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ALTHOUSE-SUCKER LANDSCAPE MANAGEMENT PROJECT DECISION RECORD #2 Decision Record for the Althouse Sucker Timber Sale EA # OR117-07-02

I. Introduction

The BLM published a decision notice for the first Decision Record (DR) on the Althouse Sucker Landscape Management Project (LMP) on May 25, 2010. All actions in that decision were Not Likely to Adversely Affect (NLAA) for the Northern Spotted Owl, and covered by two Letters of Concurrence from the U.S. Fish and Wildlife Service. That DR was protested and protest resolution is in process. This DR addresses actions analyzed for the timber sale portion of the Althouse Sucker LMP.

The Bureau of Land Management's interdisciplinary planning team designed the Althouse-Sucker Landscape Management Project (LMP) based on: a) current resource conditions in the project area; b) the objectives and direction of the Medford District Resource Management Plan (RMP) and the Northwest Forest Plan (NWFP); and c) community interest and involvement. The alternatives presented and evaluated in the Althouse-Sucker LMP 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 and outreach during project development, and incorporated public meetings, meetings with numerous groups and community members, and public field trips.

This decision record is the second decision issued for the Althouse-Sucker Landscape Management Project Environmental Assessment. The previous decision focused on the non-commercial actions identified in the Althouse Sucker LMP EA. These actions included fuel hazard reduction, special forest products, quarry use, aquatic and wildlife restoration, understory thinning, and road maintenance and decommissioning. Therefore, these actions are not addressed in this decision. This decision focuses on the commercial timber actions deferred in the May 25, 2010 Decision Record.

In this decision, 182 acres in 14 units are authorized for timber harvest; there is no harvest in riparian reserves. This decision authorizes 0.93 miles of temporary spur road construction, which would be decommissioned following completion of project activities and 0.6 miles of permanent road construction. The EA analyzed up to 1,515 acres for commercial timber harvest (EA p. 11); and up to 1 mile of permanent road construction, 2.3 miles of temporary road construction, 5 helicopter landings, and opening of 1.1 miles of existing temporary spurs (EA p. 19).

All activity fuels would be treated as appropriate (EA p. 7). All project design features (EA pp. 20-26) are integral to the selected alternative and will be implemented. See section III, Decision and Rationale for details on the acres included in this decision.

As stated in the EA (p. 1) the actions proposed in the EA were designed 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 Althouse Sucker LMP is consistent with the 2001 Record of Decision and Standards and Guidelines for Amendments to the Survey and Manage, Protection Buffer, and other Mitigation Measures Standards and Guidelines.

On December 17, 2009, the U.S. District Court for the Western District of Washington issued an order in *Conservation Northwest, et al. v. Rey, et al.*, No. 08-1067 (W.D. Wash.) (Coughenour, J.), granting Plaintiffs' motion for partial summary judgment and finding a variety of NEPA violations in the BLM and USFS 2007 Record of Decision eliminating the Survey and Manage mitigation measure.

Previously, in 2006, the District Court (Judge Pechman) had invalidated the agencies' 2004 RODs eliminating Survey and Manage due to NEPA violations. Following the District Court's 2006 ruling, parties to the litigation had entered into a stipulation, exempting certain categories of activities from the Survey and Manage standard (hereinafter "Pechman exemptions").

The project may proceed even if the District Court sets aside or otherwise enjoins use of the 2007 Survey and Manage Record of Decision. This is because the Althouse Sucker LMP meets the provisions of the last valid Record of Decision, specifically the 2001 Record of Decision and Standards and Guidelines for Amendments to the Survey and Manage, Protection Buffer, and other Mitigation Measures Standards and Guidelines (not including subsequent Annual Species Reviews).

- Surveys have been conducted as per designated survey protocols for Survey and Manage (S&M) species; and
- species found in treatment areas have been buffered as per S&M Standards and Guidelines;
- as per S&M recommendations in updated survey and management recommendations; or

- units are exempt from S&M guidelines as per survey protocols (e.g., activities in nonhabitat, activities are nonhabitat disturbing; outside the range of the species);
- or meets one of the Pechman exemptions:

Judge Pechman's Order from October 11, 2006 directs: "Defendants shall not authorize, allow, or permit to continue any logging or other ground-disturbing activities on projects to which the 2004 ROD applied unless such activities are in compliance with the 2001 ROD (as the 2001 ROD was amended or modified as of March 21, 2004), except that this order will not apply to:

- a. Thinning projects in stands younger than 80 years old;
- b. Replacing culverts on roads that are in use and part of the road system, and removing culverts if the road is temporary or to be decommissioned;
- c. Riparian and stream improvement projects where the riparian work is riparian planting, obtaining material for placing in-stream, and road or trail decommissioning; and where the stream improvement work is the placement large wood, channel and floodplain reconstruction, or removal of channel diversions; and
- d. The portions of project involving hazardous fuel treatments where prescribed fire is applied. Any portion of a hazardous fuel treatment project involving commercial logging will remain subject to the survey and management requirements except for thinning of stands younger than 80 years old under subparagraph a. of this paragraph."

Following the Court's December 17, 2009 ruling, the Pechman exemptions are still in place.

Judge Coughenour deferred issuing a remedy in his December 17, 2009 order until further proceedings, and did not enjoin the BLM from proceeding with projects. I have reviewed the Althouse Sucker LMP Project in consideration of both the December 17, 2009 and October 11, 2006 Orders. The Althouse Sucker LMP project is consistent with court orders relating to the Survey and Manage mitigation measure of the Northwest Forest Plan, as incorporated into the Medford District Resource Management Plan. This decision entails thinning in stands that have been surveyed as per the 2001 Survey and Manage ROD; thinning in stands less than 80 years old; stream and riparian restoration projects; and hazardous fuel treatments. Therefore, this decision is consistent with the 2001 ROD without Annual Species Reviews, or meets the Pechman Exemptions, A-D (October 11, 2006 Order).

The implementation of this project will not have significant environmental effects beyond those already identified in the 1995 Final EIS/Proposed RMP. 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 enclosed Finding of No Significant Impact).

II. BACKGROUND

The Althouse-Sucker Planning Area is located 8 miles east of the city of Cave Junction, and lies in the Sucker Creek and Althouse Creek 5th field watersheds.

The BLM manages approximately 10,483 acres of the 30,395-acre planning area, which is a checkerboard pattern of public and private ownerships. Of the 10,483 acres of BLM-administered lands, 6,983 acres are lands revested from the Oregon and California Railroad and Coos Bay

Wagon Road Grant Lands and 3,500 acres are public domain (PD) lands. The planning area includes 6,341 acres of matrix land allocation, designated as Southern General Forest Management Areas (SGFMA). Riparian reserves (2,651 acres), Late Successional Reserves (LSR) (1,492 acres), and a spotted owl Critical Habitat Unit (CHU) (1,492 acres) also occur in the planning area. Approximately 320 acres are in the Brewers Spruce Area of Critical Environmental Concern / Research Natural Area (ACEC/RNA).

Planning for this project began in November 2005 when BLM mailed out approximately 250 scoping letters to landowners and other individuals and groups. The BLM held an open house on December 15, 2005 to introduce the local communities to the planning team, resource specialists, and the scope of the proposed project. BLM sent a second scoping letter to the public in April 2007, providing an update to the planning process.

From the beginning, the scope of the project was intended to address the full range of conditions and opportunities that were found, and to design a multi-faceted project that addressed a range of resources. The Althouse Sucker project was designed in a manner that strives to be sensitive to the range of views and values, to the resource management mandates that are set forth in the various pertinent laws and resource plans, and to the current resource conditions in the project area. As a result, the planning team designed an integrated and multi-faceted plan that balances these factors and objectives. The result is a project that includes a broad suite of activities: wildlife habitat restoration, young forest management, older seral stand thinning, fuel hazard reduction, and road maintenance, renovation, decommissioning and construction. As stated above, the first decision addressed predominantly non-commercial activities proposed and analyzed in the EA; this decision addresses the timber sale portion of the project. Units or areas that contained structurally complex forests were dropped from consideration for treatment. Combined, the two decisions provide commercial and non-commercial outputs as directed by the Bureau's Strategic Plan and the RMP.

The Althouse-Sucker EA presented and analyzed a no action alternative and three action alternatives (Alternatives 2, 3 and 4). The three action alternatives reflect a balance and integration of resource conditions, resource potential, and management objectives included in the Purpose and Need of the EA (pp. 2-4).

The Althouse-Sucker LMP EA was available for a 30-day public comment period from February 9 through March 10, 2008. Many comments BLM received clearly show the value placed on this area by many members of local communities as well as people from other areas. Values and concerns identified by commenters include, but are not limited to, risk of fire hazard, species diversity, riparian areas, water quality, commercial harvest, healthy fisheries, and wildlife habitat (EA section 4.0 Agencies and Persons Consulted, p. 92 and Appendix F and G). For a more detailed summary of public comments, see Section VII, Public Involvement.

The Althouse Sucker project was originally consulted on programmatically in a combined Forest Service and Medford BLM Biological Assessment covering forest management activities planned for 2004-2008. The Service issued a BO for these projects in 2003 (FWS Log #1-15-03-F-511). In response to the Ninth Circuit opinion in *NEDC v. Allen/USFWS (NEDC I)*, No. 05-1279 (D. Or.), the Service sent a letter on November 2, 2005, recommending the Forest Service and the Medford BLM reinitiate and reevaluate critical habitat impacts using critical habitat definitions of the ESA, rather than the Service's regulations (50 CFR Part 402).

Subsequent to the release of the EA, BLM reinitiated section 7 consultation with the United States Fish and Wildlife Service (USFWS) for the Northern Spotted Owl. At the time of the first decision the USFWS had not issued a biological opinion. However, the BLM did receive a Letter of Concurrence from the USFWS for *Not likely to Adversely Affect* actions. As a result, all actions selected in the first decision were *Not Likely to Adversely Affect* for the Northern Spotted Owl.

On June 10, 2010 BLM received a Biological Opinion for commercial activities analyzed in the Althouse-Sucker LMP (Tails # 13420-2010-F-0082).

III. DECISION and RATIONALE

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.

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 purpose and need (EA pp. 2-4), or the objectives (EA pp. 7-20) for the project. Namely, the No Action would not meet the need to “Produce a sustainable supply of timber and other forest commodities on matrix lands to provide jobs, contribute to community stability (RMP p. 38) and provide timber receipts to Josephine County by offering a timber sale” (EA p.4). 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. With the No Action, certain undesirable ecological trends will continue unchanged and, in some cases, will be exacerbated with the passage of time. For example, high fire hazard conditions will continue or increase, and stand vigor and forest health will continue to decline.

It is my decision to implement, in part and as outlined below, Alternative 4 for the Althouse Sucker Landscape Management Project. Alternative 4 was designed to maximize treatment acres and provide flexibility in the decision; however, this decision authorizes only 182 acres of the 1,515 acres analyzed in the EA for timber harvest under this alternative.

Because of limitations on treatments allowed under current consultation for the Northern Spotted Owl, Alternative 4 is chosen to maximize treatments acres which would increase the level of timber and other forest products produced from this project. The selected units for treatment include structural retention, commercial thinning, group selection and density management. Following treatment, activity fuels will be treated. Special forest products or biomass removal may occur before or after the primary stand treatment. The following section details the decision and activities.

A. Older Seral Stand Treatments (EA p. 12-13)

Decision: The decision selects to treat older seral stage stands with structural retention, commercial thinning, group selection, and density management (Table DR-1). Structural retention (SR) is designed to increase the growth of the existing understory trees or regenerate a new understory with natural seeding and/or tree planting. SR retains 16-25 large green conifers (>20”DBH) per acre across the natural range of diameters present in the stand. This prescription retains a minimum of 40 % canopy cover at the stand level in Douglas-fir/Tanoak and White-fir series and a 25 % canopy cover in the pine and oak species (EA p. 12). Preharvest snags will

remain, as will healthy or cull green trees greater than 20" DBH to meet snag and CWD requirements. At a minimum, 2 to 4 large hardwoods per acre greater than 12" DBH would be reserved for wildlife and stand diversity (EA p. 50).

Commercial thinning will widen the spacing of residual trees to promote the growth and structural development of the remaining stand. Suppressed intermediate and dominate trees will be removed to increase individual tree growth and accelerate seral stage progression of stands. Commercial thinning will also include group selections to encourage the growth of existing Douglas-fir and shade intolerant ponderosa pine and sugar pine within mixed conifer stands. Group selection is an uneven-aged silvicultural system in which a small group of trees ranging from one-half to three acres in size would be removed within larger stands and regenerated.

Density Management /Understory Reduction (DM/UR) prescription targets areas targeted for the Douglas-fir/Tan-oak and Douglas-fir series. This treatment is prescribed for older seral stands that may provide multiple forest products (i.e., poles, sawlogs, firewood, special products) or opportunities for restoration.

There is less than 1 acre of riparian harvest authorized in this decision (Unit 10-8). Unit 12-8 is in T40S-R07W, Section 12, Operational Inventory Unit 10.

Table DR-1. Vegetation treatments and acres

Township Range	Unit	Prescription; Logging System	Acres
T40S., R7W.	R/W Sec 8	CC (clearing for road)	3
T39S., R7W.	R/W Sec 9	CC (clearing for road)	1
T39S., R7W.	Unit 9-2A	Structural Retention (SR); Tractor/Cable	24
T39S., R7W.	Unit 9-4A	Commercial Thin/Group Select (CT/GS); Tractor/Cable	4
T39S., R7W.	Unit 35-13B	Density Management/Understory Reduction (DM/UR); Cable	8
T39S., R7W.	Unit 35-23	CT/GS; Cable	7
T40S., R7W.	Unit 3-1A1	CT/GS; Tractor	27
T40S., R7W.	Unit 3-1A2	CT/GS; Cable / Tractor	33
T40S., R7W.	Unit 8-1	CT/GS; Tractor	48
T40S., R7W.	Unit 10-8	DM; Tractor	8
T40S., R7W.	Unit 11-15	SR; Tractor	11
T40S., R7W.	Unit 12-8	CT/GS; Cable	3
T40S., R7W.	Unit 18-1	CT/GS; Cable	5
TOTAL			182

Rationale: At the project scale, after the proposed treatments are implemented, a diversity of species and stand conditions will remain. Overall, forest health and resiliency will be greater across the project area with a decreased potential for stand density mortality due to insects and disease (EA p. 51). The potential for forest loss due to severe wildfire will also diminish. Species

representation across the project area will be better maintained into the future by increasing forest resiliency and growing space of hardwood species.

Treatments in previously managed stands will reduce fuel loading and vegetation density. As a result, the previously managed stands will increase in vigor with reduced competition, decreasing time to mature stand development.

Structural Retention emphasizes growing a new stand of trees for future timber production. Through retention of both individual trees and groups of conifers, remaining trees will have growing space and adequate light to develop a conifer dominated understory necessary for future mature stands (EA p. 49). Douglas-fir, sugar pine, ponderosa pine, incense cedar, and hardwood species will be the preferred leave species. Healthy codominant and dominant ponderosa pine, sugar pine, incense cedar, and hardwood species will be favored over Douglas-fir, where available. A full range of vegetation from small to the largest healthiest trees will remain.

Group selections and the combination of group selection with commercial thinning will open the canopy increasing growing space and resources (water, light, nutrients) for younger trees. Modified group selections, in combination with commercial thinning will increase hardwood tree growth by allowing more light and growing space to selected large oaks, madrones, and individual pines. These treatments will create species diversity and multiple canopy layers, while providing needed growing space for bordering overstory trees and for conifer reproduction (EA p. 47-48). Following treatment, stands will be composed of healthy trees of all species and diameter classes (EA p. 48). Structural and biological diversity will be present through the retention of trees of all age and size classes.

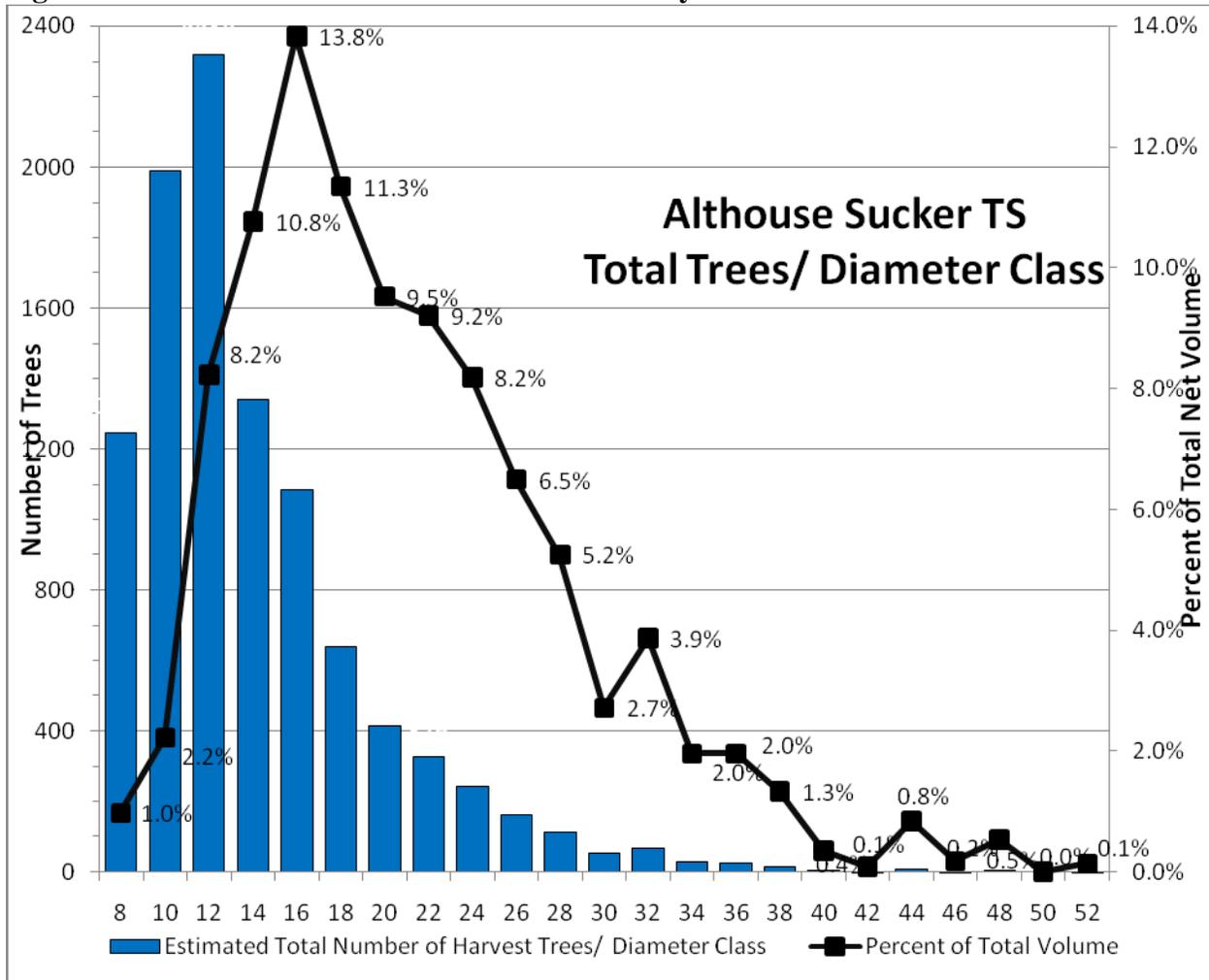
Density Management reduces competition, providing greater resources for the residual stand leading to increased growth rates and stand vigor. Following treatment, stands will be composed of healthy trees of all species and diameter classes. Mature forest characteristics will be retained or encouraged through multiple canopy layers, species diversity, multiple age classes, and stand connectivity (EA p. 47-48). Treatments will maintain stand age because trees in all canopy strata and age classes remain. In mixed conifer stands with shade intolerant pine and oak, reduced competition will promote the growth and structural development of the remaining stand and lead to species diversity in the long term (EA p. 48).

Trees marked for harvest in the Althouse Sucker timber sale are heavily weighted towards the smaller size classes, as shown in Table DR-2 and Figure DR-1 below; 95% are 24" dbh or smaller. Volume of timber harvested from trees in the smaller size classes is approximately 74%. However, as the table shows, some larger trees are designated for removal. Typically, a large tree is only removed when a more vigorous tree (better crown ratio, better form, free from disease and insects) of similar size can be retained. The result is that the remaining larger trees experience less competition for nutrients, water and sunlight, thereby promoting and retaining the large tree component as the BLM balances active management (matrix) objectives with other multiple use objectives.

Table DR-2. Number of Trees, Volumes and Percentages by Diameter Size Class

Diameter Class	Estimated Total Number of Harvest Trees/ Diameter Class	Percent of Total Trees	Estimated Net Volume (MBF)/ Diameter Class	Percent of Total Volume
8	1,247	12.4%	22	1.0%
10	1,991	19.7%	50	2.2%
12	2,318	23.0%	185	8.2%
14	1,342	13.3%	242	10.8%
16	1,084	10.7%	311	13.8%
18	640	6.3%	255	11.3%
20	416	4.1%	214	9.5%
22	326	3.2%	207	9.2%
24	242	2.4%	184	8.2%
26	163	1.6%	146	6.5%
28	114	1.1%	118	5.2%
30	52	0.5%	61	2.7%
32	66	0.7%	87	3.9%
34	30	0.3%	44	2.0%
36	27	0.3%	44	2.0%
38	16	0.2%	30	1.3%
40	4	0.04%	8	0.4%
42	1	0.01%	2	0.1%
44	8	0.1%	19	0.8%
46	1	0.01%	4	0.2%
48	4	0.04%	12	0.5%
50	0	0.00%	0	0.0%
52	1	0.01%	3	0.1%
TOTAL	10,093		2,248	

Figure DR-1. Diameter and Volume Distribution by Diameter Class



B. Activity Fuels (EA p. 7)

Decision: The decision is to treat residual activity fuels following vegetation treatments (EA p. 7). Activity fuels, when necessary, will be treated in all units proposed for treatment in mid and older seral stage stands and in identified young stands. To reduce competition for water and nutrients, the main stems of selected suppressed smaller trees within the drip line of larger trees may be cut. Suppressed trees judged to be unlikely to recover and thrive following harvest, as well as damaged residual saplings and pole size (typically <6”) trees, may also be severed.

Slash and fuel created from vegetation treatments will be handpiled and burned (HP/B). It can be expected that ≤10% of each individual pile will not be consumed leaving pile “rings” and that ≤5% of the piles on the site will not burn, resulting in scattered pockets of surface fuels remaining on site. To remove these fuels and achieve desired surface fuel conditions an underburn will be implemented as part of the initial treatment on select units within 1-2 years after the handpiles are burned.

Following initial fuel reduction low intensity underburns will be used to maintain the site in low fuel hazard condition. Frequency of underburns will be based on vegetation responses, vegetation types, and other natural disturbances, such as wind throw, ice/snow damage, or wildfire. It is estimated that maintenance burning throughout the project area will be on a 7-15 year rotation. Prior to the maintenance underburn, the cutting of approximately 90% of madrone (and some oak) resprouts (one to three stems on each plant will be retained) may be done.

Criteria used to determine fuel treatment needs include field reconnaissance and professional judgment, considering stand density, presence of ladder fuels, fuel accumulation, and proximity to communities at risk (CAR) or wildland urban interface (WUI) areas. Proposed treatments may be adjusted based on post-harvest review of conditions and on considerations of site specific physical, biological, and social features at the time of review.

Rationale: Fuel hazard reduction of existing and activity generated fuels is an important purpose of this project, especially in the rural interface. Activity fuels treatments are specifically designed to reduce the risk of crown fire by reducing overall fuels and increasing the Canopy Base Height (CBH) (EA pp. 56-57). Areas with low fuel hazard provide fire fighters opportunities for direct attack, reducing the chance of a large scale fire. Furthermore, density-induced mortality will decrease, reducing the dead fuel component.

Fuel treatments will reduce the chance of uncharacteristic fire behavior, protect communities from wildfire, and improve access for fire suppression forces.

C. Forest Products (EA p. 7-8)

Decision: The decision is to implement up to 182 acres of special forest product and biomass extraction during follow up treatments in harvest units. Table DR-1 displays forest units, treatment prescriptions and associated acres. All units will be available for special forest product (SFP) and biomass extraction following timber harvest; this would occur mainly during follow up treatment of activity fuels. SFP harvesting / collection will be consistent with stand treatment and silvicultural objectives, and will not exceed the level of treatment as described in the EA.

Biomass removal within 200 feet of roads greater than 35% slope will be performed by low level aerial cable yarding systems. Material removed will generally be small diameter and will be removed in its entirety, usually whole tree yarding. On slopes less than 35%, low impact ground-based equipment will be used. Main skid roads will be greater than or equal to 75 feet apart with a maximum trail width of 6 feet; no skid trails will be constructed in riparian reserves. With larger equipment, 150 foot spacing will apply.

Rationale: Both the public and EA (p. 4) identified a need for providing forest products. Special forest products, stewardship and small sale contracting offer potential treatment methods to accomplish ecological objectives as well as to diversify economic opportunities to local communities and contractors. Small sales and stewardship contracting also provide opportunities for innovative methods to utilize woody material.

B. Roads and Transportation Management (EA p. 19-20)

Decision: The decision is to construct 0.6 miles of new permanent road and 0.93 miles of temporary roads, which will be decommissioned following use (Table DR-3). The road subgrade will be an outsloped, 14' wide, native surfaced road plus curve widening and turnouts. Road

grades will not exceed 15%. The roads will be constructed to allow access for harvesting and transporting logs. After all project work is completed the new permanent roads will be water-barred, barricaded, and placed in a maintenance level 1, closed status. Temporary roads will be obliterated after use by pulling the fill material and clearing debris into the road prism and re-contouring the ground slopes.

Table DR-3. Temporary and permanent road construction

Road Number	Road Type	Miles
39-7-9A and B	Temporary Spur	0.44
40-7-11C	Temporary Spur	0.16
40-7-5A	New Construction	0.14
40-7-8A	New Construction	0.46
40-7-8B	Temporary Spur	0.33
Total temporary spurs and new road construction		1.53

Rationale: Currently there is no access to units served by the proposed roads. New roads will be constructed to meet multiple resource management objectives and to allow access for harvesting and transporting logs. Roads will also be used for biomass removal and stewardship activities.

Economic viability is a key component of the Purpose and Need for this project (EA p. 4) as some of the timber sale receipts will go to O&C counties. Helicopter logging is not part of this decision because it will not provide an economically viable sale, as helicopter and fuel costs have greatly increased.

IV. BLM Strategic Plan

The Decision will implement a range of activities that will promote a number of the goals of the BLM's Strategic Plan for FY2003-2008:

Resource Protection-Goals 1 & 3: Protect Cultural and Natural Heritage Resources; Improve Health of Watersheds and Landscapes (Restore Fire Adapted Ecosystems)

This project will protect and in some cases enhance cultural resources through project design features and reduced fire hazard. Wildlife habitat improvements will be completed through restoration of Jeffrey pine savannahs, white oak habitats and ultramafic plant associations.

Resource Use-Goal 4: Manage or Influence Resources to Enhance Public Benefit, Promote Responsible Use, and Ensure Optimal Value

This decision will provide opportunities for a commercial sale with approximately 2 MMBF. The project also provides biomass utilization and special forest products on up to approximately 182 acres. Small sales and stewardship contracting provide opportunities for innovative methods to utilize woody material and encourages developing markets.

Serving Communities-Goal 1: Protect Lives, Resources, and Property

Implementation of Alternative 4 will reduce fuel loadings and stand densities, moving them closer to historical levels and normal ranges. All areas to be thinned include fuel hazard reduction to protect resources, homes and property. In some areas of the Althouse Sucker LMP, fuel hazard reduction is the primary objective. Fire behavior and suppression difficulties experienced in recent fires in southwest Oregon (e.g., the 500,000 acre Biscuit fire) clearly demonstrate that fuel hazard needs to be addressed to reduce threats to public health, safety and property.

E. National Fire Plan

The National Fire Plan, a culmination of various reports, (i.e., *Managing the Impacts of Wildfires on Communities and the Environment, Integrating Fire and Natural Resource Management – A Cohesive Strategy for Protecting People by Restoring Land Health*), budget requests, Congressional direction, and resulting strategies, plans, projects, and other activities has set the stage and provided direction for an increased application and management of prescribed fire and other fuel treatments on federally-managed lands. This is further reinforced by the 1995 Federal Wildland Fire Management Policy along with its accompanying 2001 review and update.

Much of the project area has high risk fire regimes and is classified as fire condition classes two and three under the Department of the Interior's "Cohesive Strategy." The fire regimes in these fire condition classes have been moderately to significantly altered from their historical range of fire frequency. To restore them to their historical fire regimes, these lands require some level of restoration through mechanical and prescribed fire treatments (*Integrating Fire and Natural Resource Management – A Cohesive Strategy for Protecting People by Restoring Land Health*, DOI, March 2001 Draft). The Althouse Sucker LMP includes a range of management actions directed at this restoration and at reducing the high wildfire risk on federal lands.

V. Consultation and Coordination

Pursuant to the Endangered Species Act, BLM completed consultation with the US Fish and Wildlife Service. The Althouse Sucker project was covered under the 2006 Biological Opinion (BiOp) and LOC (FWS Log #1-15-06-F-0162 and Log #1-15-06-I-0165) for actions that may affect Northern Spotted Owls. However, since then the BO and LOC were pulled by the USFWS due to pending litigation the BLM reinitiated consultation on the LAA portions of the Althouse Sucker project.

In April 2010, the BLM prepared a Biological Assessment to evaluate impacts to Northern Spotted Owls and their critical habitat. In June 2010 the USFWS gave BLM a BiOp for treatments Likely to Adversely Affect (LAA) Spotted owls. This Decision is covered under a BiOp from the USFWS (Tails # 13420-2010-F-0082).

In accordance with section 7 of the ESA, the BLM analyzed project activities for their potential to affect the following plant species; the endangered Gentner's fritillary (*Fritillaria gentneri*) endangered Cook's lomatium (*Lomatium cookii*), endangered large-flowered woolly meadowfoam (*Limnanthes floccosa ssp. grandiflora*), and McDonald's rockcress (*Arabis macdonaldiana*). In September 2008, BLM prepared a BA to evaluate impacts to listed plant species and to reinitiate consultation on all acres unsold in the Fiscal Year 2006-2008 timber sale plan, which included the

Althouse Sucker LMP. In September 2008 the USFWS gave BLM a letter of concurrence (LOC) (Tails # 13420-2008-I-0136). The BLM is implementing all applicable PDCs in accordance with the mandatory terms and conditions as specified in the LOC. The Service stated that the proposed action will not jeopardize the continued existence of ESA listed species.

Critical Habitat for Cook's Lomatium (*Lomatium cookii*)

After the EA was released the U.S. Fish and Wildlife Service proposed Critical Habitat for the Federally Endangered plant Cook's desert parsley (*Lomatium cookii*) (Federal register, Vol 74, No. 143, Tuesday July 28, 2009, pages 37314-37392). There are no Critical Habitat Units within the Althouse Sucker Project Area.

BLM also 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 (MSA). In May 2007, BLM received concurrence from the National Marine Fisheries Service that the Althouse Sucker Landscape Management Project was Not Likely to Adversely Affect (NLAA) coho salmon.

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 Confederated Tribes of the Siletz and the Grande Ronde were notified of this project during scoping and the EA's public comment period. Josephine County Commissioners and the Josephine County forestry department were also contacted. No responses were received.

VI. Public Involvement

The BLM extended an invitation to the local and regional communities, Native American tribes and other state and federal agencies, private organizations and individuals to develop issues and resources important to local, state, and national economies.

Public involvement began in November 2005 when BLM mailed out approximately 250 scoping letters to 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 an open house on December 15, 2005 to introduce the local communities to the BLM planning team, resource specialists, and the scope of the proposed project. BLM sent a second scoping letter to the public in April 2007 providing an update to the planning process.

In February 2008 BLM released the EA for a 30-day comment period. Approximately 230 letters were sent to individuals, groups and agencies that requested that they be kept informed of the project. A legal ad (Notice of Availability) was published in the Grants Pass Daily Courier on February 9, 2008, initiating the comment period. Many comments BLM received clearly show the value placed on this area by many members of local communities as well as people from other areas. Values and concerns identified by commenters include, but are not limited to, risk of fire hazard, species diversity, riparian areas, water quality, commercial harvest, healthy fisheries, and wildlife habitat. Public comments and associated BLM responses are summarized in Appendix 2.

VII. Conclusion

A. Plan Consistency

Based on the information in the Althouse Sucker Landscape Management Project's 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:

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

The Althouse Sucker LMP is consistent with the 2001 Record of Decision and Standards and Guidelines for Amendments to the Survey and Manage, Protection Buffer, and other Mitigation Measures Standards and Guidelines.

On December 17, 2009, the U.S. District Court for the Western District of Washington issued an order in *Conservation Northwest, et al. v. Rey, et al.*, No. 08-1067 (W.D. Wash.) (Coughenour, J.), granting Plaintiffs' motion for partial summary judgment and finding a variety of NEPA violations in the BLM and USFS 2007 Record of Decision eliminating the Survey and Manage mitigation measure.

Judge Coughenour deferred issuing a remedy in his December 17, 2009 order until further proceedings, and did not enjoin the BLM from proceeding with projects. The project may proceed even if the District Court sets aside or otherwise enjoins use of the 2007 Survey and Manage Record of Decision. This is because the Althouse Sucker LMP meets the provisions of the last valid Record of Decision, specifically the 2001 Record of Decision and Standards and Guidelines for Amendments to the Survey and Manage, Protection Buffer, and other Mitigation Measures Standards and Guidelines (not including subsequent Annual Species Reviews).

The ACS Consistency Review (EA pp. 100-101, ACS consistency review February 2006 – located in project record) 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. 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).

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).

VIII. Administrative Remedies

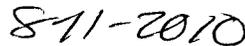
This decision is a forest management decision. Administrative remedies are available to those who believe that they will be adversely affected by this Decision. Administrative recourse is available in accordance with BLM regulations and must follow the procedures and requirements described in 43 CFR § 5003 - Administrative Remedies.

In accordance with the BLM Forest Management Regulations 43 CFR § 5003.2(a&b), the effective date of this decision, as it relates to an advertised timber sale, will be when the first notice of sale appears in the Grants Pass Daily Courier. Publication of the first notice of sale establishes the effective date of the decision for those portions of this decision record included in the timber sale and timber sale prospectus. The effective date of this decision establishes the date initiating the protest period provided for in accordance with 43 CFR § 5003.3.

Any contest of this decision should state specifically which part of the decision is being protested and cite the applicable CFR regulations.



Abbie Jossie
Field Manager, Grants Pass Resource Area
Medford District, Bureau of Land Management



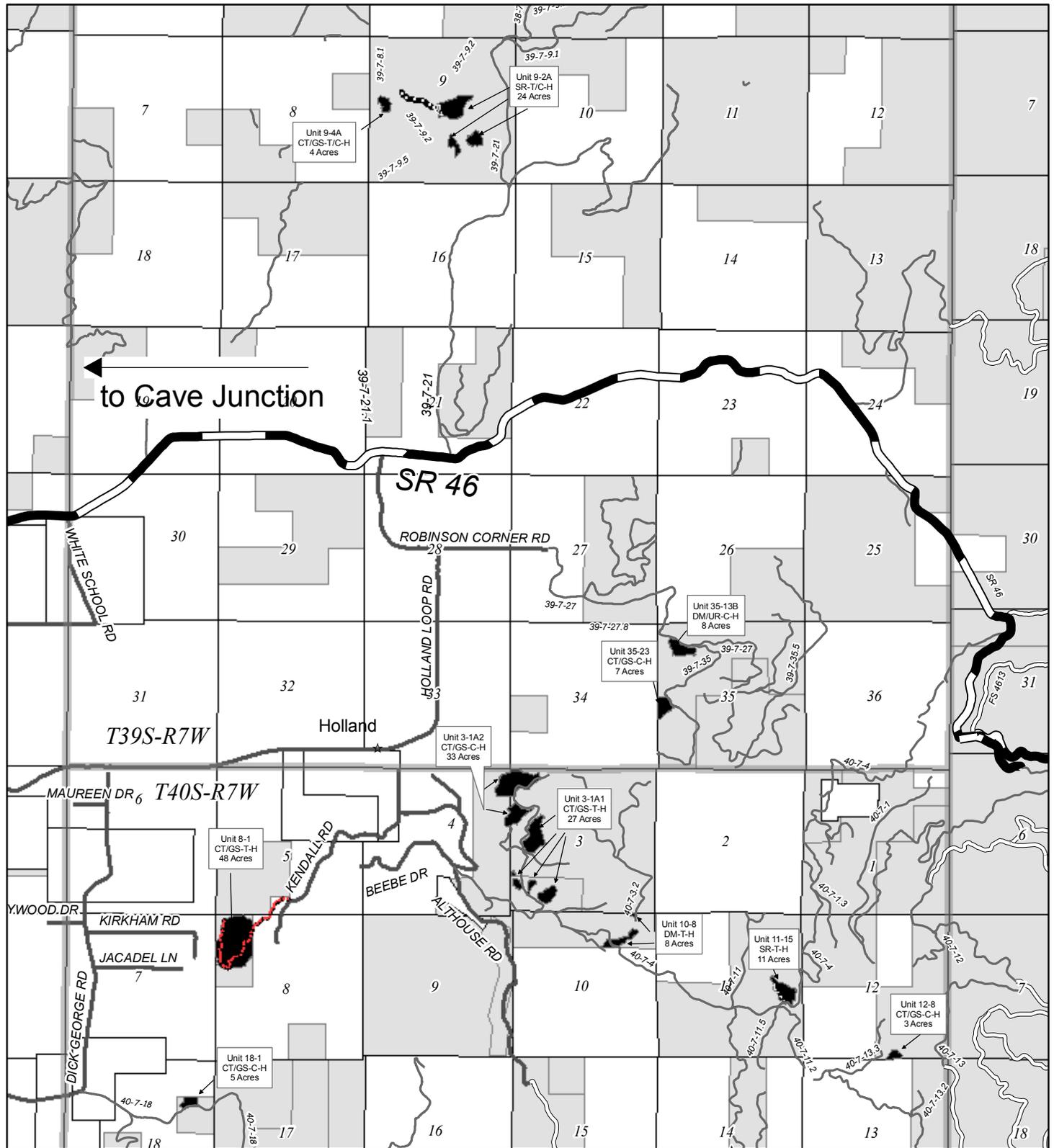
Date

Appendix 1. Map

T.40 S, R.7 W, Section 11 and 12, WM
 T.40 S, R.7 W, Section 08 and 18 WM
 T.39 S, R.7 W, Section 09, WM
 T.39 S, R.7 W, Section 35, WM

Althouse Sucker Timber Sale
 Timber Sale Location Map

USDI BLM Medford District
 Grants Pass Resource Area
 Contract TS 10-09



to Cave Junction

SR 46

Holland

T39S-R7W

MAUREEN DR T40S-R7W

KENDALL RD

BEEBE DR

ALTHOUSE RD

YWOOD DR

KIRKHAM RD

JACADEL LN

DICK GEORGE RD

0 0.5 1 2 Miles



United States
 Department of the Interior
 Bureau of Land Management
 Medford District
 Grants Pass Resource Area
 Grants Pass Interagency Office
 2164 NE Spalding Avenue
 Grants Pass, Oregon 97526

No warranty is made by the Bureau of Land Management as to the accuracy, reliability, or completeness of these data for individual or aggregate use with other data

7/14/2010

Appendix 2 Public Comment Summary and Response

The formal public comment period for the Althouse Sucker Landscape Management Project's EA was held from February 9 through March 10, 2008. The public was notified of these comment opportunities via newspaper notices and letters to 220+ individuals, Tribes, organizations and government entities.

Some of the issues described within the letters included general topics of concern such as, old growth management, watershed effects and Riparian Reserve management. Most were not specific about this project but concerned about federal forest management in general. The following is a synopsis of the key or primary issues and concerns raised in the comment letters received by the BLM.

1. Public Comment Period

Response: Numerous opportunities for comment were provided to the public. Public involvement began in November 2005 and ended after the 30 day comment period in March 2008. During this time BLM sent two scoping letters to interested citizens, held public meetings, hosted field trips with the public and provided a 30-day public comment period.

2. Purpose and Need

Response: As part of the NEPA process, an agency must examine alternatives to a proposed project. The range of alternatives considered in an EA is largely dependent on the purpose and need for the project. The overarching purpose and need of the project is to implement the Medford District RMP. Other purposes and needs for the project are defined in Section 1 of the EA (pp. 1-4), and in the objectives as defined under each action description (EA pp. 7-20). All three action alternatives analyzed in the EA meets the purpose and need for the project and all were available to the decision maker.

Management of BLM lands is based on land allocations under the Northwest Forest Plan (NWFP) and the Medford District RMP. The project area contains approximately 6,700 acres are BLM-administered Oregon and California Railroad (O&C) land; 1500 acres are in Late-successional Reserves with an additional 1,400 acres in spotted owl critical habitat. The objective for matrix lands is to manage to provide a moderately high level of sustained timber productivity and set stands on a trajectory representing a variety of structures, ages, sizes, and canopy configurations (EA p. 2; RMP p. 192).

Range of Alternatives

Response: The range of alternatives considered in an EA is largely dependent on the purpose and need for the project. The EA analyzed three action alternatives including alternatives to maximize forest products and timber receipts to the county, an alternative that minimized alternation to spotted owl habitat, and a No Action alternative. The Team also examined options with no large tree removal, which were not analyzed in detail. See EA, Appendix F for rational for not including these as separate alternatives in the EA.

BLM considered an alternative that would not include development of new roads. However, the BLM determined that a proposal without new roads will not provide access to meet the need to treat many forest units. Further, a proposal with no new roads will not provide an economically

viable sale, as helicopter and fuel costs have greatly increased (EA pp. 4, 182-183). Economic viability is a key component of the Purpose and Need for this project, as some of the timber sale receipts will go to O&C counties.

The RMP establishes land allocations and objectives. Objectives for matrix land include providing a sustainable supply of timber and providing a variety of habitats. The project is consistent with the RMP, as it will produce timber and create a diversity of habitats. The Althouse-Sucker project follows direction in the RMP, which identified structural retention/regeneration harvest as the primary method for achieving the sustainable volume goals and objectives for matrix land. No structural retention treatments will occur in designated LSRs.

3. New information regarding forests, carbon, and climate change requires RMP reassessment

Response: We are aware of two new reports regarding carbon sequestration from research completed at Oregon State University. Reassessing or changing the RMP based on this research would require a management plan amendment; this is outside the scope of this EA.

4. Snags and Dead wood

Response: The purpose of snag and coarse wood retention is to reduce impacts from project activities and retain natural processes to the extent possible, while meeting the overarching purpose and need of the project. To ensure the proper level of snag and coarse woody debris (CWD) retention, project design features include: maintain all snags, except those that need to be felled for safety reasons. Those snags felled for safety reasons will be left on-site. Where feasible, snag patches (6 or more snags) will be buffered by one half to one site tree height to protect the snag patch from damage during logging operations. Maintain existing large coarse woody debris (CWD) to the greatest extent possible from disturbance during treatments (EA p.24). To further provide structure and diversity, in Commercial Thinning and Density Management treatments, all stage 1 and 2 snags greater than 20" DBH will remain for wildlife, future CWD, and structural diversity (EA p.48). Preharvest snags will remain, as will healthy or cull green trees greater than 20" DBH to meet snag and CWD requirements. In Regeneration Harvest units, a minimum of 2 to 4 large hardwoods per acre greater than 12" DBH will be reserved for wildlife and stand diversity (EA p.50).

5. Late Successional Habitat

Response: Currently, 75% of BLM land within the Althouse watershed classifies as late successional; in Sucker Creek, 68% of BLM land classifies as late successional forest. At the maximum, the project would reduce late-successional forest on approximately 281 and 317 acres in the Althouse and Sucker Creek watersheds, respectively. It is expected that due to plant and wildlife buffers treatments will be less. Following the maximum treatment, BLM lands will maintain late-successional forest on 66% and 59% in the Althouse and Sucker Creek watersheds, respectively. Combined, the 598 acres represents 0.7% of the watersheds (EA p. 51).

Under the 1995 RMP, Matrix lands in the Medford District are divided into the Northern General Forest Management Area (NGFMA) and the Southern General Forest Management Area (SGFMA). The Southern General Forest Management Area requires retention of 16 to 25 large conifer trees per acre for regeneration harvest prescribed stands in the project. The project is in the SGFMA; however, there are "local situations in the northern GFMA that should be managed along SGFMA prescription guidelines and vice versa" (Medford District RMP ROD, p 73). The

NGFMA retention level of 9-16 large trees per acre is utilized where competition from tanoak is preventing conifer development and growth. Given tanoaks ability to thrive in diffuse light conditions, retaining 16-25 trees per acre creates ideal conditions for tanoak development, intensifying the competition to young conifer development. In addition, the low light levels presented by leaving a higher level canopy reduce the success of establishing conifer seedlings and subsequent conifer understory. Through retention of both individual trees and groups of conifers, remaining trees will have growing space and adequate light to develop a conifer dominated understory necessary for future mature conifer stands (EA p.49).

6. Special Status Species and Area of Critical Environmental Concern

Response: A variety of comments stated that effects were not disclosed on a variety of special status species. However, they did not state how the analysis was inadequate. It should be noted that a project such as this is not intended to have no effects on the resources and species across the landscape, but to adequately disclose those effects to inform the public, and so that a decision can be made as to whether those effects rise to the level of significance.

Effects to the following species and habitats were all disclosed in the Althouse Sucker EA:

Northern Spotted Owl: Effects to the Northern Spotted Owl were disclosed on pages 60-61 and 66-72; and to spotted owl prey species on pages 62, 69, and 71-72, specifically addressing effects to nesting, roosting and foraging habitat, and edge effects to species (pp. 62; 69; and 77-78). Cumulative effects to owls and other species (EA pp. 78-80) was analyzed to an extent necessary to provide the decision maker with enough information to make a reasoned decision among the alternatives. Please note that the issue of “take” of spotted owls is in the purview of the US Fish and Wildlife Service. Whether there is take authorized for the project or not will be a decision made by that agency.

Pacific fisher: As with the Northern Spotted Owl, the effects analysis (EA pp. 62-63; 66; 72-73) for the Pacific fisher and fisher habitat was adequate for the decision maker to make a reasoned choice among alternatives. Comments did not say how the analysis was in error, and without further information, it is impossible to assess the comment in any detail.

Effects to other species (red tree voles, Del Norte salamander, Great Gray Owl, landbirds, mollusks, bats and other species) was likewise adequately analyzed in the EA (pp. 73-80).

Additionally, the effects on wildlife species was analyzed for roads (EA pp. 77-78); Jeffrey pine and white oak savannahs and meadows (EA p. 77); and land bird habitat (EA pp. 75-76).

Effects to fish and fish habitat: As with wildlife, effects to fish and fish habitat were likewise disclosed (EA pp. 94-100; also see Soils/Hydrology/Riparian analysis (pp. 37-44). Because of lack of connectivity and subsequent sediment routing to streams, there is no expected increase in sedimentation. As there are minimal to no increases in peak flow or soil erosion, sedimentation of stream channels is not anticipated (EA p. 38). Because there is no anticipated increase in sedimentation rates above background levels, there are no anticipated effects to fish or fish habitat (EA pp. 95, 96, 98, 99, 100).

Brewer’s Spruce Area of Critical Environmental Concern (ACEC): No project activities are proposed within the ACEC (EA p. 186)

Protection of Special Status Plants: There is an acknowledged impact on the Bureau sensitive plant, *Erythronium howellii*. However, there are 102 sites in the project area (EA p. 177), with many sites with more than 100 plants (EA p. 83). Therefore, the analysis concluded that the potential impact on a few sites will not lead the species toward federal listing (EA p. 84).

Survey and Manage Surveys: Survey and Manage surveys were completed for botanical species (EA p. 80) and for red tree voles and Great Gray Owls (EA p. 63).

7. Watershed Concerns: Cumulative effects and peak flows

Response: Peak flow issues regarding the proposed actions include forest vegetation removal and road building/soil compaction. The analysis examined current forest conditions (EA p. 31) current compaction and roads (EA p. 32, 35), transient snow zone (EA p. 36-38) proposed vegetation management (EA pp. 37, 38) and road building / decommissioning (EA pp. 39-41), riparian reserves (EA p. 41), and cumulative effects (EA p. 42-44). All analyses concluded that the risk of elevated peak flows is very low.

The decision acknowledges that additional mining proposals were introduced subsequent to the release of the EA. However, these proposals do not modify or invalidate the conclusions in the EA. As shown in the EA, the Althouse-Sucker proposal protects, maintains and enhances riparian areas, water temperature and aquatic habitat; therefore, there will be no interactions between projects that would generate cumulative effects.

As the mining proposals develop firm proposed actions, cumulative effects will be addressed in those NEPA documents which will include the Althouse Sucker project.

8. Riparian Habitat:

Response: NWFP Standards and Guidelines identify appropriate objectives for treatments within Riparian Reserves, including stocking control, re-establishment and management of stands, and promoting desired vegetation characteristics.

As recommended in the Althouse Creek and Sucker Creek watershed analyses, and supported by field surveys and fuel models, thinning and fuel reduction in Riparian Reserves are warranted to reduce stocking, increase stand resiliency, and improve riparian conditions for large wood recruitment and use as wildlife migration corridors.

Thinning in the Riparian Reserve will meet the stated objectives in the EA and comply with direction in the NWFP for riparian treatments (EA 40-41).

9. Clean Water Act:

Response: There will be a net reduction of roads in the Upper Sucker Key Watershed (EA pp. 20, 78), consistent with the NWFP and RMP for improving aquatic habitat conditions in key watersheds. Retention of riparian buffers will maintain stream shade, protecting streams from water temperature increases (EA p. 40). Light thinning in overstocked suppressed riparian stands will accelerate tree development leading to future increases in shade (EA p.41).

Riparian reserves and project designs for roads and tractor logging will buffer the stream from and prevent any potential off-site sediment from routing to streams. Road maintenance and renovation

will reduce sediment leaving road surfaces (EA p.39). Therefore, due to protection of riparian vegetation, minimal disturbance and no routing mechanisms (EA p. 41) the project maintains and protects water quality, consistent with the Clean Water Act.

10. Off-Road Vehicles:

Response: The EA recognized OHV use as an issue (EA p. 104), made appropriate design features to reduce future potential use (EA pp. 21, 25), and addressed cumulative effects (EA pp. 78, 89). PDFs stipulates that new roads will be closed, and temporary roads will be obliterated and barricaded, which will help reduce the potential future disturbance from OHV. Actions are consistent with the RMP which identified traffic control devices, such as gates, as an accepted method to prevent or reduce adverse OHV impacts (RMP p. 68).

11. Roads

Response: The proposed actions will result in a net decrease in roads (EA p. 19, 20) – both across the watershed and within the Upper Sucker Key watershed. The EA (p. 78) disclosed that there will be a decrease in road density, decreasing potential disturbance to wildlife.

There are no unroaded sections in the project area. However, the EA included alternatives which will reduce roads in a section 13 – an area with and adjacent to sections with low road densities (See EA, Appendix A, Map Alternative 3 and 4). Further the EA team considered a road in Section 9 but dropped it from consideration due to environmental concerns.

12. Soil Health:

Response: The EA discloses, consistent with the RMP, that road building and tractor yarding will result in soil compaction; forest management will result in soil exposure (EA pp. 40, 41). The analysis concludes that hardwoods and conifers will continue to provide organic duff layers, forest litter, and coarse woody debris necessary to support beneficial mycorrhizae, bacteria, and fungi to maintain and provide nutrients (Stark, J.M. 1997) and soil structure for long term site productivity. The analysis further disclosed that observation at past harvest sites show little to no reduction in soil productivity. Therefore, soil health will be maintained.

13. Port-Orford- Cedar (POC):

Response: The Althouse-Sucker Landscape Management Project is within the natural geographical range of POC (*A Range Wide Assessment of POC on Federal Lands*), and POC is present within the project area. The only prescribed harvest where POC root disease, *Phytophthora lateralis*, is present is within the riparian areas in T40S, R7W, Section 9 unit 009.

Harvest and hauling have been shown to spread Port-Orford cedar root disease. The POC risk key was used to determine appropriate management recommendations. When all of the project design criteria regarding POC are applied, the risk for spreading POC root disease from land treatments in the project area is negligible (EA p. 52).

Port-Orford cedar in the project area will be managed according to the May 2004 BLM POC-FSEIS/ROD. Mitigation measures will be implemented if uninfected POC are in, near or downstream of the activities (USDA, USDI 2003) (EA pg. 52).

14. Visual Resource Management:

Response: The Resource Management Plan requires the use of a visual contrast rating system to determine whether or not proposed activities will meet VRM objectives. The Althouse Sucker

project area is VRM Class III and IV. The objectives are to manage lands for moderate levels of change to the characteristic landscape. Management activities may attract attention but should not dominate the view of the casual observer from main viewpoints, not from within the forest. The Visual Resource Management analysis revealed that the project design features will meet the overall change in the vegetative character within the landscape area and is consistent with and will meet VRM class objectives as identified in the RMP (USDI 1995) and BLM H-8410-1, Visual Resource Inventory Handbook (USDI 1986) (EA pg. 102).

15. Cumulative impacts across the Illinois River Basin:

Response: Developing EAs for projects in different 5th field watersheds is common practice and addresses cumulative effects at an appropriate scale for each resource. Some resources address cumulative effects on the 5th field watershed level because effects are not discernable at analysis areas larger than this (e.g., EA p. 44 for Hydrology, Soils & Riparian). Other resources address effects at additional scales as appropriate to that resource. The EA did not identify any cumulative effects at the project level. Further, this decision does not convert any late-successional forests to early seral conditions and reduces road density. Therefore, there are no cumulative effects at the project, watershed or the 630,000 acres Illinois River basin scale. The EA addressed the level of harvest across the Illinois River basin, disclosing that BLM projects propose commercial harvest on approximately 2,200 acres across the basin, representing 0.3% of the watershed (EA p. 188).

16. Cultural Resources:

Response: The EA on page 59 states that there are no anticipated effects to cultural resources because PDFs are in place to reduce any potential effects from thinning or fuels reduction.

17. Noxious Weeds:

Response: Known noxious weed populations in the project area will be treated with methods analyzed in the Medford District Integrated Weed Management Plan and Environmental Assessment (USDI 1998).

18. Fire Hazard:

Response: The BLM recognizes that there is some conflicting opinion regarding logging, canopy closure, and fire risk. Generally, there is some agreement that the wildlands are in need of fuel hazard reduction treatments, especially in the urban interface. The disagreements often revolve around the tools used to achieve desired conditions, and the extent of crown thinning. There has been concern that forest thinning does not reduce fire hazard. In the Althouse-Sucker project area, stands will be thinned to varying degrees, opening tree canopies, reducing crown bulk densities, and increasing crown base height. As acknowledged in the EA (p. 56), an increase in solar radiation on the forest floor may increase surface temperatures, decrease fine fuel moisture, decrease relative humidity, and increase surface wind speeds compared to untreated stands (Odion et al. 2004; Omi et al. 2002). Therefore, surface fuels will be treated in all thinned stands reducing fire hazard.

19. Excessive commercial thinning in stands greater than 80 years old – RMP states thinning in stands under 150 years old:

Response: The 1995 Medford RMP (p.185) identifies Commercial Thinning as a practice to Control stand density, maintain stand vigor, and to place them into a developmental path for desired future conditions. The EA (p. 12), consistent with the RMP direction proposed

commercial thinning to widen the spacing of residual trees in order to promote the growth and structural development of the remaining stand.

20. Estimate the size and number of trees proposed for logging:

Response: The number of acres impacted by project activities is relevant to the analysis. For example, the acres of soil displacement, or acres of spotted owl habitat degraded is important, while the volume and diameter of trees does not lend further information that is relevant to this analysis. Actual volume and trees removed is decided after the EA is completed and public comments on the EA are considered. Volume and number of trees proposed for logging are included in this decision (Table DR-2; Figure DR-1)

21. Economic loss of mushrooms:

Response: The small scale of activities (<1% of the Illinois basin), and associated low level of impacts spread across the 633,517 acre Illinois River Valley subbasin to the Rogue River does not warrant an economic analysis on mushrooms.

22. Acknowledge logging and public controversy:

Response: The EA (pp. 182-185) identified public opinion of logging and addressed public comments regarding logging issues.

23. Potentially unstable lands:

Response: Forest units identified as unstable are identified in the inventory data and are considered as Riparian Reserves in the EA (EA p. 9). Slope restriction on harvest methods and riparian protection buffers protect areas susceptible to mass movement and erosion (EA p. 21).