



United States Department of the Interior



BUREAU OF LAND MANAGEMENT
Grants Pass Field Office
2164 NE Spalding Avenue
Grants Pass, Oregon 97526
www.blm.gov/or/districts/medford

1790 (ORM070)

SEP 23 2014

Dear Interested Party:

As the Grants Pass Resource Area Field Manager, I have issued a Draft Decision Record (DR) for the Cook's Lomatium Habitat Management Project. This project would implement the Integrated Vegetation Management Project (IVMP) in the Josephine Creek – Illinois River, East Fork Illinois River, and West Fork Illinois River watersheds on the Grants Pass Resource Area. Project activities include vegetation treatments in 89 acres of grasslands/shrublands and 91 acres of woodlands/forest to maintain or improve habitat for Cook's lomatium, a plant federally listed as Endangered. Additionally, seven barriers would be constructed out of fence or rocks to prevent resource damage from unauthorized off-road vehicle traffic.

The activities of the Project are analyzed under the IVMP Environmental Assessment (EA) (DOI-BLM-OR-M000-2012-0001-EA). The EA was made available for public comment during August-September, 2012. The BLM's responses to public comments were considered in reaching a final decision for the Project and are included with the DR. The Selected Alternative is a portion of Alternative 2.

The Draft Decision is open for a 15 day public comment period beginning on September 24, 2014 and ending on October 9, 2014. Received comments will be considered in reaching a Final Decision for this Project. Comments should be submitted before close of business on October 9, 2014. Comments will be accepted in hard copy or electronic form and should be sent to the address below or to Ferris Fisher at ffisher@blm.gov. For additional information contact Ferris Fisher at (541) 471-6639.

You can review the DR at <http://www.blm.gov/or/districts/medford/plans/index.php>, the Medford District's internet site. Hard copies of the DR are also available at the Grants Pass Interagency Office, 2164 NE Spalding Avenue, Grants Pass, OR 97526. Office hours are Monday through Friday, 8:30 A.M. to 4:30 P.M., closed holidays.

Sincerely,

 ACTING FOR

Allen Bollschweiler
Field Manager
Grants Pass Resource Area



United States Department of the Interior

BUREAU OF LAND MANAGEMENT
GRANTS PASS INTERAGENCY OFFICE
2164 NE SPALDING AVENUE
GRANTS PASS, OREGON 97526

PROGRAMMATIC INTEGRATED VEGETATION MANAGEMENT PROJECT FINDING OF NO SIGNIFICANT IMPACT NEPA# DOI-BLM-OR-M000-2012-0001-EA

I. INTRODUCTION

The Medford District Bureau of Land Management (BLM) has analyzed integrated vegetation management activities for forest stands located across the Medford District. BLM's interdisciplinary planning team designed the Programmatic Integrated Vegetation Management Project (IVMP) on the Medford District based on current resource conditions in the project area, and to meet the objectives and direction of the 1995 Record of Decision and Resource Management Plan (1995 ROD/RMP). The proposals presented and evaluated in the IVMP Environmental Assessment (NEPA # DOI-BLM-OR-M000-2012-0001-EA) reflect what the planning team believes to be the best balance of resource conditions, resource potential, and competing management objectives. Integrated vegetation management projects authorized under Decision Records will be limited to a maximum of 5,000 acres per year and dispersed across the District. No more than 10% of BLM land in a fifth field watershed will be treated under this EA in any one year.

II. BACKGROUND

The general planning area for implementation of projects under the IVMP covers lands managed by the Medford District BLM. Lands within the area are a "checkerboard" of federal, private, county, and state ownership totaling approximately 3 million acres. Of those lands, approximately 860,000 acres are lands under the administration of the BLM. These lands are in a variety of land use allocations (e.g., Applegate Adaptive Management Area [AMA], Matrix, Late-Successional Reserve (LSR)).

The BLM began public outreach for this project on November 14, 2011 by sending a scoping letter to approximately 660 residents and landowners near or adjacent to BLM parcels within the planning area; federal, state, and county agencies; tribal governments; private organizations; and individuals that requested information concerning projects of this type. All public input was considered by the planning and interdisciplinary team in developing the proposals and in preparing the EA.

The BLM held a public meeting on January 19, 2012, and gathered information through questionnaires, personal discussions, and comment letters, which provided public input to BLM for consideration in the EA.

The EA analyzed treatments of vegetation communities that are not generally viable for commercial timber sales, but exhibit an ecological need (e.g., habitat restoration, enhanced structural complexity, improved forest stand growth and vigor, reduced risk of catastrophic wildfires). Commercial forest products and biomass would be byproducts of the restorative treatments

proposed under IVMP projects, which would help support the project economically and provide opportunities for supplying forest products to commercial markets (EA p. 1). The project proposes a variety of activities to address the purpose and need for the project, such as treatments in dry and moist young forests; dry forest management and legacy tree culturing in dry forests; moist forest management; treatments in LSRs; and treatments for restoration of oak woodlands, meadows, and chaparral shrublands.

The IVMP EA was available for public review from August 25 through September 25, 2012. It incorporated analysis of the proposed actions and addressed issues raised in public scoping comments. During the public review period, the BLM received six comment letters, mainly in support of the project, but expressing several concerns. For a summary of public comments, see Appendix A, Public Comment Summary and Response.

In designing the IVMP to address current resource conditions, the BLM interdisciplinary team was aware of and sensitive to the public's range of views and values while complying with a variety of resource management mandates. As a result, the IVMP is an integrated and multi-faceted plan that balances these factors and objectives.

III. CONSULTATION AND COORDINATION

Pursuant to the Endangered Species Act (ESA), BLM completed consultation with the US Fish and Wildlife Service for the activities addressed in this project (Trail# 01EOFW00-2013-I-0039). As per the EA (pp. 82, 157), a letter was submitted to the Level 1 team for site-specific assessment and review of this project to ensure it conforms to the Biological Assessment and Letter of Concurrence.

Programmatic consultation (Tails #13420-2008-I-0136) to analyze the effects on Gentner's fritillary (*Fritillaria gentneri*) and Cook's lomatium (*Lomatium cookii*) from various activities between 2009 and 2013 was completed in 2008. The Biological Assessment and Letter of Concurrence include Project Design Criteria (PDCs) regarding predisturbance survey requirements and protection measures that apply to different management actions. Predisturbance surveys may require one to two years of visits, depending on the project type. Programmatic consultation (Tails # 01 EOF/V00-2012-1-0019) for activities that may affect the Designated Critical Habitat of *Lomatium cookii* was also completed in 2011 (Bureau of Land Management 2011). It also prescribes PDCs for various activities proposed between 2012 and 2013 in critical habitat. These PDCs are incorporated into the Project Design Features (PDFs) for this project.

In accordance with section 7 of the ESA, the BLM analyzed project activities for their potential to affect Southern Oregon/Northern California (SONC) coho salmon or their designated critical habitat. The BLM also analyzed these activities for their potential to affect Essential Fish Habitat (EFH), in accordance with the Magnuson-Stevens Fishery Conservation and Management Act. The project is not expected to affect species or their critical habitat; therefore, consultation is not required. The project is a No Effect action for SONC, critical habitat, and EFH.

The project will not adversely impact any sites of cultural or historical significance. The State Historic Preservation Office (SHPO) was informed of the BLM's finding in accordance with 36 CFR 800.5(b).

The Cow Creek Band of Umpqua Tribe of Indians, Confederated Tribes of the Siletz, Confederated Tribes of the Umatilla Indian Reservation, Confederated Tribes of the Grande

Ronde, Affiliated Tribes of Northwest Indians, Burns Paiute Tribe, Klamath Tribes, and Coquille Indian Tribe were notified of this project during scoping. The Josephine County Commissioners and Josephine County Forestry, Commissioners, and Public Works were also contacted. The BLM did not receive responses from these groups.

IV. FINDING OF NO SIGNIFICANT IMPACT (FONSI)

A. Plan Conformance

Based on the information in the Integrated Vegetation Management Project EA and project record, and from the letters and comments received from the public about the project, I conclude that this project is in conformance with the 1995 Medford District RMP and subsequent plan amendments that include

1. Record of Decision and Resource Management Plan Amendment for Management of Port-Orford-Cedar in Southwest Oregon, Coos Bay, Medford, and Roseburg Districts (2004)
2. Medford District Noxious Weed Environmental Assessment (1998)
3. Final Supplemental EIS on Management of Habitat for Late-Successional and Old-Growth Forest Related Species within the Range of the Northern Spotted Owl (1994)
4. ROD for Amendments to Forest Service and Bureau of Land Management Planning Documents Within the Range of the Northern Spotted Owl and its attachment A entitled Standards and Guidelines for Management of Habitat for Late-Successional and Old-Growth Forest Related Species Within the Range of the Northern Spotted Owl (NWFP) (1994)
5. Final SEIS for Amendment to the Survey & Manage, Protection Buffer, and other Mitigation Measures Standards and Guidelines (2000), and the ROD and Standards and Guidelines for Amendment to the Survey & Manage, Protection Buffer, and other Mitigation Measures Standards and Guidelines (2001)

The ACS Consistency Review found that the project is in compliance with the Aquatic Conservation Strategy as originally developed under the NWFP.

This decision is also consistent with the Endangered Species Act; Native American Religious Freedom Act; other cultural resource management laws and regulations; Executive Order 12898 regarding Environmental Justice; and Executive Order 13212 regarding potential adverse impacts to energy development, production, supply, and/or distribution.

B. Finding of No Significant Impact

I have considered the intensity of the impacts anticipated from the projects analyzed under Alternative 2 in the IVMP EA relative to each of the 10 areas suggested by the Council on Environmental Quality (CEQ).

1) Impacts can be both beneficial and adverse and a significant effect may exist regardless of the perceived balance of effects.

The BLM included PDFs in the proposed actions for the purpose of reducing anticipated adverse environmental impacts that might otherwise stem from project implementation. There are no significant effects expected from project activities.

The following is a synopsis of the effects expected from implementation of activities analyzed under Alternative 2:

Proposed treatments would accelerate the development of late seral conditions in moist forests. Overall, stand heterogeneity, species diversity, structure creation and maintenance, and large tree retention would increase. Oak woodland, grassland, and chaparral communities would be restored and rehabilitated through removal of encroaching conifers, reintroduction of fire, removal of nonnative plants, and planting with native plants. Thinning and prescribed burning would reduce stand density in dry forests and reduce the susceptibility to insect and disease epidemics by increasing individual tree resiliency (EA p. 47).

Projects would have minimal to no effects to soils resources. Soil productivity may be reduced from ground-based yarding, but will not exceed the 12 percent compaction threshold identified in the 1995 RMP (p. 166). Applying PDFs and best management practices (BMPs) would minimize soil productivity losses.

Short-term erosion rate potential would increase moderately (15-50% over undisturbed rates) in the tractor units where slopes exceed 20 percent and where the skid trails are not located on the contour. Applying riparian reserve buffers, constructing water bars, and dispersing skid trails would prevent or minimize sediment from reaching streams. The decrease in soil pore space as a result of the compacted skid roads would cause a slower infiltration rate.

Temporary routes could reduce soil productivity since they are bladed (soil is mixed and displaced) and compacted. The soil profile would be modified to a degree that may take many years to return to the productive state of the undisturbed forest soils adjacent to it. Landings, with their likely deep compaction, and soil mixing from construction and recurrent disturbance could reduce soil productivity. Soils would experience a minimal decrease in soil productivity from temporary spur route and landing construction; however, rehabilitation actions would aid in the soil's recovery toward preharvest productivity levels. Soil productivity would improve from current conditions in compacted footprints because the footprints would be decompacted after use (EA pp. 60-61, 65).

There is no expectation for the occurrence of effects to fisheries because of the project design and use of PDFs and BMPs. There would be no reduction in streamside shade and, therefore, no increase in water temperature. The potential for large, instream wood recruitment would not be reduced. Riparian reserves, slash, untreated areas, and canopy retention would prevent any changes to peak flows or water temperature, and prevent sediment from traveling off treated units due to the lack of hydrologic connectivity. These should prevent or minimize impacts to an inconsequential level (EA p. 81).

The proposed vegetation treatments would not alter the overstory forest structure or remove key habitat components of northern spotted owl habitat. However, treatments that simplify forest structure may have negative effects to prey species, which can reduce the habitat quality for owls. In very dense stands, vegetation treatments would reduce understory density and improve flight paths, allowing owls increased accessibility to the forest floor, and may increase the total amount of small mammal biomass, improving the abundance and availability of prey species. Including untreated patches throughout larger treatment areas along with the spatially and temporally staggering the treatments across the landscape should ameliorate any potential negative effects of these vegetation treatments on prey species at the landscape level (EA p. 90).

Activities that treat and maintain northern spotted owl habitat are addressed and allowed due to appropriate consultation with the US Fish and Wildlife Service (See section III, Consultation and Coordination).

Project activities are not expected to affect the long-term population viability of any bird species known to be in the area or lead to the need to list these species as Threatened or Endangered (EA p. 95).

Project activities would not contribute to the need to list the Pacific fisher as Threatened or Endangered because suitable habitat would not be removed. The proposed projects would not affect persistence of fishers in the watersheds where the projects occur (EA p. 93).

Overall, impacts on sensitive wildlife species and to land birds would be minimal because PDFs would be implemented and the resultant high level of habitat variability would remain across the project area and surrounding landscape. The proposed actions, along with other future foreseeable projects expected to occur across the project area, are not expected to affect the long-term population viability of any species known to be in the area or lead to the need to list these species as Threatened or Endangered because only a small percentage of habitat would be treated and sufficient habitat would be retained throughout the District. Treatments would be separated spatially and temporally, precluding major effects to species habitats or disturbance during breeding seasons. Diversity would be retained across the landscape to provide habitat for species associated with early seral vegetation, as well as areas with mature forest to provide for quality dispersal habitat and refugia for species associated with late-successional forest (EA p. 96).

The BLM will complete surveys for Special Status plants before project implementation and protect sites from direct and indirect effects through buffers or PDFs. Treatments would improve habitat for most Special Status species by making habitat more resilient to catastrophic events like wildfire and insect outbreaks. The treatments would not reduce the amount of late-successional forests in the District that provide habitat for some Special Status plants and fungi (EA p. 107).

Proposed treatments would not contribute to the spread of noxious weeds in the District because of the use of PDFs, project-specific design, and ongoing weed treatments (EA p. 107).

Treatments that leave tops and limbs on the forest floor would temporarily increase surface fuel loadings and, therefore, potential fire severity *if not* accompanied by adequate fuels reduction. Fuel loadings after some treatments would temporarily increase in areas where biomass removal is not feasible. In the event of a wildfire, this would temporarily create higher rates of spread and greater flame lengths. Despite the temporary increase in ground fuels, recent research (Omi and Martinson 2002) indicates that a reduction in crown fuels outweighs any increase in surface fire hazard. This temporary increase in surface fuels is usually less than one year (EA pp. 114-115).

Project activities would alter the current trend of large-scale, high severity fire events by disrupting fuel continuity, uniformity, and structure. This would reduce potential fire behavior in strategic locations, promote effective suppression activities, and create more variable fire severity and intensity in the event of a wildfire (EA p. 118)

PDFs would prevent any direct and indirect effects to identified cultural resources (EA p. 124). Tribal consultation would reduce the potential for negative effects to tribally significant resources (EA pp. 126-127). Temporary route construction has a potential for minor to moderate indirect

effects by opening access to areas; however, PDFs should ameliorate these potential effects. Additionally, restoration treatments under the EA could result in a cumulative beneficial effect to archeological resources and culturally significant areas by reducing the likelihood of a high intensity wildfire (EA p. 127).

2) The degree of the impact on public health or safety.

The project has not been identified as having the potential to significantly and adversely impact public health or safety.

Potential for large-scale, high intensity fire would be reduced by strategically locating fuel treatment areas to create defensible space, making fire suppression more successful across the project area (EA pp. 114, 117).

Prescribed “burning would conform to the Oregon Smoke Management Program (OAR 629-048-0001 through 629-048-0500). All burning activities would comply with the national ambient air quality standards for particulates (PM 10 and PM 2.5)” (EA p. 116). Prescribed burning would produce smoke during implementation, but should result in reduced smoke emissions should a wildfire occur (EA p. 132).

3) Unique characteristics of the geographic area.

The Medford District encompasses a variety of areas with unique characteristics. Site-specific PDFs tailored to the characteristics of the site and incorporated into project activities would preclude adverse effects to these areas. A variety of meadow habitats, Jeffrey pine savannahs, oak woodlands, and shrublands are in decline because of encroachment and lack of disturbance in the project area. The project proposes to improve these habitats through thinning of encroaching vegetation and reintroduction of fire.

4) The degree to which the effects on the quality of the human environment are likely to be highly controversial effects.

The effects of this project are similar to those of many other projects implemented within the scope of the RMP and NWFP. There is a continuing full range of debate, findings, and opinions about the potential effects of such land management activities. It underscores a level of uncertainty that exists in assessing the changes that may occur as a result of such projects. Any uncertainty in actual effects is acknowledged by the EISs (e.g., FEIS/PRMP pp. 4-7; 4-24; 4-73; 4-79; 4-98) to which the IVMP EA is tiered, and in the EA (pp. 131, 133) regarding climate change. Opposition to the project is not the same as “controversial effects.” The Ninth Circuit has held that a project is “highly controversial” if there is a “substantial dispute [about] the size, nature, or effect of the major Federal action rather than the existence of opposition to a use.” Blue Mountains Biodiversity Project v. Blackwood, 161 F.3d 1208, 1212 (9th Cir. 1998) (quoting Sierra Club v. U.S. Forest Service, 843 F.2d 1190, 1193 (9th Cir. 1988)).

5) The degree to which the possible effects on the human environment are likely to be highly uncertain or involve unique or unknown risks.

The analysis does not show that this action will involve any unique or unknown risks.

6) The degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration.

The action and the decision will not set any precedents for future actions with significant effects. While the programmatic approach is different from many projects, the EA authorizes projects that are similar to other projects designed to implement the RMP and NWFP.

7) Whether the action is related to other actions with individually insignificant but cumulatively significant impacts.

No significant cumulative impacts have been identified. Since this is a programmatic EA, individual interdisciplinary teams would assess proposed projects in light of other projects in the area to assure that no significant cumulative effects would occur from implementation.

8) The degree to which the action may adversely affect National Historic Register listed or eligible to be listed sites or may cause loss or destruction of significant scientific, cultural or historical resources.

The project area contains sites that are listed or eligible for listing on the National Register of Historic Places. Site-specific protection measures (EA p. 34, PDFs) will be implemented for each project to prevent loss or destruction of any significant scientific, cultural, or historical resources.

9) The degree to which the action may adversely affect ESA listed species or critical habitat.

The BLM completed ESA consultation with USFWS with the determination that the actions authorized in this decision are Not Likely to Adversely Affect northern spotted owls or any other T&E species (plant or animal). PDFs will reduce potential adverse impacts on ESA-listed species and effects would not exceed those authorized under consultation with the regulatory agencies. No downgrading or removal of suitable spotted owl habitat will occur. The project is consistent with mandatory terms and conditions set forth by the regulatory agencies. No effects to EFH or designated critical habitat for terrestrial or aquatic animals, or botanical species would occur (see Section III, Consultation).

10) Whether the action threatens a violation of environmental protection law or requirements.

There is no indication this project will result in actions that will threaten a violation of any environmental laws.

V. CONCLUSION

Based on information in the EA and comments received from the public, it is my determination that Alternative 2, the selected alternative, will not result in significant impacts to the quality of the human environment. Anticipated impacts are within the range of effects addressed by the Environmental Impact Statements for the Medford District RMP (1995) and the NWFP or are otherwise not significant. Thus, the Integrated Vegetation Management Project does not constitute a major federal action having a significant effect on the human environment and an EIS is not necessary and will not be prepared.

This conclusion is based on my consideration of the CEQ's criteria for significance (40 CFR §1508.27) regarding context and intensity of the impacts described in the EA and on my understanding of the project. As noted above, the analysis of effects has been completed within the context of the Medford District RMP and it is consistent with that plan and the scope of effects

Programmatic Integrated Vegetation Management Project Finding of No Significant Impact

anticipated from that plan. The analysis of effects has also occurred in the context of multiple spatial and temporal scales as appropriate for different types of impacts.

Allen Bollschweiler
Field Manager, Grants Pass Resource Area
Medford District, Bureau of Land Management

Date

PROGRAMMATIC INTEGRATED VEGETATION MANAGEMENT PROJECT
NEPA # DOI-BLM-OR-M000-2012-0001-EA
Cook's Lomatium Habitat Management Project

September 23, 2014

Draft DECISION RECORD

I. INTRODUCTION

The **Cook's Lomatium Habitat Management Project** is consistent with the scope and purpose of the 2012 Integrated Vegetation Management Project (IVMP) Environmental Assessment (EA), which was prepared under the 1995 Medford District Resource Management Plan (RMP), and the Northwest Forest Plan.

The IVMP EA was developed to provide a tool to accomplish work that promotes healthy and resilient forest landscapes, species conservation, and provides forest products in contribution to the sustainability of local communities and industries. As stated in the EA (p. 2):

All proposed projects will include a variety of vegetation management treatments designed to attain multiple management objectives identified for various land allocations using an IVM approach. ...the focus of this programmatic analysis is on potential sets of actions that can be implemented, if and when funding becomes available, and more quickly and efficiently than if each project were analyzed on its own. This EA will not be used strictly for implementation of fuels or silviculture projects; the intent is to implement projects that meet multiple objectives. Projects proposed under the IVM programmatic EA will not overlap any other active NEPA projects; however, they could be part of a larger landscape planning effort, or could be implemented as stand-alone projects. It is expected that decisions under this programmatic EA will create significant management efficiencies.

After the public review period for this EA, it will become available for each of the three Resource Areas (Ashland, Butte Falls, and Grants Pass) of the Medford District to use for specific projects. The Resource Areas will propose and develop individual projects consistent with descriptions and stipulations in this EA. Project specific assessments will be completed prior to project decisions to assure that the effects of the suite of activities proposed under this EA do not exceed the effects disclosed in this EA.

The EA details the steps that will be completed prior to signing Decision Records (DRs) under the IVMP: "Project proposals / draft DRs would be written and posted on the Medford District BLM website and available for at least 15 days for public review" (EA p. 2). Each Resource Area would do appropriate outreach for each project: "Following public review, Decision Records would be published for each project under the Forest Management Regulations (43 CFR 5003), and subject to Administrative Remedies in accordance with these regulations" (EA p. 2). This is one of those project proposals and DRs.

This DR is for the Cook’s Lomatium Habitat Management Project, which implements the IVMP in the Josephine Creek – Illinois River, East Fork Illinois River, and West Fork Illinois River watersheds on the Grants Pass Resource Area. Within the project area, Cook’s lomatium habitat is being invaded by shrubs and conifers, reducing the availability of light, water, and nutrients. Vegetation management treatments (Table 1) will enhance natural woodland and forest openings and reduce encroaching woody plants within and around grassland habitats.

Township-Range-Section	Unit #	Acres	Vegetation Type(s)	Treatment
T39S-R08W-S31	1	4	grassland, pine-oak woodland, chaparral	Manual removal of shrubs and young conifers from grassland and chaparral. Manual thin and prune in woodland gaps.
T40S-R08W-S7	2	24	grassland, pine-oak woodland, chaparral, dry forest	Manual removal of shrubs and young conifers from grassland and chaparral. Manual thin and prune in woodland/forest gaps.
T40S-R08W-S3	3	10	grassland, chaparral, dry forest	Manual removal of shrubs and young conifers from grassland and chaparral. Manual thin and prune in woodland/forest gaps.
T40S-R08W-S9	4	9	grassland, chaparral, dry forest	Manual removal of shrubs and young conifers from grassland and chaparral. Manual thin and prune in forest gaps.
T40S-R08W-S10, 15	5	35	grassland, pine-oak woodland, chaparral	Manual removal of shrubs and young conifers from grassland and chaparral. Follow by 2.5 acre research burn. Manual thin and prune in forest gaps.
T40S-R08W-S15	6	1	dry forest	Manual thin and prune in forest gaps.
T40S-R08W-S15	7	19	grassland, chaparral, pine-oak woodland, dry forest	Manual removal of shrubs and young conifers from grassland and chaparral. Manual thin and prune in woodland/forest gaps.
T40S-R08W-S15	8	1	Jeffrey pine savannah	Manual removal of shrubs and young conifers.
T40S-R08W-S15	9	18	grassland, chaparral	Manual removal of shrubs and young conifers.
T40S-R08W-S22	10	29	pine-oak woodland, Jeffrey pine savannah, dry forest	Manual thin and prune in woodland/forest gaps.
T40S-R08W-S17, 20	11	11	grassland, chaparral, dry forest	Manual removal of shrubs and young conifers from grassland and chaparral. Manual thin and prune in woodland/forest gaps.
T38S-R08W-S27	12	12	oak woodland	Manual thin and prune in woodland/forest gaps.
T38S-R08W-S34	13	2	oak woodland	Manual thin and prune in woodland/forest gaps.
T38S-R08W-S27	14	4	oak woodland	Manual thin and prune in woodland/forest gaps.

The project will also protect habitat for Cook’s lomatium and other rare plants from unauthorized off-road vehicle traffic by construction of fence or rock barriers at seven sites within the Eight Dollar Mountain Area of Critical Environmental Concern (ACEC), the French Flat ACEC, and the proposed Waldo-Takilma ACEC.

This project was developed in cooperation with qualified resource specialists for habitat considerations and treatment options. The project was designed in context with other projects in the watersheds in which it is planned. An interdisciplinary team of resource specialists completed

pre-project clearances (Table 2) and prescribed site-specific Project Design Features (PDFs) as appropriate.

Project Design Features (PDF)

The following PDFs were developed for the Cook's Lomatium Habitat Management Project:

Hazardous Materials

- The operator would be required to have spill containment kit present on the site during operations.
- Equipment refueling would be conducted within a confined area outside Riparian Reserves.
- Store all hazardous materials and petroleum products in durable containers outside of Riparian Reserves. Equipment containing toxic fluids would not be stored within Riparian Reserves.

Silviculture

- Slash should be handpiled outside of the drip lines of leave trees prior to burning.
- During timber harvest, hardwood trees and other "ecological anchors" marked for reserve would be carefully treated around to prevent damage to limbs, tops, and stems.
- Snags greater than 16 inches diameter at breast height (DBH) not considered to be a safety hazard would be protected and remain standing.

Wildlife

- Retain 60% canopy cover or greater in nesting, roosting, and foraging habitat (NRF) in spotted owl habitat.
- Retain 40% canopy cover or greater in dispersal spotted owl habitat.
- Maintain the primary constituent elements in spotted owl Critical Habitat Units supporting feeding, breeding, sheltering, and dispersing of spotted owls.
- Approximately 10% of handpiles during handpile burn treatments units would be left untreated.

Northern Spotted Owl: Disturbance

- In units 6 and 11, any work that produce noise above ambient levels will not occur between 1 March and 30 June (or until two weeks after the fledgling period) unless protocol surveys have determined the habitat in and adjacent to these units does not contain any nesting spotted owls.

Botany/Noxious Weeds

- Manual treatments may occur within buffers during dormant period.
- Disturbed areas would be seeded with an appropriate native seed.
- Wash equipment that will be driven off system roads prior to entry onto BLM-managed lands to remove mud, dirt, and plant parts to reduce the risk of introducing or spreading noxious weeds.

- Treat weeds in meadows, oak woodlands, and chaparral plant communities prior to thinning, underburning, or broadcast burning. If seeding meadows dominated by nonnative species, use seed for site-specific native grasses and forbs.

Fuels Management

- Use only chainsaws or other hand tools to cut vegetation.
- No mechanized equipment would be used to build fire line.
- Piles would be no larger than 8 feet by 8 feet in size and cover no more than 5% of the treatment area.
- Firelines constructed in suitable habitat will be pulled back and seeded with an appropriate native seed.
- Burn piles within 50 feet of established weed populations or along weed infested roads would be seeded with an appropriate native grass.

Cultural Resources

- Archaeological or paleontological sites occurring within activity areas would be flagged for avoidance and would be identified to the project proponent / administrator on a map.
- Sites that are located within prescribed fire units would have hand lines constructed around them as necessary to protect the resource from fire.
- Sites that are within treatment units may be hand-treated to reduce fuel loading, and to lessen their visibility on the landscape. These sites would be identified prior to project implementation by district archaeological staff.
- All materials cut from sites, as well as any other cut materials would be piled off-sites for burning purposes. The District archaeological staff would work with other District staff to identify suitable areas for pile burning.
- Sensitive areas (such as flagged sites) would be discussed with the contractor to insure that they understand the need to avoid those areas. The contractor would also be informed that they cannot collect artifacts or disturb cultural resource sites in any way.

Soils/Water

- During roadside brushing remove vegetation by cutting rather than uprooting.
- Retain ground cover in ditchlines, except where sediment deposition or obstructions require maintenance.
- Retain low-growing native vegetation on cut-and-fill slopes.
- On active project work roads, during the wet season, use durable rock surfacing and sufficient surface depth to resist rutting or development of sediment on road surfaces that may drain directly to wetlands, floodplains and waters of the state.
- Prior to winter work activities, implement structural road treatments where needed such as: increasing the frequency of cross drains, installing sediment barriers or catch basins or applying gravel lifts where needed.
- Suspend road use where the road surface is deeply rutted or covered by a layer of mud or when runoff from the road surface is causing a visible increase in stream turbidity in the receiving stream.

- Do not allow wet season haul on natural surface roads or high sediment producing surfaced roads without practicable and effective mitigation.
- Place cut material on the contour and in swales in areas where sediment may exit project area.

Clearance / Survey Type	Date completed	Responsible person	Reference
Botany: Special Status Species		Rachel Showalter	FWS #01EOFW00-2014-I-0013
Botany: T&E		Rachel Showalter	
Botany: Consultation		Bryan Wender	
Wildlife: Habitat Assessment	September 17, 2014	Jason Reilly	
Wildlife: Consultation	January 29, 2013	FWS REF #01EOFW00-2013-I-0039) Final IVM Informal	
Project-specific Wildlife Consultation		Jason Reilly	Wildlife Consolation Monitoring Report
Slope Stability Assessment		Paul Showalter	Timber Production Capability Classification
Stream Surveys		NA	
Site-specific BMPs Identified		NA	
Cultural Resources Consultation		Merry Haydon	See below

II. DECISION

I have decided to implement a portion of Alternative 2, the proposed action, as described in the IVMP EA. The selected action includes (1) vegetation treatments in 89 acres of meadows and 91 acres of woodlands/forest to maintain or improve habitat for Cook’s lomatium and (2) construction of fence or rock barriers at seven sites to protect habitat for Cook’s lomatium and other rare plants from unauthorized off-road vehicle traffic.

The selected action includes all PDFs described in EA, Section 2.3, except those for working in Cook’s Lomatium Critical Habitat Units. Those PDFs have been replaced with the more current project criteria identified during consultation on Medford District’s Proposed Activities on Federally Listed Plant Species and Designated Critical Habitat (FWS #01EOFW00-2014-I-0013). Additional PDFs prescribed during project-specific planning and review will be implemented, as applicable.

III. DECISION RATIONALE

My rationale for the decision is as follows:

1. The selected action is consistent with RMP management direction to enhance and maintain habitat for threatened and endangered species in all Land Use Allocations.
2. The selected action meets the Integrated Vegetation Management Project's purpose and need to improve landscape diversity, conserve rare species, and increases resilience to high-intensity wildfire.
3. The selected action contributes to recovery of a federally protected plant, Cook's lomatium, by implementing recovery actions identified in the 2012 Recovery Plan for Rogue and Illinois Valley Vernal Pool and Wet Meadow Ecosystems.
4. Implementation of the selected action will be achieved collaboratively and provide benefits to a diverse group of stakeholders, including BLM, not-for-profit organizations, volunteers, and contractors.
5. Public comments were considered and helped to shape the project proposal. Comment responses are found as an attachment to this Decision Record.

Plan Consistency

Based on the information in IVMP EA, in the record, and from comments received from the public about the project, I conclude that the decisions documented in this DR are consistent with the *Medford District Resource Management Plan*, the *Record of Decision and Standards and Guidelines on Management of Habitat for Late-Successional and Old-Growth Forest Related Species Within the Range of the Northern Spotted Owl*, the *Record of Decision and Standards and Guidelines for Amendments to the Survey and Manage, Protection Buffer, and other Mitigation Measures Standards and Guidelines*. They are also consistent with the Endangered Species Act, The Native American Religious Freedom Act, cultural resource management laws and regulations, and Executive Order 12898 regarding Environmental Justice. They will not, per Executive Order 13212, impact energy development, production, supply and/or distribution.

IV. CONSULTATION AND COORDINATION

Botany

The BLM analyzed project activities for their potential to affect Cook's lomatium and its critical habitat. The Medford District submitted a Biological Assessment to the U.S. Fish and Wildlife Service and received a Letter of Concurrence (LOC) (FWS #01EOW00-2014-I-0013) on January 21, 2014, stating that manual control of woody vegetation and prescribed burning in the plant's habitat "may affect, but are not likely to adversely affect" Cook's lomatium or its critical habitat. The BLM is implementing all applicable PDFs in accordance with the mandatory terms and conditions as specified in the LOC.

***Wildlife* FWS REF #01EOW00-2013-I-0039**

The Cook's Lomatium Habitat Management Project would reduce encroaching vegetation in historically very open and grassy habitat types through mechanical removal of encroaching and undesirable vegetation. Treatments will occur outside of riparian reserves and outside of northern spotted owl homerange circles. Treatment areas will be monitored to ensure they meet RMP guidelines for the retention of adequate levels of snags and down wood for wildlife.

The majority (106 of 169 acres) of the project units are in locations that are not considered NSO habitat. In locations where treatments would occur within NSO habitat the treatments are considered a treat and maintain treatment and the habitat type would retain the same functionality post-treatment because only small diameter materials and understory / mid-story components would be removed. Canopy cover in dispersal and NRF habitat types would remain above threshold levels for each habitat type after the project is completed. The remaining 106 acres of treatments are in locations not considered NSO habitat (capable or unsuitable) and therefore have no affect to NSO habitat. None of the treatment units occur in any designated NSO Critical Habitat units and would have no affect to any designated NSO Critical Habitat.

Fisheries

The project will have no effect on Southern Oregon/Northern California coho salmon (*Oncorhynchus kisutch*) or its critical habitat under the Endangered Species Act and will have no adverse effect on Essential Fish Habitat under the Magnuson-Stevens Act.

Cultural

No adverse impacts to sites of cultural or historical significance were identified during project planning. The State Historic Preservation Office (SHPO) was informed of the BLM's finding in accordance with 36 CFR 800.5(b).

The Confederated Tribes of the Siletz and of the Grande Ronde, the Affiliated Tribes of Northwest Indians, the Cow Creek Band of Umpqua Tribe of Indians, the Klamath Tribe, the Burns Paiute Tribe, the Coquille Indian Tribe, and the Confederated Tribes of the Umatilla Indian Reservation were notified of this project during the scoping and the EA's public comment period. Josephine County Commissioners and the Josephine County forestry department were also contacted. No responses were received.

V. PUBLIC INVOLVEMENT

Public involvement began on November 14, 2011, with a scoping letter being sent to approximately 660 residents and landowners near or adjacent to BLM parcels within the planning area, to federal, state, and county agencies, and to tribal and private organizations and individuals that requested information concerning projects of this type.

The BLM held a public meeting on January 19, 2012. Information was gathered through questionnaires, personal discussions, and comment letters, which provided public input to BLM for consideration in the EA. Extensive discussions with individuals interested in the projects were held throughout the planning process.

A formal public comment period for the EA was provided during August and September 2012. The public was notified of this via a newspaper notice and letters to individuals, Tribes, organizations and government entities who expressed a wish to continue to be informed about the project.

A draft Decision Record will be posted on the Medford District BLM website and available for a 15 day public review. Following the public review, the Decision Record will be published in the *Grants Pass Daily Courier*, Grants Pass, Oregon.

VI. ADMINISTRATIVE REMEDIES

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 Subpart 5003, Administrative Remedies, protests of this decision may be filed with the authorized officer, Allen Bollschweiler, within 15 days of the publication date of the notice of final decision advertisement in the *Grants Pass Daily Courier*. The protest must clearly and concisely state which portion or element of the decision is being protested and the reasons why the decision is believed to be in error.

43 CFR § 5003.3 subsection (b) states: “Protests shall be filed with the authorized officer and shall contain a written statement of reasons for protesting the decision.” This precludes the acceptance of electronic mail (email) or facsimile (fax) protests. Only written and signed hard copies of protests delivered to the Grants Pass Interagency Office (2164 NE Spalding Avenue, Grants Pass, Oregon 97526) will be accepted.

43 CFR § 5003.3 subsection (c) states: “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.” Upon timely filing of a protest, the authorized officer shall reconsider the project decision to be implemented in light of the statement of reasons for the protest and other pertinent information available to him. The authorized officer shall, at the conclusion of the review, serve the protest decision in writing to the protesting parties. Upon denial of a protest, the authorized officer may proceed with the implementation of the decision as permitted by regulations at 5003.3(f).

In accordance with BLM Forest Management Regulation 43 CFR § 5003.2 (a and c), the effective date of this decision, as it pertains to actions which are not part of an advertised timber sale, will be the publication date of the Notice of Decision and FONSI in the *Grants Pass Daily Courier*. This date applies to the manual removal of shrubs and trees and the prescribed burn. Publication of this notice establishes the date initiating the protest period provided in accordance with 43 CFR § 5003.3. While similar notices may be published in other newspapers, the date of publication in the *Grants Pass Daily Courier* will prevail as the effective date of this decision. If no protest is received by the close of business (4:30 p.m.) within 15 days after publication of the decision notice, this decision will become final. If a timely protest is received, the project decision will be reconsidered in light of the statement of reasons for the protest and other pertinent information available, and the Grants Pass Resource Area will issue a protest decision.

Allen Bollschweiler
Field Manager
Grants Pass Resource Area

Date

Appendix A

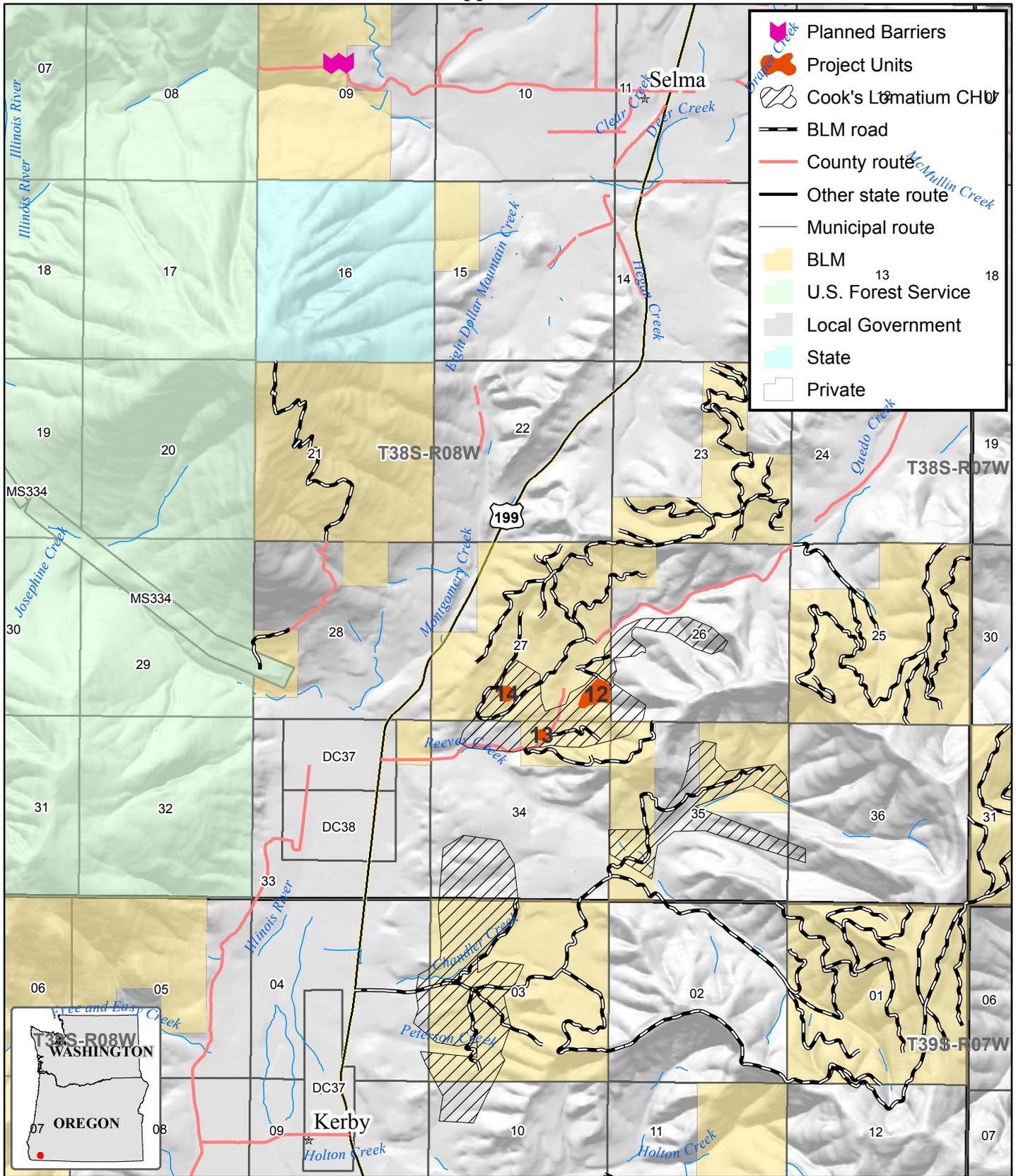
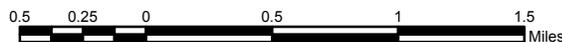


Figure 2. Cook's Lomatium Habitat Management Project, Units 12-14



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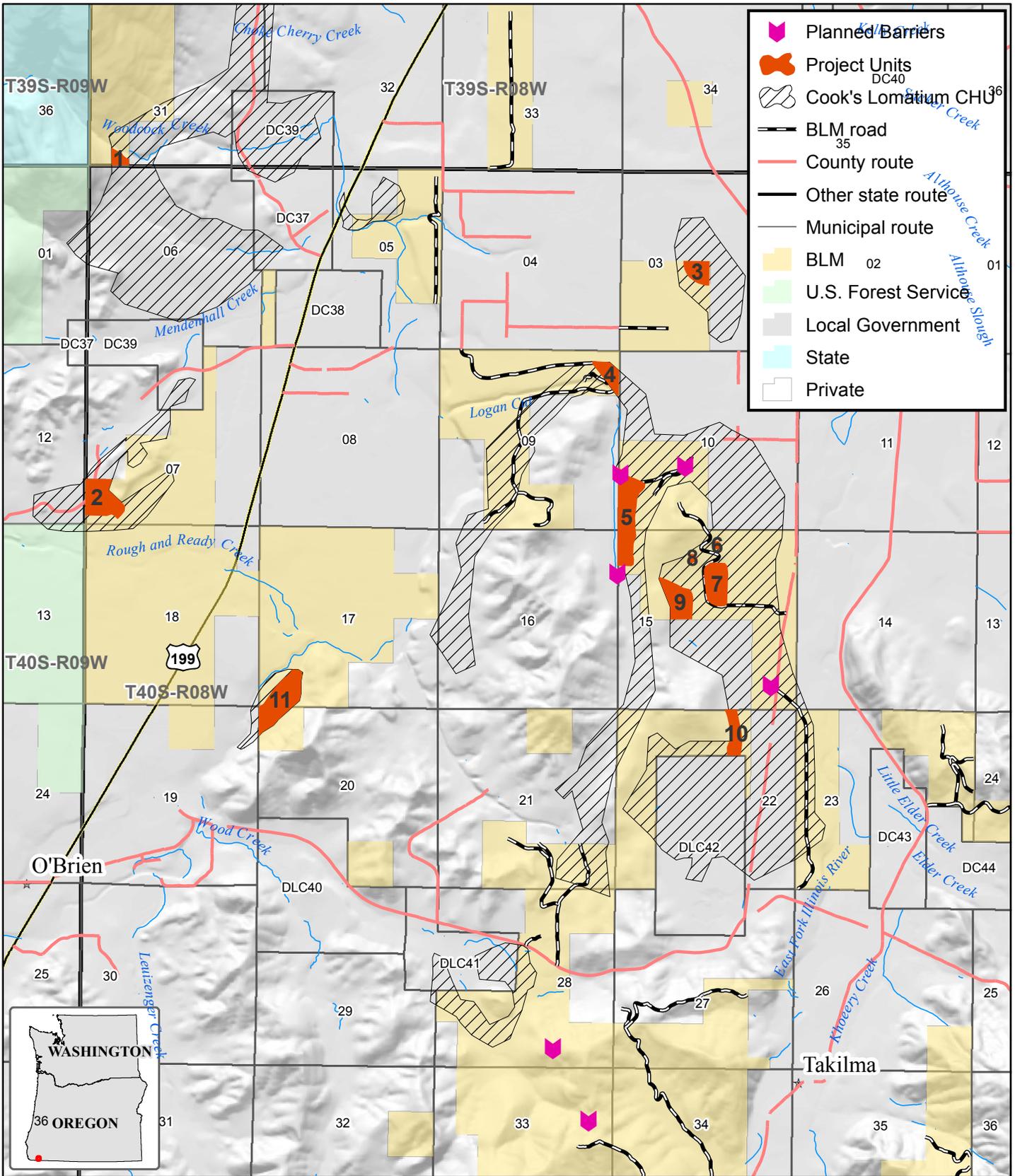
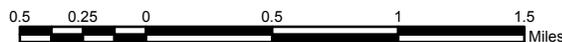


Figure 1. Cook's Lomatium Habitat Management Project, Units 1-11



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Appendix B. Integrated Vegetation Management Project EA Public Comment Summary and Response

Six comments were received from organizations and individuals. These are summarized with responses below. All changes or clarifications made to the proposal as a result of comments are italicized.

Programmatic NEPA

Comment: Request for 30-day comment period prior to signing decisions

Response: While a 30-day comment period was requested, it is felt that most projects will be relatively small, and a 15-day review period of the draft decision before it is signed would be sufficient. Additionally, the 15-day period is the minimum and individual field managers may choose to extend the review period based on the complexity and level of public interest anticipated in the project. Following the signing of the decision and publication of the decision notice in the paper, each project is subject to protest (see EA Appendix E, Pre-project Clearances and Draft DR).

Comment: Plan and evaluate projects on a site-specific basis. Include maps in Decision Records. Make it a requirement to produce individual maps of proposed treatment units in the Decision documentation posted or sent to the Public.

Response: Site specific assessment would be done for each project by reviewing existing records, field reconnaissance, field surveys, and assessment to determine if potential impacts fall within the scope of effects disclosed in the EA. A review of potential wildlife habitat, including RA32 habitat identification, would be conducted using maps, aerial photographs, Micro*Storms computer data, GIS data, and/or stand exam records (EA pp. 82, 161). *Project maps will be included in Decision Records.* All required surveys would be completed for each project.

Comment: Include an implementation monitoring program for projects.

Response: Every project completed under contract will be monitored to assure compliance with the EA and with the contract by a contract administrator.

Additionally, in an effort to determine whether the programmatic approach is practical and can be continued or expanded in the future, at a minimum, 10% of each project will be field reviewed by the Interdisciplinary Team responsible for planning and implementing the project. When practical, in addition to IDT member participation, an invitation may be extended to key publics, interested stakeholders, and third-party reviewers. This field review will help determine:

- 1) Was the project implemented as described in the Decision Record?
 - Was integration accomplished?
 - o Project design
 - o Implementation
 - Were objectives met?
 - o Ecological
 - o Economic
 - Were efficiencies gained?
 - o Funding
 - o Contracting Methods
- 2) How can improvements be made in the future?

Monitoring will occur in each project to varying levels. Every project completed under contract is monitored to assure compliance with the EA and with the contract by a contract administrator. Other monitoring will be done under annual project monitoring for the Resource Management Plan (RMP). Some projects will be monitored through the District fire monitoring and others will receive additional monitoring under resource are direction as time and funding allows. The intent is to monitor to a level necessary to determine whether the programmatic approach is practical and can be continued or expanded in the future.

Landscape

Comment: Identify one or more 5th field watershed for intensive treatment and treat 2% of the watershed annually.

Response: The IVMP EA was developed to increase planning efficiency and to allow each Resource Area to treat areas identified for multiple restoration objectives. While this could be a viable use of the EA, and this could be accomplished as a District strategy, the intent is to provide a tool for all three Resource Areas to implement restoration actions in a timelier manner than if planned separately. This approach would likely be more appropriate for a landscape-level project that incorporates a wider variety of treatments than are available under this EA.

Comment: Keep projects confined to single watersheds

Response: This comment recognized that strategic treatments along ridges could overlap more than one watershed. In any case, beyond strategic ridgeline treatments, it is expected that most projects would be contained within single watershed boundaries.

Ecology

Vegetation Prescriptions

Comment: Do not remove trees >20" dbh; maintain all legacy trees >150 years; maintain all large legacy broad-leaved trees; removal of large trees should not be favored outside of legacy tree culturing. White fir up to 25" dbh in the dripline of *Pinus spp.* may be appropriate to cut.

Response: Dry forest prescriptions retain all fire-tolerant species >20" dbh and all other species >25" dbh (EA p. 11); Legacy Tree Culturing retains all live trees >30" except white/grand fir which may be girdled and retained as snags. Trees of this size would not be removed until coarse woody debris standards have been met at the site (e.g., EA pp. 8, 63-64, 82). All trees >150 years old would be retained (see EA p. 12, Legacy Tree Culturing in Dry Forests). *All decisions that authorize removal of any trees >20" dbh will provide a specific rationale for why removal of these trees is ecologically appropriate.*

Comment: Mark all trees for removal or leave; do not allow contractors to determine what trees would be cut.

Response: We have a marking contract on the District, which could contribute to increased implementation efficiency, one of the objectives of this EA. We also use "designation by prescription" or "designation by description" for stewardship or thinning projects. However, it should be noted that these contracts are closely monitored and inspected to assure conformance with marking guidelines.

Comment: Retain broad-leaved trees >4" dbh. The single-stem and oak cluster treatment are unclear on limits on the competing vegetation to be removed.

Response: Prescriptions would retain hardwoods greater than 16" dbh (EA p. 12). Diameter of retention trees in Oak Woodlands and Savannah (EA p. 15-18) is based on the latest science and meeting primarily ecological, and some social objectives (e.g. fire threat reduction) (EA p 16). Single-step treatments retain all larger oaks and oak cluster treatments retain live stems that, "are >1/5 the dbh of the largest stem..." (EA p. 17). Setting an arbitrary limit on the diameter of trees could prevent attaining objectives for these vegetation types.

Comment: Maintain at least 50% in shrub patches, fragmenting large patches into smaller patches to reduce fuels continuity. Chaparral treatments should be very focused on the structure-ignition zone. Consider seasonal burning that won't disrupt nesting cycles.

Response: Treatments in both meadows and in chaparral shrublands will leave a minimum of 25% of untreated shrub patches (EA pp. 18 and 19). The intent is to leave $\geq 25\%$ of existing shrubs in patches; leaving more than this in meadows may not achieve meadow restoration objectives. Chaparral shrublands treatments would be prioritized in WUI or to meet wildlife habitat objectives. Leaving 50% or more in shrub patches may not meet fuel hazard reduction objectives to protect homes or other resources, or may not meet wildlife objectives. Project-specific retention will be made on site-specific objectives (EA p. 5).

Comment: Gap size and shape should be based on historic reference. Keep gap size small and ensure there is variability in prescriptions.

Response: Gap size would be based on stand conditions and the gap design would be developed to attain project objectives. Most stands would be treated with variable density thinning in which small gaps would be created to increase the diversity of biotic communities (EA p. 13). Maximum gap size is 1 acre and most created gaps would be smaller, generally ranging from ¼ to ½ acre in size (EA p. 10).

Comment: Thinning moist forests >80 years old.

Response: Moist forest stands targeted for treatment are those stands between 60 years and 120 years, and averaging ≤ 20 inches dbh that are even-aged, and lacking structural and species diversity (EA p.13). Moist forest treatments are designed to accelerate habitat diversity and heterogeneity in non-complex stands and treatments would be applied to meet these ecological objectives. Moist forest treatments are designed to enhance late seral species habitat and variable density thinning has been shown to increase vertical heterogeneity and to provide small openings for shrub and hardwood diversity. Treatment in moist forests is also supported by the Northern Spotted Owl Recovery Action 5 from the 2011 Revised Recovery Plan. The recovery plan also recommends thinning of older plantations if they are not currently suitable habitat and if treatments would accelerate the development of suitable owl habitat.

Comment: The "ecological anchors" list should be open-ended. Talus area might be another good place to use as anchors.

Response: We concur, and had intended the list included in the IVMP EA (pp. 11,14, 15) to function as a guideline, not a comprehensive list, and the EA language should reflect that "Ecological anchors include, *but are not limited to* the following:"

Comment: Numerical target for post-treatment SDI and meeting objectives for variability.

Response: Post SDI targets are set at a minimum of >30% or >35%. SDI targets will be set above the minimum depending on site specific conditions, objectives and other considerations. In dry forest prescriptions, the groups would have varying densities that will result in a range of SDI targets. In moist forest prescriptions, the SDI would be set appropriately to meet stand objectives. Creation of groups and gaps (EA pp. 9–10, 12) would also create in-stand variability.

Comment: Early-successional forests in the District are prevalent on the landscape.

Response: The EA proposal does not include creation of early-successional forest.

Comment: Treatment in riparian reserves. Concerns over removing shade ? No removal of trees >12" dbh within 1 site-potential tree of streams; expand no-treatment to "variable width Ecological Protection Zones (p. 4 of comments). Non-commercial fall –and-leave of trees 12-20" dbh might be appropriate under certain circumstances such as to culture legacy oaks and pines. Leave all trees providing shade to streams and any trees that could offer wood recruitment

Response: Treatment within Riparian Reserves would be designed to meet Aquatic Conservation Strategy Objectives (EA pp. 5, 22) and no trees larger than 20" dbh would be removed from Riparian Reserves (EA p. 7). Tree removal would only occur after large wood requirements are met (e.g., EA pp. 8, 10, 11, 12, 18, 62). Additionally, no harvest or yarding equipment would be permitted within the first site-potential tree (EA p. 24), no treatment would occur within the primary shade zone of streams, variable depending on site-specific conditions, and there would be no removal of hardwood species (EA p. 27). Prescribed burning ignition would not occur within 50 feet of streams (EA p. 28), but would be allowed to back into reserves, creating a mosaic burn characteristic of natural fire.

Comment: Sediment reduction and disconnecting roads from the stream network.

Response: There are extensive project design features in the EA that address sediment production and transport, and water quality for each action that are intended to prevent sediment reaching streams (EA pp. 24-29). Additional actions such as closing non-system roads are outside the scope of this project.

Wildlife

Comment: Canopy cover for NSO habitat and activity near NSO nest sites.

Response: The canopy cover outlined in the EA reflect those levels appropriate for the Ecoregion (Watershed Professionals Network (WPN) 2001, p. A-25-A-227) and/or the necessary cover needed to maintain Northern Spotted Owl habitat (EA p. 82) per the 2010 Draft Revised Recovery Plan for the Northern Spotted Owl Recovery.

Comment: Spring prescribed burning effects on nesting birds, pond turtles, and other animals, and soils.

Response: Potential impacts to wildlife and soils through the application of prescribed fire have been considered and addressed in the IVMP EA Project Design Features (EA p. 26 & 30). There is a narrow window of operation for prescribed burning in southwest Oregon; therefore, there may be some spring burning. Effects on these resource are addressed in the EA (e.g., pp. 94-95 for land birds; and pp. 63-66 for soils). Site-specific project design would ensure that PDFs would be implemented to protect pond turtles and other species from project activities (EA pp. 30-32).

Comment: Treatment of noxious weeds

Noxious weeds would be treated under the *Medford District Integrated Weed Management Plan and Environmental Assessment* (EA #OR-110-98-14) (EA p. 101).

Comment: Road or landing construction

Response: Extensive road construction is not anticipated under this EA; however, road construction is allowed under this EA if necessary for extraction of timber products. It is anticipated that ecological benefits would outweigh effects of temporary road construction. Any road constructed or reopened would be built to minimal standards, and decommissioned or obliterated after use.

Comment: Include road decommissioning as part of projects.

Response: All routes opened or constructed during project activities would be obliterated or decommissioned following project completion (EA pp. 22-23). Decommissioning of additional roads is outside the scope of this project.

Comment: Concerns with smoke impacts.

Response: The Oregon Department of Forestry Smoke Management Plan addresses the issue of public health and welfare and the use of plastic to cover piles. Under this authority the State Forester coordinates the administration and operation of the plan. The Forester also issues additional restrictions on prescribed burning in situations where air quality of the entire State or part thereof is, or would likely become adversely affected by smoke.

The Medford District identifies geographic areas and communities that may be impacted smoke emissions from prescribed burning and issues press releases before each active burn season in the Fall/Winter and Spring burning periods through local media.

The Medford District provides daily planned prescribed burning information through two sources. The first is an Oregon wide website that can be found at <http://stg.or.blm.gov/or/resources/fire/prescribedburns/> and through the prescribed burning 24 hour phone line at 541-618-2254 or 1-800-267-3126. Both systems give detailed information of planned burns for the next day including legal description, acres to be burned and expected emissions measured in tons per acre.

Air quality concerns have led to prohibitions on the open burning of household plastics in many areas of the country. "Inasmuch as regions in Oregon where silvicultural burning occurs are exposed to significant amounts of precipitation, there is an overall emissions reduction benefit from covering silvicultural piles. Polyethylene does not include chlorinated compounds or significant amounts of other chemicals likely to form uniquely toxic emissions, nor have these been demonstrated in the literature" (Wrobel and Reinhart, 2003).

OAR 629-048-0210(2), Best Burn Practices; Emission Reduction Techniques, states, “. . .best burn practices involve methods that ensure the most rapid and complete combustion of forest fuels . . .” Covering of hand piles is a “Best Burn Practice.” OAR 629-048-0210(4) states, “When covers will not be removed and thus will be burned along with the piled forest fuels, the covers must not consist of materials prohibited under OAR 340-264-0060(3), except that polyethylene sheeting that complies with the following may be used: a) Only polyethylene may be used. All other plastics are prohibited.”

An addendum to the original Wrobel and Reinhart literature review (2003) on the use of polyethylene sheeting to enhance combustion efficiency, discusses the rules affecting polyethylene (PE) burning. Oregon has addressed the issue based on the findings reported by Wrobel and Reinhart (2003). “The available literature does not support a contention that burning polyethylene (PE) sheeting would produce unique chemicals or classes of chemicals that are not also found in emissions from burning wood debris” (Wrobel and Reinhart 2003).

Comment: Concern over multiple entries and multiple passes of heavy equipment.

Response: Integrating treatments and increasing efficiency is a primary objective of the IVMP EA. We anticipate that this EA will provide opportunities for Resource Areas to accomplish more integrated treatments and entries; projects will be implemented to reduce multiple entries and multiple passes to the extent practicable.

Comment: Tree planting and diversity of early seral vegetation. Any tree planting should be sparse and variable. Try to enhance complex early seral habitat by allowing and tolerating diverse early seral vegetation and relatively slow conifer establishment/dominance.

Response: In many of these forested and woodland communities heterogeneity, species diversity and a mixture of seral stages are all treatment objectives. Complex early seral habitat will be enhanced through retention of natural openings and expansion of gaps to sustain native shrubs and other early seral vegetation. Planting would be used when there is little to no natural regeneration, early seral species such as pine or oak are lacking, there is a need for particular species for habitat objectives, or there is a need to reduce nonnative species through shading (EA pp. 9, 10, 12, 16).

Comment: Focus fuel reduction near residences and well-traveled roads. Further from roads, focus on restoring ecosystems and natural processes. Lop and scatter fuels rather than burn.

Response: One primary objective of this EA is to foster and create integrated projects that satisfy multiple objectives and steer away from treatments implemented under a singular objective, such as hazardous fuels reduction alone. Additional objectives for this programmatic assessment include increasing spatial heterogeneity, species diversity, and overall habitat and forest variability indicative of mixed-severity fire regimes. The application of fire inherently results in variability, due to its dynamic nature and response to varied topographic, fuel and weather conditions. Under burning typically results in a mosaic of burn severities, where some fuels are burned hot and others go unburned.

The pile sizes indicated in the EA are a maximum, not all piles will adhere to these specifications and due to human construction and diversity of fuels, no two piles are exactly the same. The suggestions for varied ways to treat fuels are welcome, but dictation of how to enforce contract specification is outside of the scope of this EA. Projects completed under the IVMP EA have the potential to generate numerous fuels >3”, particularly from thinning sapling trees. Lop and scatter of all fuels >3” would have the potential to increase the surface fuel loading by shifting the arrangement of fuels through the conversion of ladder fuels to surface fuels, This action would increase the continuity and loading of surface fuels, and thus potential fire behavior rates of spread, flame length and resonance time, which would reduce the resiliency of the stand in a wildfire event.

Comment: Use of stewardship authority for wood extraction and receipts for restoration

Response: One of the IVMP objectives is to improve efficiencies and enhance the local economy. Dictation of the tools to implement and accomplish specific projects is outside of the scope of this EA. Additionally, unlike the U.S. Forest Service stewardship authority, BLM receipts are not obligated to restoration.

Comment: Connection between IVM silvicultural objectives and timber sale projects.

Response: One of the potential tools available for implementation of IVM projects is the extraction of thinned saw log material through ground-based or cable-based means (EA p.7, 19-20). The IVM project would not replace timber sale planning; however, it is expected that commercial forest products and biomass would be byproducts of restoration treatments.