United States Department of the Interior

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

WILLIAMS INTEGRATED VEGETATION MANAGEMENT TIMBER SALE DECISION RECORD

NEPA # DOI-BLM-OR-M070-2012-009-EA

I. INTRODUCTION

The BLM's interdisciplinary planning team designed the Williams Integrated Vegetation Management Project (from here on referred to as the Williams IVMP) in the Williams Creek and Lower Applegate Watersheds based on current resource conditions in the Planning Area, and to meet the objectives and direction of the 1995 Record of Decision and Resource Management Plan (1995 ROD/RMP). The proposals evaluated in the Williams IVMP Environmental Assessment (EA) reflect what the planning team believes to be the best balance of resource conditions, resource potential and competing management objectives. Planning involved extensive public involvement through meetings and field trips with the local community.

This Decision Record applies to activities associated with 149 acres of commercial thinning in plantations for the Williams Thin Timber Sale. The land use allocations in this timber sale are Late Successional Reserve and Riparian Reserve under the Medford District's 1995 Resource Management Plan (RMP).

Fuel hazard reduction and other vegetation treatments will be decided on in separate Decision Record(s). Some of the Variable Density Thinning, Density Management, Commercial Thinning, Pre-commercial Thinning, and Hazardous Fuel Reduction treatments may be completed under stewardship contracts.

Timber harvest, road construction, road decommissioning, road maintenance, and treatment of activity fuels will be implemented as described below. All Project Design Features are integral to the Selected Alternative and will be implemented. See section III, Decision and Rationale for details on the decision.

IV. CONTACT PERSON

For additional information contact either Allen Bollschweiler, Grants Pass Field Manager, 2164 NE Spalding Avenue, Grants Pass, OR 97526; telephone 541-471-6653 or Leah Schofield, Planning and Environmental Coordinator, 541-471-6504.

5/22/13

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

Date

II. PLAN CONSISTENCY

The actions proposed and analyzed in the EA were developed to be consistent with, and/or tier to the following:

1. *Final EIS and ROD for the 1995 Medford District Resource Management Plan* (RMP) (1995)
2. *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)
3. *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 the 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)
4. *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)
5. *Medford District Noxious Weed Environmental Assessment* (1998)
6. *ROD for Management of Port-Orford Cedar in Southwest Oregon* (2004)

The implementation of this project will not have significant environmental effects beyond those already identified in the 1995 Final EIS/Proposed RMP or its amendments. The proposed action does not constitute a major federal action having significant effects on the human environment; therefore, an environmental impact statement will not be prepared (see attached Finding of No Significant Impact).

III. FINDING OF NO SIGNIFICANT IMPACT (FONSI)

The EA disclosed that proposed actions will treat and maintain dispersal spotted owl habitat (EA pp. 132-135). Season restrictions listed as Project Design Features will prevent disturbance to nesting spotted owls within the Project Area. Maintenance of dispersal habitat is addressed and allowed due to appropriate consultation with the U.S. Fish and Wildlife Service (USFWS) (See Section IV, Consultation and Coordination below). No nesting, roosting, or foraging habitat will be removed under this decision.

The Williams IVM Project would provide interim protection for the Outstandingly Remarkable Value of fisheries on an eligible Wild and Scenic river segment of the Applegate River through the design of this project. This segment is potentially classified as a recreational river under the Wild and Scenic River system. There are no proposed activities within this eligible Wild & Scenic corridor; therefore, the project would not affect its potential classification as a recreational river.

It is my determination that the Selected Alternative will not significantly affect the quality of the human environment, individually or cumulatively with other actions in the

general area. No environmental effects meet the definition for significance, outside what has been analyzed in the higher level environmental documents, in context or intensity as defined in 40 CFR § 1508.27. Therefore an environmental impact statement will not be prepared.

IV. PUBLIC INVOLVEMENT

Public scoping involved a variety of approaches including letters, community meetings, public field tours of sites within the Project Area, and extensive conversations and discussions with groups and individual residents of the Williams Valley and the region.

Public scoping began on March 30, 2012, which included a letter mailed to the list of individuals, agencies, and organizations expressing interest in Grants Pass Resource Area projects and landowners within ¼ mile of the Williams IVMP proposed units. The BLM received approximately 100 public responses from letters, emails, and phone calls during scoping. In April, May, and June of 2012, two public meetings and three public field trips were held and numerous phone conversations with individuals helped to inform the public of the proposed project and the BLM of the public's concerns. The public meetings had up to 35 attendees and the field trips had up to 13 attendees. The BLM considered comments during development of the project prior to environmental analysis. There was an additional meeting held with members of the Williams Community Forest Project on March 11, 2013 to discuss the group's desired modifications to some proposed actions.

From this involvement it is abundantly clear that the range of views and preferences about resource management on BLM lands in the Project Area and the Williams Valley is very broad. There does, however, appear to be broad consensus in several areas: a) there is widespread recognition that the potential for severe wildfires is high, but concern was expressed about treating fuels on a landscape scale; b) there is a concern regarding cumulative effects in light of recent harvest on private lands; c) there is widespread support for ecological forestry objectives; and d) there is a widespread desire for monitoring to build trust between BLM and the community.

The BLM's interdisciplinary planning team designed the Williams IVMP in a manner that strives to accommodate the range of views and values, the resource management mandates in the pertinent laws and resource plans, and the current resource conditions in the Planning Area. In designing and presenting an integrated and multi-faceted project plan, the planning team has created what it believes to be the best balance of these factors and objectives. The result is a project that includes a broad suite of vegetation treatments to restore ecological systems of forests in southwest Oregon, reduce wildfire danger, and contribute to continuous timber production. This project would retain trees generally

older than 150 years including legacy trees[1], oaks, and hardwoods (EA p. 6). It provides commercial timber as directed by the Bureau's Strategic Plan and the RMP.

The public comment period for review of the Williams IVMP EA was initiated on December 17, 2012 for a 45 day comment period. Approximately 100 letters were sent to individuals, groups and agencies that requested they be kept informed of the project. The letter provided a synopsis of proposed actions, stated that the EA was available on-line or from the Grants Pass Interagency Office, and announced the 45-day public comment period. A legal notice was published in the Grants Pass Daily Courier on December 17, 2012. Eleven comment letters and approximately 100 form letters were received. Public comments and associated BLM responses are summarized in Attachment 1 of this Decision Record.

The Williams IVMP Planning Area totals 55,602 acres within the Applegate Adaptive Management Area (AMA) including areas within the East Illinois Valley/Williams-Deer Late-Successional Reserve (LSR) and within Riparian Reserves. The EA uses the term "Adaptive Management Area/Matrix" for areas outside LSR and Riparian Reserves (e.g., EA pp. 6, 9); however, it should be noted that Matrix as per the RMP (pp. 38-40) does not overlap the AMA land allocation; in the EA, AMA/Matrix is used to show the designation of lands outside LSR and Riparian Reserves that are available for schedule timber harvest. There are 16 Northern Spotted Owl "core" areas (EA p. 126) that overlap the Planning Area. The BLM manages approximately 28,161 acres of the Planning Area, forming a "checkerboard" pattern of public and private ownerships. Approximately 858 acres of the Planning Area is managed by the Rogue River-Siskiyou National Forest and approximately 26,583 acres is privately owned.

The Williams IVMP proposes a variety of activities to address the purpose and need for the project, ranging from commercial timber harvest to non-commercial thinning (EA pp. 10-11), Hazardous Fuel Reduction (EA pp. 11-12), Oak and Pine Restoration (EA p. 10), and temporary route construction or reconstruction to access proposed timber harvest units (EA pp. 11, 25-27).

The Williams IVMP EA incorporated analysis of the proposed actions and addressed comments and issues raised in public scoping comments.

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

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[1] These trees are survivors of previous disturbances, particularly trees much older than 150 years old that show signs of very old age (charcoal on the bark, very large limbs, very wide bark plates on ponderosa pine, and other indicators that the trees were part of the original stand), (EA p. 291).

Based on the extensive public input, recommendations from the planning team, and careful consideration of the objectives of the laws, regulations, and planning documents and NEPA analysis governing these lands, the following constitutes my decision.

V. DECISION and RATIONALE

Alternative 1, the No Action Alternative, is rejected because it does not meet the resource management objectives identified in the Medford District Resource Management Plan or the objectives for resources detailed in the EA (EA pp. 6-7). The No Action Alternative would not address or alter many of the existing resource conditions and trends that are of major concern relative to healthy forest conditions and resource protection. The No Action alternative would perpetuate or promote undesirable resource conditions, and these conditions would not be improved or mitigated. Certain undesirable ecological trends would continue unchanged and, in some cases, would be exacerbated over time. For example, high fire hazard conditions would continue and increase, and stand vigor would continue to decline.

It is my decision to implement, in part and as outlined below, the timber sale associated activities in plantations as described in Alternative 2 for the Williams IVMP EA and will be referred to as the Selected Alternative from this point on in this Decision Record.

The Hazardous Fuel Reduction, Commercial Thinning, Pre-commercial Thinning, Density Management, Oak and Pine Restoration, and some of the Variable Density Thinning treatments analyzed as part of Alternative 2 of the EA will be deferred from this Decision Record and will be decided upon in one or more separate Decisions.

Variable Density Thinning (EA pp. 30-31) in 149 acres of plantations (9 units) will be sold as a small timber sale (Williams Thin Timber Sale). Activity fuels will be treated as necessary (EA p. 11). Road work (reconstruction and decommissioning) associated with the timber sale will be completed (EA pp. 11, 37-38). All Project Design Features are integral to the Selected Alternative and will be implemented (EA pp. 38-52).

There are three potential Decision Records that will implement projects from the Williams IVMP. Following this first Decision Record, future decisions would implement Density Management, Hazardous Fuels Reduction, Variable Density Thin, and Oak /Pine Restoration treatments.

There are three ongoing federal projects in the Williams IVM Planning Area: 1) the ongoing Deer Willy Fuel Hazard Reduction Project, treating approximately 4,571 acres of strategic roadside and ridgeline treatments; 2) the Williams Hazardous Fuels Reduction Project treating approximately 250 acres within the next year; and 3) the West Williams Private Lands Hazardous Fuels Reduction project, a continuation of a Title II

funded project treating 20 acres of hazardous fuels on private lands (40 acres of treatment have been completed) within the Planning Area.

The following section provides details and the rationale for my decision. Resources and issues will be addressed in the same order in which they are presented in the EA.

A. Commercial Activities

1. Commercial Timber Harvest and Treatment of Activity Fuels (EA pp.10-11)

***Decision**:* The decision is to proceed with an advertised timber sale (Williams Thin) totaling 149 acres in 9 units identified in Table DR-1 below. All units are young stands in Late-Successional Reserve (LSR), and will be treated with a Variable Density Thinning (VDT) prescription (EA pp. 30-31, 205). There will be a tree removal diameter limit of 20 inches dbh, consistent with thinning recommendations for LSR. Trees greater than 150 years of age would not be prescribed for removal. Riparian thinning (EA pp. 34-37) will occur on 19 acres within these units. Where feasible, trees will be whole-tree yarded or yarded with the tops attached to minimize residual, post-harvest slash (EA p. 42).

Table DR-1. Williams Thin Timber Sale Units

Township-Range-Section	Unit	Unit Acres	Riparian Thinning	Prescription	Logging System
T39S-R6W-3	3-17A	14	3	VDT	tractor
T39S-R6W-3	3-17B	21	8	VDT	cable
T39S-R6W-1	1-4W	6	2	VDT	cable
T39S-R6W-12	12-3W	22	2	VDT	cable
T39S-R6W-23	23-4	12	0.1	VDT	tractor
T39S-R6W-26	26-1A	16	0	VDT	tractor
T39S-R6W-26	26-1B	25	2	VDT	cable
T39S-R6W-25	25-13	25	2	VDT	tractor/cable
T39S-R6W-25	25-5W	8	0	VDT	cable
Totals		**149**	**19.1**		

Riparian Thinning units will maintain a minimum 25 foot no-treatment buffer from bankfull-width to protect stream-bank stability. A variable width Ecological Protection Zone (EPZ), has been established based on site-specific conditions (EA pp. 35-37). Within the EPZ, no timber or biomass yarding will occur (EA p. 28) and only trees in the understory <8 inches dbh will be cut. Commercial timber extraction will occur on approximately 19 acres within the Riparian Reserve, but outside the EPZ. The primary shade zone will be maintained and canopy cover would remain above 50% (EA p. 36).

After harvest, the activity slash will be assessed by the fuels specialist and planned fuel treatments may be modified to ensure that overall unit objectives are met. Any changes made to the fuel hazard reduction planned for a unit would be within the scope of the fuel treatment options assessed in the EA and their anticipated impacts (EA p. 34).

Of the approximately 1,359 acres analyzed for potential harvest in Alternative 2 (EA pp. 12-24), units addressed in this decision total 149 acres of commercial timber harvest. This is approximately 0.5% of the 28,161 BLM acres in the Project Area, and approximately 0.3% of the 55,602 acre Planning Area.

The Williams Thin Timber Sale includes only portions of the units from the Williams IVMP. The remainder of the units will be decided on in separate decisions at a later date. They may be treated under the same Variable Density Thinning, Density Management (EA p. 29) or Commercial Thinning (EA pp. 32-33) prescriptions under another timber sale, or stewardship or other service contract.

***Rationale*:** Harvest in the Williams Thin Timber Sale is in young stands (average age 45 years) in LSR that were identified as needing thinning to accelerate their development into multilayered stands with large trees, diverse plant species, and structures that may, in turn, maintain or enhance species diversity (EA p. 205). Current stocking and structure of some of the stands is consistent with producing high yields of timber. However, these stands may be missing late successional characteristics such as diverse stand structure and multiple canopies. LSR objectives include managing to protect and enhance conditions of late-successional and old-growth forest ecosystems (RMP p. 32).

The RMP also directs treatments to benefit the creation of late-succession habitat (EA p. 76) and Variable Density Thinning will aid in acceleration of stand development and enhancement of structure. The prescription and marking guidelines would promote and maintain late-successional forest conditions (EA p. 77).

Without some treatment, future stand development will be slowed because of competition between trees for resources (e.g., nutrients and water) in these stands, and delaying development of late-succession habitat. The Variable Density Thinning prescription will provide for some timber volume while providing for protection and enhancement of habitat within the LSR. The result is that the remaining larger trees will be released, thereby promoting and retaining the large tree component to achieve LSR objectives.

2. Road Construction and Maintenance (EA pp. 20-21)

Decision: The decision is to implement the road construction as follows: temporary route construction (0.25 miles) and reconstruction (0.61 miles), which will be decommissioned after use; and the existing route reconstruction (0.28 miles) on private lands, which will not be decommissioned, consistent with existing right-of-way

agreements (EA pp. 11, 25). Road maintenance for haul roads will occur on a total of 19.6 miles of road (EA pp. 25-27), including 4.5 miles of natural roads.

***Rationale*:** Road construction and reconstruction is necessary to access units for an economically viable timber sale. Maintenance is necessary to support the Williams Thin Timber Sale and to maintain existing road conditions and prevent adverse impacts such as sediment delivery to streams.

B. BLM Strategic Plan

The decision will implement a range of activities that will promote a number of the goals of the Oregon/Washington BLM's 2015 Strategic Plan:

Strategic Theme Area 3: Healthy Land—Forests

- Where forest health is an issue, use ecological health information to identify priority landscapes and to support land use planning and decision-making
- Design treatments to minimize impacts to sensitive species and/or support Threatened & Endangered species recovery.
- Supply forest products to local communities on a sustained-yield basis.

Implementation of the Williams Thin Timber Sale will contribute approximately 2.38 million board feet (MBF) of timber to local and regional economies. The project will also serve to enhance the development of late-successional habitat in the LSR land allocation, a primary objective to support Threatened & Endangered species recovery.

IV. CONSULTATION AND COORDINATION

Northern Spotted Owl (pp. 142-143)
The Williams Thin Timber Sale is covered by a Biological Assessment submitted by the Medford District to the U.S. Fish and Wildlife Service (USFWS) (USDI BLM 2011) and received a Letter of Concurrence (USDI FWS 2011b) to cover a portion of the District's forest management work for Fiscal Year 2011, including the Williams Thin Timber Sale. The Williams IVMP Planning Area does not occur within the range of the marbled murrelet or within marbled murrelet critical habitat.

Pursuant to the Endangered Species Act (ESA), BLM completed consultation with the U.S. Fish and Wildlife Service for the activities addressed in this decision.

National Oceanic and Atmospheric Administration (NOAA)
The Proposed Action is within the Rogue River Basin and the range of the federally threatened Southern Oregon/Northern California coho salmon, would have no effect on coho or critical habitat. Consultation for the Endangered Species Act with NOAA is not needed as the Proposed Action would not affect listed species or their habitat. No consultation is needed under the Magnuson-Stevens Fishery Conservation and

Management Act as there is no adverse effect to Essential Fish Habitat for coho and chinook within the Rogue River Basin.

State Historical Preservation Office
Required cultural surveys was completed for the Williams IVMP. Eligible sites would be protected using Project Design Features (PDFs) with a no cut buffer. The State Historic Preservation Office concurred that the Williams IVMP will have no effect to cultural resources as cultural sites will be avoided during project implementation. The form is contained within the Williams IVMP Environmental Assessment case file.

Native American Tribal Consultation
Williams IVMP Scoping Report (March 2012) were sent to local federally recognized Native American Tribes interested in Medford District Bureau of Land Management proposed projects. The Tribes take an active role in the management of their native lands and the BLM works with individual tribal governments to further identify and address Native American concerns and traditional uses of lands administered by the BLM. Further consultation with Tribes in the form of meetings and phone calls did not identify cultural resource concerns.

VI. CONCLUSION

A. Plan Consistency

Based on the information in the Williams IVMP EA, in the record, and from the letters and comments received from the public about the project, I conclude that this decision is consistent with the:

1. Final EIS and ROD for the 1995 Medford District Resource Management Plan (RMP) (1995)
2. 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)
3. 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 the 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)
4. 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)
5. Medford District Noxious Weed Environmental Assessment (1998)
6. ROD for Management of Port-Orford Cedar in Southwest Oregon (2004)

The ACS Consistency Review (EA pp. 210-215) found that the project is in compliance with the Aquatic Conservation Strategy as originally developed under the Northwest Forest Plan.

This decision is also consistent with the Endangered Species Act; the 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.

This decision will not have any adverse impacts to energy development, production, supply and/or distribution (per Executive Order 13212).

This document complies with the Council on Environmental Quality's (CEQ) Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act (NEPA; 40 CFR Parts 1500-1508) and the Department of the Interior's regulations on the National Environmental Policy Act of 1969 (43 CFR Part 46) as well as the BLM specific NEPA requirements in the Departmental Manual (516 DM 11).

VII. ADMINISTRATIVE REMEDIES

This decision is a forest management decision. Administrative remedies are available to persons who believe they will be adversely affected by this decision. In accordance with the BLM Forest Management Regulations (43 CFR § 5003.2(1)), the decision for this project will not become effective, or be open to formal protest, until the Notice of Sale appears in the Grants Pass Daily Courier.

To protest a forest management decision, a person must submit a written and signed protest to the Grants Pass Field Manager, 2164 NE Spalding Avenue, Grants Pass, OR 97526 by the close of business (4:30 p.m.) not more than 15 days after publication of the first Notice of Sale. The protest must clearly and concisely state which portion or element of the decision is being protested and why it is believed to be in error, as well as cite applicable regulations. Faxed or emailed protests will not be considered.

VIII. IMPLEMENTATION DATE

If no protest is received by the close of business (4:30 p.m.) within 15 days after publication of the Notice of Sale, the decision will become final. The first Notice of Sale is expected to be published May 23, 2013. If a timely protest is received, the decision will be reconsidered in light of the statement of reasons for the protest and other pertinent information available, and a final decision will be issued in accordance with 43 CFR § 5003.3.

IV. CONTACT PERSON

For additional information contact either Allen Bollschweiler, Grants Pass Field Manager, 2164 NE Spalding Avenue, Grants Pass, OR 97526; telephone 541-471-6653 or Leah Schofield, Planning and Environmental Coordinator, 541-471-6504.

5/22/13

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

Date

ATTACHMENT 1

PUBLIC COMMENT ON THE WILLIAMS IVMP ENVIRONMENTAL ASSESSMENT (DOI-BLM-OR-M070-2012-009-EA) AND BLM RESPONSE

The Williams IVMP Environmental Assessment (EA) and Finding of No Significant Impact (FONSI) were released for public comment from December 17, 2012 to January 28, 2013 in the Grants Pass Daily Courier newspaper as well as on the Medford District Bureau of Land Management website at http://www.blm.gov/or/districts/medford/index.php; and through letters mailed to those individuals, organizations, and agencies that have requested to be involved in the environmental planning and decision making processes for forest management activities.

Eleven comment letters were received from natural resource organizations and area residents as well as 100 form letters from the Williams community.

BLM responses to substantive comments to the EA are present in this Attachment to the Decision Record.

Substantive comments do one or more of the following (BLM Manual, National Environmental Policy Handbook, 1/30/2008):

- question, with reasonable basis, the accuracy of information
- question, with reasonable basis, the adequacy of, methodology for, or assumptions used for the environmental analysis
- present new information relevant to the analysis
- present reasonable alternatives
- cause changes or revisions in one or more alternative

Comments that are not considered substantive include the following:

- comments in favor of or against the proposed action or alternatives without reasoning that meet the criteria listed above (such as “we disagree with Alternative Two and believe the BLM should select Alternative Three).
- comments that only agree or disagree with BLM policy or resource decisions without justification or supporting data that meet the criteria listed above (such as “more grazing should be permitted”).
- comments that don’t pertain to the Project Area or the project (such as “the government should eliminate all dams,” when the project is about a grazing permit).
- comments that take the form of vague, open-ended questions.

If a number of comments are identical or very similar, agencies may group comments and prepare a single answer for each group. Depending on the volume of comments received, responses may be made individually to each substantive comment or similar comments may be combined and a single response made. The Code of Federal Regulations (40 CFR §1503.4) identifies five possible types of responses for use with environmental impact statements.

- Modify action alternatives.
- Develop and evaluate alternatives not previously given serious consideration by the agency.
- Supplement, improve or modify the analysis.
- Make factual corrections.
- Explain why the comments do not warrant further agency response, citing the sources, authorities or reasons which support the agency's position and, if appropriate, indicate those circumstances which would trigger agency reappraisal or further response.

Comment: Provision of firewood to the community

Response: The BLM is required to either do the fuels work themselves or contract it out under a service contract. The BLM may be able to work with contractors to provide firewood to the local community, but cannot guarantee that it will be able to do so. In the past, contractors in the Williams area have provided firewood to neighboring landowners; however, we cannot guarantee that this will occur in the future.

Comment: Effects of treatments on recreational and commercial mushroom harvest

Response: The Selected Alternative will thin 149 acres, equaling 0.5% of the 28,161 BLM acres in the Project Area, and approximately 2.6% of the 55,602 acre Planning Area.

Effects of project activities on fungi and mycelial networks were disclosed in the EA. Effects on fungi and mycelial networks are expected from timber harvest, road work, and burning of slash piles. Impacts are expected to be small because of the small scale of activities in the Planning Area (EA pp. 230-231). Reintroduction of fire will reintroduce this natural process, a process these species evolved with, into the Planning Area. Additionally, with the 10 year period for activities to occur for the entire Williams IVMP, and the resultant temporal and spatial distribution of treatments, effects would not be expected as treated areas are also expected to trend toward recovery over this time period.

Comment: Wants gap sizes to be smaller

Response: To create heterogeneous conditions, prescriptions are designed to incorporate gaps (±15% of the stand) to increase ground cover suitable to the site and growing

conditions that provide for the establishment of early seral tree species. These areas would vary in size and shape, but typically would range from ¼ to 1 acre in size. In addition, untreated patches, or skips (10-15% of the stand), would be integrated into treatments. The untreated portions of the stand would protect and/or provide ecologically key features, habitat, hiding cover, and structure where such natural stand features exist.

Comment: Decommission roads and restrict harvest activities to where current access exists

Response: The roads in the Williams IVMP were evaluated to determine suitability for decommissioning. Transportation Management Objectives were developed for BLM roads within the Williams Watershed in 1997 through 2006. Roads were identified that met criteria for decommissioning. Roads encumbered by reciprocal agreements were removed from decommission status at request of reciprocal agreement partners. Reciprocal agreement holders consented that some roads could be decommissioned if an alternative route would be constructed in its place in a better location. Therefore no roads are identified for decommissioning in the Williams IVM Project proposal.

The 0.25 miles of temporary route construction and 0.61 miles of temporary route re-construction to access proposed units, would not result in an increase in road density in this watershed because they would all be decommissioned following use.

The 0.28 miles of existing route re-construction would restore existing portions of road beds to its original or modified condition. These roads would not lead to stream sedimentation since they are located well out of Riparian Reserves and/or are near ridgetops which are hydrologically disconnected.

Comment: Concern was expressed regarding use of plastic for burn piles

Response: The BLM recognizes the concern over burning polyethylene plastic (PE) in slash piles. However, the available literature supports the contention that there is an overall emission reduction benefit from covering silvicultural piles. Additionally, there is no evidence that burning PE sheeting would produce chlorinated compounds of significant amounts of other unique chemicals or classes of chemicals that are not also found in emissions from burning wood debris (Worbel & Reinhardt, 2003) (EA p. 262).

Comment: Restrict harvest to trees < 100 years old

Response: Restricting harvest to trees <100 years old is a target for LSRs; however, restricting harvest across the project area would not meet the purpose and need as described above and would also restrict BLM's ability to, "Produce a sustainable supply of timber and other forest commodities to provide jobs and contribute to community stability" (EA p. 7).

Comment: POC sanitation treatments should not be implemented

Response: POC sanitation described in the scoping report (March 2012) has been deferred from this project (EA p. 146). There are no POC sanitation treatments proposed in the EA.

Comment: Effects analysis on various resources

A. **Effects on neotropical birds and other species from actions on private lands and fragmentation in the watershed**

Response: This was also addressed above under Cumulative Effects above. Regarding effects on land birds as well as other late-successional forest-dependent species, there would be no reduction in the amount of late-successional forest habitat from this project (EA p. 223); untreated habitat would be retained across the watershed and continue to provide adequate hiding cover, and foraging and nesting habitat in the planning area. Treatments would maintain key habitat features across the project area, minimizing impacts within the Planning Area (EA p. 324).

> Due to the variety of land-bird habitat requirements, any action that changes or removes vegetation used by one species may benefit another. Species requiring dense cover and forage that have benefited from lack of fire and dense understories could be adversely affected by thinning treatments designed to reduce vegetation density. Due to habitat removal, songbird composition and abundance in treated stands could be reduced for approximately 25 to 40 years. (EA p. 233)

With the exception of small gap openings, there would no habitat removal in the project area; however, the EA acknowledges that some individual birds may be displaced and nests lost during project activities (EA p. 234). The relatively light-touch activities (FHR, Oak/Pine Restoration, Density Management) and retention of untreated riparian areas and the minimum ¼ to ½ acre patches, 10-15% of each unit remaining untreated (EA p. 50). The land bird effects section concludes that bird populations in the region would be unaffected at the regional scale (EA p. 234).

B. **Songbird decline, edge effects and fragmentation**

Response: One comment was raised stating that the decline in songbird populations (EA p. 234) may be due to edge effects and fragmentation; however, local research (Sauer et al. 2004; Alexander 2005) does not support this contention. The EA section on songbirds displays a clear, well-reasoned analysis.

C. Anticipated songbird decline

Response: Another comment quoted the affected environment section stating that there would be a decrease in songbird abundance for 25-40 years. The EA acknowledges local effects, but because of the small area being proposed for treatment (11.9% of the Planning Area over 10 years), there are no expected widespread effects on bird populations.

> …untreated areas adjacent to the treatment areas would provide refuge and nesting habitat, minimizing short-term loss of habitat. In treated stands, riparian areas not receiving treatment would also serve as refugia in proposed harvest units. Activities occurring during active nesting periods could cause some nests to fail. However, seasonal restrictions (Section 2.3.3.7) would protect most nests from disturbance during project activities (EA p. 234).

D. Potential for brood parasitism and predation, edge effects

Response: There is no increase in edge effects from the proposed temporary route construction (EA p. 301). There would be no reduction in the amount of late-successional forest habitat from this project (EA p. 223). Treatments would maintain key habitat features across the project area, minimizing impacts within the Planning Area (EA p. 324). Additionally, field evaluations of RA 32 habitat, structurally complex habitat, resulted in 141 acres being withdrawn from consideration for treatment (EA p. 117). These factors, along with no treatment of 10-15% of the land in each FHR unit, and other untreated areas in the watershed (over 75% of BLM lands in the Planning Area), reduce the potential for increased brood parasitism or predation. Additionally, the Williams IVMP follows guidelines in the U.S. Fish and Wildlife Service (USFWS) and BLM Memorandum of Understanding to minimize effects to migratory birds.

Approximately 1,359 acres are analyzed for potential harvest in Alternative 2, and a total of 6,625 acres are analyzed for some type of treatment (EA pp. 12-24), equaling approximately 23.5% of the 28,161 BLM acres in the project area, and approximately 11.9% of the 55,602 acre Planning Area that may be treated over a period of 10 years. The average treatment over those 10 years would be a maximum of 2.4% of BLM lands in the planning area per year. Treatment acres will likely be less than that because of logistical, operational, and safety concerns, and because of budget limitations.

Comment: Requests monitoring of the project: review the mark before the Decision is made.

Response: Appendix 13 of the EA contains the monitoring plan for this project. Public involvement and monitoring was encouraged through FIREMON plot data collection. An initial field trip was conducted in the summer of 2012 with interested volunteers to establish some FIREMON plots. Other members of the public requested the BLM to

conduct post treatment monitoring. For silvicultural treatments, post-treatment monitoring would also occur for BLM staff as part of our standard operating procedures.

A field trip was provided to review sample marking of units in the Williams IVMP during public scoping. The BLM interdisciplinary team and Grants Pass Field Manager considered public comments before a Decision was reached for the Williams Thin Timber Sale.

Comment: Greenhouse gas emissions / carbon storage are not analyzed

Response: The EA states that, "Treatments of the Proposed Action were compared to treatments in other recent projects and found to be similar. Carbon storage and carbon emissions of the Proposed Action were calculated to determine the net contributions of greenhouse gases resulting from the treatments." (EA p. 172). Carbon emissions (carbon dioxide) were calculated from timber harvest activities (including fuel consumption) and post-harvest fuel treatments. The Williams IVMP would reduce carbon stores temporarily but would result in net increases over time, "Carbon stores would exceed direct and indirect carbon emissions, resulting in a net storage of carbon compared to pretreatment conditions" (EA pp. 172, 296-297).

Comment: Information requests

A. Request for information on diameters and volume

Response: Volume estimates will be provided in the timber sale prospectus. The Williams Thin timber sale marking will be completed by Designation by Description so volume and diameter distributions are not available.

B. Request for information on Scattered Apples timber volumes and marking guidelines/prescriptions

Response: The Scattered Apples timber volumes and marking guidelines/prescriptions are not relevant to this project. The EA is available on the Medford District website at: http://www.blm.gov/or/districts/medford/plans/nepa-details.php?id=152

C. Request of the Scattered Apples Settlement Agreement, prescriptions, and marking guidelines

Response: The Scattered Apples Settlement Agreement is outside the scope of analysis of the Williams IVMP. The commercial treatments in the settlement agreement were cancelled; therefore it is no longer a foreseeable project. The Williams IVMP is a new planning effort and the treatments of the Scattered Apples Project were not carried over to the Williams IVMP proposals.