Decision Documentation
for the
Speaking Coyote Timber Sale
(DOI-BLM-OR-M070-2012-0002-EA)

United States Department of the Interior
Bureau of Land Management
Grants Pass Resource Area, Medford District

I. INTRODUCTION

This Decision Record documents the decision regarding forest management activities analyzed under the Speaking Coyote Project Environmental Assessment (DOI-BLM-OR-M070-2012-0002-EA). The Speaking Coyote Timber Sale would commercially thin approximately 818 acres of overstocked stands and remove vegetation on approximately 14 miles of roadway for daylighting maintenance. To facilitate timber harvesting activities approximately 2.6 miles of new temporary routes would be constructed and 0.21 miles of existing temporary routes re-constructed. These routes would be decommissioned after use.

The EA was made available for public comment from July 11, 2012 to August 9, 2012. The EA analyzed the effects of the Proposed Action and the No Action Alternative (Alternative 1). The Speaking Coyote Project Planning Area (PA) is located near the communities of Wolf Creek and Sunny Valley.

II. PUBLIC INVOLVEMENT

An initial Speaking Coyote Project map, along with a request to the public for sites to visit for a proposed field trip, was mailed to 720 residents within the Wolf Creek and Sunny Valley communities on October 20, 2011. A public field trip took place on November 5, 2011. The BLM issued a 24 page Speaking Coyote Scoping Report which was available for public comment between December 15, 2011 and January 11, 2012.

III. CONSULTATION AND COORDINATION

Medford BLM submitted a Biological Assessment (Medford BLM Summer 09 Biological Assessment) to the Fish and Wildlife Service and received a Letter of Concurrence (Medford BLM Summer 2009 Informal TAILS#: 13420-2009-I-0159) stating proposed treatments are “not likely to adversely affect the spotted owl”. Medford BLM submitted a Biological Assessment for harvest units in T33S R6W Sections 27&34 (Medford BLM FY 2011 SUMMER NLAA) to the Fish and Wildlife Service and received a Letter of Concurrence (October 2011 Informal TAILS #: OIEOFW00-2012-1-0003) stating proposed treatments are “not likely to adversely affect the spotted owl”.

Consultation for the Endangered Species Act with NMFS 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 Basin.

Speaking Coyote Project Scoping Reports 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 did not identify cultural resource concerns for the proposed project.

IV. DECISION

Based on site-specific analysis, the supporting project record, management recommendations contained in the Grave Creek Watershed Analysis (1999) as well as the management direction contained in the Record of Decision and Standards and Guidelines of the Northwest Forest Plan (1994), Medford District Resource Management Plan and Record of Decision (1995), Medford District Record of Decision and Resource Management Plan (2008) and public comments, I have decided to implement Alternative 2 with Best Management Practices and Project Design Features as disclosed in the EA referred to hereafter as the Selected Alternative. The Selected Alternative will commercially thin approximately 818 acres of overstocked stands and remove vegetation on approximately 14 miles of roadway for daylighting maintenance. To facilitate timber harvesting activities approximately 2.6 miles of new temporary routes would be constructed and 0.21 miles of existing temporary routes re-constructed. These routes would be decommissioned after use.

Alternative Considered

See Appendix 1 of the EA titled "Alternatives and Issues Considered, but not Analyzed in Detail" for alternatives considered but eliminated from further study. The BLM received seven letters of comments after the Speaking Coyote Scoping Report was released. Some of the concerns were resolved in the design of the Selected Alternative such as units not being located adjacent to private lands. The Selected Alternative (Alternative 2) was designed to meet the management direction provided in the 1995 Medford District Resource Management Plan. The No Action Alternative (Alternative 1) serves as the baseline to compare effects and what it means if any of the action alternatives were not selected.

Decision Rationale

The Decision Factors used to make my decision were identified in the EA to

- Provide for social and economic benefits to local communities.
- Manage for desired stand characteristics
- Maintain road system infrastructure

My rationale for the decision is as follows:

1. The Selected Alternative is designed to meet BLM's obligation to implement the RMP and to address two primary needs identified for lands in the Planning Area. The two primary needs identified for lands in the Planning Area are: 1) the need for production of commercial and non-commercial forest products; 2) the need for improved forest health and vigor. The Proposed Project is designed to address each of the needs and achieve each of the associated objectives which would assist in moving the current conditions found on the Speaking Coyote PA toward desired forest conditions for lands within the Matrix land allocation
3. Alternative 1 was not selected because it does not meet the purpose and need of the project.
4. I considered public comments. Responses to these comments are found as an attachment to this Decision.

Finding of No Significant Impact

A Finding of No Significant Impact (FONSI) is attached. I have determined that the Speaking Coyote Timber Sale does not constitute a major Federal action having a significant effect on the human environment; an environmental impact statement is not necessary and will not be prepared.

V. PLAN CONFORMANCE

This decision conforms with the *Final Supplemental Environmental Impact Statement* and *Record of Decision for Amendments to Forest Service and Bureau of Land Management Planning Documents Within the Range of the Northern Spotted Owl* (Northwest Forest Plan FSEIS,1994 and ROD, 1994); the *Final-Medford District Proposed Resource Management Plan/Environmental Impact Statement* and *Record of Decision* (EIS, 1994 and RMP/ROD, 1995); the *Final Supplemental Environmental Impact Statement: Management of Port-Orford-Cedar in Southwest Oregon* (FSEIS, 2004 and ROD, 2004); the *Final Supplemental Environmental Impact Statement and Record of Decision and Standards and Guidelines for Amendment to the Survey and Manage, Protection Buffer, and other Mitigation Measures Standards and Guidelines (*FSEIS, 2000 and ROD, 2001).

The Grants Pass Resource Area initiated planning and design for this project to conform and be consistent with the Medford District's 1995 RMP. This project is consistent with the Medford District's 1995 RMP.

VI. ADMINISTRATIVE REMEDIES

The decision described in this document is a forest management decision and is subject to protest by the public. In accordance with Forest Management Regulations at 43 CFR § 5003 Administrative Remedies, protests of this decision may be filed with the authorized officer Allen Bollschweiler within 15 days of the publication of the notice of decision/timber sale advertisement in the Grants Pass Courier.

43 CFR § 5003.3 subsection (b) states, "Protests shall be filed with the authorized officer and shall contain a written statement of reasons for protesting the decision." This precludes the acceptance of electronic mail (email) or facsimile (fax) protests. Only written and signed hard copies of protests that are delivered to the Grants Pass Interagency Office will be accepted. The protest must clearly and concisely state which portion or element of the decision is being protested and the reasons why the decision is believed to be in error.

43 CFR § 5003.3 subsection (c) states: "Protest received more than 15 days after the publication of the notice of decision or the notice of sale are not timely filed and shall not be considered."

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

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.

VII. 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 Martin Lew, Ecosystem Planner, 541-471-6504.

8/15/12

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

Date

Finding of No Significant Impact
for the
Speaking Coyote Project
DOI-BLM-OR-M070-2012-0002-EA

I. INTRODUCTION

The Grants Pass Resource Area, Medford District Bureau of Land Management (BLM), Speaking Coyote Project Environmental Assessment (EA) was made available for public comment from July 11, 2012 to August 9, 2012. The EA stated that the need of the project was to improve forest health, provide economic benefits and reduce the fire hazard within the Speaking Coyote Project Planning Area. The Grants Pass Field Manager has decided to implement the Proposed Action (Alternative 2), with associated best management practices (BMPs) and project design features (PDFs). All proposed forest management activities were analyzed under the Speaking Coyote Project Environmental Assessment (DOI-BLM-OR-M070-2012-0002-EA).

II. DETERMINATION OF SIGNIFICANCE

The discussion of the significance criteria that follows applies to the intended actions and is within the context of local importance. Chapter 3 of the EA details the effects of Alternative 2. None of the effects identified, including direct, indirect and cumulative effects, are considered to be significant and do not exceed those effects described in the Medford District Resource Management Plan/Final Environmental Impact Statement (June 1995). The environmental effects of Alternative 2 do not meet the definition of significance in context or intensity as defined in 40 CFR § 1508.27. Therefore, an environmental impact statement is not necessary and will not be prepared.

Context. The Proposed Action would commercially thin approximately 818 acres of overstocked stands and remove vegetation on approximately 14 miles of roadway for daylighting maintenance. To facilitate timber harvesting activities approximately 2.6 miles of new temporary routes would be constructed and 0.21 miles of existing temporary routes re-constructed. These routes would be decommissioned after use. The Proposed Action by itself does not have international, national, region-wide, or state-wide importance.
Intensity. The following discussion is organized around the Ten Significance Criteria described in 40 CFR 1508.27.

1. Impacts that may be both beneficial and adverse. The predicted environmental effects of Alternative 2, most noteworthy, include:

a) **Fire hazard**. The slash fuel loads would have an initial increase following proposed activities. Immediately following thinning activities and prior to slash disposal, fire behavior potential would increase from the current potential fire behavior due to increased surface fuels. Within 4 to 6 years the amount of woody fuels (slash) would

return to pre-treatment levels due to fuels mitigation measures and decay that incorporates the slash into litter and duff layers.

There are no long term effects to fire hazard since the short term increase would be negated once the landing and/or hand piles are burned and or removed. If the cut vegetation is chipped into the unit there are no long term effects to fire hazard due to the reduction of fuel bed depth and discontinuous arrangement of chipped fuels.

b) **Soil Erosion and Sensitive Soils**. Because of the type of actions proposed and the PDFs that would be implemented, there would be no instances of chronic erosion or excessive soil displacement that would occur as a result of any proposed actions associated with this project. The magnitude and extent of soil erosion from all activities associated with the Proposed Action would be consistent with the impact analysis and conclusions provided in the1994 Medford RMP EIS.

c) **Water Quality.** The amount of fine sediment introduced to streams during haul activities on all haul routes would be indiscernible beyond natural erosion processes occurring during winter rains and would have negligible impacts to downstream resources. The use of these roads is expected to be short term and limited by weather conditions as specified in the site specific Project Design Features. Where sediment would reach stream channels as a result of road activities, it would not cause a visible increase in stream turbidity or a reduction in macroinvertebrate populations**.**

d) **Soil Compaction and Productivity.** The analysis of skid trail compaction/displacement that was projected in GIS averaged 5.7% compaction per unit. Total compaction/displacement associated with tractor skid trails, landings and cable yarding corridors would account for an average of 9.2% per unit. Speaking Coyote Project harvest units would be below 12% compaction and 5% productivity loss as analyzed in the 1994 Medford District FEIS RMP.

e) **Fisheries**. See 9 below.

f) **Botany**. See T &E plants in 9 below. Vascular and nonvascular plant surveys were conducted in the fall of 2009 and the spring of 2010, respectively. Professional botanists surveyed the Planning Area units using intuitive controlled methodology, wherein areas supporting high potential habitat were surveyed more intensively; surveys were also in compliance with the 2001 Survey and Manage protocol, which requires surveys for Category A and C species. Survey and Manage protocol also requires managing known (documented) sites of Category A, B, C, and E species, managing 'high-priority' Category D species, and no site management requirement of Category F species. Surveys revealed the following new sites; (4) *Chaenotheca ferruginea* (Sensitive, S&M B), (2) *Chaenotheca furfuracea* (S&M F), (2) *Piperia elongata* (STR) and (1) *Lotus stipularis* (SEN).

There are three main reasons why potential weed establishment is not expected to result in a detectable effect to overall ecosystem health. First, surveys indicate that a very small

percentage - less than 1.2 % of acreage within the Planning Area units - are affected by noxious weeds. Second, these sites located in units proposed for treatment have been reported during predisturbance surveys, and have received weed treatment under Medford District's Integrated Weed Management Plan and Environmental Assessment OR-110-98-14. Third, Project Design Features (PDFs) have been established to minimize the rate at which project activities might potentially spread noxious weed seed from outside/adjacent sources.

g) **Northern spotted owl**. See 9 below.

2. The degree to which the selected alternative will affect public health or safety. The project has not been identified as having the potential to significantly and adversely impact public health or safety. Dust created from vehicle traffic on gravel or natural-surfaced roads and logging operations would be localized and of short duration. As such, Alternative 2 is consistent with the provisions of the Federal Clean Air Act.

3. Unique characteristics of the geographic area such as proximity to historic or cultural resources, park lands, prime farm lands, wetlands, wild and scenic rivers, or ecologically critical areas. It was the BLM's recommendation to the State Historic Preservation Office (SHPO) that the proposed Speaking Coyote Project will have No Adverse Effect to the five potentially eligible (unevaluated) sites. The SHPO concurred in a letter dated June, 21, 2012 that the proposed project would have No Adverse Effect to cultural resources.

There are no park lands, prime farm lands, wetlands, or ecologically critical areas in Alternative 2. There are no developed recreation sites that would be affected by Alternative 2. The area is open to dispersed recreation use, as is most of the Grants Pass Resource Area. Alternative 2 would have a neutral effect on dispersed recreation in the Resource Area.

4. The degree to which the effects on the quality of the human environment are likely to be highly controversial. The effects of Alternative 2 on the quality of the human environment are adequately understood by the interdisciplinary team to provide analysis for the decision. There are no highly controversial effects from Alternative 2. A complete disclosure of the predicted effects is contained in Chapter 3 of the EA. The effects of this project are similar to those of many other projects that are implemented within the scope of the RMP and Northwest Forest Plan. There is a continuing full range of debate, findings and opinions about the potential effects of such land management activities as evidenced by public comments received regarding this project. Opposition to the project is not the same as "controversial effects." The Ninth Circuit has held that a project is "highly controversial" if there is a "'substantial dispute [about] the size, nature, or effect of the major Federal action rather than the existence of opposition to a use.'" Blue Mountains Biodiversity Project v. Blackwood, 161 F.3d 1208, 1212 (9th Cir. 1998) (quoting Sierra Club v. U.S. Forest Service, 843 F.2d 1190, 1193 (9th Cir. 1988)).

5. The degree to which the possible effects on the human environment are highly uncertain or involve unique or unknown risks. The effects of Alternative 2 are not unique or unusual. The BLM has experience with forest management projects and have found the effects to be reasonably predictable. The environmental effects to the human environment are fully analyzed

in Chapter 3 of the EA. Map 8 of the Grave Creek Watershed Analysis (WA) identifies areas that may have unstable soils within this Planning Area. This information is compiled broadly and is not based on site specific field review. As such, these areas were cautiously assessed during multiple site specific field reviews. Additionally, due to the known and assessed potential for instability on some slopes within this Planning Area, a certified geotechnical engineer was brought in to evaluate the stability of the proposed treatment areas. This report can be viewed in Appendix 9 of the EA. The field data collected ultimately determines the specific areas where timber management is suitable. The remaining proposed treatment areas for this project were selected based on information in the Geotechnical Report and data collected during field review.

6. **The degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration.** Alternative 2 does not set a precedent for future actions that might have significant effects nor does it represent a decision in principle about future consideration. Alternative 2 would meet the 1995 Medford District Resource Management Plan (RMP). Any future projects would be evaluated through the National Environmental Policy Act (NEPA) process and would stand on their own as to environmental effects.

7. **Whether the action is related to other actions with individually insignificant but cumulatively significant impacts.** The interdisciplinary team evaluated Alternative 2 in context of past, present and reasonably foreseeable actions. Significant cumulative effects outside those already disclosed in the *Medford District Resource Management Plan/Final Environmental Impact Statement (1995)* are not predicted. A complete disclosure of the effects of Alternative 2 is contained in Chapter 3 of the EA.

8. The degree to which the action may adversely affect districts, sites, highways, structures, or other objects listed in or eligible for listing in the National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historical resources. The BLM recommended that the proposed Speaking Coyote Project will have No Adverse Effect to the five potentially eligible (unevaluated) sites. SHPO concurred in a letter dated June 21, 2012 that the proposed project would have No Adverse Effect to cultural resources.

9. The degree to which the action may adversely affect an endangered or threatened species or its habitat that has been determined to be critical under the Endangered Species Act of 1973.

a) Fish. Southern Oregon/Northern California Coast (SONCC) coho salmon are within the Grave Creek Watershed. Thinning, yarding, landing construction and rehabilitation, temporary route construction and reconstruction (including route decommissioning), road maintenance, roadway clearing, hauling, and activity fuel treatments would have no effect on SONCC coho salmon (ESA-Threatened) and coho critical habitat (CCH). For the Speaking Coyote Project Planning Area, the closest CCH (Wolf Creek) is approximately 100 feet from the closest thinning units (9-1, 10-1 and 15-1). These thinning units will have intact 100 foot Ecological Protection Zones and have 60 percent canopy retention.

The Speaking Coyote Project Planning Area haul road segments and road related activities intersect four streams containing CCH. These four road segments represent one bridge (Wolf Creek) and three culverts (Bummer Gulch, Mackin Gulch and Secesh Gulch) on CCH streams. Sediment would not be expected to enter CCH as a result of haul or maintenance of haul roads, with dry condition haul, well-vegetated ditch lines, properly functioning cross drains, and existing filter strips, or sediment barriers installed, where needed, to prevent sediment delivery into CCH.

b) Plants. Of the four federally listed plants on the Medford District (*Fritillaria gentneri*, *Limnanthes flocossa* ssp. *grandiflora*, *Arabis macdonaldiana,* and *Lomatium cookii),* only *Fritillaria gentneri* has a range which extends into the northern portion of Grants Pass Resource Area. Final units within the Speaking Coyote Project Area are not within the range of *F. gentneri*, as determined by the 2004 US Fish and Wildlife Service Biological Opinion. Vascular plant surveys were conducted in the spring of 2011, and no *Fritillaria gentneri* populations were found. There would be no anticipated effect from the Proposed Action on any federally listed plant.

c) Spotted owl. Canopy opening from 2.6 miles of temporary route construction and 0.21 miles of reconstruction, and 14 miles of daylighting would not deter owls from moving across small openings created due to the narrow linear nature of constructed or existing road clearing (approximately 20 to 40 feet). Enlarging the current existing road openings from daylighting by removing narrow strips (1-2 row of trees) of second growth/ dispersal-size trees (up to 24 inch DBH) along chosen roads and adjacent to treatment units would have no measureable effect on owl movement across roads or foraging behavior along roads, as spotted owls are known to forage along openings, and cross large openings such as clearcuts, meadows, and highways (Forsman et.al. 2002).

Alternative 2 does not occur within 2008 Critical Habitat, therefore no cumulative effects to 2008 Critical Habitat would occur. Units within the Speaking Coyote project have been reviewed to minimize impacts to nesting roosting and foraging (NRF) habitat within core area territories and Relative Habitat Suitability (RHS) areas that rank as high suitability (USFWS 2011). There would be no treatments within: nest patch territories, forest stands greater than 120 years old, active red tree vole habitat areas, untreated portions of Riparian Reserves, unstable slopes, 100 acre spotted owl cores and high quality complex habitat (RA32). Maintaining 60% canopy cover with hardwoods, dominant trees, snags, and down wood, within suitable habitat maintains primary constituent elements supporting nesting and roosting, foraging, and dispersal. Thinning plantations and dense single-storied stands to accelerate habitat structure for spotted owls and increase fire resiliency, aids in restoring a natural forest dynamic process

10. **Whether the action threatens a violation of Federal, State, or local law or requirements imposed for the protection of the environment.** Alternative 2 does not violate any known federal, state, or local law or requirement imposed for the protection of the environment. Furthermore, the Proposed Action is consistent with applicable land management plans, policies, and programs (EA, Chapter 1.6).

III. FINDING

I have determined that Alternative 2 does not constitute a major federal action having a significant effect on the human environment; an environmental impact statement is not necessary and will not be prepared. This conclusion is based on my consideration of the Council on Environmental Quality's criteria for significance (40 CFR §1508.27), with regard to the context and the intensity of the impacts described in the EA, and on my understanding of the project, review of the project analysis, and review of public comments. As previously noted, the analysis of effects has been completed within the context of the Medford District's Resource Management Plan and the Northwest Forest Plan. This conclusion is consistent with those plans and the anticipated effects are within the scope, type, and magnitude of effects anticipated and analyzed in those plans. The analysis of project effects has also occurred in the context of multiple spatial and temporal scales as appropriate for different types of impacts and the effects were determined to be insignificant.

8/15/12

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

Date

PUBLIC COMMENT
SPEAKING COYOTE PROJECT BLM RESPONSE

The Speaking Coyote Project Environmental Assessment (EA) was released for public comment from July 11, 2012 to August 9, 2012. Notification of the comment period was included in publication of a legal notice in the Daily Courier, newspaper of Grants Pass, Oregon on July 11, 2012; the Medford District Bureau of Land Management website at http://www.blm.gov/or/districts/medford/index.php; and a letter was mailed to those individuals, organizations, and agencies that requested to be involved in the environmental planning and decision making processes for forest management activities. Four comment letters were received by the Grants Pass Resource Area.

Substantive comments do one or more of the following (H -1790-1, National Environmental Policy Handbook):

- 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

For comments that were identical or very similar, they were combined and a single response was made. The Code of Federal Regulations (40 CFR §1503.4) identifies five possible types of responses for use with environmental impact statements.

- modifying one or more of the alternatives as suggested
- developing and evaluating suggested alternatives
- supplementing, improving, or modifying the analysis
- making factual corrections
- explaining why the comments do not warrant further agency response, citing cases, authorities or reasons to support the BLM's position

Fish and Wildlife

Comment 1: "The EA is defective because the BLM has failed to consult with National Marine Fisheries Service."

Response: The analysis of potential effects of riparian treatments to fish and aquatic habitat was presented in the EA (pp. 110). The BLM concluded that the proposed treatments would not affect coho. Under current federal policy, the BLM is required to consult with the National Marine Fisheries Service (NMFS) under Section 7 of the Endangered Species Act if a proposed action may affect a listed species, but is not required to consult if it determines that the action would have no effect.

Comment 2: "New information in a National Marine Fisheries Service memorandum dated July 23, 2010 indicates that the proposed riparian reserve thinning would not achieve aquatic conservation objectives consistent with management of coho salmon. All stream channels must receive a minimum 150 ft no cut buffer."

Response: The NMFS memo of 2010 does not constitute new information as the BLM had been discussing the issue of riparian thinning with NMFS for the several years previous to the completion of the EA. The NMFS 2010 memo is not federal policy and the agencies involved are still negotiating the issues addressed. The EA (pp. 100-104) analyzed the proposed riparian treatments and disclosed the effects to fish and aquatic habitat. The riparian treatments were included in the analysis of the proposed action for consistency with the Aquatic Conservation Strategy (ACS). The BLM concluded that the riparian treatments would be consistent with meeting ACS objectives (EA PP. 104-109).

The commenter has not identified non-compliance with the RMP or FSElS or shown any violation of applicable laws and regulations concerning Riparian Reserves.

Comment 3: "The EA must consider implementing recovery actions for coho salmon identified in NMFS recovery plan for SONCC coho salmon."

Response: The commenter should be aware that there is a draft recovery plan for coho salmon and not a final recovery plan. The EA determined that there would be no effect on SONCC coho salmon (ESA-Threatened) and coho critical habitat (CCH). As provided on pages 8 and 9 of the FONSI:

> Southern Oregon/Northern California (SONCC) coho salmon are within the Grave Creek Watershed. Thinning, yarding, landing construction and rehabilitation, temporary route construction and reconstruction (including route decommissioning), road maintenance, roadway clearing, hauling, and activity fuel treatments would have no effect on SONCC coho salmon (ESA-Threatened) and coho critical habitat (CCH). For the Speaking Coyote Project Planning Area, the closest CCH (Wolf Creek) is approximately 100 feet from the closest thinning units (9-1, 10-1 and 15-1). These thinning units will have intact 100 foot Ecological Protection Zones and have 60 percent canopy retention.

> The Speaking Coyote Project Planning Area haul road segments and road related activities intersect four streams containing CCH. These four road segments represent one bridge (Wolf Creek) and three culverts (Bummer Gulch, Mackin Gulch and Secesh Gulch) on CCH streams. Sediment would not be expected to enter CCH as a result of haul or maintenance of haul roads, with dry condition haul, well-vegetated ditch lines, properly functioning cross drains, and existing filter strips, or sediment barriers installed, where needed, to prevent sediment delivery into CCH.

The findings in the EA were that determined that Alternative 2 would have no effect on SONCC coho salmon (ESA-Threatened) and coho critical habitat (CCH).

Comment 4: "The EA is inadequate because it fails to provide a quantitative cumulative effects analysis at spatial scales relevant to coho salmon."

Response: See Response to 3 above. The findings in the EA were that that Alternative 2 would have no effect on SONCC coho salmon (ESA-Threatened) and coho critical habitat (CCH). As such there are no cumulative effects and that Alternative 2 is consistent with the NWFP and RMP.

Comment 5: Logging spotted owl habitat

Response: The BLM consulted with the United States Fish and Wildlife Service as required under the Endangered Species Act. The EA (p. 90) documents the findings:

> Medford BLM submitted a Biological Assessment (Medford BLM Summer 09 Biological Assessment) to the Fish and Wildlife Service and received a Letter of Concurrence (MedfordBLM Summer 2009 Informal TAILS#: 13420-2009-I-0159) stating proposed treatments are "not likely to adversely affect the spotted owl". Medford BLM submitted a Biological Assessment for harvest units in T33S R6W Sections 27&34 (Medford BLM FY 2011 SUMMER NLAA) to the Fish and Wildlife Service and received a Letter of Concurrence (October 2011 Informal TAILS #: OIEOFW00-2012-1-0003) stating proposed treatments are "not likely to adversely affect the spotted owl".

While the commenter cites page 78 of the EA under "Affected Environment" the environmental effects analysis (EA, p. 80) states:

> The proposed action is not likely to adversely affect the function of subunit KLE-2 to function primarily for east-west connectivity between subunits and CHUs, to provide for spotted owl demographic support, and to contribute to the conservation of the species to meet the recovery criterion that calls for the continued maintenance and recruitment of spotted owl habitat (USFWS 2011, p. ix).

The commenter has not provided a question, with reasonable basis, the adequacy of, methodology for, or assumptions used for the environmental analysis or present new information relevant to the analysis. The commenter merely disagrees with the BLM's findings.

Hydrology and Riparian Reserves

Comment 6: "The minimum Ecological Protection Zone illustrated on p. 13 is inadequate. The no harvest zone must be a minimum of 150 ft for all channels."

Response: See Response to 2 above. The commenter has not identified non-compliance with the RMP or NWFP or shown any violation of applicable laws and regulations concerning Riparian Reserves. The riparian treatments were included in the analysis of the proposed action for consistency with the Aquatic Conservation Strategy (ACS). The BLM concluded that the riparian treatments would be consistent with meeting ACS objectives (EA PP. 104-109).

Comment 7: "The proposed action must identify unstable and potentially unstable areas as Riparian Reserves (see Northwest Forest Plan ROD: C-31) and exclude them from treatment."

Response: The commenter has not identified specifically where there are unstable areas that are adjacent to riparian reserves. The NFP and Medford RMP require BLM to delineate riparian reserves during "implementation of site-specific projects based on analysis of the critical hillslope, riparian, and channel processes and features" (RMP, p. 26). The commenter's apparent disagreement is that all unstable or potentially unstable areas must be designated as riparian reserves, regardless of its connection to a stream or other water body, is contrary to the NFP, which states: "Riparian Reserves include those portions of a watershed directly coupled to streams and rivers, that is, the portions of a watershed required for maintaining hydrologic, geomorphic, and ecologic processes that directly affect standing and flowing water bodies such as lakes and ponds, wetlands, streams, stream processes, and fish habitats. Riparian Reserves include…primary source areas for wood and sediment such as unstable and potentially unstable areas in headwater areas and along streams. Riparian Reserves occur at the margins of standing and flowing water, intermittent stream channels and ephemeral ponds, and wetlands. Riparian Reserves generally parallel the stream network but also include other areas necessary for maintaining hydrologic, geomorphic, and ecologic processes" (NFP Standards and Guidelines, p. B-12)

The guidance for determining "riparian reserve widths" at page C-31 of the NFP Standards and Guidelines is not properly read to require designation of all unstable and potentially unstable areas, without regard to the area's proximity to lakes, natural ponds, or streams or potential to deliver coarse woody debris to such water bodies by earthflows or landslides. The discussion of pages C-30 and C-31 of the NFP is properly understood to mean that the only unstable or potentially unstable areas that need be included within the width of a riparian reserve are those that are in some way proximate or connected to a water body that the riparian reserve is designed to protect.

Furthermore, it would not serve the purpose for designating Riparian Reserves to include every unstable or potentially unstable area. Ecologists consider it desirable to have landslides dump large trees and coarse rocks into streams. Logging in areas capable of producing such results is prohibited so that large dead timber remains can be carried into streams during a landslide. The objective is not to prevent landslides, but to enhance the ecological value of landslides to the aquatic system. This ecological value is not achieved, however, where the location of the slope

and ensuing landslide renders it unlikely that any coarse woody debris or coarse sediments would actually reach a stream.

Roads

Comment 8: "The new construction of temporary routes must be reduced substantially."

Response: The EA provided a detailed analysis of effects from temporary route construction. The EA determined on pages 46 and 47 that:

There is a total of 2.81 miles of temporary route construction/reconstruction, and subsequent decommissioning proposed for access to units and extraction of materials using uphill cable yarding. Of these, 0.10 miles is proposed on FNNW to allow for extraction of materials from a portion of unit 11-1. Specific placement of all proposed temporary routes would address accelerated erosion and raveling concerns through the following PDFs.

- Proposed temporary route would not be located on or above a headwall or on slopes in excess of 70%.
- Routes would be located on the upper slope or ridge, and would not cross through any Riparian Reserves.
- The proposed route would be discontinuously sub-soiled, seeded, mulched, have slash placed over, water-barred, and blocked.

Through implementation of project design features (Section 2.3), impacts to soils from temporary route construction, reconstruction, and decommissioning would be minimized. There would be a short term impact to soil function on approximately 10.2 acres, as well as an increase in onsite erosion for 1-3 years until ground vegetation recovers. For 0.21 miles of reconstructed routes, required sub-soiling would help to rehabilitate sites with long-term damage from past actions. This would result in a net improvement to soil resources on approximately 0.25 acres. Since all temporary routes would be sub-soiled, stabilized, and blocked, and none of these routes would be hydrologically connected to streams, proposed temporary routes would not result in any measurable change to watershed hydrology or water quality.

In summary, none of these routes would be hydrologically connected to streams and proposed temporary routes would not result in any measurable change to watershed hydrology or water quality.

Comment 9: "The temporary routes must be individually evaluated in a geotechnical report for unstable and potentially unstable areas. (i.e. surface erosion and mass wasting)."

Response: The EA provided a thorough analysis of routes and unstable areas, to the extent of providing a Geotechnical Report for this project (Appendix 9). A certified geotechnical engineer was brought in to assess treatment units and roadside treatment areas within the high to medium risk portions of the Planning Area. Based on recommendations in this report treatment areas where altered or deferred. Additionally, stream and upland field surveys were conducted in all units to identify and defer any additional areas that have the potential to result in chronic erosion,

excessive soil displacement, or landslides. BMPs and PDFs were then identified and incorporated into the Speaking Coyote Proposed Action to address remaining treatment areas and the general management concerns that were identified for each soil type.

As stated in BLM Response to 6 above: "none of these routes would be hydrologically connected to streams, proposed temporary routes would not result in any measurable change to watershed hydrology or water quality." The fact that there is no hydrologic connection (where these surface flows are continuous between roads and streams) does not imply that the BLM is relying on mitigation measures to compensate for routes and unstable lands.

The EA provided a thorough analysis of effects to soils on pages 34 to 54 of the EA. The commenter has not provided a question, with reasonable basis, the adequacy of, methodology for, or assumptions used for the environmental analysis or present new information relevant to the analysis. The commenter merely disagrees with the BLM's findings.

Soils

Comment 10: "The Medford District RMP Requires Protection of Sensitive Soils."

Response: The EA provided a thorough analysis of effects to soils on pages 34 to 54 of the EA. The EA considered alternate methods of harvest and discloses on page 5 that removal of commercial trees would be accomplished by ground-based yarding on 290 acres, and cable yarding on 528 acres. The cost of the use of helicopter yarding for commercial thinning was considered but determined not to be economically feasible. As stated on page 35 of the EA:

> Portions of the Planning area are classified as having fragile soils under the Timber Production Capability Classification (TPCC) Handbook (BLM 1986). These soils require harvest or reforestation, techniques or timing to be altered, or protection measures to be implemented to be capable of meeting minimum stocking and to minimize productivity loss from erosion, mass wasting, nutrient loss, a reduction in moisture supplying capability, or a rise in water table (BLM 1986).
> TPCC fragile classifications within the Planning Area include Fragile-Slope Gradient-Suitable (FGR), Fragile-Nutrient-Suitable (FNR), and Fragile-Groundwater- Suitable (FWR). Some sites have a combination of these classifications such as (FGNR, FNWR, etc). Fragile-Slope Gradient-Suitable sites are considered suitable for commercial harvest actions but if implemented without site specific PDFs or BMP's, can have higher instances of debris type landslides and unacceptable levels of surface erosion. Without the application of specific protection measures, these sites can be prone to excessive soil displacement, and where hydrologically connected, stream sedimentation.

Site specific Project Design Features for the TPCC classifications are found in the EA on pages 18-20,24,25, and 27). The commenter has not provided a question, with reasonable basis, the adequacy of, methodology for, or assumptions used for the environmental analysis or presented new information relevant to the analysis. The commenter merely disagrees with the BLM's findings.

NEPA

Comment 11: "The BLM did not develop or analyze a reasonable range of action alternatives"

Response: The BLM considered commenter's (KS Wild) comments. As stated on pages 104 and 105 of the EA (Appendix 1 Alternative Development Summary):

> The BLM received seven letters of comments after the Speaking Coyote Scoping Report was released. The BLM considered the public comments and have minimized the environmental effects while also providing an economically feasible project. Some of the concerns were resolved by the final EA design of the project such as units not being located adjacent to private lands. Also, the BLM follows recommendations by the USFWS regarding regeneration harvesting in the range of the spotted owl. Public comments ranged from:
>
> 1) requesting that the BLM "create a favorable operating climate for the forest products industry" by "improving federal laws, regulations, policies and decisions regarding access to, and management of, forest lands" and that "these stands are at a stage that necessitates a regeneration harvest."
> 2) "We implore the BLM to thin the smallest percentage possible in the lands abutting Cabbage Lane Trust. We encourage leaving a large buffer of uncut timber at our borders and eliminate timber cutting near the gulches and creeks."
> 3) "Thinning stands up to 130 years old is too old "
> 4) "The two most prominent issues of concern to our organizations regarding the Speaking Coyote timber sale project are the proposals to construct additional temporary logging roads and to log within designated riparian reserves."

The purpose and need statement is consistent with the goals and objectives identified in the Medford RMP. The Proposed Action and the No Action Alternative were analyzed. The commenter's proposal to avoid new road construction, avoiding and deferring daylighting, minimizing new landing construction and decommissioning unneeded roads was considered under the No Action Alternative.

Comment 12: "The BLM must acknowledge and respond to the findings contained in the Grave Creek Watershed Analysis**."**

Response: The Speaking Coyote Project EA acknowledges and responds to findings in the Grave Creek Watershed Analysis (EA, pp. 37, 65, 76, 138, 139). The Grave Creek Watershed Analysis clearly stated that it "should be stressed that these recommendations are not to be considered management decisions. They are intended as recommendations to be considered for future management actions and may help frame the context for developing future projects. They should not be viewed by the public, BLM staff or managers as a commitment or as binding on future management" (p. 91). Any specialist recommendation in the watershed analysis is considered with the larger landscape analysis done through the Northwest Forest Plan and consultation with the U.S. Fish and Wildlife Service and the subsequent Biological Opinion.

The commenter lists citations from the Grave Creek Watershed Analysis they want analyzed but fail to specify how commercially thinning 818 acres of overstocked stands, removing vegetation

on approximately 14 miles of roadway for daylighting maintenance, and constructing 2.6 miles of new temporary routes and re-constructing 0.21 miles of existing temporary routes in the 104,371 acre watershed would have effects beyond those anticipated in the NWFP and RMP. The Interior Board of Land Appeals (IBLA 2012-72) ruled that "In assessing the adequacy of an EA, we will generally be guided by the "rule of reason,' such that the EA need only briefly discuss the likely impacts of a proposed action: "By nature, it is intended to be an overview of environmental concerns, not an exhaustive study of all environmental issues which the project raises." *Bales Ranch, Inc*., 151 IBLA 353, 358 (2000) (quoting Don't Ruin our park v. Stone, 802 F Supp. 1239, 1247 (M.D. Pa. 1992)).

Comment 13: "The EA fails to take the required "hard look" at ground based yarding impacts."

Response: The EA took a hard look at tractor yarding and impacts to soil productivity (EA, pp 61-64):

> Design of the proposed action to meet established standards for loss of soil productivity in this project maintains desired soil productivity on BLM managed lands below 12% compaction and 5% productivity loss as analyzed in the 1994 Medford District FEIS.

The EA is tiered to the Medford RMP in accord with 102(2)(C) of NEPA. BLM has considered all relevant matters of environmental concern and has taken a "hard look" at potential environmental concerns. No significant impact was identified that was not already addressed in the NWFP or RMP. Wyoming Outdoor Council, 173 IBLS 26, 235, (2007).

Harvesting Methods

Comment 14: "Logging big trees (that are in deficit) will not achieve the project purpose".

Response: The commenter merely states their preference to leave large trees. The decision to cut trees was reached in the NWFP and RMP. The interpretation of what constitutes a "big tree" can be highly variable. The silvicultural prescription explains the current conditions, objectives, and recommended treatment (including the cutting of trees) to reach the desired silvicultural and other resource conditions. Commercial thinning, which is proposed for this project, is a silvicultural practice generally applied to control stand density, maintain stand vigor, and place or maintain stands on developmental paths so that desired stand characteristics result in the future. Thinning would promote improved stand health, as well as increased vigor and crown development on retained trees. Some units contain mature remnant pine and Douglas-fir trees. These legacy trees are generally much larger than the average stand diameter. The Speaking Coyote Project also proposes culturing of some legacy trees. Where appropriate, selected legacy trees would have all competing conifers removed from around the bole at various distances which would not exceed 40 feet. This treatment would be applied only to selected legacy trees. The remainder of the unit would be thinned on a regular spacing interval. Commercial thinning and culturing legal trees may involve the cutting of what some would interpret as large trees to meet the larger silvicultural objectives of the project, stated in earlier in this paragraph.

The desired outcome of the silvicultural prescriptions is to reduce mortality of remaining conifers, increase the size of remaining tree crowns over time, and improve overall stand vigor and growth. Growth and yield are important considerations in applying commercial thinning treatments. Production of some wood volume at the present time and an increase/maintenance of growth rates for wood volume production in the future are primary objectives.

Instead of consisting of numerous smaller trees, the canopy would be formed from the crowns of fewer but larger trees. Large hardwoods would be part of the retained stand.

The analysis of fire hazard is found on pages 30- 34 of the EA. The EA discloses :

> When compared to the No Action Alternative, the cumulative impact of the proposed action on Fire Regime Condition Classes within the watersheds and the Planning Area would be minimal. The departure from the historical fire regime would continue to trend toward condition classes 2 and 3. The cumulative impact would be an initial increase in fire hazard due to activity slash from the thinning activities until the fuels mitigation work is completed.

The commenter has not questioned, with reasonable basis, the adequacy of, methodology for, or assumptions used for the environmental analysis or presented new information relevant to the analysis. The commenter merely disagrees with the BLM's findings.

Comment 15: Daylighting." Such logging drastically increases the habitat fragmentation, hydrological effects (peak flow response), and changes to interior forest temperature already caused by the extensive system of logging roads. Please do not increase the already significant ecological impacts of the logging road system by clearing large swaths adjacent to roads in the project area."

Response: The Speaking Coyote Project EA addressed these concerns

> In addition to traditional road maintenance actions, Alternative 2 proposes to reduce future road maintenance needs through daylighting of the road surface. Daylighting road maintenance would result in an increase in the intermittent occurrence of upslope erosion within this Planning Area on up to 52 acres, instead of the 14 acres that would be sporadically affected during typical roadside brushing maintenance. Erosion would primarily remain onsite within the hillslope vegetation. It would be expected, as with typically ditchline or soil disturbing road maintenance, that there would be a small amount of sediment that would move offsite via roadside ditches that connect cutbank actions to streams (EA, p58).
>
> Canopy opening from 2.6 miles of temporary route construction and .21 miles of reconstruction, and 14 miles of daylighting would not deter owls from moving across small openings created due to the narrow linear nature of constructed or existing road clearing (approximately 20 to 40 feet). Enlarging the current existing road openings from daylighting by removing narrow strips (1-2 row of trees) of second growth/ dispersal-size trees (up to 24 inch DBH) along chosen roads and adjacent to treatment units would have no measureable effect on owl movement across roads or foraging behavior along roads, as spotted owls are known to forage along openings, and cross large openings such as clearcuts, meadows, and

highways (Forsman et.al. 2002). Canopy opening from temporary route construction or road renovation/improvement would be slightly less than the ground clearing width, as the adjacent tree branches would extend into the opening above the ground clearing. (EA, p72)

Comment 16: "Is mechanical slash piling proposed for this project?"

Response: Page 27 of the EA under Project Design Features states: "Do not mechanically pile slash" in Fragile Suitable Restricted Nutrient soils." Page 50 of the EA states "Activity fuels treatments would be any combination of lop-and-scatter, hand-piling and handpile burning, or underburning."

Comment 17: Un-quantified cable yarding impacts. "Page 86 of the EA indicates that [i]solated instances of cable yarding through areas not within established unit boundaries may occur." This is unsettling. Will such impacts in fact occur? If so, where? How many such corridors will be established? How much "add on" volume does the BLM anticipate from yarding activity?"

Response: Unit 23-5 includes cable corridors outside of the unit through a brushfield. Surveys were completed for this area and were accounted for in calculations for compaction and productivity under Chapter 3, Section 3.5.3.

Rural Interface areas

Comment 18: Request for a field tour.

Response: As stated on page 9 of the EA:

> An initial Speaking Coyote Project map, along with a request to the public for sites to visit for a proposed field trip, was mailed to 720 residents within the Wolf Creek and Sunny Valley communities on October 20, 2011. A public field trip took place on November 5, 2011. The BLM issued a 24 page Speaking Coyote Scoping Report which was available for public comment between December 15, 2011 and January 11, 2012.

The commenter did not attend the public meeting or field trip. The commenter is asking for a private field trip without the general public participating. The commenter has had the opportunity to visit sites of concern and make specific comments that are within the criteria of substantive comments stated at the beginning of BLM's Comment Response

Comment 19: Consideration of Rural Interface Areas

Response: The commenter appears to speak for the "Cabbage Lane" area. As noted in the EA, the BLM provided a field trip and Scoping Report for the public to participate. The BLM considered the interests of the public. The Speaking Coyote Project identifies design features to avoid/minimize impacts as recommended in the RMP (p. 88) to rural interface areas and adjacent residents. This includes the following:

Apply water or approved road surface stabilizers/dust control additives as necessary where haul roads are located near residences and where needed to reduce surfacing material loss and buildup of fine sediment that can enter into wetlands, floodplains and waters of the state. Prevent entry of road surface stabilizers/dust control additives into waters of the state during application. (EA, p. 22).
As a safety standard, local residents would be advised of logging and haul through news releases (EA, p.24).

Place warning signs stating "truck traffic ahead" or similar on Wolf Creek residential roads where hauling would occur. (EA, p.24).

Provide signage on hauling/activity roads leading to recreation areas such as London Peak and Burma Pond if there are delays due to project implementation (EA, p.24).

While the commenter has concerns for helicopter logging in the RIA, helicopter yarding is not proposed.

Vegetation

Comment 20: "It is important to not completely isolate pines from the rest of the forest so that they are unavailable to flying squirrels."

Response: The EA (pp. 73, 74) addresses the effects to flying squirrels and recent research for this species. The EA determined that,

> Based on this research, the prescriptions in Speaking Coyote that retain 40% canopy cover in younger undifferentiated stands, and in the older stands retaining 60% canopy cover, the largest diameter trees, thinning through diameter classes to retain vertical structure, retaining untreated areas within riparian reserves and for botanical and wildlife special status species surveys would retain cover that would be used by flying squirrels as well as other prey species. While flying squirrels may inhabit some of the young stands, it is not likely that they will be significantly affected by the proposed actions because large dead wood would be retained, some canopy diversity will be maintained, and treatment areas make up a small proportion of available habitat.

Comment 21: Greenhouse Gases and Carbon Sequestration

Response: The EA considered greenhouse gases and carbon storage (EA, p. 130). While the commenter asks that the EA consider a 2011 paper with plot level analysis for carbon storage, limitations on the paper are not included. For instance the paper did not consider:

- Soil carbon and fine roots (roots less than 2 mm in diameter).
- Vegetation in-growth. This report assumes that in-growth is managed with regular treatment (e.g., with herbicides) that limits in-growth. If in-growth is allowed and fire is suppressed, estimates of carbon pools on-site may significantly increase, especially for longer time periods.

The Speaking Coyote Project section on greenhouse gasses and carbon included root storage and did not include the use of herbicides. The commenter has not provided site specific analysis to change or modify the findings in the EA.

Comment 22: Logging trees over 80 years of age.

Response: The commenter does not agree with logging trees over 80 years of age and is expressing a disagreement with the NWFP and RMP that provided for the harvest of trees in the remaining lands outside of reserves allocated to Matrix. The NWFP and RMP strive to meet the dual needs of forest habitat and forest products (RMP, p. 16). For Matrix lands, no diameter or age limits were placed under either of these EISs in which the Speaking Coyote Project conforms.

ACS

Comment 23: "The ACS analysis on pp142-143 is inadequate."

Response: The 7 units the commenter is concerned about (≥ 80 years old) are units; 9-1, 14-1, 20-2, 22-1, 23-4, 23-5, 24-1, and 27-2. These units are above coho critical habitat, above presence verified-presence not verified streams (according to corporate data layer) except unit 9-1. The units also lack the proximity to deliver large wood to fish-bearing streams due their ridge top location or lack of slope. The few units with streams near or adjacent to them will have a no-harvest buffer and an EPZ to allow the continuation of delivery of coarse woody debris. Riparian Reserves will also maintain 50 percent canopy cover across the range of age classes. These ridgetop riparian units were individually visited by silviculturist and hydrologist stream crew. Units stand data was reviewed by hydrologist and silviculturist to achieve unit prescriptions to achieve ACS objectives

The EA acknowledges that forests are dynamic and outside of fire return intervals. As stated on page 31 of the EA, 52% of the Speaking Coyote Project Area has a high departure from the natural (historical) regime of vegetation characteristics; fuel composition; fire; fire frequency, severity and pattern; and other associated disturbances.
As stated on page 140 of the EA:

> Riparian thinning would also reduce the spread of disease and the risk of a high intensity or severity fire within Riparian Reserves. Such a fire could result in tree mortality and a reduction in shade, which could negatively affect fish habitat by causing an increase in water temperature, a reduction in future recruitment of LWD, an increase in soil erosion and sediment entering streams.

Snags

Comment 24: "Heavy thinning leaves far too few trees to ensure future recruitment of high quality habitat for spotted owls and many other species that depend on complex habitat structure provided by dead wood."

Response: The Speaking Coyote Project is consistent with the Medford District Resource Management Plan and the Northwest Forest Plan (1994) for snag and coarse woody debris retention. Regarding the removal of mature trees, the Proposed Action Habitat patches will be retained within the project area for red tree voles habitat areas, high quality structurally complex spotted owl habitat from RA32 surveys to aid in the recovery of the spotted owl, untreated riparian areas, areas with fragile soil concerns, and stand ages greater than 160 years are deferred from treatment, and other constraints that provide a mosaic of untreated patches within the project area Snags and deadwood would be retained in the uplands and in Riparian Reserves." Page 21 of the EA states, "All non-hazardous snags would be retained within harvest units. If it is necessary to fall snags for safety reasons, they would remain on site as down wood. All existing naturally occurring dead and down woody debris would remain on site."