



United States Department of the Interior

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

TENNESSEE LIME LANDSCAPE MANAGEMENT PROJECT DECISION RECORD EA# OR117-06-02

I. INTRODUCTION

The BLM's interdisciplinary planning team designed the Tennessee Lime Landscape Management Project (LMP) based on: (a) current resource conditions in the project area; (b) meeting the objectives and direction of the Medford District Resource Management Plan (RMP) and the Northwest Forest Plan (NWFP); and (c) community interest and involvement. The proposals presented and evaluated in the Tennessee Lime LMP Environmental Assessment (EA) reflect what the planning team believes to be the best balance of resource conditions, resource potential and competing management objectives. Planning involved extensive public involvement and outreach including public meetings and field trips.

During the EA comment period the public identified minor errors and an unintended omission of the socioeconomic analysis. To rectify this, the attached Erratum, includes corrections and the socioeconomic analysis completed for the project. The corrections and socioeconomic section were available to the Decision Maker prior to release of this decision. This information and the corrections do not modify project proposals, the scope of the project, the analysis, or any conclusions in the EA. Therefore, I have determined it is not necessary to release this information for further public comment.

In this decision, the commercial timber sale portion of the project and associated road construction analyzed as part of all action alternatives is being deferred and will be decided on in a separate decision.

A portion of the proposed Density Management/Modified Group Selection (DM/Mod GS) and Density Management / Understory Reduction (DM/UR) treatments (EA p. 10) will be completed under stewardship contracts; these actions are Not Likely to Adversely Affect for the Northern Spotted Owl and No Affect for Southern Oregon/Northern California coho salmon. Road maintenance; young stand management; fuel hazard reduction; noxious weed treatments; and special forest products action would be implemented as described below. All project design features are integral to the selected alternative and will be implemented. See section III, Decision and Rationale for details on the decision.

As stated in the EA (p. 1), the actions proposed and analyzed in the EA were developed to be consistent with, and/or tier to the following:

- (1) Final EIS/ROD for the Medford District Resource Management Plan (RMP) (1995).
- (2) Final Supplemental EIS on Management of Habitat for Late-Successional and Old-Growth Forest Related Species within the Range of the Northern Spotted Owl (1994).
- (3) ROD for Amendments to Forest Service and Bureau of Land Management Planning Documents Within the Range of the Northern Spotted Owl and its attachment A entitled Standards and Guidelines for Management of Habitat for Late-Successional and Old-Growth Forest Related Species within the

Range of the Northern Spotted Owl (NWFP) (1994).

(4) Final SEIS for Amendment to the Survey & Manage, Protection Buffer, and other Mitigation Measures Standards and Guidelines (2000), and the Record of Decision and Standards and Guidelines for Amendment to the Survey & Manage, Protection Buffer, and other Mitigation Measures Standards and Guidelines (2001)

(5) Medford District Noxious Weed Environmental Assessment (1998).

(6) ROD for Management of Port-Orford Cedar in Southwest Oregon (2004)

The EA also tiered to the ROD Final SEIS for the Clarification of Language in the 1994 Record of Decision for the Northwest Forest Plan amending wording about the Aquatic Conservation Strategy (2004). On March 30, 2007, the District Court ruled adverse to the US Fish and Wildlife Service (USFWS), National Oceanic and Atmospheric Administration (NOAA-Fisheries) and USFS and BLM in *Pacific Coast Fed. of Fishermen's Assn. et al v. Natl. Marine Fisheries Service, et al and American Forest Resource Council*, Civ. No. 04-1299RSM (W.D. Wash)(*PCFFA IV*).

As a result of PCFFA IV, the BLM reviewed the Tennessee Lime project for consistency with the nine ACS objectives as originally described in the 1994 Northwest Forest Plan. The ACS review (December 2007 ACS Consistency Review (located in the project record)) found the actions to be consistent.

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

II. BACKGROUND

The planning effort for the Tennessee Lime LMP afforded community members several opportunities for participation in the planning process. The planning team synthesized issues and comments received from previous planning efforts under the Free and Easy 2 LMP as well as the Tennessee Lime LMP. Each project provided scoping periods, an EA review comment period and public meetings.

While developing this project, the planning team reviewed and considered public comments on the Free & Easy 2 project (EA #OR110-00-15), which was completed in 2000. Scoping for the Free and Easy 2 project began in December 1998. A comment period from December 2000 through February 2001 followed the release of the EA. The fuel hazard reduction work analyzed under that EA has been completed; no timber was harvested under that project as BLM received no bids on the timber sale offering. However, the need for treatments in these units for forest health and commodity production remains. Therefore, the untreated vegetation units of the Free and Easy 2 project located within the Kerby watershed were included in the Tennessee Lime project.

Planning for the Tennessee Lime project began in July 2005 when BLM mailed out more than 600 scoping letters to landowners and other individuals and groups who asked to be informed about upcoming BLM projects. The BLM held an open house on September 27, 2005 to introduce the local communities to the BLM planning team, resource specialists, and the scope of the proposed project. A field trip on October 19, 2005 facilitated informal discussions between BLM resource specialists and the public.

From the beginning, the scope of the project was intended to address the full range of conditions and

opportunities that were found, and to design a multi-faceted project that addressed a range of resources. The result is a project that includes a broad suite of activities: wildlife habitat restoration, young forest management, older seral stand thinning, fuel hazard reduction, and road maintenance, renovation, and decommissioning. It provides commercial and non-commercial outputs as directed by the Bureau's Strategic Plan and the RMP.

The project area lies in 18,279 acre Kerby watershed. The BLM manages approximately, 6,030 acres (32%) of the 18,279 -acre planning area, which is a checkerboard pattern of public and private ownerships. Of the 6,036 acres of BLM-administered lands, 4,647 acres (77%) are lands revested from the Oregon and California Railroad and Coos Bay Wagon Road Grant (O & C) Lands and 1,389 acres are public domain (PD) lands.

The Tennessee Lime LMP EA presented and analyzed a no action alternative and two action alternatives (Alternatives 2 & 3). The two action alternatives reflect what the planning team determined to be the best balance and integration of resource conditions, resource potential, and management objectives included in the Purpose and Need of the EA (pp. 2-4). In designing the Tennessee Lime LMP, the BLM interdisciplinary team was aware of and sensitive to the range of views and values of the public, while complying with a variety of resource management mandates. As a result, the Tennessee Lime project is an integrated and multi-faceted plan that balances these factors and objectives.

The Tennessee Lime LMP EA was available for public review from July 7 to August 6, 2006. It incorporated analysis of the proposed actions, addressed issues raised in public comments, and referenced pertinent information and literature. Many comments BLM received clearly show the value placed on this area by many members of local communities as well as people from other areas. Values and concerns identified by commenters include, but are not limited to, risk of fire hazard, species diversity, riparian areas, water quality, commercial harvest, healthy fisheries, and wildlife habitat (EA section 4.0 Agencies and Persons Consulted, p. 92). For a more detailed summary of public comments and BLM responses see Appendix 2—Public Comment and Response.

In September 2007, the BLM prepared a Biological Assessment to evaluate impacts to Northern Spotted Owls and their critical habitat. In September 2007 the USFWS gave BLM a letter of concurrence (LOC) for treatments that are Not Likely to Adversely Affect (NLAA) Spotted owls, which included fuels reduction activities in the Tennessee Lime Project Area (Tails # 13420-2007-I-0231). In April 2009, the BLM prepared another Biological Assessment to evaluate impacts to Northern Spotted Owls and their critical habitat. In May 2009 the USFWS gave BLM a letter of concurrence (LOC) for thinning and stewardship activities that are Not Likely to Adversely Affect spotted owls or critical habitat (Tails #1342-2009-I-0093). These LOCs cover the Not Likely to Adversely Affect treatments in the Tennessee Lime LMP included in this Decision Record. The decision regarding a commercial timber sale and associated road construction is being deferred and may be decided on in a separate decision.

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

III. DECISION and RATIONALE

The proposed and analyzed commercial timber and associated road construction is being deferred at this time and may be decided on in a separate decision. Additionally, several fuel hazard reduction, density management/understory reduction, and restoration thinning units that did not receive required botany surveys, precludes a decision on these units at this time (Table DR-3). Once the surveys are complete and results become available, a separate decision may be issued on these units.

A portion of the proposed Density Management, Modified Group Select and Understory Reduction treatments will be completed under stewardship or other contracts. All actions incorporated into this decision herein are Not Likely to Adversely Affect for the Northern Spotted Owl and No Affect for Southern Oregon/Northern California coho salmon (Table DR-1). Road maintenance, young stand management, fuel hazard reduction, noxious weed treatments, and special forest products action will be implemented as described below.

Alternative 1, the No Action Alternative, is rejected because it does not meet the Purpose and Need identified for this project, or the resource management objectives identified in the Medford District RMP. The No Action Alternative would not address or alter many of the existing resource conditions and trends that are of major concern relative to healthy forest conditions and resource protection. It would not provide economic opportunities to the local, regional or national economy as required under the RMP. The No Action alternative would perpetuate or promote undesirable resource conditions and these conditions would not be improved or mitigated. Certain undesirable ecological trends would continue unchanged and, in some cases, would be exacerbated over time. For example, high fire hazard conditions would continue and increase, and stand vigor would continue to decline.

Because of limitations on treatments allowed under current consultation for the Northern Spotted Owl, it is my decision to implement, in part and as outlined below, Alternative 2. Alternative 2 is selected to maximize treatments acres and associated level of timber and other forest product availability. Alternative 2 results in more acres treated for fuel hazard reduction, minimizing potential fire spread from untreated stands than alternative 3. Alternative 2 also treats more riparian acres than alternative 3 with precommercial thinning and fuel hazard reduction, providing more benefit to aquatic ecosystems (EA p. 12).

Fuel hazard reduction (EA p. 5-8), young stand management (EA p. 10-11), road maintenance (EA p. 12-13), noncommercial riparian reserve treatments (EA p. 11-12), and special forest products (EA p. 13), will be implemented as described below. All project design features are integral to the selected alternative and will be implemented (EA pp. 13-19).

Table DR-1 summarizes treatment and acres. Appendix -1 details units, acres and prescriptions.

Table DR-1. Summary of Vegetation Treatments

Prescription	Acres of Matrix	Acres of Riparian
DM/ModGS	143	130
Fuel Hazard Reduction	294	213
Young-Stand Management	109	58
Grand Total	546	401

1. Fuel Hazard Reduction (EA pp. 5-8)

Decision: The decision is to implement fuel hazard reduction as described in Alternative 2, with units prioritized based on strategic location (CAR, WUI, ridges, etc.). The actions include slashing of vegetation <8" dbh, pruning, hand piling and burning, and maintenance underburning depending on fuel type and loading.

Fuel hazard reduction will be implemented on approximately 507 acres; 213 of these lie within riparian reserves. Fuel hazard reduction in Jeffrey pine areas will also occur. Actual acres treated will likely be less due to economic, safety and access limitations. Biomass products may be removed during initial fuel hazard reduction, depending on market conditions and access. Approximately 507 acres of fuels reduction will be available for ground-based biomass extraction. In areas where biomass extraction is not feasible, hand piling and burning would occur. Ground based methods will utilize existing skid trails whenever possible. When this is not possible, BLM will require the designation of skids trails, spaced approximately 75 feet apart. In riparian areas, biomass removal will be limited to areas accessed by existing roads and skid trails. Treatments are anticipated to take place over a 3 to 6 year period.

When necessary, activity fuels will be treated in all units proposed for treatment in mid and older seral stage stands and in identified young stands. Vegetation treatments in the selected units apply density reduction and fuel hazard reduction. These treatments typically do not require follow up treatment of activity fuels. However, following primary treatments, activity generated fuels will be evaluated using the BLM's Fuel Hazard/Risk Assessment and Treatment Recommendations analysis process prior to fuel hazard reduction. This interdisciplinary review will ensure that the appropriate fuel reduction treatments are used to meet fuel hazard reduction, and other resource and safety objectives. Based on this review and analysis, proposed fuel treatments may be modified or dropped to achieve silvicultural or resource protection objectives identified in the EA. Substantial changes to the proposed treatments are not anticipated. Those changes that are made will be consistent with the descriptions, overall extent, and impacts addressed in the EA and its range of fuel treatment alternatives. For example, hand piling and burning of slash will be used when underburning is not advisable; where high surface fuel loadings exist; or when underburning presents a significant risk to ecological processes, resource values, or private property and rural residences. Modified fuel treatments will be within the scope of overall effects anticipated and analyzed in the EA.

Rationale: Treatments will reduce hazardous fuels while utilizing the biomass to benefit the local economy. Approximately 69% and 26% of the project area rates as high and moderate fire hazard, respectively. Based on the fire hazard rating, the potential for a large fire to occur is moderate to high across the project area (EA p. 79). In treated forest stands, surface fuels and ladder fuels would be reduced, resulting in low to moderate intensity surface fire (EA p. 85). With a reduced intensity, direct attack suppression tactics are generally successful, safer and more effective in reducing wildfire size.

Fuel treatments will reduce the chance of uncharacteristic fire behavior, protect communities from wildfire, improve access for fire suppression forces (EA p. 87), and promote the National Fire Plan (2000) (EA p. 74) and the Josephine Integrated Fire Plan (2004) (EA p. 5). Fuel hazard reduction is an important purpose of this project (EA p. 2), especially in the rural interface. Biomass removal meets an identified need for forest products (EA pp. 2-3) and offers potential treatment methods to accomplish ecological objectives as well as to provide opportunities for innovative methods to utilize woody material.

2. Older Seral Stage Stands (EA pp.8-10)

Decision: The decision is to implement the Density Management/Modified Group Select (DM/MODGS) prescription on 273 acres (Table DR-2; Appendix 1), as detailed in the EA (pp. 8-10). Approximately 130 acres of density management will occur in riparian reserves. Treatments in the selected units will maintain spotted owl habitat and all actions are Not Likely to Adversely Affect for the Northern Spotted Owl. The main commercial timber sale portion of the project and associated road construction analyzed as part of Alternative 2 is being deferred at this time and will be decided on in a separate Decision.

Density Management increases the spacing of residual trees in order to promote the growth and structural development of the remaining stand. DM targets older seral stands which may provide multiple forest products (ie. poles, sawlogs, firewood, special products) or opportunities for restoration (i.e. prescribed burning, planting, etc.) Spacing of the residual trees will use the crown radius of the healthiest dominant and co-dominant trees to achieve an average relative density of 35% with variations between 30 and 40%.

Table DR-2. Tennessee Lime Stewardship, Pole, or Small Sale Harvest Units

Vegetation Unit (Township-Range- Section-OI Unit Number)	Prescription	Riparian Acres	Matrix Acres
38S-08W-27-001	DM/ModGS	38	41
38S-08W-27-004	DM/ModGS	76	57
38S-08W-27-012	DM/ModGS	16	45

Modified group selection removes trees around selected pine or non-tanoak hardwood trees. This treatment removes those trees (usually Douglas-fir) that are competing with vigorous pines and non-tanoak hardwoods. It favors and retains large vigorous ponderosa and sugar pines and non-tanoak hardwoods with greater than 30% live crown ratio. The treatment objective is to increase the potential for pine or non-tanoak hardwoods to survive and regenerate.

A number of units are deferred in this decision for a variety of reasons. See Deferred Units, Section 8 and Table DR-3 below for details.

Rationale: Objectives outlined in the Proposed Action for older seral stands include reducing stand densities; promoting the historic mixture of tree species and a multi-layered stand structure; reducing the risk of a stand replacement fire; and contributing to BLM’s commitment to produce forest products (EA pp. 2, 3, 8). Current stand densities are higher than desired, leaving trees susceptible to insects, disease and fire. Release of residual trees through thinning and density reduction will accelerate diameter growth, retain high crown ratios and increase individual tree vigor. Following treatments, the resulting stand structure would be vertically and horizontal diverse (EA p.36).

Thinning around pines and oaks will perpetuate these forest components which are currently threatened by high stand densities, understory competition and high canopy closures. Following density management and modified group select treatments, Pine and oak regeneration is expected to increase as well as understory plant diversity and abundance. Treatments will retain multiple canopy layers, snags, down wood and large hardwoods to promote structural diversity (EA p. 36).

Both the public and EA (pp. 2-3) identified a need for providing forest products. Special forest products, stewardship and small sale contracting offered from these units will accomplish ecological objectives as well as to provide economic opportunities to local communities and contractors. Small sales and stewardship contracting also provide opportunities for innovative methods to utilize woody material.

3. Young Stand / Forest Development (EA pp. 10-11)

Decision: This decision is to implement young stand treatments as proposed in Alternatives 2, including approximately 109 acres of precommercial thinning and brushing on matrix lands. An additional 58 acres of brushing and precommercial thinning will occur in riparian reserves (see Riparian Reserve section below for more detail). After young stands are treated, fuels (slash) would be handpiled and burned in the two young stands in the Community at Risk (CAR). Outside the CAR, activity-generated slash would be evaluated for fuel hazard reduction based on the level of the fuel hazard, wildfire risk, and resource values (see Fuel Hazard Reduction section above).

Rationale: Young stand treatments will meet the identified need to enhance health and structural diversity of forest vegetation (EA p. 2), and meet objectives for young stand development (EA p. 10). Brushing and pre-commercial thinning will reduce canopy bulk density and ladder fuels, leaving the stand in a more fire resistant condition (EA p. 35). Thinning and brushing in young stands will accelerate the growth of desired trees (conifer and hardwood) to meet long term forest product and habitat goals from the RMP for matrix lands and riparian reserves.

4. Wildlife Habitat / Jeffrey Pine Restoration (EA p. 11)

Decision: This decision is to implement fuel hazard reduction on 146 acres to restore Jeffrey Pine savannahs by reducing the encroachment of Douglas-fir, incense cedar, and shrubs such as ceanothus and manzanita. Decadent brush and small diameter conifers would be targeted for removal. All vigorous pine and large limbed, open grown Douglas-fir would be retained.

Rationale: Restoration treatments will help restore wildlife habitats in Jeffery pine and white oak woodlands. The project area is experiencing noticeable Douglas-fir encroachment into pine stands, and brush encroachment into otherwise open plant communities associated with serpentine or ultramafic soils such as Jeffrey pine savannahs (EA pp. 11; 49-50). Wildlife habitat treatments increase the availability of forage habitat for species such as the Rufous Hummingbird . Long-term benefits include increased native grass abundance and the maintenance and enhancement of meadows, oak woodlands and Jeffrey pine savannahs. Species that would benefit long term from these treatments include the Flammulated Owl, Western Bluebird, and prey species such as small mammals (EA p.70).

5. Riparian Reserves (EA pp. 11-12)

Decision: The decision is to treat select sections of riparian reserve with precommercial thinning and fuel reduction in young stands; commercial thinning and underburning will occur in older seral stands. Approximately 130 acres of density management, 213 acres of fuel reduction, and 58 acres of young stand management will be implemented.

Thinning will maintain a canopy closure of 50% in early and mid seral stands, and 60% in late seral stands. In thinning units outside the no treatment buffer, leave trees would be the largest in the stand. All trees showing old-growth characteristics would be retained. Trees leaning towards the stream would be retained over trees leaning away from the stream. The treatment can be described as density management / understory reduction with a target canopy closure of 50% in early and mid-seral stands

and 60% for late-seral stands. Treatments will also include brushing, and fuel hazard reduction (thinning, hand pile burning, under burning). No canopy gaps (modified group selection) will be created within riparian reserves.

Existing snags and large down wood will be maintained, and prescriptions will designate leave trees for future large wood recruitment. Riparian prescription will occur outside the 50 and 25 foot designated no treatment buffer along perennial and intermittent stream, respectively. All trees showing old-growth characteristics will be retained. Trees leaning towards the stream will be retained over trees leaning away from the stream.

Proposed road treatments in riparian reserves, such as maintenance and improvements of stream crossings will be implemented to meet both road and riparian objectives. Roads that have been identified as having erosion and sediment problems will be improved to reduce erosion and routing of sediment to the streams. Under this decision there will be no temporary or permanent road building in the riparian zone.

Rationale: High tree density in many riparian zones has reduced tree vigor and health. As a result, the time required for riparian forest stands to reach conditions where they can provide wildlife connectivity and large wood recruitment has greatly increased. Fuels in riparian zones need to be treated to reduce the risk of high fuel loading and degradation of aquatic resources (EA p.11).

Riparian zones identified for treatment have high tree densities and reduced growth rates. In these conditions, the Sufficiency Analysis for Stream Temperatures (USDA, USDI 2003), and the Northwest Forest Plan (USDI, USDA 1994a, b) recommend thinning and fuel activities to increase vigor and resiliency. The Kerby Watershed Analysis (USDI BLM 1995) also recommends thinning and fuels reduction to enhance tree species and structural diversity to aid in riparian development.

Over time, late-successional forest conditions in riparian reserves would have increased structural diversity, canopy, and large woody debris recruitment, with improved stream complexity and water quality (EA p.47). Treatments will maintain primary shade along perennial streams. This complies with the temperature anti-degradation policy for the Illinois River and Free and Easy Creek (EA p. 27).

6. Roads and Transportation Management (EA pp. 14-15)

Decision: The decision is to implement the road maintenance, renovation, and decommissioning as described in Alternatives 2 in the EA. Specifically, the following road projects will be implemented: 39.8 miles of road maintenance; 0.83 miles of renovation, and 0.25 miles of decommissioning (EA p. 13, Appendix C). All road construction proposed in the EA is deferred in this decision and will be decided on in a future decision.

Rationale: The EA (p. 3) identified the need to address road-related erosion problems, increase road safety and improve access for fire suppression and the public. The roadwork will correct existing road drainage problems that are contributing to sediment delivery to streams, as well as meeting objectives of improving driver safety and improvement of road drainage (EA p. 12). As a result, road work will reduce chronic erosion (EA p. 46), leading to reduced delivery of fine sediment to fish habitat. Road maintenance/improvements will also protect the government's investment by increasing road stability and reducing the chance of road washouts.

7. Special Forest Products (EA. p. 17)

Decision: The decision is to provide forest products resulting from activities associated with fuel hazard reduction, density reduction, wildlife habitat restoration, and young stand treatments. All units (Appendix 1) selected in this decision will be available for special forest products, biomass utilization and small sales (e.g., poles, merchantable trees, fuel wood, etc.) (EA p.13), including stewardship contracting.

Rationale: Both the EA project team and public identified a need (p. 2) to provide forest products. Incorporating special forest product extraction into forest stand treatments will meet objectives of providing a wide range of forest products (EA p. 13) and meet silvicultural, fuel hazard reduction and wildlife habitat objectives (EA pp. 5, 6, 8, 9-11).

Special forest products, stewardship, and small sale contracting diversifies economic opportunities to local communities and contractors (Attachment 1 – EA erratum). Offering forest products also provide opportunities for innovative methods to utilize woody material.

8. Units deferred from decision at this time

Table DR-3 displays timber units deferred in this decision. BLM deferred these areas due to presence of red tree voles, lack of wildlife consultation, current economic conditions and/or need for sensitive plant surveys. The deferred units may be selected in a future decision following further USFWS consultation, surveys, or an improvement in economic conditions.

OI Unit Number	OI acres	Seral Stage	Vegetation Treatment
39S-08W-15-004B	87	Mature-Late	DM/ModGS
39S-08W-17-002	28	Mature	DM/ModGS
38S-08W-35-001A	12	Mature-Late	DM/ModGS
38S-08W-35-001C	62	Mature	DM/ModGS
39S-08W-11-001	46	Mature	DM/ModGS
39S-08W-11-003	19	Mature	DM/ModGS
39S-08W-11-004	7	Mature	DM/ModGS
39S-08W-11-005	17	Mature	DM/ModGS
39S-08W-14-002	8	Mature	DM/ModGS
39S-08W-14-008	9	Mature	DM/ModGS
38S-08W-33-001	13	Mature-Late	DM/ModGS
39S-08W-14-004A	25	Mature	DM/ModGS
39S-08W-15-003	28	Mature-Late	DM/ModGS

IV. BLM Strategic Plan

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

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

This project will protect cultural resources through project design features and reduced fire hazard. Wildlife habitat improvements will restore Jeffrey pine savannahs, white oak habitats and ultramafic plant associations. Fuel hazard reduction treatments will help restore fire adapted ecosystems through reintroduction of fire on the landscape.

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

The actions will improve forest health while providing economic opportunities. Implementation of Alternative 2 will make available approximately 1,200 acres for small business and stewardship contracting opportunities to apply density reduction, wildlife habitat improvements and fuel hazard reduction treatments.

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

Ninety-six percent of the project area is in the National Fire Plan (NFP) designated wildland urban interface (WUI); thirty-five percent of the project area is designated as community at risk (CAR). The NFP and its 10-Year Comprehensive Strategy and Implementation Plan, the Josephine County Integrated Fire Plan (JCIFP) and the Illinois Valley Fire Plan place strong emphasis on reducing potential wildfire severity in these areas. Consistent with the NFP, alternative 2 directs fuel hazard reduction near communities to decrease fire risk to residences, businesses and resources.

V. National Fire Plan

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

The Tennessee Lime LMP is within the National Fire Plan designated Illinois Valley Community at Risk (CAR) (EA p. 5). Consequently, regional and national attention is focused on this area as a wildland-urban interface community in the vicinity of federal lands that are at high risk from wildfire. This emphasis extends 1.5 miles beyond the CAR which is also identified as a wildland-urban interface (WUI).

Much of the project area has high risk fire regimes and is classified as Fire Regime Condition Classes 2 and 3 under the Department of the Interior's "Cohesive Strategy." The fire regimes in these fire condition classes have been moderately to significantly altered from their historical range of fire frequency. To restore them to their historical fire regimes, these lands require some level of restoration

through mechanical and prescribed fire treatments (Integrating Fire and Natural Resource Management – A Cohesive Strategy for Protecting People by Restoring Land Health, DOI, March 2001 Draft). The Tennessee Lime LMP includes a range of management actions directed at this restoration and at reducing the high wildfire risk on federal lands.

VI. CONSULTATION AND COORDINATION

Pursuant to the Endangered Species Act, BLM completed consultation with the US Fish and Wildlife Service. The East Fork Illinois project was covered under the 2006 BO and LOC (FWS Log #1-15-06-F-0162 and Log #1-15-06-I-0165) for actions that may affect Northern Spotted Owls. However, since then the BO and LOC were pulled by the USFWS due to pending litigation and the BLM has reinitiated consultation on the NLAA portions of the Tennessee Lime project. This Decision is covered under two LOCs from the USFWS (Tails # 13420-2007-I-0231 and Tails #1342-2009-I-0093).

In September 2007, the BLM prepared a Biological Assessment to evaluate impacts to Northern Spotted Owls and their critical habitat. In September 2007 the USFWS gave BLM a letter of concurrence (LOC) for treatments Not Likely to Adversely Affect (NLAA) Spotted owls, which included fuels reduction and restoration activities in the Tennessee Lime Project Area (Tails # 13420-2007-I-0231). In April 2009, the BLM prepared another Biological Assessment to evaluate impacts to Northern Spotted Owls and their critical habitat. In May 2009 the USFWS gave BLM a letter of concurrence (LOC) for thinning and stewardship activities that are Not Likely to Adversely Affect spotted owls or critical habitat (Tails #1342-2009-I-0093). These LOCs cover the Not Likely to Adversely Affect treatments in the Tennessee Lime LMP included in this Decision Record.

In accordance with section 7 of the ESA, the BLM analyzed project activities for their potential to affect to the following plant species; the endangered Gentner's fritillary (*Fritillaria gentneri*) endangered Cook's lomatium (*Lomatium cookii*), endangered large-flowered woolly meadowfoam (*Limnanthes floccosa ssp. grandiflora*), and McDonald's rockcress (*Arabis macdonaldiana*). In August 2008, BLM prepared a BA to evaluate impacts to listed plant species. In September 2008 the USFWS gave BLM a letter of concurrence (LOC) (Tails # 13420-2008-I-0136). The BLM is implementing all applicable PDCs in accordance with the mandatory terms and conditions as specified in the LOC. The Service stated that the proposed action will not jeopardize the continued existence of ESA listed species.

After the EA was released the U.S. Fish and Wildlife Service proposed Critical Habitat for the Federally Endangered plant Cook's desert parsley (*Lomatium cookii*) (Federal register, Vol. 74, No. 143, Tuesday July 28, 2009, pages 37314-37392). Proposed Critical Habitat for the Federally Endangered plant *Lomatium cookii* is located within the Tennessee Lime Project Boundary. Proposed Critical Habitat Units (CHU) IV3, IV4, IV5, and IV6A are located within the project boundary in their entirety, while approximately 14 acres of IV6B is within the project boundary. There are approximately 110 acres of project units within CHU IV3 and approximately 20 acres within IV4. The treatments proposed for these project units are DM/Mod GS and Fuel Hazard Reduction. These treatments would not adversely affect the critical habitat because the project will not enter or affect wet meadow habitat that is suitable for the species. The proposed treatment may improve habitat by reducing canopy cover and creating openings that would be suitable for *Lomatium cookii*. There are three populations of *Lomatium cookii* in the treatment units. These populations would be protected in accordance with USFWS LOC (Tails # 13420-2008-I-0136). The Proposed CHU ruling is located in the Federal Register, Vol 74, No. 143, Tuesday July 28, 2009, pages 37314-37392.

In accordance with the ESA and the Magnuson-Stevens Fishery Conservation and Management Act (MSA), on April 14, 2000 the BLM initiated informal consultation with the National Marine Fisheries Service (NMFS) on the Free and Easy 2 project, which is now included within the Tennessee Lime LMP. In a Letter of Concurrence (LOC) dated June 21, 2000, the NMFS agreed with the BLM's determination that the proposed project is not likely to adversely affect (NLAA) Southern Oregon/Northern California (SONC) coho salmon or Critical Habitat, and that it will not adversely affect Essential Fish Habitat under the MSA. In addition, the BLM evaluated the effects of the Tennessee Lime Landscape Management Project not previously covered by the LOC and determined that project actions will not affect SONC coho, coho Critical Habitat, or Essential Fish Habitat under the MSA. According to section 7 of the Endangered Species Act and the Magnuson-Stevens Act, consultation with the NMFS is not necessary on actions that have no effect on listed species, Critical Habitat, or Essential Fish Habitat.

The project will not adversely impact any sites of cultural or historical significance (EA pp. 909-91). The State Historic Preservation Office (SHPO) was informed of the BLM's finding in accordance with 36 CFR 800.5(b).

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

VII. CONCLUSION

A. Plan Consistency

Based on the information in the Tennessee Lime Landscape Management Project's EA, in the record, and from the letters and comments received from the public about the project, I conclude that this decision is consistent with the:

- *Final 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);
- *Final-Medford District Proposed Resource Management Plan/Environmental Impact Statement and Record of Decision* (EIS 1994 and RMP/ROD 1995);
- *Final Supplemental Environmental Impact Statement: Management of Port-Orford-Cedar in Southwest Oregon* (FSEIS 2004 and ROD 2004);
- *Final SEIS for Amendment to the Survey & Manage, Protection Buffer, and other Mitigation Measures Standards and Guidelines* (2000), and the *Record of Decision and Standards and Guidelines for Amendment to the Survey & Manage, Protection Buffer, and other Mitigation Measures Standards and Guidelines* (2001); and
- *Medford District Integrated Weed Management Plan Environmental Assessment (1998)* and tiered to the *Northwest Area Noxious Weed Control Program* (EIS 1985).

On July 25, 2007, the Under Secretary of the Department of Interior signed a new Survey and Manage Record of Decision that removed the survey and manage requirements from all of the BLM Resource Management Plans (RMPs) within the range of the Northern Spotted Owl. On December 17, 2009, partial summary judgment against this decision was granted. Nonetheless, for this project the District elected to complete pre-disturbance surveys for Survey and Manage species consistent with the 2001 Survey and Manage Record of Decision.

The ACS Consistency Review (EA p.28, ACS consistency review December 2007 (in project record)) found that the project is in compliance with the Aquatic Conservation Strategy as originally developed under the Northwest Forest Plan.

This decision is also consistent with the Endangered Species Act; the Native American Religious Freedom Act; other cultural resource management laws and regulations; Executive Order 12898 regarding Environmental Justice; and Executive Order 13212 regarding potential adverse impacts to energy development, production, supply and/or distribution. The project will not adversely impact any sites of cultural or historical significance. The State Historic Preservation Office (SHPO) was informed of the BLM's finding in accordance with 36 CFR 800.5(b).

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

VIII. PUBLIC INVOLVEMENT

BLM initiated public scoping for the Tennessee Lime LMP in July 2005, when the BLM announced that an Environmental Assessment would be prepared for the project. The BLM mailed out more than 600 letters to adjacent landowners and other people or groups that have expressed an interest in this type of project. Approximately 40 letters were received. An open house held on September 27, 2005 introduced the local communities to the BLM planning team, resource specialists and the scope of the project. A field trip on October 19, 2005 facilitated informal discussions between BLM resource specialists and the public. Responses to questionnaires, personal discussions and comment letters provided public input for BLM consideration. Letters, phone calls, meetings, and field visits solicited additional issues and concerns (EA p. 92), which were addressed in the EA. Additionally, the EA incorporated comments received on the Free and Easy 2 project (EA #OR110-00-15) into project development.

On July 7, 2006, the BLM initiated the 30-day public comment period for the Tennessee Lime LMP EA. Public comments and associated BLM responses are summarized in Appendix 2.

IX. ADMINISTRATIVE REMEDIES

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

In accordance with the BLM Forest Management Regulation 43 CFR § 5003.2 (a&c), the effective date of this decision, as it pertains to actions which are not part of an advertised timber sale, will be the date of publication of the notice of decision in the Grants Pass Daily Courier. Publication of this notice establishes the date initiating the protest period provided for in accordance with 43 CFR § 5003.3. While similar notices may be published in other newspapers, the Grants Pass Daily Courier publication date will prevail as the effective date of this decision.

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



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

5-11-2010
Date

Appendix 1. Treatment Unit table

Operational Unit	Riparian Acres	Matrix Acres	Treatment
38S-08W-23-010	0	3	Fuel Hazard Reduction
38S-08W-26-001	10	24	Fuel Hazard Reduction
38S-08W-27-001	38	41	DM/ModGS
38S-08W-27-002B	3	9	Fuel Hazard Reduction
38S-08W-27-004	76	57	DM/ModGS
38S-08W-27-005A	6	6	Fuel Hazard Reduction
38S-08W-27-005B	5	2	Fuel Hazard Reduction
38S-08W-27-006	8	0	Fuel Hazard Reduction
38S-08W-27-007	9	8	Fuel Hazard Reduction
38S-08W-27-008	5	5	Fuel Hazard Reduction
38S-08W-27-009	3	2	Fuel Hazard Reduction
38S-08W-27-011	21	14	Fuel Hazard Reduction
38S-08W-27-012	16	45	DM/ModGS
38S-08W-27-013	6	10	Fuel Hazard Reduction
38S-08W-27-016	1	1	Fuel Hazard Reduction
38S-08W-27-017	11	38	Fuel Hazard Reduction
38S-08W-34-006	2	4	Fuel Hazard Reduction
38S-08W-35-002	17	15	Fuel Hazard Reduction
38S-08W-35-005	3	6	Fuel Hazard Reduction
38S-08W-35-006	10	9	Fuel Hazard Reduction
38S-08W-35-006	10	9	Fuel Hazard Reduction
38S-08W-35-011	21	12	Fuel Hazard Reduction
38S-08W-35-013	2	7	Fuel Hazard Reduction
39S-08W-1-001	0	2	Fuel Hazard Reduction
39S-08W-1-004A	14	9	Young-Stand Management
39S-08W-1-004B	13	0	Fuel Hazard Reduction
39S-08W-1-006A	4	6	Young-Stand Management
39S-08W-1-009	6	28	Young-Stand Management
39S-08W-1-011	10	21	Young-Stand Management
39S-08W-1-012	23	28	Young-Stand Management
39S-08W-3-012	11	9	Fuel Hazard Reduction
39S-08W-3-013	1	17	Young-Stand Management
39S-08W-5-002	5	9	Fuel Hazard Reduction
39S-08W-5-003	14	24	Fuel Hazard Reduction
39S-08W-5-004	17	46	Fuel Hazard Reduction
39S-08W-9-002	0	20	Fuel Hazard Reduction

Appendix 2. PUBLIC COMMENT SUMMARY AND RESPONSE

Comment and Response Summary

1. Comment: Helicopter logging.

Response: Helicopters, along with tractors and cable systems are a method of logging on the Medford District. Helicopters allow us to minimize new road construction on steeper slopes and areas where environmental effects can be minimized or eliminated by use of helicopters. Helicopters are also quicker, decreasing extraction time and inconvenience to residents. No helicopter logging would occur under this decision as the commercial timber sale decision has been deferred.

2. Comment: Water supply and quality.

Response: The project is designed under management direction in the Medford District 1995 Resource Management Plan (RMP), which ensures consistency of management activities with Oregon's Statewide Water Quality Management Plan for forest practices and with Oregon's water quality criteria and guidelines (RMP p. 42). The EA identifies site-specific, project-related mechanisms that have the potential to impact water quality and quantity, and fully discloses the anticipated impacts. (p. 21-31). With anticipated improvements in riparian and road conditions (EA p. 46-49), water quality is expected to improve. BLM developed a Water Quality Restoration Plan for the watershed in conjunction with development of the Tennessee Lime LMP to evaluate and plan for enhancing of water quality and aquatic habitat. This plan was submitted to the Oregon Department of Environmental Quality in February 2007.

3. Comment: Tractor yarding and environmental impacts

Response: The planning team acknowledged the potential for negative impacts due to tractor yarding and has designed the project in a way that minimizes or avoids these impacts (EA pp. 21-31). Harvest systems adhere to Best Management Practices (BMPs) described in the Medford District Resource Management Plan (pp. 149–178) to minimize loss of soil productivity, and reduce potential for surface runoff and subsequent water quality degradation. These include, but are not restricted to:

- Implementing riparian buffers;
- restricting tractor harvest to slopes less than 35%
- designating skid roads in previously unentered stands to limit soil compaction to less than 12 percent of the harvest area
- minimizing width of skid roads and utilizing existing skid roads in stands previously logged with tractors
- ripping all skid roads used following final entry
- avoiding placement of skid roads through areas with high water tables
- using appropriate seasonal restrictions that would result in no off-site damage from designated skid roads
- Constructing appropriate waterbars on skid roads.
- Also see Project Design Features in the EA (pp. 13-19)

4. Comment: Soil chemistry, productivity, hydrology, and biological integrity

Response: Soil chemistry and productivity, hydrology, and biological integrity have been carefully considered by resource specialists on a site-specific basis and project design features are incorporated into the design of each alternative to minimize effects (EA pp. 13-19). Effects related to soil integrity (erosion, compaction, and productivity) are fully disclosed in the EA (pp.21-31, 45-76).

5. Comment: Noxious weeds control measures

Response: Project design features (PDFs) and noxious weed control measures are derived from the RMP, Medford District Integrated Weed Management Plan, and the professional knowledge of the resource area botanist. Noxious weeds will be treated using an integrated pest management approach (RMP p. 92) under the guidance of the Medford District Integrated Weed Management Plan (PA-OR110-98-14) (EA pp. 15, 16). This guidance is incorporated into project design features which are integral to all proposed alternatives.

Examples of PDFs incorporated into the project include: 1) All treated noxious weed populations will be monitored for treatment effectiveness; 2) seed and straw used will be native species and weed free; and 3) heavy equipment will be cleaned prior to moving onto BLM lands and when moving from known noxious weed areas into weed-free areas to remove seeds and mud containing seed from equipment undercarriages (EA p. 16). Project design features (EA p. 16) will reduce the spread of weeds resulting from on-going and project related mechanisms of spread.

6. Comment: Botany, Rare plants & fungi

Response: The EA adequately explains effects and the rationale regarding effects of the project on botany, rare plants, and fungi (EA p. 39 - 45). Plant site buffers are put in place to avoid or lessen the potential of impacts to the special status, or Survey and Manage plants and habitat.

7. Comment: New road construction

Response: The EA (p. 128) recognized the issues regarding new road construction. Roads constructed under Alternative 2 will be built in accordance with RMP Standards and Guideline, and specific project design features to minimize adverse impacts to the resources (EA pp.12-15; 17, 18).

The planning objective is to minimize permanent road construction, improve road drainage, and maintain existing roads at levels consistent with planned long term road use (EA p. 12). The proposal also seeks to reduce road densities at the watershed scale where possible and consistent with the anticipated long term resource management needs. There is also the need to provide road systems that are safe for forest road travelers.

The EA proposed renovation for 0.83 miles of road (Appendix C; EA p. 13). Appendix C (EA p. 127) also shows that 1.04 miles of road is proposed for construction and 0.79 miles of road is proposed to be decommissioned. This result in 0.25 miles of permanent roads proposed for construction in this project. However, this decision defers timber harvest and associated road construction; a decision may be made on this action in the future.

8. Comment: Harvest volume and tree diameters

Response: Actual volume and trees removed is decided after the EA is completed and public comments on the EA are considered. Because timber sale units are deferred in this decision volume estimates and diameter distribution are not available.

9. Comment: Tree diameter limits, old growth and unentered stands.

Response: The EA proposes retention of all old growth forests. The silvicultural prescription and marking guidelines call for variable density commercial thinning and modified group selection in the

units proposed for harvest (EA pp. 8-10). In general, such harvest regimes favors retention of the large, dominant trees with the suppressed and intermediate trees (the smaller trees) targeted for removal. Individual trees that display “old-growth characteristics” will be favored for retention. Imposing a strict diameter limit on a harvest regime is felt to be inappropriate, and imposing this limitation would not meet the objectives for forest health. Generally, trees marked for harvest in the Tennessee Lime timber sale are heavily weighted towards the smaller size classes. As stated previously, the decision on the timber sale and associated road construction has been deferred and may be decided on in a future decision.

The Northwest Forest Plan and the Medford District RMP accomplishes a balance of sometimes competing forest ecosystem values such as wildlife and fish habitat protection, stream protection, forest health, long term site productivity, watershed restoration, and timber harvest through land use allocations. The Late-successional Reserve land allocation is set aside from scheduled timber harvest with development of late-successional forest habitat as a priority; these lands are specifically set aside to provide large blocks of areas which support the needs of late-successional dependent species. All proposed forest harvest activity lie within the matrix land allocation.

10. Comment: Timber harvest

Response: The Northwest Forest Plan and the Medford District RMP manages a balance of sometimes competing forest ecosystem values such as wildlife and fish habitat, stream protection, forest health, long term site productivity, watershed restoration, and timber harvest through land use allocations. Land use allocations are late-successional reserves (LSR), adaptive management areas, riparian reserves, and matrix lands. Approximately 75-80% of the lands on the BLM Medford District have been allocated to one of the reserve land use allocations where the protection and enhancement of wildlife and fish habitat, and late-successional forest values are the primary focus. The BLM lands in the Illinois Valley and the Tennessee Lime project area are included in the small percentage of Medford District lands that were placed into the matrix land use allocation, where the primary focus is timber production. The decision to log on Matrix lands has already been made in the RMP. Revisiting decisions made in the RMP is beyond the scope of this EA.

11. Comment: Canopy closure

Response: For units proposed for vegetation treatment (DR Appendix 1), the silvicultural prescription calls for Density Management/understory reduction modified group selection. The post-treatment canopy closure will be variable in harvest units, ranging from 40-60%, with the higher target figure in the riparian reserves. No clear-cut or regeneration harvest is proposed.

Post-harvest canopy closures exceeding 60% would conflict with matrix objectives of maximizing timber production. Higher densities (higher canopy closures) provides less sunlight, moisture and nutrients for trees to utilize for primary/secondary growth, and defense mechanisms against insects and disease. Additionally as stand development progresses, canopies will respond with lateral growth of branches and quickly recolonize upper canopy space, producing an approximate 10% increase in canopy closure over an estimated 10 years (EA p. 27).

12. Comment: Riparian reserves

Response: The riparian objectives in the EA address the need for action in riparian reserves (EA pp. 11,

12), and impacts from proposed actions are adequately addressed (EA pp. 45-49). While the BLM acknowledges that it is a controversial proposal, the planning team has clearly articulated the reasons why action in the reserves is appropriate now and why it is scientifically sound, as well as disclosing potential environmental effects from this proposal.

The objectives in the Northwest Forest Plan (NWFP) for riparian areas include maintaining and restoring riparian structure and functions of intermittent channels, and improving travel and dispersal corridors for wildlife. Further, the strategy of the ACS (p. B-9) is to maintain and restore ecosystem health at a watershed and landscape scale, and to restore degraded habitats. NWFP Standards and Guides pertaining to riparian management identify appropriate objectives for riparian treatments, including stocking control, reestablishment and management of stands, and promoting desired vegetation characteristics.

As recommended in the Kerby Watershed Analysis and as supported by field surveys and fuel models, thinning and fuel reduction in riparian areas are warranted to reduce stocking, increase stand resiliency, and improve riparian conditions for large wood recruitment and use as wildlife migration corridors. The objective of treating riparian zones includes expediting large tree development for wildlife habitat and future instream large wood recruitment; improving wildlife habitat in oak savannah and pine stands; protecting key resources from wildfire; and reducing the risk of wildfire in riparian areas as well as the risk of wildfire spreading to adjacent areas and local communities (EA pp. 11-12).

Treatments in the riparian area will meet the stated objective in the EA and comply with direction in the NWFP for riparian treatments. Treatments were, “designed to benefit aquatic systems and be consistent with ACS objectives.” (EA p. 12) These treatment activities will not adversely affect aquatic conditions or ecosystem function at the landscape scale as defined in the ACS. Additionally, enhancement of riparian functions would improve future large wood recruitment, shade, and wildlife corridors. Therefore, the riparian management of this decision is consistent with the objectives of the ACS (EA pp. 12, 28, 31).

13. *Comment: Stewardship contracts, timber production, sustainability and economics*

Response: Diversity of opportunities from commercial timber sales, stewardship and service contracts expected from this project provides for a diversity of economic interests in the Illinois Valley. Economies are not based on small-scale, site-specific projects but the collective opportunities throughout the valley and region. Therefore, addressing BLM’s activities across the region better addresses the economic issues.

The RMP further supports the philosophy of providing a diversity of opportunities. The Medford District RMP (p. 80, 81) states two major objectives for contributing to socioeconomics:

- Contribute to local, state, national, and international economies through sustainable use of BLM-managed lands and resources and use of innovative contracting and other implementation strategies.
- Provide amenities (e.g., recreation facilities, protected special areas and high quality fisheries) that enhance communities as places to live, work, and visit.

In addition to the timber sale opportunity provided in this project, an additional 1300 acres would be available for stewardship and/or additional small sale contracts. It is in the best interest of the BLM and

the public to provide as much opportunity as possible for specialty and mainstream markets alike. The integration of biomass utilization from fuel hazard reduction activities also provides new opportunities for emerging markets.

This decision selects 839 acres of fuel hazard reduction, implemented largely through local contracts, which could include biomass extraction, and over 300 acres of stewardship projects, thus providing opportunities for local employment.

14. Comment: Port-Orford Cedar (POC) FSEIS

Response: Addressing the efficacy of mitigation measures from the POC-EIS is outside the scope of the analysis of this EA. The Tennessee Lime LMP appropriately and legally tiers to the POC FSEIS, which analyzed the efficacy of mitigation measures chosen in the Record of Decision.

15. Comment: Commercial timber products and fuels reduction

Response: A full suite of products will be available from this landscape management project as a result of this decision. The project is carefully designed, including incorporation of project design features (EA pp. 13-19) to minimize site degradation. This allows for the responsible production of commercial timber as well as other products as required under the RMP. Additionally, development of the project through an interdisciplinary approach resulted in recommendations from wildlife, soils, botany, and cultural and other resources that were integrated into the final project design as outlined in this decision.

16. Comment: Off-highway vehicle use.

Response: The project area has open, limited and closed categories for off-highway vehicle (OHV) use (RMP p.109). The effect of project implementation on OHV issues was fully analyzed and disclosed in the Tennessee Lime LMP EA (EA p.19, 89-91). There is a potential for increased use; however, project design features are intended to minimize these effects and if resource damage from OHV use is documented, additional steps such as signing, barriers and increased law enforcement will be implemented (EA p. 19, 90).

17. Comment: Recreational activities and tourism.

Response: No recreation actions are proposed in the Tennessee Lime LMP. BLM is currently developing recreational opportunities in the Illinois Valley with other partners and agencies. The majority of the new trail/recreation site development on the Grants Pass Resource Area has been in the Illinois Valley. BLM has developed over 27 miles of existing or new trails in the valley. Approximately 10.5 miles are roads that are closed to motorized vehicles in special areas (Rough and Ready Wayside, Eight Dollar Mountain boardwalk, French Flat ACEC). Eight miles of trails have been constructed and 19 miles are either proposed or existing unofficial trails that are proposed for upgrading. The BLM is proposing 9.5 miles of low elevation trails in Allen Gulch, in the East Fork Illinois Landscape Project. The BLM is also working with the community to develop a 3-5 mile trail system that would begin at Illinois Forks State Park and travel onto BLM land, just outside of the city limits of Cave Junction. Also, a one mile loop trail to the Illinois River is being proposed at Eight Dollar Mountain. These areas could serve to promote ecotourism and bring visitors to the Illinois Valley and opportunities for dispersed recreation would continue to be available.

The Tennessee Lime project includes matrix lands, and allocations where the primary focus is providing a sustainable supply of timber and other forest commodities (RMP pp. 38-39). It is not within the scope of the Medford District RMP to promote tourism over sustained timber production on those lands.

However, recreation and visual resource management are given consideration during the planning process, and project proposals are in compliance with the Medford RMP (PMP p. 63), which states: “Pursue recreation opportunities that will benefit local community economic strategies consistent with BLM land use objectives”.

Some commenters stated that the forest has many products offering economic opportunities. At a community meeting held August 2, 2006, I listened to concerns from many community members. It seemed apparent from the comments heard from those present that an economic future for the Illinois Valley should be based on tourism and development, rather than timber production. This is reflected in many of the comment letters we received as well. There are many members of the community who feel that timber production and therefore logging was contrary to that focus. While I agree that tourism is a growing economic opportunity, with potential to support some Illinois Valley businesses and residents, it is not the only opportunity that can be provided by public lands. A recent economic analysis for Josephine County, conducted at the request of BLM for the Western Oregon Plan Revisions, indicated that the trend in Josephine County has been away from timber production toward service type jobs. However, timber production has always been a proportion of the economy of the county. In fact, under the Oregon and California Act, sustained timber production is mandated by federal law, and the receipts from this activity are shared with the counties in Western Oregon to provide services to their residents. Neither timber production nor tourism should be the exclusive focus at the expense of the other, or of other resources. Increasing all opportunities increases public use and value.

Highway 199 provides a travel route to the coast, redwoods, Oregon Caves and Crater Lake National Park. BLM’s activity in timber production or fuels reduction is unlikely to deter travelers to these destinations. Timber production has long been a part of the valley and region. This same corridor passes private logging areas and a mill. BLM will continue to provide reasonable and practical recreation opportunities, both undeveloped and developed, near the Highway 199 corridor. Access onto many of the BLM lands is limited, however, by nature of the “checkerboard” land status. This prevents the public from visiting many areas because access is restricted across private lands. Without public access, BLM can neither designate nor advertise these as recreation opportunities. BLM also incorporates Visual Resource Management (VRM) objectives into every project (EA p.18-19, RMP p.70). These objectives are used to reduce impacts to visual resources across the landscape.

18. *Comment: Economic benefits of the Tennessee Lime LMP*

Response: Socioeconomic analysis was provided for in the Tennessee Lime LMP, but was mistakenly left out of the EA (EA Erratum, enclosed). This was considered by the decision maker in making this decision. The analysis of socioeconomics follows RMP guidelines. Full cost analysis was addressed in the RMP EIS to which the project tiers. As the timber sale is open for bid, it would be speculative to perform a cost analysis for the Illinois Valley, which is why economics analysis on socioeconomic conditions was done on a regional scale in the RMP EIS (EIS p. 4-105 to 4-114).

19. *Comment: Threatened and sensitive fish species*

Response: Potential impacts to the aquatic environment were thoroughly analyzed and were disclosed (EA pp. 21-31). This analysis assessed effects from project activities to fish habitat and in turn, fish populations through production and survival (EA pp. 45-49). Impacts to sensitive status species (e.g., salmonids) were considered and found to be avoided or minimized through Project Design Features

(EA, p. 13-19). The hydrologic and biological assessments determined that there will be no effect on coho salmon and designated critical habitat, and therefore Endangered Species Act (ESA) Section 7 consultation is not required. See consultation section in the Decision Record for details on BLM's consultation process for this project.

20. Comment: Fuel Hazard Reduction

Response: Several comments received indicated that the most effective means to increase safety around homes and communities is to treat fuels directly around homes. While it is beyond our purview to treat on private land (except in limited circumstances), where most homes reside, we are emphasizing and focusing our fuel treatments in the Wildland Urban Interface and Communities at Risk as directed under the National Fire Plan. The issue of wildfire and hazard assessment has been addressed in the EA at length. The BLM agrees that protecting residential areas from wildfires is very important. Our analysis shows that a majority of the project area is in the high and moderate values at risk category (EA p. 80), due primarily to the residential and recreational values. Ninety-six percent of the project area is in a designated Wildland Urban Interface and 35% of the project area is designated as Community at Risk (CAR) (EA p. 5, 80). Implementation of Alternative 2 will reduce the intensity of wildfires, allowing firefighters to initially attack and suppress the fires with greater success, thus reducing the risk to private property in the project area (EA pp. 3, 6, 85, 87).

21. Comment: Timber harvest and fire risk

Response: The BLM recognizes that there is some conflicting opinion regarding logging, canopy closure, and fire risk. Generally, there is some agreement that the wildlands are in need of fuel hazard reduction treatments, especially in the urban interface. The disagreements often revolve around the tools used to achieve desired conditions, and the extent of crown thinning. Proposed actions in Alternative 2 are designed in concert with the latest science, and strike a balance with the objectives identified in the purpose and need statement.

All harvest treatments proposed include follow-up treatments to reduce the slash. While there may be a lapse time between the creation of the slash and the treatment of the fuels, it is generally due to seasonal timing. For example, covered hand piles must be burned in the fall after the season changes and the rain starts to fall, and prescribed burns must be planned around fuel moistures and atmospheric conditions when impacts from smoke and risk of fire escape can be reduced. Reducing the risk of catastrophic fire across the landscape through manipulation of the vegetation, including stem density reduction (logging), is an objective of the proposed action. While there may be a temporary increase in fire risk due to logging slash and the seasonal time lag (EA p. 86), the overall fuel and fire severity risk reduction over the long term (EA Table 15; Table 18; pp. 84-88) far outweighs the short time increase in risk.

22. Comment: Prescribed fire

Response: The BLM planning team believes that the use of prescribed fire is a valuable tool for the management of public lands given the departure from a normal fire regime. BLM fire planners are encouraged that many citizens support the use of fire on the landscape, and hope to build on that trust by successfully reintroducing fire into the Tennessee Lime project area.

23. Comment: Biomass removal

Response: The utilization of woody biomass is making key contributions in the United States for power production, second only to hydropower as the largest domestic source of renewable energy (http://www.nationalatlas.gov/articles/people/a_energy.html#five). In July 2004, BLM implemented a Biomass Utilization Strategy for increasing the utilization of biomass from BLM lands. The overall goal of this strategy is to increase the offering, removal and utilization of small diameter timber and woody

biomass as part of the BLM's hazardous fuels reduction, restoration and timber sale projects in Southwest Oregon. Traditionally, small diameter timber and biomass have been considered noncommercial products and have required labor intensive and expensive treatments to reduce fire hazard. The utilization of small diameter timber and woody biomass generated by hazardous fuels reduction, ecological restoration and other resource management activities may help to offset the costs of these activities, reduce smoke emissions from prescribed burning, generate electricity or fuel such as ethanol, bio-methane, and hydrogen, and provide economic opportunities for rural communities. BLM efforts in biomass utilization continue today, and have garnered broad community support.

24. Comment: Variable thinning for structural and species diversity

Response: The integration of project design features (EA pgs 13-19) and recommendations from wildlife, soils, botany and cultural resources have created a project that will provide opportunities to reduce fire hazard, reintroduce fire to a fire-dependent ecosystem, and create strategic points for fire suppression while reducing the potential for adverse environmental impacts. The project will incorporate seasonal restrictions and no-treatment buffers associated with special status species and riparian areas. Prescribed burning will be conducted during times when environmental conditions such as fuel moistures, humidity, and temperatures will allow for low-intensity, mosaic burn patterns.

Traditionally, past commercial thinning utilized strict spacing guidelines based on tree diameter. The proposed actions in Alternatives 2 and 3 differ from this traditional way of thinning in several ways. The proposal includes utilizing density targets relative to site potential (i.e. varying densities over the landscape), implementation of small patch cuts, and no-treatment buffers associated with special status species and riparian areas. The variety of treatments coupled with a mosaic burn pattern will result in structural and species diversity across the landscape.

25. Comment: New information on Northern Spotted Owls

Response: The new information referenced on this project includes the Northern Spotted Owl Five-year Status Review, which was completed by the U.S. Fish and Wildlife Service (USFWS) in 2004. There are four reports including the Status Review which are important to this effort: 1) *Scientific Evaluation of the Status of the Northern Spotted Owl* (Sustainable Ecosystems Institute, Courtney *et al.* 2004); 2) *Status and Trends in Demography of Northern Spotted Owls, 1985-2003* (Anthony *et al.* 2004) 3) *Northern Spotted Owl Five Year Review: Summary and Evaluation* (USFWS, November 2004); and 4) *Northwest Forest Plan – The First Ten Years (1994-2003): Status and trend of northern spotted owl populations and habitat, PNW Station Edit Draft* (Lint, Technical Coordinator, 2005).

This new information was considered in the EA (addressed in the Wildlife Cumulative Effects Section) and in this decision. In summary, these reports have concluded that although the agencies anticipated a decline of NSO populations under land and resource management plans during the past decade, the reports identified greater than expected NSO population declines in Washington and northern portions of Oregon, and more stationary populations in southern Oregon and northern California. The reports did not find a direct correlation between habitat conditions and changes in NSO populations, and they were inconclusive as to the cause of the declines. Lag effects from prior harvest of suitable habitat, competition with Barred Owls, and habitat loss due to wildfire were identified as current threats; West Nile Virus and Sudden Oak Death were identified as potential new threats. Complex interactions are likely among the various factors. This information has not been found to be in conflict with the NWFP or the RMP (Evaluation of the Medford RMP Relative to the Four Northern Spotted Owl Reports, August 24, 2005).

In addition to these documents, new information released between the time of the EA and this DR was also considered in the final decision. These documents include The Final Recovery Plan for the Northern Spotted Owl (*Strix occidentalis caurina*) (2008), the Revised Designation of Critical Habitat for the Northern Spotted Owl (*Strix occidentalis caurina*) (2008), and the Scientific Review of the Draft Northern Spotted Owl Recovery Plan and Reviewer Comments (2008). The new information included in these documents does not change the effects as analyzed in the EA. Also see comment #27 below.

26. Comment: Northern Spotted Owl nesting, roosting and foraging (NRF) habitat.

Response: The BLM analyzed a reasonable set of alternatives that ranged from no action, to post-treatment canopy covers ranging from 25-50%. The alternatives analyzed in the Tennessee Lime EA represent a compromise between competing objectives as outlined in the EA's purpose and need, contribution to the district's timber harvest commitment and providing for wildlife habitat and other non-commodity needs in the watershed) (EA p. 2, 3). BLM did not consider an alternative that will retain all large trees and all owl habitat because it will not meet the objectives for these older seral stands as outlined in the EA (pp. 8-9). Specifically, the following objectives would not be met if no management were to occur in stands currently functioning as NRF habitat (EA pp. 8-9):

1. *Reduce stand densities:* Growth stagnation, resulting from abnormally high tree densities renders even the dominant trees highly susceptible to bark beetles, defoliating insects, dwarf mistletoe, and root diseases (Knutson et. al. 1986; Byler and Zimmer-Grove 1991; Cochran and Barrett 1995; Filip et al. 1999).
2. *Perpetuate the historic mixture of tree species:* Fire exclusion has created a shift from fire-tolerant (ponderosa pine and black oak) to less fire-tolerant species (Douglas-fir) (Atzet 1995). Pines and black oaks require openings and bare mineral soil for regeneration. Overstory trees are experiencing intense competition from abnormally high tree densities, resulting in reduced vigor and subsequent mortality.
5. *Contribute to the BLM's commitment to provide forest products:* Harvest would be balanced with other RMP objectives for resources such as soil, water, and habitats. In order to provide a sustainable supply of timber, some proposed actions focus on stand development.

Subsequent to the release of the EA, BLM reinitiated section 7 consultation with the United States Fish and Wildlife Service (USFWS) for the Northern Spotted Owl. The consultation processes is on-going and the BLM is waiting for a Biological opinion from the USFWS. Until a biological opinion is issued all actions in this decision are required to be a Not Likely to Adversely Affect for the Northern Spotted Owl.

27. Comment: Recovery of Northern Spotted Owls

Response: At the time the EA was written, the USFWS found an overall trend toward recovery of the spotted owl, stating that: "Over the past 10 years the Northwest Forest Plan (NWFP) has been implemented across Federal lands, resulting in considerable change in forestry practices during this implementation period. The overall trend towards the recovery of the Northern Spotted Owl, and old growth and late-successional forest related species has improved (USFWS 2004)" (EA p. 51). The statement, from the affected environment section of the 2004 Status Review of the Northern Spotted Owl helped to set the stage for analyzing the effects of the project on this species. As this was the latest information available at the time the EA was written, the specialists appropriately used this information.

Since the EA was written, a new Northern Spotted Owl Recovery plan was released (2008). Many Recovery Actions were included to aid in the recovery of the northern spotted owl. The Tennessee Lime units in this Decision meet the appropriate recovery actions. Additionally, the USFWS stated in the two LOCs covering treatments in this decision, “Because the proposed action is not likely to adversely affect spotted owls, murrelets, or spotted owl designated critical habitat within the action area, it is not necessary to consider whether the action will jeopardize the species or appreciably diminish the value of their designated critical habitat.”

28. Comment: Red tree vole surveys

Response: Because the 2000 and 2001 red tree vole (RTV) surveys expired, the BLM has conducted new RTV surveys throughout the planning area. New surveys were conducted in 2006 in all areas where timber harvest activities are planned *and* where habitat was deemed suitable under protocol definitions (Survey Protocol for the Red Tree Vole, Version 2.1, October 2002). These most recent surveys have discovered several RTV nests, all of which are being managed in accordance with RTV management recommendations (Management recommendations for the Oregon red tree vole, Ver. 2.0, 2000).

29. Comment: Red Tree Voles and third party surveyors

Response: The BLM appropriately used the current protocol (Survey protocol for the red tree vole, Version 2.1, 2002), which BLM is legally required to follow. While climbing of additional trees beyond those identified in ground surveys may locate additional RTV nests, the protocol was never intended to locate and protect every single red tree vole nest on the landscape. Management areas of 10+ acres per each active nest site are intended to protect the identified nest(s) as well as adjacent (but undiscovered) nests.

Additionally, all RTV nests located by third party surveyors in the Tennessee Lime planning area were found to be inactive and not associated with any active red tree vole nest trees, nor was the current survey protocol used in their work as required under the Survey and Manage program. As per management recommendations (Management recommendations for the Oregon red tree vole, Ver. 2.0, 2000), inactive nest sites will not be managed as active sites. The recently located RTV nests from surveys conducted in 2006 by BLM will be managed in accordance with the above management recommendations.

30. Comment: Purpose and Need.

Response: The comment stated that the purpose and need was too narrowly defined. However the purpose of the project, to implement the Medford District RMP is rather broad. The needs for the project encompassed a wide variety of resource needs including commodity production, through commercial timber sales as well as stewardship contracting opportunities, fuel hazard reduction, roadside maintenance, and wildlife habitat restoration (EA p. 2-3). Furthermore, objectives for matrix lands are clearly stated in the EA: “As stated in the RMP (pp. 38-39) objectives for matrix land are to:

- Produce a sustainable supply of timber and other forest commodities to provide jobs and contribute to community stability.
- Provide connectivity (along with other allocations such as riparian reserves) between late-successional reserves.
- Provide habitat for a variety of organisms associated with late-successional and younger forests.

- Provide for important ecological functions such as dispersal of organisms, carryover of some species from one stand to the next, and maintenance of ecologically valuable structural components such as down logs, snags, and large trees.
- Provide early-successional habitat.” (EA p. 3).

The project provides for all of these resources and appropriately provides an adequate range of alternatives for the decision maker to choose from, as well as providing both timber and non-timber resources and contract opportunities.

35. Comment: Suitable woodlands

Response: Suitable woodlands classification is based on suitability of forest land for commercial forest production. “Non-suitable woodlands” are defined in the RMP (p. 115) as “[f]orest land occupied by minor conifer and hardwood species not considered in the commercial forest land ASQ determination and referred to as noncommercial species. These species may be considered commercial for fuel wood, etc. under woodland management...” The comment does not state how this was not addressed in the EA, and therefore, additional comments would not clarify any issues. The EA (p. 34, Table 5) displays the Vegetation Condition Class in the project area.

36. Comment: Black oaks and tree spacing for hardwoods.

Response: Black oaks, pines and other hardwoods will be protected during project activities. Treatments are intended, “to favor and retain large vigorous ponderosa and sugar pines and non-tanoak hardwoods with greater than 30% live crown ratio. The treatment seeks to increase the potential for pine or non-tanoak hardwoods to survive and regenerate” (EA p. 9). A wide variety of tree spacing options are available for implementation. During fuel hazard reduction treatments, “[u]nderstory vegetation density would be reduced by cutting and spacing of conifers <8” dbh and hardwoods <12” dbh. Retained vegetation would be spaced 14-45’ apart. Within this range, wider spacing would be used for larger leaf trees or for species such as pine or oak which thrive in less dense conditions” (EA p. 7).

37. Comment: Biological Assessment and Biological Opinion (BA/BO)

Response: BLM is required to consult on impacts to Threatened and Endangered Species and is required to follow mandatory Terms and Conditions in the BA/BO which are the results of consultation. Addressing the validity of the BA/BO is beyond the scope of this EA. At the time the EA was released for public comment, the Tennessee Lime project was covered under the 2006 BO and LOC (FWS Log #1-15-06-F-0162 and Log #1-15-06-I-0165). Since then, the BO and LOC were pulled by the USFWS due to pending litigation and the BLM has reinitiated consultation on the NLAA portions of the Tennessee Lime project. This Decision is covered under two LOCs from the USFWS (Tails # 13420-2007-I-0231 and Tails #1342-2009-I-0093). Consultation on the Likely to Adversely Affect actions is pending, and units under that consultation process are deferred until consultation is complete.

38. Comment: Habitat effects and timber volume from the Biscuit Fire

Response: Effects of the Biscuit Fire on owl habitat were addressed in the EA (EA p. 75). While there is some timber volume expected from this sale, one of the main focuses of this project is restoration including up to: 1,649 acres of fuel hazard reduction; 730 acres of commercial timber harvest, of which 226 acres is in riparian reserves and is intended to aid in restoration of these habitats; 752 acres of noncommercial treatment in riparian reserves with the same focus; and 221 acres of young stand

management (EA pp.8-10; Appendix B, unit treatments). While the Biscuit Fire salvage logging did provide commercial timber volume, this project is intended to provide additional volume as part of BLM's commitment to local communities and the region.

39. Comment: Cumulative Effects

Response: Developing EAs for projects in different 5th field watersheds is common practice; each address cumulative effects at an appropriate scale for each resource. Some resources address cumulative effects on the 5th field watershed level because effects are not discernable at analysis areas larger than this. Other resources address effects at additional scales as appropriate to that resource.

The EA disclosed that the six projects (Deer Creek Salvage, Althouse Sucker, West Fork Illinois River, East Fork Illinois River, South Deer, Tennessee Lime, Anderson West), collectively propose 3,786 acres of commercial thinning / special forest products / density reduction, representing 0.5% of the Illinois River subbasin (EA p. 19). This is not a significant impact requiring preparation of an EIS. Each project evaluated cumulative effects at the project and sub-watershed scale, and at larger scales as appropriate for the particular resource.

At the Illinois Valley scale (>630,000 acres) processes and conditions across the landscape and through time need to be considered. At this broad scale, the NWFP and RMP are appropriate citations as they address activities across the landscape. Under the NWFP and as adopted by the RMP, > 75% of the BLM lands are in reserves for protection of wildlife and watersheds. Under the 1995 RMP, timber harvest declined dramatically; road decommissioning has occurred; riparian conditions have improved; road building and ground based harvest has decreased, and watershed restoration activities have occurred. Based on the changes in management across the landscape there is an improving trend in condition of late-successional habitat across BLM lands. The USFWS (2004) estimated that within the NWFP area, late-successional forest habitat development through in-growth (tree growth) is occurring at approximately 8% (600,000 acres) per decade over the baseline condition established in the NWFP. This development is 2.5 times the rate of loss through stand replacement fire and harvest, and would result in a 2.7 million acre net increase in late-successional forest over 3-4 decades (USDA, USDI, 2004) (EA p. 75) across the NWFP planning area.

The proposed Illinois Valley projects maintain the trend of improving habitat conditions for late-successional habitat. To reiterate, the BLM projects collectively propose density reduction and thinning on less than 1% of the watershed. The proposed action combined with other proposed, underway, or completed actions on BLM lands in the Illinois Valley represents approximately 5% of the Illinois Sub-Basin. Of this amount, less than 1% is contained within commercial timber sales.

Effects on connectivity along with fragmentation are likewise addressed at both watershed (EA pp. 64-66) and regional scales (EA pp. 65, 75). The comment requested analysis at the 4th, 5th, 6th and 7th field watersheds. Effects are analyzed at the project level scale, then extended to further analysis for cumulative effects at the appropriate scale for each resource; if effects are not found at these scales, analysis beyond these scales is neither necessary nor does it provide any information that would assist the decision maker in making a decision or determining the significance of effects.

The Tennessee Lime LMP EA appropriately analyzed the cumulative effects of the project and neighboring projects (EA pp. 19-21), and an EIS is not necessary and will not be prepared.

40. Comment: Seral stages of lands in the planning area.

Response: The BLM identified seral stages in the project area (EA pp. 33, 34; Table 5).

41. Comment: Citizen's alternative

Response: Aspects of all proposals in the citizen's alternative are included in the project proposal as summarized in the EA (p. 128).

Thin plantations – Plantations will be thinned in this project (EA pp. 13-14)

Do not treat late seral stands – This proposal would not meet the purpose and need for fuel hazard reduction, timber, or stand vigor. Reserves have been established on 75%-80% of Medford District BLM lands for late seral forest development. All treatments in this decision in late-seral stands will maintain suitable spotted owl habitat.

Retain the [old] growth forests – BLM is not treating old growth stands. However, BLM is treating mature stands which the public sometimes perceives as old growth. The RMP defines old growth as stands approximately 200 years and older (RMP p.113).

Do not build roads – The No Action alternative provides the decision maker the opportunity to select no road building. The action alternatives did not include no road building because roads are necessary to allow BLM access to stands in need of treatments for forest health, fuel hazard reduction and timber harvest commitments. However, due to restriction of the spotted owl consultation process road construction is being deferred in this decision.

The project will result in a net decrease of 0.25 miles of road.

Upgrade existing roads – Several roads will be maintained and receive improved drainage treatments (EA Appendix C).



United States Department of the Interior

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

TENNESSEE LIME LANDSCAPE MANAGEMENT PROJECT FINDING OF NO SIGNIFICANT IMPACT EA# OR117-06-02

I. INTRODUCTION

The BLM's interdisciplinary planning team designed the Tennessee Lime Landscape Management Project (LMP) based on: (a) current resource conditions in the project area; (b) meeting the objectives and direction of the Medford District Resource Management Plan (RMP) and the Northwest Forest Plan (NWFP); and (c) community interest and involvement. The proposals presented and evaluated in the Tennessee Lime LMP Environmental Assessment (EA) reflect what the planning team believes to be the best balance of resource conditions, resource potential and competing management objectives.

As stated in the Environmental Assessment (EA p. 1), the actions proposed and analyzed in the EA were developed to be consistent with, and/or tier to the following:

- *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);
- *Final-Medford District Proposed Resource Management Plan/Environmental Impact Statement and Record of Decision* (EIS 1994 and RMP/ROD 1995);
- *Final Supplemental Environmental Impact Statement: Management of Port-Orford-Cedar in Southwest Oregon* (FSEIS 2004 and ROD 2004);
- *Final SEIS for Amendment to the Survey & Manage, Protection Buffer, and other Mitigation Measures Standards and Guidelines* (2000), and the *Record of Decision and Standards and Guidelines for Amendment to the Survey & Manage, Protection Buffer, and other Mitigation Measures Standards and Guidelines* (2001)
- *Medford District Integrated Weed Management Plan Environmental Assessment* (1998) and tiered to the *Northwest Area Noxious Weed Control Program* (EIS 1985);

The EA also tiered to the ROD Final SEIS for the Clarification of Language in the 1994 Record of Decision for the Northwest Forest Plan amending wording about the Aquatic Conservation Strategy (2004). On March 30, 2007, the District Court ruled adverse to the US Fish and Wildlife Service (USFWS), National Oceanic and Atmospheric Administration (NOAA-Fisheries) and USFS and BLM (Agencies) in *Pacific Coast Fed. of Fishermen's Assn. et al v. Natl. Marine Fisheries Service, et al and American Forest Resource Council*, Civ. No. 04-1299RSM (W.D. Wash)(*PCFFA IV*).

As a result of PCFFA IV, the BLM reviewed the Tennessee Lime project for consistency with the 9 ACS objectives as originally described in the 1994 Northwest Forest Plan. The ACS review

(December 2007 ACS Consistency Review (located in the project record)) found the actions to be consistent.

II. BACKGROUND

The planning effort for the Tennessee Lime LMP afforded community members several opportunities to input and participate in the planning process. The planning team synthesized issues and comments received from previous planning efforts under the Free and Easy 2 LMP as well as the Tennessee Lime LMP. Each project provided scoping periods, an EA review comment period and public meetings.

The Tennessee planning team reviewed and considered Public Comments on the Free & Easy 2 project (EA #OR110-00-15) completed in 2000. Scoping for Free and Easy 2 project began in December 1998. A comment period from December 2000 through February 2001 followed the release of the EA. The fuels work analyzed under that EA has been completed; however, no timber was harvested under that project as BLM received no bids on the timber sale offering. However, the need for treatments in these units for forest health and commodity production remains. Therefore, the untreated vegetation units of the Free and Easy 2 project located within the Kerby watershed have been included in the Tennessee Lime project.

Planning for the Tennessee Lime project began in July 2005 when BLM mailed out more than 600 scoping letters to landowners and other individuals and groups who asked to be informed about upcoming BLM projects. The BLM held an open house on September 27, 2005 to introduce the local communities to the BLM planning team, resource specialists, and the scope of the proposed project. A field trip on October 19, 2005 facilitated informal discussions between BLM resource specialists and the public.

From the beginning, the scope of the project was intended to address the full range of conditions and opportunities that were found, and to design a multi-faceted project that addressed a range of resources. The result is a project that includes a broad suite of activities: wildlife habitat restoration, young forest management, older seral stand thinning, fuel hazard reduction, and road maintenance, renovation, decommissioning and construction. It provides commercial and non-commercial outputs as directed by the Bureau's Strategic Plan and the RMP.

The Tennessee Lime LMP EA presented and analyzed a no action alternative and two action alternatives (Alternatives 2 & 3). The two action alternatives reflect what the planning team determined to be the best balance and integration of resource conditions, resource potential, and management objectives included in the Purpose and Need of the EA (pp. 2-3). In designing the Tennessee Lime LMP, the BLM interdisciplinary team was aware of and sensitive to the range of views and values of the public. As a result, the Tennessee Lime project is an integrated and multi-faceted plan that balances these factors and objectives.

The Tennessee Lime LMP EA was available for public review from July 7 to August 6, 2006. It incorporated analysis of the proposed actions; addressed issues raised in public comments; and referenced pertinent information and literature. Many comments BLM received clearly show the value placed on this area by many members of local communities as well as people from other areas. Values and concerns identified by commenters include, but are not limited to, risk of fire hazard, species diversity, riparian areas, water quality, commercial harvest, healthy fisheries, and

wildlife habitat (EA section 4.0 Agencies and Persons Consulted, p. 92). For a more detailed summary of public comments, see Section VII, Public Involvement; and Appendix 2 of the Decision Record).

The decision on this project is found in the attached document and was based on the extensive public input, recommendations from the planning team, and careful consideration of the objectives of the laws, regulations and planning documents, and NEPA analysis governing these lands.

III. CONSULTATION AND COORDINATION

Pursuant to the Endangered Species Act, BLM completed consultation with the US Fish and Wildlife Service. The Tennessee Lime project was covered under the 2006 BO and LOC (FWS Log #1-15-06-F-0162 and Log #1-15-06-I-0165) for actions that may affect Northern Spotted Owls. However, since then the BO and LOC were pulled by the USFWS due to pending litigation and the BLM has reinitiated consultation on the NLAA portions of the Tennessee Lime project. This Decision is covered under two LOCs from the USFWS (Tails # 13420-2007-I-0231 and Tails #1342-2009-I-0093).

In accordance with section 7 of the ESA, the BLM analyzed project activities for their potential to affect to the following plant species; the endangered Gentner's fritillary (*Fritillaria gentneri*) endangered Cook's lomatium (*Lomatium cookii*), endangered large-flowered woolly meadowfoam (*Limnanthes floccosa ssp. grandiflora*), and McDonald's rockcress (*Arabis macdonaldiana*). In August 2008, BLM prepared a BA to evaluate impacts to listed plant species. In September 2008 the USFWS gave BLM a letter of concurrence (LOC) (Tails # 13420-2008-I-0136). The BLM is implementing all applicable PDCs in accordance with the mandatory terms and conditions as specified in the LOC. The Service stated that the proposed action will not jeopardize the continued existence of ESA listed species.

After the EA was released the U.S. Fish and Wildlife Service proposed Critical Habitat for the Federally Endangered plant Cook's desert parsley (*Lomatium cookii*) (Federal register, Vol. 74, No. 143, Tuesday July 28, 2009, pages 37314-37392). Proposed Critical Habitat for the Federally Endangered plant *Lomatium cookii* is located within the Tennessee Lime Project Boundary. Critical Habitat Units (CHU) IV3, IV4, IV5, and IV6A are located within the project boundary in their entirety, while approximately 14 acres of IV6B is within the project boundary. There are approximately 110 acres of project units within CHU IV3 and approximately 20 acres within IV4.

The treatments proposed for these project units are DM/Mod GS and Fuel Hazard Reduction. These treatments would not adversely modify or destroy the critical habitat because the project will not enter or affect wet meadow habitat that is suitable for the species. The proposed treatment may improve habitat by reducing the canopy cover and creating openings that would be suitable for *Lomatium cookii*. There are three populations of *Lomatium cookii* in the treatment units. These populations would be protected in accordance with USFWS LOC(Tails # 13420-2008-I-0136).

In accordance with the ESA and the Magnuson-Stevens Fishery Conservation and Management Act (MSA), on April 14, 2000 the BLM initiated informal consultation with the National Marine Fisheries Service (NMFS) on the Free and Easy 2 project, which is now included within the Tennessee Lime LMP. In a Letter of Concurrence (LOC) dated June 21, 2000, the NMFS agreed with the BLM's determination that the proposed project is not likely to adversely affect (NLAA)

Southern Oregon/Northern California (SONC) coho salmon or Critical Habitat, and that it will not adversely affect Essential Fish Habitat under the MSA. In addition, the BLM evaluated the effects of the Tennessee Lime Landscape Management Project not already covered by the existing Letter of Concurrence or a programmatic Biological Opinion and determined that project actions will not affect SONC coho, Critical Habitat, or Essential Fish Habitat under the MSA. According to section 7 of the Endangered Species Act and the Magnuson-Stevens Act, consultation with the NMFS is not necessary on actions that have no effect on listed species, Critical Habitat, or Essential Fish Habitat.

The project will not adversely impact any sites of cultural or historical significance (EA pp. 909-91). The State Historic Preservation Office (SHPO) was informed of the BLM's finding in accordance with 36 CFR 800.5(b).

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

IV. FINDING OF NO SIGNIFICANT IMPACT (FONSI)

A. Plan Consistency

Based on the information in the Tennessee Lime Landscape Management Project's EA, in the record, and from the letters and comments received from the public about the project, I conclude that this decision is in conformance with the 1995 Medford District Resource Management Plan (RMP) and subsequent plan amendments which include:

1. Record of Decision and Resource Management Plan Amendment for Management of Port-Orford-Cedar in Southwest Oregon, Coos Bay, Medford, and Roseburg Districts, May, 2004.
2. Medford District Noxious Weed Environmental Assessment (1998)

The decision is also consistent with the following:

- Final Supplemental EIS on Management of Habitat for Late-Successional and Old-Growth Forest Related Species within the Range of the Northern Spotted Owl (1994)
- ROD for Amendments to Forest Service and Bureau of Land Management Planning Documents Within the Range of the Northern Spotted Owl and its attachment A entitled the Standards and Guidelines for Management of Habitat for Late-Successional and Old-Growth Forest Related Species Within the Range of the Northern Spotted Owl (NWFP) (1994)
- Final SEIS for Amendment to the Survey & Manage, Protection Buffer, and other Mitigation Measures Standards and Guidelines (2000), and the ROD and Standards and Guidelines for Amendment to the Survey & Manage, Protection Buffer, and other Mitigation Measures Standards and Guidelines (2001)

The ACS Consistency Review (EA p.28, ACS consistency review December 2007(in project record)) found that the project is in compliance with the Aquatic Conservation Strategy as originally developed under the Northwest Forest Plan.

This decision is also consistent with the Endangered Species Act; the Native American Religious Freedom Act; other cultural resource management laws and regulations; Executive Order 12898

regarding Environmental Justice; and Executive Order 13212 regarding potential adverse impacts to energy development, production, supply and/or distribution.

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

B. Finding of No Significant Impact

Based on information in the EA and comments received from the public, it is my determination that this decision will not result in significant impacts to the quality of the human environment.

Anticipated impacts are within the range of effects addressed by the Medford District RMP and the Northwest Forest Plan, or are otherwise not significant. Thus, the Tennessee Lime LMP does not constitute a major federal action having a significant effect on the human environment and an EIS is not necessary and will not be prepared.

This conclusion is based on my consideration of the CEQ's criteria for significance (40 CFR §1508.27), regarding context and intensity of the impacts described in the EA and on my understanding of the project. As noted above, the analysis of effects has been completed within the context of the Medford District RMP and it is consistent with that plan and the scope of effects anticipated from that plan. The analysis of effects has also occurred in the context of multiple spatial and temporal scales as appropriate for different resources and types of impacts.

I have considered the intensity of the impacts anticipated from this Tennessee Lime LMP decision relative to each of the ten areas suggested by the CEQ. With regard to each:

1) Impacts can be both beneficial and adverse and a significant effect may exist regardless of the perceived balance of effects. Project design features (PDFs) are included in the proposed actions for the purpose of reducing anticipated adverse environmental impacts which might otherwise stem from project implementation. There are no significant effects expected from project activities. The following is a synopsis of the effects expected from implementation of activities detailed in the Decision Record.

The EA disclosed that there is a potential for minor, short term impacts to riparian and stream habitats, and hydrologic function as a result of the proposed road maintenance activities. Any impacts will be negligible at the sixth field level. Site productivity and hydrology will not be negatively affected by fuel hazard reduction activities (EA p. 24). No ground based logging will occur on serpentine soils, and therefore project activities will not negatively affect these sensitive soils (EA p. 25). There is potential for soil compaction in the project area from timber harvest and biomass removal (EA pp. 25-26), but loss of long-term productivity is not expected (EA pp. 26, 37). Minimal erosion is expected from project activities or from road maintenance (EA pp. 26-27). There are potential effects to botanical species and habitat, including drying of moist microsites (EA p. 43), and potential for spread of noxious weeds from vehicles and equipment (EA p. 44). However, PDFs will reduce the risk of weed spread, and known sites will be treated under the Medford District's Noxious Weed EA (EA pp. 43, 44).

While the EA did note that proposed actions would result in downgrading of suitable spotted owl habitat and associated effects on late-successional associated species and connectivity, (EA pp. 54-57, 76), there will be no downgrading of suitable spotted owl habitat from the actions in this

decision. There are some actions in the decision that will treat and maintain suitable habitat, potentially reducing the canopy cover within the stand. However, the stands will continue to provide nesting, roosting or foraging habitat and dispersal habitat because a minimum 60% or 40% canopy cover would be retained, as well as other key habitat features such as snags and coarse woody material (EA p. 131). Treat and maintain activities are addressed and allowed due to appropriate consultation with the US Fish and Wildlife Service (See section III, Consultation and Coordination above). Additionally, season restrictions listed as Project Design Features will prevent disturbance to nesting spotted owls within the project area.

As with spotted owls, there is an acknowledged effect on fisher habitat (EA pp. 59-63); however, under this decision, treatments will not remove suitable fisher habitat as anticipated since those units are deferred in this DR. Fuels and thinning treatments will degrade fisher habitat, but will still provide suitable dispersal and foraging habitat. Habitat features, such as large snags and coarse wood would be maintained throughout the project area, which will provide future denning and resting habitat, and will reduce potential impacts to fishers.

Depending on the species, the project will result in both positive and negative impacts to neotropical birds. The effects to habitat and the associated effects to populations will be immeasurable at the regional scale (EA pp. 69-72).

There is a potential for increase in legal and illegal OHV use; however, there are measures (EA p. 19) such as barrier construction, signing and monitoring integral to the project that will minimize this unauthorized use (EA p. 90).

Beneficial effects include reduction in canopy and resultant release of residual trees, which will accelerate diameter growth, develop high crown ratios and increase individual tree vigor (EA pp. 36-38). Additionally, riparian thinning will increase structural diversity and result in accelerated development of late-successional forest conditions in riparian areas. In the long term, late-successional forest conditions in riparian reserves will result in an increased structural diversity, and large woody debris recruitment, leading to improved stream complexity and water quality (EA p.47). Salmonid production will likely increase through an increase in adult holding areas and gravel retention (EA p. 47). Increased stream complexity would result in improved juvenile rearing habitat. Reduction in hazardous fuel loading will result in moderation of extreme fire behavior (EA p. 84-88).

Visual resource management objectives would be met, as proposed prescriptions would implement project design features (EA pp. 18-19) to blend the treatments with the characteristic landscape, which is already varied by human alterations, as well as a variety of vegetation types (EA pp. 91-92).

2) *The degree of the impact on public health or safety.* The project has not been identified as having the potential to significantly and adversely impact public health or safety. Fuel hazard reduction will benefit public health and safety, particularly in CARs and WUIs. Implementation of Alternative 2 will have the highest amount of smoke produced from prescribed burning compared to Alternative 3 but should result in reduced smoke emissions due to wildfire and will comply with air standards.

3) *Unique characteristics of the geographic area.* Eight Dollar Mountain Area of Critical Environmental Concern (ACEC) is in the project area. No treatments are proposed in the ACEC. The team also identified sensitive serpentine resource values within the project area. To protect and enhance resource values, limitations on ground-based harvest (EA p. 25) have been established and reintroduction of fire (EA p. 11) to help restore and maintain serpentine habitat will be implemented. These actions will maintain or enhance the values that make those areas unique.

4) *The degree to which the effects on the quality of the human environment are likely to be highly controversial effects.* The effects of this project are similar to those of many other projects 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. It underscores a level of uncertainty that exists in assessing the changes that may occur as a result of such projects. Any uncertainty in actual effects is acknowledged by the EISs (e.g., FEIS/PRMP pp. 4-7; 4-24; 4-73; 4-79; 4-98) to which the Tennessee Lime LMP EA is tiered. Opposition to the project is not the same as “controversial effects.” The Ninth Circuit has held that a project is “highly controversial” if there is a “substantial dispute [about] the size, nature, or effect of the major Federal action rather than the existence of opposition to a use.” Blue Mountains Biodiversity Project v. Blackwood, 161 F.3d 1208, 1212 (9th Cir. 1998) (quoting Sierra Club v. U.S. Forest Service, 843 F.2d 1190, 1193 (9th Cir. 1988)).

5) *The degree to which the possible effects on the human environment are likely to be highly uncertain or involve unique or unknown risks.* The analysis does not show that this action will involve any unique or unknown risks.

6) *The degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration.* The action and the decision will not set any precedents for future actions with significant effects. It is one of many similar projects designed to implement the RMP and NWFP.

7) *Whether the action is related to other actions with individually insignificant but cumulatively significant impacts.* No significant cumulative impacts have been identified. There are no cumulative effects on soils or hydrology expected on either the project, Josephine-Kerby 6th field sub-watershed, or the Illinois River scale (EA p.28); As no cumulative effects were identified in the analysis of impacts to soil, riparian and water, no cumulative effects to fish and aquatic habitats are expected (EA p. 48). Reductions in natural fuels, in combination with forest thinning, would increase initial attack effectiveness, and public and firefighter safety (EA p. 88). Wildland firefighter and public safety would increase in treated areas and direct strategies and tactics could be used to control fire, resulting in fewer acres burned and less threat to private property within the watershed and the region. Smoke produced from prescribed fires is expected to be short term and not contribute cumulatively to any air quality impacts (EA p. 87-88). There will be no project level effects to botanical species because all known sites are protected from project activities; therefore, there are no cumulative effects from this project for botany.

Under this decision, project activities will maintain spotted owl habitat, which is consistent with consultation. No substantial negative effects are anticipated to any Bureau Sensitive or former Survey and Manage wildlife species because of the small scope of the proposed action compared to

the available habitat within the Josephine-Kerby 6th field sub-watershed. There are no expected cumulative effects to cultural resources, economics, recreation, and visual resources (EA p.91-92).

8) *The degree to which the action may adversely affect National Historic Register listed or eligible to be listed sites or may cause loss or destruction of significant scientific, cultural or historical resources.* The project area does not contain any sites that are listed on the National Register of Historic Places. All cultural sites will be buffered from project activities (EA p. 18). No activities will be authorized within the buffered boundary, protecting sites from project activities.

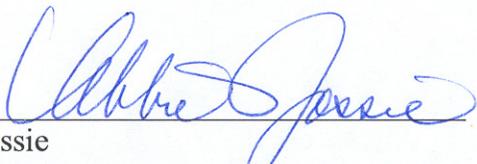
9) *The degree to which the action may adversely affect ESA listed species or critical habitat.* Project design features will reduce potential adverse impacts on ESA listed species. ESA consultation with NMFS and USFWS has been completed. All actions proposed in this decision are Not Likely to Adversely Affect Northern Spotted Owls or any other T&E species because of retention of canopy cover and key habitat features. The project is consistent with mandatory terms and conditions set forth by the regulatory agencies. The project area does not contain spotted owl critical habitat.

10) *Whether the action threatens a violation of environmental protection law or requirements.* There is no indication that this decision will result in actions that will threaten a violation of any environmental laws.

V. CONCLUSION

Based on information in the EA and comments received from the public, it is my determination that this decision will not result in significant impacts to the quality of the human environment. Anticipated impacts are within the range of effects addressed by the Medford District RMP (1995) and the Northwest Forest Plan or are otherwise not significant. Thus, the Tennessee Lime LMP does not constitute a major federal action having a significant effect on the human environment and an EIS is not necessary and will not be prepared.

This conclusion is based on my consideration of the CEQ's criteria for significance (40 CFR §1508.27), regarding context and intensity of the impacts described in the EA and on my understanding of the project. As noted above, the analysis of effects has been completed within the context of the Medford District RMP and it is consistent with that plan and the scope of effects anticipated from that plan. The analysis of effects has also occurred in the context of multiple spatial and temporal scales as appropriate for different types of impacts.



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

5-11-10

Date

Attachment 1

ENVIRONMENTAL ASSESSMENT

for the

Tennessee Lime Landscape Management Project

EA #OR117-06-02

ERRATUM

***Effects to Socioeconomics of Project Activities
and Minor Corrections***

U.S. DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
MEDFORD DISTRICT
GRANTS PASS RESOURCE AREA

April 2010

In the course of analyzing comments submitted during the public comment period for the Tennessee Lime Landscape Management Plan Environmental Assessment (EA) (July 7 – August 7, 2006), the ID Team realized that the socioeconomic section had been inadvertently omitted from the EA (see below). Additionally, an error was discovered in Table 2 (EA p. 12). The corrected table is below with the error crossed through.

Stream Type	Riparian Reserve Width
Fish-bearing streams (none identified in project area)	330'
Perennial streams & springs and intermittent streams	165'
Unstable or potentially unstable areas	165'
No Treatment Widths	
Perennial streams & springs	50'
Intermittent streams	25'

An error was also noted in the Watershed Overview / History (EA p. 20) where it states that: “Approximately 1,011 acres of BLM land within the Kerby sub-watershed are in riparian reserves.” There are actually 2,069 acres in riparian reserves in the sub-watershed.

New Information: Critical Habitat for Cook’s Lomatium (*Lomatium cookii*)

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

Proposed Critical Habitat for the Federally Endangered plant *Lomatium cookii* is located within the Tennessee Lime Project Boundary. Critical Habitat Units (CHU) IV3, IV4, IV5, and IV6A are located within the project boundary in their entirety, while approximately 14 acres of IV6B is within the project boundary. There are approximately 110 acres of project units within CHU IV3 and approximately 20 acres within IV4. The treatments proposed for these project units are DM/Mod GS and Fuel Hazard Reduction. These treatments would not adversely modify or destruct the critical habitat because the project will not enter or affect wet meadow habitat that is suitable for the species. The proposed treatment may improve habitat by reducing the canopy cover and creating openings that would be suitable for *Lomatium cookii*. There are three populations of *Lomatium cookii* in the treatment units. These populations would be protected in accordance with USFWS LOC(Tails # 13420-2008-I-0136). The Proposed CHU ruling is located in the Federal Register, Vol 74, No. 143, Tuesday July 28, 2009, pages 37314-37392.

This information was available to the decision maker in developing her decision and is provided here to inform the public about additional considerations that were not included in the EA.

The following is the discussion of effects of project activities on socioeconomics:

Socioeconomics

Affected Environment

The Medford District RMP (p. 80, 81) states two major objectives for contributing to socioeconomics:

Contribute to local, state, national, and international economies through sustainable use of BLM-managed lands and resources and use of innovative contracting and other implementation strategies.

Provide amenities (e.g., recreation facilities, protected special areas and high quality fisheries) that enhance communities as places to live, work, and visit.

Although there are no specific land use allocations related to socioeconomic conditions, management direction supports assisting in development of economic opportunities for rural, resource-based communities, increasing emphasis on management of special forest products, and "...other activities identified by BLM and the involved communities as benefiting identified economic strategies" (RMP p. 81). It concludes by stating that the Medford District should:

Design and implement forest management activities to produce a sustained yield of products to support local and regional economic activity. A diversity of forest products (timber and non-timber) will be offered to support large and small commercial operations and provide for personal use. Service contracts will include opportunities for both large and small contractors.

The BLM extended an invitation to the local and regional communities and other state and federal agencies, private organizations and individuals to develop issues and resources important to local, state, national, and international economies. Public involvement for the Tennessee Lime Landscape Management Project began in July 2005, when BLM mailed out scoping letters to landowners and others who have asked to be kept informed about upcoming BLM projects. This project also incorporated input from the Free and Easy, and Free and Easy 2 projects.

Through a series of public meetings (see EA Section 4.0, Agencies and Persons Consulted, p. 92), questionnaires, personal discussions and comment letters, the public provided input to BLM for consideration in the EA. Letters, phone calls, meetings, and field visits elicited the following issues or concerns related to socioeconomics:

- Maintain the quality of life by protecting forest resources
- Creation of local jobs from forest activities
- Water quality
- Fuel loading/fuel reduction activities
- Recreation and tourism
- Spiritual values
- Support for maintaining current road access to public lands
- Protection of older forests

In addition to enhanced socioeconomic opportunities, the project proposes a variety of vegetation, and riparian and other habitat restoration treatments. These treatments are subject to a variety of environmental and land management policies such as the Clean Water Act, Endangered Species Act, Northwest Forest Plan, the Medford District Resource Management Plan, and the State Historic Preservation Office. These plans were intended to guide management to protect intrinsic values of water quality, wildlife, recreation, and vegetation and cultural resources through establishment of reserves, Best Management Practices (BMP) and project design features.

Environmental Consequences

Alternative 1 - No Action

Under the no action alternative, the objectives stated in the RMP would not be met. Contributions to local, state, national, and international economies would not occur and economic opportunities to the local and regional economies would not be made. The No Action alternative would not provide opportunities for local contractors to create jobs from forest activities.

Fuel hazards would not be addressed and there would be no opportunities to enhance the forest resources important to local communities as identified through scoping. Recreation and tourism activities would continue to be developed by the local community; forest resources important to these activities would continue to be threatened by risk of wildfire and would continue to degrade because of dense stand conditions.

There are no expected gains or losses to the spiritual or intrinsic values found in the project area. However, it is recognized that wildfire has the potential to reduce these values through loss of forest stands and vegetation.

Alternatives 2 and 3

Economics

The BLM alternatives were designed to help achieve the objectives of the RMP. The commercial timber sale, fuel hazard reduction activities and stewardship opportunities would all contribute to “local, state, national, and international economies through sustainable use of BLM-managed lands and resources and use of innovative contracting and other implementation strategies” (RMP p. 80). Approximately 2.8 million board feet of timber could be offered to the timber industry through alternative 2, although the estimated harvest volume would be reduced because of implementation of red tree vole and other special status species buffers.

Project activities have no effect on recreational opportunities. Rather, proposed actions would assist in development of economic opportunities for rural, resource-based communities by providing approximately 2,900 acres for contract opportunities in fuel hazard reduction, stewardship, and special forest products. Stewardship contracts would enhance and reduce threats to forest resources, provide economic opportunities, and produce forest products to support local and regional economic activity. Fuel hazard reduction under both Alternative 2 and 3 would provide for safer communities in the case of wildfire; alternative 2 would provide an increased benefit for the community because of the greater number of acres treated for fuel hazard reduction.

Opportunity costs, defined as loss of future economic benefit resulting from project implementation, are highly speculative. However, given the scale (approximately 3.2% of the watershed) and project design (no old growth removal, no clear-cuts, and future development of old growth), future adverse effects to the local and regional economy are very unlikely. .

Cumulative effects

As economic health is expected to affect the Illinois Valley similarly, cumulative effects are considered at that scale. Combining all BLM projects in the Illinois Valley, propose commercial and special forest product harvest is expected on less than one percent of the watershed (EA p. 19). At this level of harvest with no clear-cut's, and minimal acreage of structural regeneration harvest (none in the Tennessee Lime project), actions would not lead to a decrease in tourism or future economic potential of forest lands in the Illinois Valley.

The combined Illinois Valley projects (EA p. 19) are expected to contribute commercial timber and special forest products (e.g., poles, small timber sale, biomass), to the local economy. The proposed actions would provide contracting opportunities through stewardship and fuel hazard reduction as well as reduced risk of stand replacing wildfire.

Additionally, to enhance tourist values and public demand, BLM has constructed or proposed for construction approximately 37.5 miles of trail within the Illinois Valley. Of this, 10.5 miles are roads that are closed to motor vehicles in special areas (e.g., Eight Dollar Mountain, Rough and Ready Wayside, French Flat ACEC). This would be expected to enhance recreation opportunities and value, for both residents and visitors to the Illinois Valley, as well as bring additional tourist revenues to the valley.

Since publication of the EA, two additional potential projects in the Illinois Valley have been identified, potentially for completion in 2010 or 2011. They have preliminarily been identified as the Deer North and East-West Junction projects. Initial reconnaissance in the Deer North project has identified a potential for up to 800 acres of timber harvest and 700 acres with a potential for stewardship opportunities. Initial reconnaissance on the East-West Junction project has identified a potential for up to 1,000 acres of timber harvest. Each project is likely to provide opportunities for one or more timber sales and stewardship opportunities, and recreational development. However, proposals have not been developed to the extent that effects can be determined. Therefore, effects of those projects, including cumulative will be addressed in the respective projects' NEPA documents.

The Medford District RMP (pg 80) directs the BLM to contribute to local and state economies through sustainable yield practices, special forest products, and amenities such as recreation and habitat enhancement. The project complies with this direction through bidding and contracting opportunities, habitat restoration, thinning to improve future forest development, fuel hazard reduction and trail construction and maintenance.

Logging Activity Impacts to Residents

No helicopter yarding is proposed in the project area. Effects on people associated with logging activities include chain saw noise, dust and log truck traffic. Chain saw noise has different properties and duration than helicopters, but the possible effects on people follow a similar

pattern. Sound would be dispersed and of short duration so restrictions are not deemed necessary. Dust from truck hauling would be mitigated by watering, lignin and/or speed reductions. Log truck traffic on publicly owned roads would follow all laws, regulations and speed limits. Special measures would be implemented as needed during special times of the day such as school bus pick-up and drop-off times.

In summary, effects of increased noise from chainsaw use, logging trucks, and dust and traffic from project activities will be relatively short to moderate in duration and mitigated as necessary. There are no cumulative effects as the disturbance ceases when the project is completed.