment 14** | 9. Remember that diameter limits are a tool in the tool box. Don't reject the tool out of hand. The public likes diameter limits a lot because they provide assurances. It is usually OK to use lower diameter limits for fire resistant species, higher limits for fire intolerant species. The exceptional circumstances in which diameter caps allegedly don't work, are more rare than the circumstances in which alternative techniques will lead to unintended consequences, including lack of public trust. | **Forestry/Fuels Management - Although the proposed action does not include diameter limits during silvicultural thinning, variable density thinning will retain trees of all diameter sizes and promote a healthy ponderosa pine forest. Large diameter ponderosa pine will be represented in this forest following treatment. This includes retaining existing snags and recruitment of future snags and large woody debris. (See pages 9 and 10 of the EA).** |
| **Comment 15** | 10. Recognize that thinning affects fire hazard in complex ways, possibly even making fire hazard worse because thinning: creates slash; moves fine fuels from the canopy to the ground (increasing their availability for combustion); thinning increases ignition risk; thinning makes the forest hotter, dryer, and windier; and makes site resources available that could stimulate the growth of future surface and ladder fuels. Fuel reduction must find the "sweet spot," by removing enough of the small surface and ladder fuels while retaining enough of the medium and large trees to maintain canopy cover for purposes of microclimate, habitat, hydrology, suppression of ingrowth, etc. | **Forestry/Fuels Management - Although the silvicultural thinning portion of the proposed action may make stands hotter and dryer and increase opportunities for ignition, studies show that reducing canopy closure and raising canopy base height reduces the chances of crown fire occurrence. Following the thinning with prescribed fire will keep thinning slash from increasing surface fuel loading (See pages 9 and 10 of the EA).** |
| **Comment 16** | 11. There is growing evidence that in order to be effective, mechanical treatments must be followed by prescribed fire. But the effects of such fires must also be carefully considered. | **See response to comment 15.** |
| **Comment 17** | 12. Don't thin to uniform spacing. Use variable density thinning techniques to establish a variety of microhabitats, break up fuel continuity, create discontinuities to disrupt the spread of other contagious disturbances such as disease, bugs, weeds, fire, etc. Retain patchy clumps of trees which is the natural pattern for many species. | **See response to Comment 10.** |
| **Comment 18** | 13. Use your creativity to establish diversity and complexity both | **See response to Comment 10.** |

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| | within and between stands. "Gappy and clumpy" is often use to describe the distribution of trees in dry forests. Use skips and gaps within units to help achieve diversity. Gaps should be small, while skips should be a little larger. Landings do not make good gaps because they are clearcut, highly compacted and disturbed, more likely subject to repeated disturbance, and directly associated with roads. Gaps should be located away from roads and should not be clearcut but rather should retain some residual structure in the form of live or dead trees. | |
| **Comment 19** | 14. Thin heavy enough to stimulate development of some patches of understory vegetation, but don't thin so heavy that future development of the understory becomes a more significant fuel problem than the one being addressed by the current project. | **See response to Comment 10.** |
| **Comment 20** | 15. The scale of patches in variable density thinning regimes is important. Ideally variability should be implemented at numerous scales ranging from small to large, including: the scale of tree fall events; pockets of variably contagious disturbance from insects, disease, and mixed-severity fire; soil-property heterogeneity; topographic discontinuities; the imprint of natural historical events; etc. | **See response to Comment 10.** |
| **Comment 21** | 16. Retain and protect under-represented species of conifer and non-conifer trees and shrubs. Retain patches of dense young stands as wildlife cover and pools for recruitment of future forests. | **Vegetation - Species such as mountain mahogany, bitterbrush, aspen, and other riparian hardwoods that are critical wildlife habitat will be promoted under the proposed action (See page 12 of EA).** |
| **Comment 22** | 17. Recognize that thinning captures mortality and that most stands (especially plantations) are already lacking critical values from dead wood due to the unnatural stand history of logging, planting, and disrupted natural processes. | **Watersheds/Wildlife - The proposed action includes a project design element to protect all snags and large downed wood during implementation of thinning and underburning (See pages 22 and 23 of the EA).** |
| **Comment 23** | 18. Retain abundant snags and course wood and green trees for future recruitment of snags and wood. Retention should be both distributed and in clumps so that thinning mimics natural disturbance. Retention of dead wood should generally be proportional to the intensity of the thinning, e.g., heavy thinning should leave behind more snags not less. Retain wildlife trees such as hollows, forked tops, broken tops, leaning trees, etc. | **Watersheds/Wildlife - See response to comment 21. The proposed action also includes a design element that protects trees with signs of wildlife occupation (See page 23 of EA).** |
| **Comment 24** | 19. If using techniques such as whole tree yarding or | **Forestry - Although the primary post-thinning treatments in pine forest and woodland stands will be underburning within 10 years** |

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| | yarding with tops attached to control fuels, the agency should top a portion of the trees and leave the greens in the forest in order to retain nutrients on site. | **of completing the thinning treatments, some woody material will remain on the surface of the treatment areas following the close of the project.**<br><br>**Direction in the Three Rivers Resource Area Resource Management Plan (RMP) calls for treatment of all slash generated by thinning in excess of 12 tons per acre.** |
| **Comment 25** | 20. Avoid impacts to raptor nests and enhance habitat for diverse prey species. Train marking crews and cutting crews to look up and avoid cutting trees with nests of any sort and trees with defects. | **Wildlife - See response to comment 23. Goshawk surveys are typically conducted in forested stands prior to thinning. The Fuels/Fire Wildlife Biologist will review and approve all burn plans associated with the project (See page 22 of EA).** |
| **Comment 26** | 21. Take proactive steps to avoid the spread of weeds. Avoid and minimize soil disturbance. Retain canopy cover and native ground cover to suppress weeds. | **Noxious Weeds - The proposed action includes a project design element to inventory and monitor for invasive species and treat them under the Burns District Noxious Weed Treatment EA if necessary (See page 23 of the EA).** |
| **Comment 27** | 22. Buffer streams from the effects of heavy equipment and loss of bank trees and trees that shade streams. Mitigate for the loss of LWD input by retaining extra snags and wood in riparian areas. Recognize that thinning captures mortality that is not necessarily compensated by future growth. | **Water Quality/Aquatics - Bluebucket Creek is the only perennial stream within the silvicultural thinning treatment areas. The proposed action includes a project design element to maintain existing large downed wood and to create additional LWD through manual cutting if necessary.** |
| **Comment 28** | 23. Protect soils by avoiding road construction, minimizing ground-based logging, and avoiding numerous large burn piles. Rank new road segments according to their relative costs (e.g. length, slope position, soil type, ease of rehabilitation, weed risk, native vegetation impacts, etc.) and benefits (e.g. acres of restoration facilitated), then use that ranking to consider dropping the roads with the lowest ratio of benefits to costs. Where road building is deemed necessary, ensure that the realized restoration benefits far outweigh the adverse impacts of the road, build the roads to the absolute minimum standard necessary to accomplish the job, and remove the road as soon as possible to avoid firewood theft, OHV trespass, and certainly before the next rainy season to avoid stormwater pollution. Do not allow log hauling during the wet season. | **Soils/Roads - The proposed action will construct less than two miles of temporary road to facilitate the silivicultural thinning activities (See page 10 of EA). This would minimize soil disturbance by reducing the amount of skid trails necessary to remove commercial sized logs. Temporary roads will only be utilized when soils are dry or frozen. At the close of the project, the temporary road would be ripped and closed with a tank trap or embankment if necessary (See page 10 of EA).** |

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| **Comment 28** | Livestock, by annual elimination of herbaceous cover, can cause many of the same effects as juniper encroachment, and many other effects that are far more deleterious. We propose the agency remove livestock and reintroduce fire before controlling juniper. By removing livestock maybe the herbaceous component can increase enough to carry fire and kill some of the juniper trees to reestablish a mosaic of fire driven seral development. | **Range/Fuels Management - The decision whether to graze or not graze domestic livestock on these lands is not a decision to be made under project level NEPA analysis. This issue is outside the scope of this decision.** |
| **Comment 29** | There is a strong possibility that the significant expansion of juniper that we are seeing today is a response to several things that are not being addressed by the agencies. Those include livestock grazing, fire suppression, and climate change. Since the agencies are not proposing to treat the root causes of juniper expansion, they are not really addressing the "problem" effectively and appropriately. We recommend that the agency remove livestock, reintroduce fire as part of this project. | **Range/Fuels and Fire Management - A primary purpose and need of the project is to re-introduce fire to the rangeland plant communities with various forms of prescribed fire. Removing livestock grazing from the project area is an action that is outside the scope of project level analysis.** |
| | After the close of the public comment period on the Otis Mountain / Moffet Table Fuels Management Project EA, ONDA submitted xxx areas that display wilderness characteristics for possible designation as Wilderness Study Area (WSA). The closest area to the current project area is located adjacent to the current project area at Merlie Table. No part of this proposed wilderness area is within the Otis Mountain / Moffet Table project area. | **Wilderness - The proposal brought forward by ONDA late in the planning process does not change the results of the wilderness inventory update conducted by the Otis Mountain IDT that found wilderness characteristics were not present in the current project area. The current proposed action will have no effect on any wilderness characteristics present in the Merlie Table wilderness proposal.** |