DECISION RECORD
for
Hazardous Fuel Reduction Treatments
within the Revised Westside Project
Environmental Assessment
(EA# OR118-05-021)

United States Department of the Interior
Bureau of Land Management
Medford District
Glendale Resource Area

I. INTRODUCTION

The Westside Project is a landscape scale project that includes several forest management treatments designed to meet multiple federal directives such as the Medford District Resource Management Plan (RMP), the Northwest Forest Plan, and the National Fire Plan. This decision is applicable only to the hazardous fuel reduction treatments and related biomass utilization activities associated with the Westside Project. Decisions regarding stewardship projects and timber sales are to be issued separately.

II. DECISION

I have decided to implement the proposed hazardous fuel reduction treatments and related biomass utilization as described in Alternative 3 of the revised environmental assessment (Revised EA) including the Project Design Features (PDFs). This decision includes implementing these treatments on approximately 950 acres of forest land by the general prescription of slashing, hand piling, pile burning, and underburning. Descriptions of these treatments, biomass utilization methods, and the PDFs are found in Chapter 2 of the Revised EA.

The Revised EA replaces and supersedes the original Westside Project EA (OR118-05-021) previously released on June 22, 2006. Any comments submitted for consideration must be directed to the analysis contained in the Revised Westside Project Environmental Assessment (OR118-05-021) in order to be considered. The following are changes from the original EA:

1. Appendix 2 (p. 190) has been revised to include migratory birds. This revision is in response to public comment.

2. Appendix 10 has been added on page 345 and includes the wildlife biologist's specialist report regarding the rationale for determining migratory birds as Not Affected in Appendix 2.

3. Remove wording in section 2.3.1 that states "Firelines would be constructed by hand on slopes greater than 35%. On slopes less than 35%, one-pass with a brush blade could be used to construct fireline using machinery. Machine firelines would not be constructed in riparian reserves." This language is removed because no mechanical line construction is proposed. This revision is in response to public comment.

4. Appendix 2 (p. 184) has been revised to include information to explain why Pacific lamprey and cutthroat trout (Bureau Tracking species) are not affected by the Westside Project and would not lead to listing as a threatened and endangered species. This revision is in response to public comment.

5. The Westside interdisciplinary team evaluated the effects of the Screen Pass Timber Sale and determined the effects are within those analyzed under the Westside EA. The analysis of potential effects of Screen Pass hauling is found in the Revised Westside Project EA on pages 68, 69, 72, 69, 140 and 150. This revision is in response to public comment.

These modifications are minor and do not change the scope of the project analyzed, nor do the modifications affect the adequacy of the analysis contained in the EA.

III. DECISION RATIONALE

A. Plan Conformance

This decision is in conformance with the following plans:

- *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 Supplemental Environmental Impact Statement and Record of Decision and Standards and Guidelines for Amendment to the Survey and Manage, Protection Buffer, and other Mitigation Measures Standards and Guidelines (*FSEIS, 2000 and ROD, 2001) including any amendments or modifications in effect as of March 21, 2004
- *Final Supplemental Environmental Impact Statement Clarification of Language in the 1994 Record of Decision for the Northwest Forest Plan National Forests and Bureau of Land Management Districts Within the Range of the Northern Spotted Owl*, and *Proposal to Amend Wording About the Aquatic Conservation Strategy* (FSEIS, 2003 and ROD, 2004)
- *Medford District Integrated Weed Management Plan Environmental Assessment (1998*) and tiered to the *Northwest Area Noxious Weed Control Program* (EIS, 1985)

The Glendale Resource Area is aware of the August 1, 2005, U.S. District Court order in Northwest Ecosystem Alliance et al. v. Rey et al. which found portions of the *Final Supplemental Environmental Impact Statement to Remove or Modify the Survey and Manage Mitigation Measure Standards and Guidelines* (January, 2004) (EIS) inadequate. The Glendale Resource Area is also aware of the January 9, 2006, court order to:

- set aside the 2004 Record of Decision *To Remove or Modify the Survey and Manage Mitigation Measure Standards and Guidelines in Forest Service and Bureau of Land Management Planning Documents Within the Range of the Northern spotted Owl* (March, 2004) (2004 ROD) and

- reinstate the 2001 *Record of Decision and Standards and Guidelines for Amendments to the Survey and Manage, Protection Buffer, and other Mitigation Measure Standards and Guidelines* (January, 2001) (2001 ROD), including any amendments or modifications in effect as of March 21, 2004.

The order further directs: "Defendants shall not authorize, allow, or permit to continue any logging or other ground-disturbing activities...unless such activities are in compliance with the provisions of the 2001 ROD (as amended or modified as of March 21, 2004)."

The litigation over the amendment that eliminated the Survey & Manage mitigation measure from the Northwest Forest Plan does not affect the Westside Project. This is because all required biological surveys for Survey & Manage species were completed before the completion of the Middle Cow LSR Project EA and meets the 2001 protocol (2001 ROD as amended or modified as of March 21, 2004). Therefore, this project complies with the Northwest Forest Plan prior to that amendment.

The Glendale Resource Area is also aware of ongoing litigation Pacific Coast Federation of Fishermen's Associations et al. v. National Marine Fisheries Service et al. (W.D. Wash.) related to the 2004 supplemental environmental impact statement and record of decision for the Aquatic Conversation Strategy. The Magistrate Judge issued findings and recommendations to the Court on March 29, 2006. The District Court has not yet adopted them. The Court has not found this amendment to be "illegal," nor did the Magistrate recommend such a finding. The District Court has yet to adopt the findings and recommendations and rule.

B. Alternatives Considered

The alternatives considered included the No Action Alternative (Alternative 1), which serves as the baseline to compare effects, the Proposed Action (Alternative 2), which initiated the environmental analysis process, and Alternative 3, the Selected Alternative. A description of these alternatives can be found in Chapter 2 of the Revised EA.

1. Alternative 1 was not selected because this alternative would not meet the purpose and need of the project as described in Chapter 1 of the Revised EA.

2. Both Alternatives 2 and 3 propose the same units and acreages to receive hazardous fuel reduction treatments. Because there is no other defining factor separating the two alternatives regarding hazardous fuels management, Alternative 3 has been chosen to be consistent with previous decisions issued from the Revised Westside Project EA as the Selected Alternative.

3. Planning of the Westside Project involved the public by mailing invitations to approximately 1,281 residents of the towns of Glendale and Azalea to attend a public scoping meeting provided on April 28, 2005 at the Azalea Grange Hall. About 30 local residents attended. A subsequent scoping report was mailed to those attending the meeting and to individuals and organizations that have expressed interest in Glendale Resource Area projects. The scoping public comment period was available from June 7, 2005 to July 7, 2005. The BLM received 32 public responses from either letters or emails, and fully responded to those comments in Appendix 3 of the Westside Project Environmental Assessment. The Glendale Resource Area also accepted public comments to the Westside Project through the quarterly BLM Medford Messenger publication beginning in the fall of 2004. Public comments were considered in the development of the alternatives as analyzed in Appendix 1 of the EA.

   The Westside Project EA, including a Finding of No Significant Impact (FONSI), was made available for public comment from June 22 to July 24, 2006. Thirty-five letters or emails were received during the 32-day comment period on the EA and FONSI. These public comments were considered in reaching a decision for hazardous fuel reduction treatments in the Westside Project Planning Area. See the Attachment, *Public Comment to Revised Westside Project Environmental Assessment and BLM Response*, for the public comments related to hazardous fuel reduction treatments and the BLM's response to those comments.

IV. FINDING OF NO SIGNIFICANT IMPACT (FONSI)

The thirty-five letters received during the 32-day review period for the EA and FONSI requested additional information but did not identify a flaw in assumptions, analysis, or data that would alter the environmental analysis disclosed in the EA or conclusions documented in the FONSI. It is my determination that Alternative 3 will not significantly affect the quality of the human environment, individually or cumulatively with other actions in the general area. No environmental effects meet the definition for significance in context or intensity as defined in 40 CFR § 1508.27. Therefore an environmental impact statement will not be prepared.

V. AMINISTRAVTIVE REMEDIES

This decision is a forest management decision. Administrative remedies are available to persons who believe 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.

To protest a forest management decision, a person must submit a written and signed protest to the Glendale Field Manager, 2164 NE Spalding Avenue, Grants Pass, OR 97526 by the close of business (4:00 p.m.) not more than 15 days after publication of the Notice of Decision in the *Grants Pass Daily Courier* newspaper. The protest must clearly and concisely state which

portion or element of the decision is being protested and why it is believed to be in error, as well as cite applicable regulations. Faxed or emailed protests will not be considered. If no protest is received by the close of business (4:00 p.m.) within 15 days after publication of the Notice of Decision, the decision will become final. If a timely protest is received, the decision will be reconsidered in light of the statement of reasons for the protest and other pertinent information available, and a final decision will be issued in accordance with 43 CFR § 5003.3.

VI. CONTACT PERSON

For additional information contact either Katrina Symons, Glendale Field Manager, (541-471-6653) or Donni Vogel, Natural Resource Specialist, (541-471-6528) at 2164 NE Spalding Avenue, Grants Pass, OR 97526.

10/25/06

Katrina Symons
Field Manager, Glendale Resource Area
Medford District, Bureau of Land Management

Date

Attachment
Public Comment to Revised Westside Project Environmental Assessment and BLM Response

The Westside Project EA, including a Finding of No Significant Impact (FONSI), was made available for public comment from June 22 to July 24, 2006. Thirty-five letters or emails were received during the 32-day comment period on the EA and FONSI. These public comments were considered in reaching a decision for hazardous fuel reduction treatments in the Westside Project Planning Area. Below are the BLM responses to the public comments concerning hazardous fuel reduction treatments.

Comment 1: *KS Wild again proposes the following Citizen's Alternative that would thin plantations in the planning area and log forests identified as GFMA. The Citizen's Alternative would decommission, barricade and gate all roads possible. The thinning prescriptions proposed in this Citizen's Alternative would not reduce the canopy closures below 60% in order to meet US Fish and Wildlife Service minimum requirements for Northern spotted owl (NSO) suitable habitat. Additionally, this alternative should include BLM proposed activities aside from logging, such as treating approximately 2,500 acres of existing vegetation that pose a fire hazard, decommissioning of existing roads, and riparian treatments that include bank stabilization and instream restoration. See Scoping Notice at 3.*

BLM Response: The BLM appreciates Klamath-Siskiyou Wildland Center's (KS Wild) support of the proposed hazardous fuel treatments. The BLM is unsure about the reference to 2,500 acres because the environmental assessment (EA) analyzed 988 acres for hazardous fuel treatments. This decision is to treat approximately 950 of the 988 acres analyzed. The remaining acres are planned to be included in subsequent decision documents.

Comment 2: (KS Wild) *Fires rarely consume large tree boles, but they nearly always consume fine surface fuels including leaves, twigs and branches smaller than 3 inches in diameter (Agee 1996, Rothermel 1991). The primary variables that account for initiation of canopy fires are the surface fuel load, fine fuel moisture, and the vertical ground-to-crown height (Agee et al. 2000, Graham et al. 2004). The ability of a forest to resist canopy fire initiation is dependent on the flammability of surface fuels, which directly influences flame length and fire intensity (Agee 1996). Thus, surface fuel treatments and pruning of "ladder fuels" to increase crown height above the ground are the most effective means to reduce fire intensity and crown fire ignition potential (Agee 2002, Agee et al. 2000, Omi & Martinson 2002, Stephens 1998, van Wagtendonk 1996).*

BLM Response: KS Wild's comments support the information provided in the EA (page 37): "Hazardous fuel treatments (HFT) are designed to reduce the existing fire hazard posed by dense younger stands and older stands with dense understories. This is accomplished by increasing the spacing between trees in the younger stands through thinning and by thinning the understories of the older stands. These treatments reduce the amount of surface and ladder fuels present, thereby reducing the existing fire hazard."

Comment 3: (Oregon Natural Resource Council) *The BLM should have considered obtaining timber volume through thinning dense young stands or from careful fuel reduction focusing on surface and ladder fuels.*

BLM Response: The BLM appreciates ONRC's support of hazardous fuel treatments.

Comment 4: (Pacific Rivers Council) *Forest fuel reduction treatments are not universally effective in reducing fire severity, restoring fire regimes, or reducing the ecological effects of higher severity fire. In most forest systems, such treatment benefits are highly unlikely, due to the transience of treatment effects on fuels, combined with the patchy nature of fire and its relatively restricted occurrence annually. The transient effects of treatments on forest fuels (Kauffman et al., 2004; Graham et al., 2004), coupled with the relatively low probability of higher-severity fire, makes it highly unlikely that the treatments can potentially reduce fire severity – largely because it is unlikely that fire will affect treated areas while fuel levels are reduced.*

BLM Response: The BLM agrees with Pacific Rivers Council's (PRC) assertion that fuel reduction treatments are not *universally* effective. However, as Chapter 3 of the EA explains, hazardous fuel treatments designed to reduce surface and ladder fuels are effective in decreasing fire hazard in vegetation types found in southwestern Oregon. Case in point, the current condition of the stands proposed to receive hazardous fuel treatments are characterized by fuel models with the potential of producing flame lengths well above the fire behavior threshold of 4 feet (p. 51). After treatment, the stands transition to fuel models associated with flame lengths between 1 to 2 feet, which is below the 4 foot fire behavior threshold related to effective fire suppression tactics (p. 55).

Comment 5: (PRC) *Mechanized fuel treatment practices can exacerbate fire severity, adding to the collateral damage to watersheds and aquatic resources caused by the treatments (Agee, 2003), as documented by Raymond (2004) in Southwest Oregon… Mechanized fuel treatments cannot be assumed to eliminate high severity fire, nor can it be assumed that untreated areas will burn at high severity, if left untreated. In contrast, there is complete certainty that a single iteration of mechanized fuel treatments cannot persistently reduce fuels and future fire severity (Kauffman et al., 2004; Graham et al., 2004; Agee and Skinner, 2005)… Just as the "divine implementation" of BMPs cannot be justifiably assumed (Espinosa et al., 1997), it cannot be reasonably assumed that mechanized fuel treatments will be applied consistent with the best available information on how to reduce fire severity…Road construction, use, and maintenance are inexorably linked to mechanized fuel treatments and are also known to be among the primary sources of aquatic damage on public lands. Similarly, the construction and use of landings, which have impacts similar to roads, are also inextricably intertwined with mechanized fuel treatments...There are no reliable data indicating that "Best Management Practices" (BMPs) can reduce the adverse effects of significant soil and vegetation disturbance on aquatic resources to ecologically negligible levels, especially within the context of currently pervasive watershed and aquatic degradation (Ziemer and Lisle, 1993; ISG, 1999; Espinosa et al., 1997; Beschta et al., 2004). BMPs are often not implemented to the degree promised in environmental analyses, and where they are implemented the execution may be slipshod and/or ineffective. Activities*

implemented with somewhat effective BMPs still often contribute to negative cumulative effects. Just as the "divine implementation" of BMPs cannot be justifiably assumed (Espinosa et al., 1997), it cannot be reasonably assumed that mechanized fuel treatments will be applied consistent with the best available information on how to reduce fire severity.

BLM Response: This project proposes no mechanized fuel treatments. As the EA states, hazardous fuel treatments will be conducted using manual treatments and prescribed burning methods. As such, the comments above are irrelevant to this project.

Comment 6: (PRC) *In many situations, the adverse aquatic impacts of fuel reduction treatments will not be offset by reductions in fire severity and consequent watershed impacts. Fuel treatments have been documented to be ineffective at reducing fire severity under some weather conditions (Martinson et al., 2003; Graham et al., 2003; Romme et al., 2003a). The treatments are almost always ineffective in some prevalent forest types (Veblen, 2003; Schoennagel et al., 2004a; Noss et al., 2006). Although the variability in treatment effectiveness makes it difficult to generalize across all forest types, the overall effectiveness of fuel treatments remain remains largely unsubstantiated by field data, especially at larger scales (e.g., CWWR, 1996; DellaSala and Frost, 2001; Carey and Schumann, 2003; Graham et al., 2004). Many fuel reduction practices are unlikely to reduce fire severity or consequent ecological effects and can, instead, increase fire severity (Raymond, 2004; Agee and Skinner, 2005). In some forest types, there are no sound scientific bases for fuel treatments (Baker et al., 2001, Veblen, 2003; Schoennagel et al., 2004a; Noss et al., 2006).*

BLM Response: Without definitions of treatments, forest types, and measurements of effectiveness, PRC fails to show any relevance of their comment to this project. In lieu of speculating as to what PRC's point may be, the BLM's response to this comment is that the EA specifically describes the proposed hazardous fuel treatments, thoroughly discusses the current forest conditions and desired future conditions of the stands proposed for treatment, and clearly explains the effectiveness of the treatments (Chapter 3: Fire Risk and Hazard). See the BLM Response to Comment 4 above for a description of treatment effectiveness on reducing fire behavior. In regard to PRC's comment concerning aquatic impacts, the analysis of hazardous fuel treatments concluded the following (EA, p. 128):

Beneficial Effects to Fish Habitat
Commercial thinning, non-commercial thinning, and fuels reduction treatments within riparian reserves would help to improve fish habitat by reducing stand densities. A reduction in stand densities in young dense stands would allow for the development of late successional riparian characteristics. Some of these characteristics include multi-level canopy cover which helps to maintain cool water temperatures. Late successional characteristics in riparian areas also include downed coarse woody debris and LWD which provides nutrient inputs to stream and increases channel complexity. The importance of channel complexity and LWD to fish habitat was discussed in the fisheries affected environment section above. Late successional characteristics in riparian areas also include diverse species composition which provides a variety of chemical and biological inputs to streams. These treatments also reduce the spread of disease and the risk of a high intensity or severity fire within riparian reserves. Such a fire could result in a reduction in shade and tree mortality. These actions could negatively affect fish habitat by an increase in water temperature, a reduction in future recruitment of LWD, an increase in soil erosion and sediment entering fish habitat.