



United States Department of the Interior

BUREAU OF LAND MANAGEMENT
Grants Pass Resource Area
2164 N.E. Spalding
Grants Pass, Oregon 97526

IN REPLY REFER TO
1790 (ORM070)

MAR 27 2014

Dear Interested Party:

The Decision Record for the Stratton/Brimstone Salvage Project is available for review. This Decision Record applies to activities associated with the Stratton/Brimstone timber salvage which consists of 137 acres of post fire economic salvage recovery on BLM managed Matrix lands.

The activities of the Stratton/Brimstone Salvage Project are Categorically Excluded (CX) and documented in DOI-BLM-OR-M070-2014-002-CX. The CX was made available for public comment on February 18, 2014 for a 15 day public comment period. The Bureau of Land Management's responses to public comments are included with the Decision Record. These comments were considered in reaching a final decision for the Stratton/Brimstone Salvage Project sale.

This is a forest management decision. Administrative remedies are available to persons who believe they will be adversely affected by the decision. In accordance with the BLM Forest Management Regulations (43 CFR § 5003.2(1)), the decision for this project will not become effective, or be open to formal protest, until the first Notice of Sale appears in the Grants Pass Daily 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 Resource Area office, 2164 NE Spalding Avenue, Grants Pass, Oregon 97526 will be accepted. The protest must clearly and concisely state which portion of the decision is being protested and the reason why the decision is in error.

For additional information contact Allen Bollschweiler, Grants Pass Field Manager, at (541) 471-6653 or Leah Schofield, planning and environmental coordinator, at (541) 471-6504. The Decision Record is available on the Medford District's internet site at:
<http://www.blm.gov/or/districts/medford/plans/index.php>.

Hardcopies of the Decision Record are also available at the Grants Pass Interagency Office at 2164 Spalding Avenue, Grants Pass, OR 97526. Office hours are Monday through Friday, 7:30 A.M. to 4:30 P.M., closed holidays.

Sincerely,

Allen Bollschweiler
Field Manager
Grants Pass Resource Area

**United States Department of the Interior
Bureau of Land Management
Medford District, Grants Pass Resource Area
2164 NE Spalding Ave
Grants Pass, OR 97526**

Decision Record for the Stratton/Brimstone Salvage Project

DOI-BLM-OR-M070-2014-002-CX

I. Introduction

This Decision Record applies to harvest activities associated with the Stratton/Brimstone Salvage Project. The associated sale consists of 137 acres of post fire salvage. The activities of the Stratton/Brimstone Salvage Project are Categorical Exclusions (CX) and documented in DOI-BLM-OR-M070-2014-002-CX. This project will authorize the salvage of fire-killed and fire-injured trees on lands allocated as Matrix. For the purpose of this Categorical Exclusion, a fire-injured tree is defined as a Douglas-fir, ponderosa pine, sugar pine or incense cedar with a high probability of mortality (see BLM Response to Public Comments, Appendix 2, p. 9). This project excludes salvage within Riparian Reserves, 100 acre (LSR) northern spotted owl activity centers and northern spotted owl nest patches.

The Planning Area (PA) is west of the town of Hugo. The legal description of the PA is Township 34 South, Range 7 West, Section 13, 23, and 27, Willamette Meridian, Josephine County, Oregon.

Salvage will occur in 13 units that range in size from 1 to 39 acres (see the table on page 2 for unit details). Units 23-9, 23-7 and 23-7A have been deferred from salvage harvests.

To access three of the harvest units, 0.31 miles of temporary routes will be constructed in three segments. These routes will be fully decommissioned after use. Within the Stratton/Brimstone Fire perimeter approximately 0.9 miles of permanent road has been identified as a candidate for decommissioning. While not documented in the Stratton/Brimstone CX, the Grants Pass Resource Area is in the process of evaluating decommissioning possibilities within the areas affected by the 2013 fires.

One acre of green tree removal will occur to construct one segment of temporary route. Additional green tree removal is confined to the area adjacent to the 34-7-23.1 road. The green tree removal is listed as 1 acre of right-of-way (ROW) in the table below. The units will be yarded using conventional ground based tractor harvesting and cable yarding methods. Within units 23-1, 23-6, and 23-15A&B, four tractor swing routes will be utilized. Tractor swing routes are designated skid trails which do not require construction activities prior to use. Tractor swing routes are utilized to access areas with a cable yarder and a tractor. No log trucks will utilize these routes. A cable yarder will travel up the tractor swing route and deck logs which will be skidded to a landing with a tractor. After final use these routes will be winterized prior to October 15th. All skid trails and yarding corridors will be rehabilitated upon harvest completion (water barred, seeded and mulched).

Within units that occur outside of northern spotted owl 500 acre core areas an average of two snags per acre will be retained. Unit 27-24 is within a 500 acre northern spotted owl (NSO) core, it is in NSO critical habitat and it is classified as post fire foraging habitat (severely burned nesting, roosting and foraging habitat). Due to the location of the unit and the habitat value, unit 27-24 will retain four snags

per acre and will retain all coarse woody debris. Unit 23-8A will retain 1.2 snags/acre. To account for the deficit in snag retention within unit 23-8A the area between unit 23-8A and 23-8B has been excluded from salvage harvest. This area is present on the CX treatment map but appears as a gap between units 23-8A and 23-8B in the Decision Record map. Unit 23-8B will retain 3 snags/acre to account for a deficit in coarse woody debris. Snag retention for unit 23-2A will be grouped in the 1 acre inoperable area delineated to the south of the unit. Snags will generally be retained along the sides and near the bottom of treatment units to facilitate safe salvage operations.

Treatment units will retain 120 linear feet of coarse woody debris ≥ 16 inches at the small end diameter and ≥ 16 feet in length. Where this retention cannot be met with existing coarse woody debris, merchantable material will be used to make up the deficit. Additionally, 280 linear feet of non-merchantable coarse woody debris will be retained. Units 27-24, 23-6 and 23-16 will retain all coarse woody debris.

To provide for soil stability and protection, harvested material will not be whole tree yarded. Material remaining in the treatment unit after harvest will be lopped and scattered. Any material remaining in the unit that exceeds 18 inches in depth will be piled and burned at the landing(s). All landings are restricted to existing roads or proposed temporary routes. Landings will be approximately $\frac{1}{4}$ acre in size and fully decommissioned after the landing piles are burned. This will generally occur in late fall or early winter. Landings will not be placed in Riparian Reserves, 100 acre (LSR) northern spotted owl activity centers and northern spotted owl nest patches.

Stratton/Brimstone Unit Table

Unit Number	Acres	Temp Routes (Miles)	Minimum Total Number of Leave Snags $\geq 16''$ DBH	Harvest Systems (Acres)		Tractor Swing Routes (Miles)
				Ground Based	Cable	
13-6	9	0	18	3	6	0
13-9	6	0	12	0	6	0
13-10	10	0	20	0	10	0
23-1	39	0.25	78	8	31	0.2
23-2A	4	0	20	1	3	0
23-6	9	0	18	0	9	0.09
23-8A	11	0	9	3	8	0
23-8B	4	0	12	0	4	0
23-11	1	0	2	0	1	0
23-15A	8	0	16	0	8	0.13
23-15B	20	0	40	0	20	0.9
23-16	5	0	20	5	0	0
27-24	10	0.06	40-70	0	10	0
ROW	1			1	0	0
	137	0.31		21	116	1.32

ROW=Right-of-way DBH=Diameter at breast height

II. Public Involvement

A public comment period for the Stratton/Brimstone Salvage Project CX was initiated on February 18, 2014. The CX was mailed to interested parties and property owners adjacent to the planning area. The document was published on the Medford District website the same day (<http://www.blm.gov/or/districts/medford/plans/nepa-details.php?id=2686>). The CX was available for a 15 day public review and comment period, which ended on March 3, 2014. The BLM received 3 comment letters. The comments were considered in making the final decision. The comments and responses are attached to this Decision Record in Appendix 2.

III. Decision and Rationale

The Purpose and Need of the Stratton/Brimstone Salvage Project is to recover the economic value of fire-killed and fire-injured trees on Matrix lands while balancing the need to minimize environmental effects to resources from project implementation.

Based upon the Stratton/Brimstone Salvage Project CX, it is my decision to authorize the salvage of 137 acres of fire-killed and fire-injured trees as described in the Proposed Action. The Proposed Action has been reviewed by the Grants Pass Resource Area staff and appropriate Project Design Features, as specified on page 3 of the CX, will be incorporated into the implementation of the Proposed Action.

Based on the National Environmental Policy Act Categorical Exclusion for the Stratton/Brimstone Salvage Project, I have determined the Proposed Action involves no significant impact to the environment and no further environmental analysis is required.

IV. Administrative Remedy

The decision described in this document is a forest management decision and is subject to protest by the public. In accordance with Forest Management Regulations at 43 CFR Subpart 5003 Administrative Remedies, protests of this decision may be filed with the authorized officer, Allen Bollschweiler, within 15 days of the publication date of the first timber sale advertisement in the *Grants Pass Daily Courier*, *Grants Pass, Oregon*. While similar notices may be published in other newspapers, the date of publication in the *Grants Pass Daily Courier* will prevail as the effective date of this decision.

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 Resource Area office, 2164 NE Spalding Avenue, Grants Pass, Oregon 97526 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: "Protests received more than 15 days after the publication of the notice of decision or the notice of sale are not timely filed and shall not be considered." Upon timely filing of a protest, the authorized officer shall reconsider the project decision to be implemented in light of the statement of reasons for the protest and other pertinent information available to them. 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 43 CFR § 5003.3(f).

This Decision Record for the Stratton/Brimstone CX will be posted on the Medford District internet website <http://www.blm.gov/or/districts/medford/plans/index.php>.

For additional information concerning this decision or administrative remedies please contact Leah Schofield, Planning and Environmental Coordinator, telephone (541) 471-6504, 2164 NE Spaulding Avenue, Grants Pass, Oregon 97526.

V. Implementation Date

The publication of the first timber sale ad will be issued in the Grants Pass Daily Courier on March 27, 2014. If no protest is received by the close of business (4:30pm) within 15 days after publication of the first timber sale ad, this decision will become final.

VI. Decision

I have reviewed the Proposed Action in accordance with the above criteria and have determined that the Proposed Action would not involve any significant environmental impacts. Therefore, the actions do not meet any of the criteria for exception (CX p. 14 and 43 CFR § 46.215) and are Categorically Excluded from future environmental review.



Allen Bollschweiler
Field Manager
Grants Pass Resource Area



Date

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Appendix 2

Public Comments for the Stratton/Brimstone Salvage Project Categorical Exclusion (DOI-BLM-OR-M070-2014-002-CX) and BLM Responses

Salvaging through a Categorical Exclusion (CX)

Comment

- Salvage logging is not suitable for a CX because salvage logging is controversial and causes significant adverse ecological effects.

Response

- The CEQ regulations for the NEPA at 40 CFR § 1508.4 states that:
“ ‘Categorical exclusion’ means a category of actions which do not individually or cumulatively have a significant effect on the human environment and which have been found to have no such effects in procedures adopted by a Federal agency in implementation of these regulations (Sec. 1507.3) and for which, therefore, neither an EA or an EIS is required...Any procedures under this section shall provide for extraordinary circumstances in which a normally excluded action may have a significant environmental effect.”
- Implementation of the NEPA regulations:
“The BLM has developed categorical exclusions for certain silvicultural activities such as...salvage. In developing categorical exclusions, the BLM demonstrated through rulemaking procedures how these actions do not typically result in significant environmental effects and set forth the methodology and criteria used to define the categories of actions.”
- The BLM is within our legal designation for salvage operations associated with our CX salvage authority listed in the NEPA handbook at 516 DM 11.9 (8).

Purpose and Need Statement

Comment

- The Categorical Exclusion (CX) does not provide a Purpose and Need statement.

Response

- The Purpose and Need of this project is to salvage fire-killed and fire-injured trees for economic recovery on the Matrix Land Use Allocation (CX p. 15).

Snag Retention

Comment

- The BLM is proposing to leave an “average” of as little as two snags per acre in proposed salvage logging units.
- Two snags/acre snag retention is inadequate to meet the requirements of the Resource Management Plan (RMP).

Response

- The RMP does not specify how many snags will be retained in salvage areas. The interdisciplinary team specialists chose to retain snags as directed on page 40 of the RMP:
“Retain snags and green trees within a timber harvest unit at levels sufficient to support species of cavity nesting birds at 40 percent of potential population levels. Meet the 40 percent minimum throughout the Matrix with per-acre requirements met on average areas no larger than 40 acres.”

- The Stratton/Brimstone fires burned 1,520 acres of BLM managed lands. The final salvage acres for this project are 137. This leaves 1,383 acres of snag retention within the fire perimeter area. These retained snags will provide the important ecological function and carryover for species from one stand to the next.
- This project excludes Riparian Reserves, 100 acre Northwest Forest Plan northern spotted owl (NSO) activity centers and 70 acre NSO nest patches. These areas contribute to additional snag retention within the project area.

Comment

- Conduct surveys for roosting bats...

Response

- The BLM does not routinely survey for roosting bats in green or salvage sales. The BLM surveys for species which are present on the 2001 Survey and Manage (S&M) list and in suitable habitat areas, there are no bats on the S&M list for our area. The BLM does buffer known sites for roosting bats such as caves and structures.

Comment

- Retain 4-7 snags per acre in all salvage units.

Response

- Many areas within the fire perimeter are excluded from salvage and will add additional snags to the landscape.
- The conservative approach to salvage marking criteria will result in additional tree mortality into the future which will contribute to future snag recruitment (see BLM Response to Public Comments, Appendix 2, p. 9).
- The RMP does not require the retention of snags at the level the commenter recommended.

Diameter Limit

Comment

- Some studies suggest that adverse impacts of salvage logging might be mitigated if removal was limited to “ingrowth” of small trees which may have resulted from fire exclusion.

Response

- As described above, the Stratton/Brimstone fires burned 1,520 acres of BLM managed lands. The final salvage acres for this project are 137. This leaves 1,383 acres of untreated areas within the fire perimeter. These untreated areas will mitigate impacts of the adjacent salvaging logging operations.
- The Stratton/Brimstone prescription requires the retention of the largest 2 snags per acre or 4-7 snags per acre in unit 27-24.
- The RMP does not direct a diameter limit for green or salvage timber sales.

New Road Construction

Comment

- The BLM is proposing new road construction (requiring tree removal) in unburned late-successional green forests greater than 80 years of age.

Response

- The proposed temporary route is located within a burned area and the majority of the trees to be cut during temporary route construction are dead trees. Green tree removal has been minimized to the maximum extent practical. Green trees that occur either in or near the proposed temporary route clearing limits were surveyed for red tree voles and any possible nest trees were climbed for RTV verification, no RTVs were discovered. Additionally, many

large trees that exhibit “wolfy” characteristics have been orange marked and are excluded from removal.

- The CX authority allows:
 - a. Salvage *“May include incidental removal of live or dead trees for landings, skid trails, and road clearing.”*
 - b. *“May include temporary roads which are defined as roads authorized by contract, permit, lease, other written authorizations, or emergency operations not intended to be part of the BLM transportation system and not necessary for long-term resource management...”*
 - c. *“Shall require the treatment of temporary roads constructed or used so as to permit the reestablishment, by artificial or natural means, of vegetative cover on the roadway and areas where the vegetative cover was disturbed by the construction or use of the road, as necessary to minimize erosion from the disturbed area (516 DM 11.9(8).”*

Comment

- The BLM is proposing the exact maximum amount of temporary road construction that it believes can be done while evading environmental analysis and documentation of any potential significant impacts.
- The new temporary route proposal discounts the recommendations of NOAA regarding road density and “proper functioning condition” and the BLM’s own watershed analysis regarding road density.

Response

- The Stratton/Brimstone CX proposed the construction of 0.5 miles of temporary route construction. After field review, the BLM reduced the amount of temporary routes to 0.31 miles. Within this Decision Record the BLM has documented the construction of 0.31 miles of temporary routes. The BLM will fully decommission the 0.31 miles of temporary route after final entry. This number is under the limit allowed by BLM’s CX authority. As mentioned on page 1 of this Decision Record, the BLM is considering 0.9 miles of temporary route decommissioning within the Brimstone Fire perimeter. Additionally, the BLM is in the process of identifying appropriate roads for decommissioning within areas that were affected by the 2013 fires. These efforts incorporate the recommendations of NOAA and the BLM’s watershed analyses.
- The CEQ regulations for the NEPA at 40 CFR § 1508.4 states that:
 - “Categorical exclusion’ means a category of actions which do not individually or cumulatively have a significant effect on the human environment and which have been found to have no such effects in procedures adopted by a Federal agency in implementation of these regulations (Sec. 1507.3) and for which, therefore, neither an EA or an EIS is required...Any procedures under this section shall provide for extraordinary circumstances in which a normally excluded action may have a significant environmental effect.”*
- In implementation of the NEPA regulations:
 - “The BLM has developed categorical exclusions for certain silvicultural activities such as...salvage. In developing categorical exclusions, the BLM demonstrated through rulemaking procedures how these actions do not typically result in significant environmental effects and set forth the methodology and criteria used to define the categories of actions.”*

Comment

- Road construction will harm soil, water quality, and recovering vegetation.

Response

- The temporary routes for this project are on the upper 1/3 of the slope and are not hydrologically connected to streams. There are no special status or threatened and endangered botanical species present. The temporary routes will be fully decommissioned after use. The temporary routes will be seeded and mulched with native weed free material after use.

Comment

- Forgo new road construction.

Response

- It is within our CX authority to construct 0.5 miles of temporary routes. The BLM will construct 0.31 miles of temporary routes which is below the amount authorized under the CX authority.

Comment

- Glad to see necessary roads proposed to access certain units with conventional logging systems. This makes a significant difference in the value BLM receives at auction.

Response

- The BLM strives to produce economically viable timber sales while adhering to our laws, policies and regulations.

Salvaging fire-injured trees

Comment

- This timber sale will better accomplish its Purpose and Need if the BLM limits salvage logging to those burned trees that are actually dead.
- Retain all “fire-injured” trees and limit salvage logging to snags.

Response

- The Purpose and Need of this project is economic recovery on the Matrix land use allocation of fire-killed and fire-injured trees.
- BLM is using a very conservative approach to assess trees which have a high probability of mortality.
- The BLM Interdisciplinary team silviculturist employed marking criteria and salvage guidelines from the Southwest Oregon Forest Insect and Disease Service Center (SWOFIDSC 2001). The guidelines focus on fire-injured/fire-killed conifers (mainly Douglas-fir) in southwest Oregon with 70 % crown scorch or greater. This optical measurement has been found to equate to a high probability ($\geq 75\%$) of death within 4 years following a fire.

The SWOFIDSC 2001 guidelines are based upon unpublished studies conducted by retired entomologist Don Goheen. His study contained 200 plots on the Biscuit, Tiller Complex and Apple fire areas that Mr. Goheen monitored from 2003-2007. Additionally, the results of the Goheen study were based on collected field data, personal correspondence, published literature from other studies and other post-fire monitoring experiences.

The most useful models for on the ground field application (e.g. salvage marking) are those that contain the fewest, most easily observed explanatory variables (Woolley et al. 2012). The SWOFIDSC 2001 guidelines use percentage of crown scorch as a

determination of bole scorch/cambium injury. In their recent review of 33 studies covering 100 models, Woolley et al. (2012) state that tree crown impacts are the single most effective predictors of short-term, post-fire mortality. In their introduction, Hood et al. (2010) state the primacy of tree crown impacts as the best predictors, citing numerous supporting studies including the important review by Fowler and Sieg (2004) that is central to the discussion in Bland Mountain II (USDI 2005a)¹.

The SWOFIDSC 2001 guidelines were selected from the available rating systems and models that were considered. Using crown scorch is a relatively conservative approach to salvage marking and has been proven to have satisfactory performance. The project silviculturist selected this model because it adequately summarized the best science and provides a local perspective to salvage marking guidelines.

Northern spotted owl critical habitat units (CHU)/ 100 acre Northwest Forest Plan northern spotted owl activity cents (KOAC)

Comment

- Drop unit 27-24 which is in CHU and adjacent to a KOAC.

Response

- This unit will retain all down woody material so as to not adversely impact CHU.
- This unit will retain 4-7 snags per acre so as to not adversely impact CHU.
- According to the 2012 Final CHU rule, Section 7 consultation needs to consider the temporal and spatial scale of impacts a proposed action may have on the primary constituent elements (PCE) of the CHU. The USFWS recommends using a 500 acre core area scale as a reasonable metric to assess the effects of a treatment on critical habitat. This assessment showed that the salvage of unit 27-24 may affect but is not likely to adversely affect northern spotted owl CHU (0.07% change in CHU PCE) (Tails#: 01EOFW00-2014-I-0105).

NRF Units

Comment

- Drop NRF unit 23-9

Response

- This unit will be deferred from treatment at this time.

Reforestation

Comments

- Timely removal of fire killed trees is important to meet the intent of the O&C Act.

Response

- The BLM is focused on reforestation in the Matrix land use allocation (LUA) to accelerate post fire stand establishment. The salvage of trees on the Matrix LUA will contribute to a sustainable supply of timber in the future.

Riparian Reserves

Comment

- Encourage Grants Pass Resource Area to treat portions of Riparian Reserves (RR) in future salvage projects to attain several aspects of the Aquatic Conservation Strategy (ACS) objectives.

¹ Fire salvage guidelines and marking criteria were discussed and evaluated in the context of scientific literature in the 2005 EA for the Bland Mountain Salvage. The SWOFIDSC 2001 guidelines were upheld by the USDI Office of Hearings and Appeals, Interior Board of Land Appeals.

Response

- Any potential post fire restoration activities would have required the initiation of consultation with the National Marine Fisheries Service which would not have allowed the BLM to capture the economic recovery of the burnt timber in the Stratton/Brimstone area in a timely manner.

Retention Trees

Comment

- We would like to see the BLM develop logging plans early in the planning process so the retention tree layout can be designed to balance the need for safety and economically viable timber sales that retain key ecological structural elements.

Response

- To ensure retention tree design achieves these goals the interdisciplinary team silvicultural prescription recommends the retention of snags along the sides and near the bottom of salvage units. This configuration will aid in safe salvage operations.

Ecological Objectives

Comment

- Salvage logging has no ecological objectives; it homogenizes the landscape, simplifies the vegetation composition of the area, removes potential down woody material, and degrades all stages of seral habitat.

Responses

- The Stratton/Brimstone fires burned 1,520 acres of BLM managed lands. The final salvage acres for this project are 137. This leaves 1,383 acres of untreated areas within the fire perimeter area. These untreated areas will contribute to obtaining the ecological objectives described in the above comment.
- This project also excludes Riparian Reserves, 100 acre Northwest Forest Plan northern spotted owl (NSO) activity centers and 70 acre NSO nest patches. These areas will remain untreated and support ecological process within the project area.
- Additionally, the conservative approach to salvage marking criteria will result in future tree mortality and the retention of ecological structures.

Fire Hazard

Comment

- Salvage logging followed by lop-and-scatter fuels treatments will increase fire hazard.

Response

- As stated on page 2 and 3 of the Stratton/Brimstone CX:
“The lop and scatter fuels treatment would break up jackpots of material so that the slash does not increase the fire hazard (p. 9). The material would decompose faster in this arrangement and minimize the amount of time the slash would be available to influence fire behavior. Retained slash would mitigate negative impacts to sensitive burned soils, decrease the chance of off-site erosion and increase retained nutrients on site (p. 2).”

Wet Season Haul

Comment

- Appreciate the flexibility for wet season haul.

Response

- The BLM authorizes wet season haul where no adverse effect to aquatic habitat and listed fish species are achievable. The implementation of PDFs as well as maintained rocked or paved haul routes accommodates wet season haul activities.

Comment

- Prohibit wet weather timber haul.

Response

- As stated on page 7 of the CX:
“Hauling on natural surface or rocked roads would not resume for a minimum of 48 hours following any storm event that results in ½ inches or more of precipitation within a 24 hour period, and until road surface is sufficiently dry to prevent any of the above conditions from reoccurring, and as approved by the Authorized Officer.”

Dry Season Yarding

Comment

- AFRC supports the Best Management Practices (BMPs) as identified in the RMP. They are confused why the Grants Pass Resource Area is restricting cable yarding to the dry season.
- Appendix D of the RMP outlines two scenarios where such restrictions should apply: 1) the inability to achieve partial suspension and 2) the presence of sensitive soils.
- The CX provides direction for mitigation of cable yarding corridors including waterbarring, mulching, slash application, and full no-touch RR buffers; it would seem all necessary resources are being protected with the BMPs, without the need for seasonal restrictions.

Response

- As stated on page 151 of the RMP:
“The Best Management Practices are meant to be practices selected based on site specific condition to ensure that water quality will be maintained at its highest practicable level.”
- The interdisciplinary team of specialist developed the PDF’s and chose applicable BMPs for this project based on site-specific conditions which included the reduction of ground cover from the fire.