



United States Department of the Interior

BUREAU OF LAND MANAGEMENT
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WEST FORK ILLINOIS LANDSCAPE MANAGEMENT PROJECT DECISION RECORD and FINDING OF NO SIGNIFICANT IMPACT

I. INTRODUCTION

The BLM's interdisciplinary planning team has designed the West Fork Illinois Landscape Management Project (LMP) based on current resource conditions in the project area and to meet the objectives and direction of the Medford District Resource Management Plan (RMP) and the Northwest Forest Plan (NFP). The proposals presented and evaluated in the West Fork Illinois LMP Environmental Assessment (EA) reflect what the planning team believes to be the best balance of resource conditions, resource potential and competing management objectives.

II. BACKGROUND

Planning for this project began in June 1999. 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 the range of resources. The result is a project that includes a broad suite of recreation, road, wildlife habitat, forest stand, and fuel hazard reduction activities. It provides commercial and non-commercial outputs as directed by the Bureau's Strategic Plan and the RMP.

The West Fork Illinois LMP EA was available for public review June 16-July 30, 2004. Based in part on comments received, it was decided that an EA addendum would be prepared. On June 29, 2005 the West Fork Illinois LMP EA Addendum became available for public review and comment through August 1, 2005. It incorporated corrections to the EA, documented additional analysis of the proposed actions, addressed issues raised in public comments, and referenced new information. It provided additional analysis of the environmental consequences of the proposed actions on the unique values of the portion of the public-nominated Waldo-Takilma Area of Critical Environmental Concern (ACEC) that overlaps the West Fork Illinois planning area.

During the EA Addendum comment period (June 29-August 1, 2005), it was discovered that a section on harvest and fuel treatment effects on special status / survey and manage plants had been inadvertently omitted from the Addendum. Therefore, on September 1, 2005 the West Fork Illinois EA Addendum Erratum - Effects of Stand Treatments on Special Status / Survey and Manage Plants, became available for public review and comment through September 30, 2005.

During the three comment periods, many comments were received that 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 by no means limited to) risk of fire hazard, species diversity, riparian areas, disapproval of commercial harvest, botanical values of the nominated Area of Critical Environmental Concern, recreational opportunities, healthy fisheries, and wildlife habitat to name a few. For a more detailed summary of public comments, see Appendix A, Public Comment Summary and Response.

In designing the West Fork Illinois LMP to address current resource conditions, 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 West Fork Illinois project is an integrated and multi-faceted plan that balances these factors and objectives.

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

III. DECISION and RATIONALE

Alternative 1, the No Action Alternative, is rejected because it does not meet the resource management objectives identified in the Medford District Resource Management Plan. It 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. The No Action alternative would perpetuate or promote undesirable resource conditions. With the No Action alternative, 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.

Alternative 3 is rejected because it will not treat riparian reserves that would benefit from the accelerated development of late successional stand characteristics, large wood sources, and reduced fire hazard. Alternative 3 is also rejected because it will not reduce fuel hazard on as many acres as Alternative 2.

It is my decision to implement Alternative 2. All project design features are integral to the selected alternative and will be implemented (EA pp. 18-24; Addendum pp. 6-7). Harvest units under the West Fork Illinois timber sale comprise 228 acres, which are approximately 8% of the BLM acres in the project area, and approximately 0.3% of the 76,932 acre West Fork Illinois watershed. An additional 83 acres are identified and selected for harvest under Alternative 2, however, those acres are deferred for economic reasons and will be bundled into a future timber sale. Approximately 60 acres of light commercial thinning will take place within riparian reserves. None of the fuels treatments will be done by machine masticator (slashbuster). The following section provides details of my decision and the rationale for my decision. Resources and issues will be addressed in the same order in which they are presented in the EA:

1. Potential Research Natural Area (RNA) (EA p. 6)

Decision: Approximately 631 acres in T41S, R9W, Section 9 that have potential for RNA status

will be protected and treated consistent with the values of an RNA as outlined in Alternative 2A (RNA), which addresses treatments only in the area identified as having RNA potential. This area would be considered during the RMP process for RNA designation.

Rationale: Protection and habitat enhancement of this area is crucial for acquiring more information on habitat and management for the species which make this area so unique.

2. ACEC (Addendum pp. 1-4, 41-42)

Decision: Implement the vegetation treatments in Alternative 2 within the boundaries of the portion of the nominated Waldo-Takilma ACEC that are in the West Fork Illinois watershed (Addendum Appendix A, Map 2a). Treatments will include timber harvest, fuel hazard reduction, wildlife habitat restoration, and young stand management. Harvest units are summarized in Tables DR-1 and DR-2 below.

Rationale: The West Fork Illinois project interdisciplinary team (IDT) reviewed an ACEC nomination submitted by a public group. The IDT's preliminary assessment was based on guidance in BLM Manual 1613, Areas of Critical Environmental Concern which includes relevance and importance criteria used in the IDT's assessment.

The interdisciplinary team's preliminary assessment found that a portion of the nominated area may meet the relevance and importance criteria for both botanical and cultural values. The specific values nominated that may meet these criteria are: a) Exceptional biological diversity in a small geographic area, and b) Ultramafic influenced lands with a variety of rare and sensitive plants and with diverse peridotite/serpentine influenced plant communities including chaparral, Jeffery pine savanna and open-canopied mixed-conifer forest. A collateral benefit could potentially be met through protection of historical sites.

ACECs can only be designated through the BLM's Resource Management Planning (RMP) process. Final determination and designation is thus outside the scope of this decision. Until the RMP revision process occurs, nominated ACEC values will be protected. "Temporary management includes those reasonable measures necessary to protect significant resource values from degradation until the area is fully evaluated through the resource management planning process" (BLM Manual 1613.21(E)). Resource management activities appropriate to the underlying land allocation and RMP management direction are permissible as long as the nominated ACEC values are not degraded. Addendum Section 3.2.9 documents the finding that actions implemented as described in Alternative 2 will not diminish the identified unique resource values in the proposed Waldo-Takilma ACEC.

3. Riparian Reserves (EA p. 7)

Decision: Vegetation treatments in the riparian reserves will be implemented as proposed in Alternative 2 and will include pre-commercial and commercial thinning, brushing, Port-Orford cedar (POC) sanitation, road maintenance, stream crossing improvements, and fuel hazard reduction (thinning, hand pile burning, under burning). Existing snags and large down wood will

be maintained, and prescriptions will designate leave trees for future large wood recruitment. Commercial thinning will only occur on approximately 47 acres.

POC sanitation will occur as described in the EA (pp 8-9) **except** that BLM road 41-9-9A will be gated rather than sanitized. Where these roads cross through riparian reserves, the treatments will be implemented according to the proposed prescription.

Rationale: In the West Fork Illinois watershed, the primary goal in riparian reserves is the maintenance and long term restoration of aquatic ecosystems as identified in the NFP Aquatic Conservation Strategy (ACS) objectives. Using the ACS as a guide, objectives for treatments in the riparian reserve were developed. Areas selected for riparian treatment lack structural complexity and species diversity and are at risk of high intensity wildfire. The treatments are designed to enhance terrestrial and aquatic systems in both the short and/or long term by accelerating development of large conifers, promoting snag and down wood recruitment and reducing density in the Douglas-fir/tanoak series. Canopy closure would be retained at 60% although some areas may experience a reduction to 50% temporarily.

Fuel treatments in riparian reserves will decrease the risk of wildfires that burn hotter and more destructively than historically due to decades of fire exclusion and fuel buildup. The reintroduction of fire in riparian areas through prescribed burning will enhance wildlife habitat and restore stands in the Jeffrey pine and white oak plant series to conditions consistent with a natural fire regime.

Roadside sanitation of Port-Orford Cedar (POC) will restrict the spread of PL to uninfected areas. Road crossings of streams are particularly high risk areas for the transmission of PL to downstream areas. By closing roads in uninfected areas and removing the means of transmission of PL, corridors which are dependent on POC for shade will be managed to reduce the risk of POC mortality and the loss of stream shade. Planting of resistant stock provides for the eventual establishment of POC corridors which can continue to provide stream shade and reduce stream heating in the watershed. The replacement of two log ford crossings on streams in the area of the watershed uninfected by PL will reduce the risk of transmission by vehicles coming into contact with flowing water.

Road treatments will improve drainage and reduce the potential for delivery of fine sediment to fish habitat.

4. Port-Orford Cedar (EA p. 10)

Decision: POC treatments outlined in Alternative 2 include sanitation, installation of a gate and planting of disease resistant POC seedlings. Sanitation material will be available for bough collection during the dry season: June 1 to Sept 30 (dates may vary depending on weather and soil conditions). Leftover material will be hand piled and burned, followed by under burning as part of fuel hazard reduction objectives. Mitigation measures identified in the POC risk-key analysis and project design features will be followed in order to protect against the spread of *Phytophthora lateralis* due to project activities (EA p. 23).

Rationale: Sanitation treatments will reduce potential spread of POC root disease by removing the host in high traffic areas (along a major road). The gate will reduce traffic and the potential for disease spread. Planting resistant seedlings will introduce resistance into the POC population and may help retain this species as an ecosystem component.

5. Special Forest Products (EA. p. 11)

Decision: Implement special forest products work as proposed. Special forest product gathering or harvesting will be consistent with and promote stand treatment objectives. Scheduling of special forest product collection will be coordinated with other project activities. Port-Orford cedar boughs will be available in sanitized areas. All units proposed for harvest, fuel hazard reduction or young stand treatment will be available for special forest products and small sales (e.g., poles, merchantable trees, fuel wood, burls, etc.).

Rationale: There is an ever increasing demand for a wide range of forest products for personal and commercial use. Incorporating special forest product harvest into forest stand treatments will provide forest products and meet stand objectives. In some instances, special forest product collection or stewardship contracting may be the best strategy to accomplish management objectives. Providing these opportunities will contribute to the local economy.

6. Young Stand / Forest Development (EA p. 11)

Decision: Implement young stand treatments as proposed in Alternative 2 (106 acres). After young stands are treated in a given unit, fuel hazard will be assessed by an interdisciplinary team and planned fuel treatments may be modified to ensure that overall unit objectives are met. Any changes made to the fuel hazard reduction planned for a unit would be within the scope of the fuel treatment options assessed in the EA and their anticipated impacts. For a more complete description of post treatment fuel hazard evaluation, see section 8, below.

Rationale: Thinning and brushing in young stands will hasten the growth of desired trees (conifer and hardwood) to meet long term RMP determined forest product and habitat goals of both the matrix land allocation and in the selected areas of the riparian reserves where treatment is proposed.

7. Older Seral Stage Stands (EA p.12)

Decision: Implement stand harvest and post harvest treatments as outlined in Alternative 2 except for five units with access issues and wildlife concerns. At this time, harvest will be deferred in units 40-8-21 (21-1), 40-8-10 (10-1), and 41-9-10 (003B) because BLM does not have access (see "Access" section below for more information). Harvest treatments in units 41-9-2 (2-1) and 41-9-2 (2-3) will be deferred due to Survey and Manage buffers that render the units marginally economic to commercially harvest. However, understory thinning for fuel hazard reduction will occur as planned in unit 2-1.

The decision is to proceed with timber harvest on units identified in Table DR-1 as part of the West Fork Illinois timber sale. Four units (Table DR-2) which are also prioritized for timber harvest will be temporarily deferred due to helicopter system feasibility issues or other economic reasons. These units will be packaged with a future action.

After harvest, fuel hazard will be assessed by an interdisciplinary team and planned fuel treatments may be modified to ensure that overall unit objectives are met. Any changes made to the fuel hazard reduction planned for a unit would be within the scope of the fuel treatment options assessed in the EA and their anticipated impacts. For a more complete description of post treatment fuel hazard evaluation, see section 8, below.

As summarized in Table DR-1, of the 614 acres analyzed for potential harvest in Alternative 2, units planned for treatment as part of the West Fork Illinois timber sale comprise 228 acres, which are approximately 8% of the BLM acres in the project area, and approximately 0.3% of the 76,932 acre West Fork Illinois watershed. Units deferred from treatment under the West Fork Illinois timber sale may be treated under the terms of a different contract at a later date. Such treatments may include fuel hazard reductions, pole sales, or some other form of alternative contracting, such as stewardship.

Further, an assessment of age class distribution for watersheds in the GPRA was done in May 1999. Approximately 77% (2,357 acres) of BLM lands in the West Fork Illinois watershed are in late-successional condition as defined by the 15% Late-Successional Standard and Guidelines (Instruction Memo OR98-100).

OI Unit	OI Unit Acres	Timber Sale Unit # (acres)	Harvest Type	Logging Method
40-8-9-(003)	51	9-3 (50)	CT/MGS**	Tractor
40-8-9 (001) (010)	62	9-10 (48)	CT/MGS	Tractor
40-8-21 (003)	70	21-3 (55)	CT/MGS	Tractor
40-8-28 (002)	12	28-6 (25)	CT/MGS	Tractor
40-8-28 (006)	26			
41-9-12 (001)	19	12-1 (18)	CT/MGS	Tractor/Cable
41-9-13 (001)	35	13-1 (30)	CT/MGS	Tractor/Cable
		R/W* (2)		
TOTAL	275	228	Est. Volume: 1.43 mmbf	

* R/W=road right-of-way ** CT/MGS=commercial thin/modified group selection

OI Unit	Acres	Harvest Type	Logging Method
40-8-20 (001)	41	CT/MGS	Tractor/Heli
40-8-27 (006)	2	CT/MGS	Tractor/Cable
40-8-28 (007)	21	CT/MGS	Tractor/Cable/Heli
40-8-33 (001)	19	CT/MGS	Tractor/Cable/Heli

Rationale: Harvest in older seral stands will reduce stand densities, perpetuate the historic mixture of tree species, promote multi-layered stand structure, reduce the risk of a stand replacement fire, and contribute to meeting the BLM's commitment to produce timber/forest resources. Current stand densities are higher than desired, leaving trees susceptible to insects, disease and fire. Release to pine and oak will perpetuate these stand components which are currently threatened by high stand densities, understory competition, high canopy closures and high duff layers. Treatments are designed to retain multiple canopy layers, snags, down wood and large hardwoods in order to promote structural diversity.

Fire exclusion over the past decade has resulted in a significant departure from the historical range of natural fire and the risk of losing forested stands is high. As a result, the changes to species composition, structural stage, stand age, dead fuel loadings and canopy closure have increased the risk of large, high intensity stand replacement fires which have the potential to degrade older seral stands.

The silvicultural prescription and marking guidelines call for variable commercial thinning and modified group selection in the units proposed for harvest. The prescription and marking guideline favors the retention of large, dominant trees that display old-growth characteristics, as smaller co-dominants and suppressed trees are removed. This project objective is in-line with the Medford District RMP which states that on matrix lands "emphasize retention of the largest trees and snags available to provide the unique structure and functions associated with these large old trees" (p. 39). Generally, trees marked for harvest in the West Fork Illinois timber sale are heavily weighted towards the smaller size classes, as is evident in Table DR-3 below. But, as the table shows, some larger trees are designated for removal. The majority of those larger harvest trees (greater than 32" dbh) are found in the road right-of-ways in Sections 12 and 13, and their removal is not silviculturally driven. Outside of right-of-ways, typically a large tree is only removed when a more vigorous tree (better crown ratio, better form, free from disease and insects) of similar size can be retained. The result is that the remaining larger trees will be released, thereby promoting and retaining the large tree component as the BLM balances active management (matrix) objectives with other multiple use objectives.

Diameter Class	Number of Harvest Trees (estimated)	Percent of Total Trees to be Harvested	Estimated Volume (mbf)	Percent of Total Sale Harvest Volume
8	1,037	14%	24	2%
10	1,229	17%	46	3%
12	1,692	23%	136	10%
14	1,049	14%	138	10%
16	723	10%	151	11%
18	434	6%	109	8%
20	373	5%	146	10%
22	245	3%	138	10%
24	248	3%	201	14%
26	102	1.4%	88	6%
28	73	1.0%	74	5%

Diameter Class	Number of Harvest Trees (estimated)	Percent of Total Trees to be Harvested	Estimated Volume (mbf)	Percent of Total Sale Harvest Volume
30	37	0.5%	54	4%
32	19	0.26%	24	2%
34	8	0.11%	11	0.79%
36	16	0.22%	29	2.02%
38	3	0.04%	7	0.46%
40	7	0.10%	17	1.19%
42	3	0.04%	7	0.46%
44	7	0.10%	16	1.11%
46	0	0.00%	0	0.00%
48	2	0.03%	7	0.46%
50	1	0.01%	4	0.27%
52	1	0.01%	4	0.29%
Totals	7,309		1,430	

8. Fuel Hazard Reduction Treatments (EA p. 14; Addendum pp. 2, 4, 41)

Decision: The decision is to implement fuel hazard reduction as described in Alternative 2, with the exception of machine mastication. Based on public comments received, the decision is to eliminate machine mastication (slashbuster) as a tool used to accomplish the fuel objectives described in the EA and its Addendum. The fuels treatments will instead be accomplished by a combination of broadcast or under burning, hand slashing, and hand piling/burning. All understory thinning done for fuel hazard reduction will be integrated into the silvicultural stand treatment objectives. Including wildlife habitat restoration/enhancement burning and fuel hazard reduction, approximately 2,402 acres will be treated.

Because of lack of access, it is unlikely that units 21-4, 10-3A, 10-2, 10-6, 15-1, 15-3 and 15-4 will receive fuels treatments.

Activity generated fuels will be evaluated using the BLM's Fuel Hazard/Risk Assessment and Treatment Recommendations analysis process after treatment and prior to fuel hazard reduction. This interdisciplinary review will ensure that the appropriate fuel reduction treatments are used to meet fuel hazard reduction, 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 and its Addendum. 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/burning of slash will be used when under burning is not advisable, where high surface fuel loadings exist, or when under burning 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: Fuel treatments will reduce the chance of uncharacteristic fire behavior and promote the Healthy Forest Initiative and National Fire Plan. Fuel hazard reduction of existing and activity generated fuels are an important purpose of this project, especially in the rural interface. Reduced fuel loadings and altered fuel profiles will make fire suppression safer and more effective. Priority treatment areas include communities at risk and the wildland urban interface.

9. Wildlife Habitat Restoration and Enhancement (EA p. 16),

Decision: Wildlife habitat restoration and enhancement burning will be implemented in accordance with Alternative 2. Jeffrey pine savannahs and white oak woodlands will be treated to remove encroaching conifers and brush through manual and mechanical means (including machine mastication) and burning.

Rationale: These treatments will help restore wildlife habitats in Jeffrey pine and white oak woodlands. These fire dependent ecosystems will be reinvigorated and restored through the reintroduction of low intensity fire, the removal of encroaching shade tolerant species and the reduction of overly dense, declining chaparral.

10. Roads and Transportation Management (EA p. 17; Addendum p. 4, Appendix C)

Decision: The decision is to implement Alternative 2 as described in the EA and its Addendum. Approximately 20 miles of road would be maintained, 1.43 miles constructed (0.33 miles of temporary road and 1.1 miles of permanent new road), and 3.88 miles renovated.

Rationale: This roadwork is necessary to support the West Fork Illinois timber sale and to correct existing road conditions that are contributing to sediment delivery to streams.

11. Cultural Resources (EA p. 23, Addendum p. 5)

Decision: The decision is to implement Alternative 2 as described in the EA and its Addendum. Known cultural and historic sites will be protected. Some sites will receive interpretive development. In limited OHV use areas, roads and trails will be designated for use.

Rationale: In addition to no treatment buffers, fuel treatments will further protect sites and, through a reduced risk of severe fire, interpretive values will be protected or improved.

12. Visual Resource Management (VRM)

Decision: The decision is to implement Alternative 2.

Rationale: The project area is in VRM Class III. Objectives for VRM class III lands are to partially retain the existing character of the landscape. Management activities may attract attention, but should not dominate the view of the casual observer. VRM III objectives will be met. Management actions are not highly visible and openings/thinning areas will not dominate the view of the casual observer, who is generally traveling through the area along Highway 199.

13. Access

Decision: Treatments will not be implemented in the following units due to lack of access.

T-R-S (Unit)	Acres	Proposed Vegetation Treatment	Est. Volume (mbf)
41-9-10 (10-1)	31	Commercial thin/modified group select	224
41-9-10 (10-3B)	68	Commercial thin/modified group select	280
41-8-21 (21-1)	33	Commercial thin/modified group select	155
41-9-10 (10-2)	7	Fuel Hazard Reduction	N/A
41-9-10 (10-3A)	68	Fuel Hazard Reduction	N/A
41-9-10 (10-6)	10	Fuel Hazard Reduction	N/A
41-9-15 (15-1)	30	Fuel Hazard Reduction	N/A
41-9-15 (15-3)	76	Fuel Hazard Reduction	N/A
41-9-15 (15-4)	48	Fuel Hazard Reduction	N/A
40-8-21 (21-4)	7	Wildlife Habitat Restoration	N/A
41-9-10 (10-4A)	61	Wildlife Habitat Restoration	N/A
41-9-10 (10-4B)	79	Wildlife Habitat Restoration	N/A
41-9-10 (10-5)	23	Wildlife Habitat Restoration	N/A
41-9-15 (15-2)	35	Wildlife Habitat Restoration	N/A

Rationale: The BLM has been unsuccessful in obtaining access to these parcels, so they are not planned for treatment at this time. If access is gained in the future, they may be treated under a separate decision.

C. Errata

Alternatives 2 and 3 incorrectly show machine mastication (MM) as a proposed fuel treatment in unit 40-8-33 (Addendum p. 45, 49).

Alternative 2, Table B-1 (Addendum p.46): In a table formatting error, estimated totals at the bottom of the table were shifted away from the columns to which they should have been attached. Total unit acres are 2,875; total unit volume is 17,438; total matrix harvest acres are 497; total riparian harvest acres are 117; and total harvest volume is 3,856.

D. BLM Strategic Plan

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

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

This project will protect and in some cases enhance cultural resources through project design

features, reduced fire hazard and interpretation. Wildlife habitat improvements will restore Jeffrey pine savannahs, white oak habitats and ultramafic plant associations.

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

Implementation of Alternative 2 will contribute approximately 1.43 mmbf of timber to local and regional economies.

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

Implementation of Alternative 2 will reduce fuel loadings and stand densities, moving them closer to historical levels and normal ranges. All areas to be thinned include fuel hazard reduction to protect resources, homes and property. In some areas of the West Fork Illinois project, fuel hazard reduction is the primary objective. Fire behavior and suppression difficulties experienced in recent fires in southwest Oregon (i.e., the 500,000 acre Biscuit fire) clearly demonstrate that fuel hazard needs to be addressed in order to reduce threats to public health, safety and property.

E. National Fire Plan

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

The West Fork Illinois LMP includes the National Fire Plan designated Illinois Valley Community at Risk (CAR). 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 1½ 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 condition classes two and three under the Department of the Interior's "Cohesive Strategy." The fire regimes in these fire condition classes have been moderately to significantly altered from their historical range of fire frequency. To restore them to their historical fire regimes, these lands require some level of restoration through mechanical and prescribed fire treatments (*Integrating Fire and Natural Resource Management – A Cohesive Strategy for Protecting People by Restoring Land Health*, DOI, March 2001 Draft). The West Fork Illinois LMP includes a range of management actions directed at this restoration and at reducing the high wildfire risk on federal lands.

IV. CONSULTATION AND COORDINATION

Pursuant to the Endangered Species Act, consultation was completed with the US Fish and Wildlife Service. The USFWS's October 20, 2003 Biological Opinion (log # 1-15-03-F-511) addresses timber sale projects for FY04-08, including the acres of the West Fork Illinois LMP. The Service stated that the proposed action will not jeopardize the continued existence of ESA listed species. This decision regarding the West Fork Illinois LMP is consistent with all of the mandatory terms and conditions identified in the biological opinion. It also incorporates and meets all of the identified recommended conservation measures.

In accordance with the ESA and the Magnuson-Stevens Act (MSA), the BLM initiated informal consultation on the West Fork Illinois LMP with National Marine Fisheries Service (NMFS) on June 24, 2004. NMFS concurred 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.

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

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

V. PUBLIC INVOLVEMENT

Public scoping for the West Fork Illinois LMP was initiated in June 1999, when the Forest Service and the BLM announced that the two agencies were planning to jointly prepare an EIS for public lands in the East and West Forks of the Illinois River. The project at that time was called the Upper Illinois River LMP. BLM mailed out more than 240 letters to adjacent landowners and others. Approximately 300 letters were received. Most of the comments were specific to lands in the East Fork, particularly to lands that residents commonly refer to as the "Takilma Forest". Few of the comments referred specifically to BLM lands in the West Fork of the Illinois watershed.

In March 2001, a letter went out to the public notifying them of BLM's intent to split the Upper Illinois River LMP into two projects along watershed lines. A primary reason for splitting them was a delay in completing the East Fork Illinois Watershed Analysis 2.0. Thus, the West Fork Illinois LMP was initiated. In that letter, BLM identified their intent to analyze the West Fork Illinois project and its effects in an EA rather than an EIS.

The public comment period for review of the West Fork Illinois LMP EA was initiated on June 16, 2004. The review period was subsequently extended until July 30, 2004. Partially in response to public comments, an EA Addendum was prepared and issued for a 30-day comment period which began on June 29, 2005 and concluded on August 1, 2005. Again in response to

comments, a third public comment period occurred September 1-30, 2005 upon completion of an erratum to the West Fork Illinois Addendum that addressed effects to special status and survey and manage plants. Public comments and associated BLM responses for the three comment periods are summarized in Appendix A.

VI. CONCLUSION AND FINDING OF NO SIGNIFICANT IMPACT (FONSI)

A. Plan Consistency

Based on the information in the West Fork Illinois Landscape Management Project 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 *Medford District RMP (1995)*; *Evaluation of the Medford RMP Relative to the Four Northern Spotted Owl Reports (August 24, 2005)*; *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 Standards and Guidelines for Management of Habitat for Late-Successional and Old-Growth Forest Related Species Within the Range of the Northern Spotted Owl (1994)*; *ROD and Standards and Guidelines for Amendment to the Survey & Manage, Protection Buffer, and other Mitigation Measures Standards and Guidelines (2001)*; *ROD Amending Resource Management Plans for Seven Bureau of Land Management Districts and Land and Resource Management Plans for Nineteen National Forests Within the Range of the Northern Spotted Owl: Decision to Clarify Provisions Relating to the Aquatic Conservation Strategy (2004)*; and the *ROD and Resource Plan Amendment for Management of Port-Orford-Cedar in Southwest Oregon, Coos Bay, Medford, and Roseburg Districts (2003)*. 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).

The BLM is aware of the recent U.S. District Court ruling which found portions of the *Final SEIS to Remove or Modify the Survey and Manage Mitigation Measure Standards and Guidelines (2004)* inadequate. At this time the *ROD to Remove or Modify the Survey and Manage Mitigation Measure Standards and Guidelines (2004)* has not been vacated or withdrawn. Therefore there is no current requirement to complete surveys according to previous Survey and Manage protocols. The court has not yet entered an order specifying what, if any, injunction will be ordered in regard to its findings on the adequacy of the 2004 SEIS. Injunctions for NEPA violations are common, but not automatic.

The BLM expects that the court's findings regarding the 2004 SEIS will result in a court ordered remedy, but the extent of that remedy and whether it would be imposed pending possible appeal of the court's findings are unknown at this time. We will reexamine project level NEPA documents in light of a potential court ordered remedy and will make revisions to EAs as necessary following issuance of the court's judgment. We have provided advance notice to

potential purchasers informing them that the court's ruling may result in delays in award of the sale to the high bidder or suspensions of operations. The appropriate processes are currently in place to provide us the ability to delay award of timber sales or issue suspensions should they become necessary to comply with future court orders.

In any case, we do not expect that litigation over the amendment that eliminated the Survey & Manage mitigation measure from the NWFP will affect this project. This is because this project complies with the NWFP prior to that amendment in terms of Survey and Manage surveys and management prescriptions.

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. Thus, the West Fork Illinois 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.

I have considered the intensity of the impacts anticipated from this West Fork Illinois 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 None of the individual or cumulative effects are significant. There is potential for minimal short term erosion in the Jeffery pine thinning units located in sections 9 and 33. The proposed treatment units are located on serpentine soils that are susceptible to compaction and subsequent erosion if heavy equipment is used when soil moisture content exceeds 30% (EA p. 28). Project design features limit the use of machines on steep slopes or when soil moistures exceed recommended percentages. 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 would be negligible at the sixth field level. Any sediment delivery would be short-term and minimal in quantity and will not likely degrade habitat or negatively affect salmonid migration, spawning, egg incubation, rearing or feeding (EA p. 34).

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.

3) *Unique characteristics of the geographic area.* Resource values and unique values in the project area have been identified (potential RNA and nominated ACEC) and appropriate management activities are proposed that 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 continual 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 to which the West Fork Illinois LMP EA is tiered.

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 NFP.

7) *Whether the action is related to other actions with individually insignificant but cumulatively significant impacts.* No significant cumulative impacts have been identified. The project is consistent with the actions and impacts anticipated in the RMP.

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 contains several sites that are listed or eligible for listing on the National Register of Historic Places. These sites and others will be protected from project activities through project design features. Most if not all will benefit from reduced fire hazard and some will receive some degree of interpretive development (Addendum p. 5-6).

9) *The degree to which the action may adversely affect ESA listed species or critical habitat.* Project design features will eliminate or reduce potential adverse impacts on ESA listed species. ESA consultation with NMFS and USFWS has been completed with the determination that the project is not likely to adversely affect T&E species. As noted in the decision, some changes are made to the proposal to insure consistency 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.

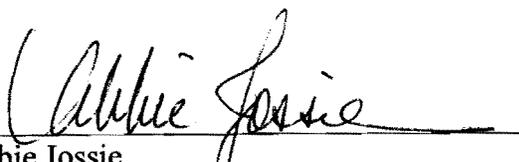
VII. ADMINISTRATIVE REMEDIES

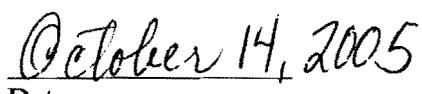
This decision is a forest management decision. Administrative remedies are available to those who believe that they will be adversely affected by this Decision. Administrative recourse is available in accordance with BLM regulations and must follow the procedures and requirements described in 43 CFR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

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

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


Date

APPENDIX A. PUBLIC COMMENT SUMMARY AND RESPONSE

2004 Comment and Response Summary

1. *Comment:* Retain high canopy closure (18 comments received)

Response: For units proposed for harvest treatment, the silvicultural prescription calls for commercial thin/modified group selection. The post treatment canopy closure in harvest units will be 40-60%, with the higher figure the target in the riparian reserves. No clearcut or regeneration harvest is proposed.

2. *Comment:* Don't log at all in the West Fork Illinois Project Area (14 comments received)

Response: The Northwest Forest Plan and the Medford District RMP accomplishes 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 West Fork Illinois 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. Chapter 3 of the EA describe the current environmental conditions and justification for the proposed action.

3. *Comment:* Don't log in the riparian reserves (13 comments received)

Response: Chapter 3 of the EA addresses the need for action in riparian reserves. While the BLM acknowledges that it is a controversial subject, the planning team has clearly articulated the reasons why action in the reserves is appropriate now and why it is scientifically sound.

4. *Comment:* Protect residential areas from fire (13 comments received)

Response: 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 76% of the project area is in the high and moderate values at risk category, due primarily to the residential and recreational values, and that 40% of the project area is designated as Community at Risk (CAR). 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.

5. *Comment:* Impose a diameter limit on harvest trees (11 comments received); do not harvest old-growth or large trees (10 comments received)

Response: As mentioned in #2 above, the public lands in the West Fork Illinois project area has been designated as matrix, with an emphasis on timber production. The silvicultural prescription and marking guidelines call for variable commercial thinning and modified group selection in the units proposed for harvest. In general, such a harvest regime 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 an artificial limitation that does not meet the objectives for forest health. Similar projects and silvicultural treatments demonstrate that the trees and volume planned for cutting and removal are heavily weighted towards the smaller size classes. Approximately 95% of the trees harvested will be ≤ 24 ” dbh and will provide 78% of the total volume for the sale. Generally, trees marked for harvest in the West Fork Illinois timber sale are heavily weighted towards the smaller size classes. But, as the Table DR-3 shows, some larger trees are designated for removal. The majority of those larger harvest trees (greater than 32” dbh) are found in the road right-of-ways in Sections 12 and 13, and their removal is not silviculturally driven. Outside of right-of-ways, typically a large tree is only removed when a more vigorous tree (better crown ratio, better form, free from disease and insects) of similar size can be retained. The result is that the remaining larger trees will be released, thereby promoting and retaining the large tree component as the BLM balances active management (matrix) objectives with other multiple use objectives.

6. *Comment:* Treat fewer machine masticator (slashbuster) acres, or none at all (9 comments received)

Response: The effects analysis of the proposed slashbuster treatments has been disclosed in Chapter 3 of the EA. It has been demonstrated on other projects in the Illinois Valley and elsewhere that slashbuster is an effective tool for the treatment of hazardous fuels across the landscape, and that used appropriately and in combination with other methods of reducing vegetation, the risk of catastrophic fire is reduced. However, due to some of the comments received, the decision is to eliminate the use of the machine masticator as Alternative 2 is implemented. Instead, fuels objectives will be met with a combination of broadcast or underburn, and slash, handpile, and burn.

7. *Comment:* Logging slash increases fire risk (8 comments received)

Response: The 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 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 due to the seasonal time lag, the overall fuel and fire severity risk reduction over the long term far outweighs the short time increase in risk.

8. *Comment:* Log fewer acres (7 comments received)

Response: There are approximately 2,875 acres with the project planning area. As a result of internal and external scoping and careful analysis of the West Fork Illinois landscape by the planning team, the final timber sale acres have been substantially reduced to 569 (reduced further to 497 acres in the EA Addendum) acres of matrix harvest, with forest health treatments also proposed on approximately 115 (117 Addendum) acres of riparian reserve. The vast majority of the proposed treatments are fuel hazard reduction, wildlife habitat restoration, and young stand management. Portions of the project area that were included in the EA but not in the West Fork Illinois timber sale may be treated in the future through a variety of options including other potential timber sales. Partially because of the above, and due to on-the-ground layout decisions, the West Fork Timber Sale will be only 228 acres.

9. *Comment:* Promote tourism, not timber (7 comments received)

Response: As mentioned, the West Fork Illinois land allocation is matrix, where the primary focus is a sustainable supply of timber and other forest commodities. It is not within the scope of the Medford District RMP to promote tourism on those lands. However, recreation and visual resource management are given consideration during the planning process, and project proposals are in compliance with all of the standards and guidelines. The Medford RMP (p. 63) states "Pursue recreation opportunities that will benefit local community economic strategies consistent with BLM land use objectives".

10. *Comment:* Support use of prescribed fire (6 comments received)

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 West Fork Illinois project area.

11. *Comment:* Support hand thinning of fuels vs mechanical (6 comments received)

Response: BLM project planners have choices when treating the fuels on the landscape, and they go through a detailed process to evaluate those choices and the corresponding effects, which have been disclosed in Chapter 3. Some units cannot be treated mechanically simply because of topography or access, and must be treated by hand. Other units with good access that average less than 35% slope can be treated mechanically with good results, and for lower cost.

12. *Comment:* Restrict use of slashbuster on serpentine soils (5 comments received)

Response: The use of slashbuster was only proposed on sites where it was feasible and appropriate, including on ultramafic soils. However, due to some of the comments received, the decision is to eliminate the use of the machine masticator as Alternative 2 is implemented. Instead, fuels objectives will be met with a combination of broadcast or under burn, and slash,

hand pile, and burn.

13. *Comment:* No action at all on serpentine soils (5 comments received)

Response: BLM specialists recognize that serpentine soils are relatively rare across North America, and that many of the plants have adapted to those soils and the ecological processes that created the landscape. The action is necessary to maintain or re-establish plant communities that are threatened by thatch buildup or encroachment of woody vegetation. See the specialist discussions in Chapter 3 for more specific justification for action on the serpentine soils.

14. *Comment:* The spread of noxious weeds is not addressed (4 comments received)

Response: This oversight was corrected in the EA addendum (p. 7). Any noxious weeds located in the project area will be treated as outlined in the EA Addendum Project Design Features (p.7).

15. *Comment:* Retain botanical values (3 comments received)

Response: We are quite aware of the botanical values in the project area, and have incorporated project design features into the project proposal which maintain and/or enhance botanical values (EA pp. 3, 22, 42).

2005 Comments to EA Addendum and Response Summary

1. *Comment:* Purpose & need is inadequate, and proposed treatments not simultaneously achievable

Response: The BLM disagrees that the purpose and need and the alternatives described in the EA are not achievable. The proposed actions are well thought out, using the best science and judgment, balancing values and objectives such as wildlife and fish habitat, stream protection, forest health, long term site productivity, watershed restoration, and timber harvest, thus meeting the stated purpose and need.

2. *Comment:* Botany/Rare plants/fungi-BLM has not adequately addressed the effects of the project on rare plants

Response: As noted in the Errata section above, a section regarding impacts to vascular plant species was inadvertently omitted from the Addendum (p. 19) but is attached to this decision (Appendix DR-A). This attached writeup more thoroughly explains the rationale regarding effects of the project on rare plants. Of the 19 SS plant species found in the project, only three would most likely be found in timber harvest units. Others are found in openings, primarily serpentine, where fuels treatments would benefit these species. Project design features ensure that impacts to special status or survey and manage plants will not be substantial.

3. *Comment:* Range of alternatives not adequate; suggest a "restoration alternative" should have been analyzed

Response: The range of alternatives considered in an EA is largely dependent on the purpose and need for the project. The overarching purpose and need of the project is to implement the Medford District RMP. The EA is tiered to this document and its EIS. The final EIS for the RMP analyzed a range of alternative land allocations and management options. The RMP was required to be consistent with the Northwest Forest Plan adopted by the Secretary of the Interior in 1994. An explicit goal of the two broad scale plans was to balance the natural, economic, and social values produced by public lands. The BLM does not have to revisit these decisions every time a site-specific implementation of these plans is proposed (40 CFR §1508.28). The BLM can therefore appropriately limit the range of alternatives for an implementation action to those which would fulfill the requirements of the RMP to which it is tiered.

4. *Comment:* EIS is appropriate; combine West Fork and East Fork into an EIS

Response: The potential impacts of a proposal are to be analyzed and then evaluated with regard to their potential significance per the guidelines / criteria of the Council on Environmental Quality. This has been done and is documented in the project's FONSI. As no significant impacts were identified through this process, an EIS is not necessary and will not be prepared

It is important to keep in mind that the purpose of the West Fork Illinois project is to implement the Medford District Resource Management Plan (RMP) and the Northwest Forest Plan (NFP). Both of these plans are based on environmental impact statements and the West Fork Illinois project EA is tiered to these EISs and decisions.

The assessment has considered both beneficial and adverse impacts. None of the individual or cumulative effects have been identified as being significant. Cumulative effects discussion incorporate potential impacts of both East Fork and West Fork so combining the two projects into an EIS would not change the analysis in either EA, therefore, an EIS is not required. Impacts are within the scope of the EISs to which the EA is tiered.

5. *Comment:* Disclose cumulative impacts

Response: The cumulative effects of the alternatives were adequately disclosed and analyzed in the West Fork EA, which were supplemented in the Addendum. Past and future foreseeable activities in the West Fork Illinois watershed were summarized and discussed in the EA and the addendum.

6. *Comment:* Proposed ACEC-defer logging until a full plan revision, apply unique set of PDFs

Response: BLM specialists can appreciate opinions that suggest that treatments be postponed in the nominated ACEC area until a plan revision fully evaluates the potential. However, the Addendum pp. 2-5 clearly identifies the procedures that are to be followed when a nomination is received, and the BLM is in compliance with those manual guidelines.

7. *Comment:* Removing large trees causes irreversible damage; 20" diameter limit appropriate

Response: The silvicultural prescription and marking guidelines call for variable commercial thinning and modified group selection in the units proposed for harvest. In general, such a harvest regime 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 an artificial limitation that does not meet the objectives for forest health. Trees marked for harvest in the West Fork Illinois timber sale are heavily weighted towards the smaller size classes. Generally, trees marked for harvest in the West Fork Illinois timber sale are heavily weighted towards the smaller size classes. But, as the Table DR-3 shows, some larger trees are designated for removal. The majority of those larger harvest trees (greater than 32” dbh) are found in the road right-of-ways in Sections 12 and 13, and their removal is not silviculturally driven. Outside of right-of-ways, typically a large tree is only removed when a more vigorous tree (better crown ratio, better form, free from disease and insects) of similar size can be retained. The result is that the remaining larger trees will be released, thereby promoting and retaining the large tree component as the BLM balances active management (matrix) objectives with other multiple use objectives.

8. *Comment:* Logging and reducing canopy closure increase 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 strikes a balance with the objectives identified in the purpose and need statement.

9. *Comment:* Slashbuster is harmful to wildlife, diversity, and ultramafic landscapes; don’t do it, especially on serpentine soils or in riparian areas; monitor depth of chip layer post treatment

Response: The West Fork EA and its Addendum disclose the effects of the proposed machine mastication (slashbuster) treatments. The decision is to eliminate all machine mastication from the project implementation.

10. *Comment:* Do not harvest in previously un-entered stands or late-successional forests

Response: While the comment is recognized as an important social issue, late-successional forest habitat is a priority on other public lands specifically set aside to provide large blocks of areas which support the needs of late-successional dependent species. The West Fork Illinois project contains matrix and riparian reserve land-allocations in a checkerboard arrangement with inclusions of serpentine soils resulting in a highly fragmented arrangement for the mature forested stands. While large scale logging has not been a major impact in the mature forested stands, mining in the late 1800s and early 1900s has occurred on these same areas. The proposed commercial thinning retains these stands in the mature forest category resulting in no new early successional habitat.

11. *Comment:* Objection to new road construction

Response: BLM planners and specialists recognize that new road construction is often controversial, and agree that new road construction needs to be kept to a minimum, and must be built to standards that minimize adverse effects to the resources. Road construction in Alternative 2 will be built in accordance with RMP Standards and Guideline and specific project design features to minimize adverse impacts to the resources.

12. *Comment:* POC-FSEIS for Port-Orford Cedar (POC) is inadequate at site-specific level

Response: The adequacy of POC FSEIS is outside the scope of this project. The POC-FSEIS for Port-Orford cedar analyzed risks to POC within the range and provides guidance for site-specific analysis, which was followed for this project. At the site-specific level, effects were adequately analyzed (EA p. 30, 41 & 42) for the no-action and action alternatives. The EA recognized that risks to infection will continue regardless of BLM activity due to disease processes and forest use by private citizens. The project design features apply the appropriate mitigation measures as required by the POC-FSEIS.

13. *Comment:* Fish consultation: NMFS is biased towards NLAA

Response: Under Section 7 of the ESA, the NMFS may authorize the incidental "take" of a federally listed fish species in an activity that a federal agency does as part of its management of public lands. Activities which result in take are determined to be Likely to Adversely Affect (LAA) federally listed fish or their critical habitat. This determination is made routinely on BLM habitat restoration projects which involve construction work in coho streams (e.g., during culvert replacement for fish passage improvement, reclamation of placer mined channels and large wood placement for coho habitat improvement). Activities that do not include instream work may still have the potential to result in take, but this can often be avoided through Project Design Features (EA, p.18) which eliminate or minimize impacts to listed fish and critical habitat. In this project, the IDT worked to establish management objectives for riparian reserves and a proposal for achieving these goals without harming fish in the process. The resulting proposal was designed to be "Not Likely to Adversely Affect" SONC coho, and the NMFS concurred with the BLM through the consultation process.

14. *Comment:* Logging in riparian reserves is not appropriate

Response: Chapter 3 of the EA addresses the need for action in riparian reserves. While the BLM acknowledges that it is a controversial subject, the planning team has clearly articulated the reasons why action in the reserves is appropriate now and why it is scientifically sound.

15. *Issues:* Wildlife: discussion of the fisher is lacking, EA does not discuss barred owl competition adequately, protect the goshawk populations in the area, protect Del Norte salamanders, Red Tree Vole buffer sizes and locations not disclosed, USFWS 2003 Biological Opinion is invalid.

Response: The EA gives a fairly lengthy discussion of Pacific fisher biology and likely effects to this species. A question was raised regarding the assertion that fishers will be able to move away from disturbed areas. Fisher home-range sizes are of sufficient size (63-147 km²) that a portion of their home-range will provide adequate refuge from noise and disturbance activities. No sightings of Pacific fisher have been confirmed in the project area, but if fishers do occur in the area, they will likely be occupying a mixture of federal and private lands where disturbance will not occur throughout the animal's home-range.

Regarding barred owls, additional information on barred owls can be found in *Status and Trends in Demography of Northern Spotted Owls, 1985-2003* (Anthony et al. 2004). This research indicated that there is some evidence that barred owls may have had a negative effect on NSO survival in the northern portion of the NSO range. They found little evidence for such effects in Oregon or California. The threat from barred owl competition has not yet been studied sufficiently yet to determine whether it is a cause or a symptom of NSO population declines.

As stated in the West Fork EA, no goshawk nests have been located and there are no historic records of nesting in the watershed (p. 29). The only known historic goshawk nest in the GPRA is approximately 20 air miles from the West Fork Illinois watershed. The likelihood of the West Fork planning area being used for goshawk nesting is relatively low. If at any time, a goshawk nesting territory is found it will be protected using standard language in the timber sale contract.

As stated in the EA (p. 30), The 2001 Survey and Manage Annual Species Review moved the Del Norte Salamander from a category "D" (Uncommon, pre-disturbance surveys not practical or not necessary) to complete removal from the survey and manage program (Survey and Manage ROD 2001). Due to this change in status, federal agencies are not required to afford any protective measures for the Del Norte salamander. Even without any legal requirements for protection, several known talus areas were incorporated into buffers (RTV and riparian) and will provide protection for several sites. Additionally, all known sites will have a minimum 40% canopy closure post-harvest.

The 2003 Biological Opinion is invalid only for activities in critical habitat. In any case, this sale is actually under the FY 04-08 BO (log# 1-15-03-F-511) as it will be offered for sale in FY 05. The FY 04-08 BO is sound and not under any litigation.

16. *Issue:* New information on northern spotted owls (spotted owl status review) should have been considered.

Response: This new information was considered in this decision (*Scientific Evaluation of the Status of the Northern Spotted Owl* (Sustainable Ecosystems Institute, Courtney et al. 2004); *Status and Trends in Demography of Northern Spotted Owls, 1985-2003* (Anthony et al. 2004); *Northern Spotted Owl Five Year Review: Summary and Evaluation* (USFWS, November 2004); and *Northwest Forest Plan – The First Ten Years (1994-2003): Status and trend of northern spotted owl populations and habitat, PNW Station Edit Draft* (Lint, Tech. Coordinator, 2005). To summarize these reports, 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).

2005 Comments to EA Erratum and Response Summary

1. *Comment:* Survey and Manage management recommendations need to have NEPA analysis conducted.

Response: The Survey and Manage program was developed in conjunction with, and is consistent with the Northwest Forest Plan FEIS and ROD. Revisiting the NEPA analysis for the Survey and Manage Management Recommendations is unnecessary and is beyond the scope of this EA.

2. *Comment:* The Agency may not rely on the illegal Annual Species Review.

Response: The Annual Species Review has not been determined to be illegal.

3. *Comment:* It is likely and foreseeable that BLM will do away with the Riparian and Late-successional Reserves in the Western Oregon Plan Revision (WOPR).

Response: While the WOPR is foreseeable, the decisions made under the plan revision are far from given. No decisions have been made and the Settlement Agreement only stipulates that an alternative be considered that removes the Reserve land allocation. There is no predetermined decision to do so and it would not be appropriate to speculate on a decision that will be made two or more years from now. Until the time a decision is made, the Medford BLM will continue to make decisions based on the current RMP.

4. *Comment:* New information regarding fire behavior (Odion paper) should be considered.

Response: KSWC cites Odion et al (2004) as evidence of scientific controversy regarding the effects of logging on fire behavior. However, KSWC fails to show how Odion et al (2004) indicate that the West Fork project would increase fire hazard or risk. In that paper, researchers make the following points that are relevant to the West Fork project:

- although fuel buildup in pine forests may increase fire severity, the same cannot automatically be said of Douglas-fir forests
- even-aged silviculture can increase fire severity
- harvest of small trees and suppression of undergrowth can reduce fire intensity and spread

- more research is needed to understand the interaction of fuels, topography and weather
- open stands and significant amounts of combustible brush in recently burned (85 years or less) stands can increase fire severity
- canopy shading can lower fire severity
- risk of crown fire depends on canopy height, amount of fuel, rate of fire spread and surface heat output.

There is nothing in the Odion et al (2004) paper to indicate that thinning and fuel hazard reduction treatments in West Fork project would increase fire hazard. Thinning treatments reduce overall fuel loading and maintain or improve multi-aged stand structure. Fuel hazard reduction is specifically designed to reduce the risk of crown fire by reducing overall fuels and increasing the canopy base height. Although there may be reduced canopy cover in the short term in some areas, increased tree growth and vigor following thinning will result in relatively rapid recovery of pretreatment canopy closure. Furthermore, density induced mortality would decrease, thus reducing the dead fuel component. All activity fuels would be treated.

Fire history and length of time since an area last burned is not a criterion we use for whether or not an area needs to be treated to reduce fire hazard; criteria used include stand density, presence of ladder fuels, fuel accumulation and proximity to communities at risk or wildland urban interface areas.

5. *Comment:* The EA contains inaccurate and misleading statement regarding serpentine soils and their ability to support late-successional forest habitat suitable for spotted owls.

Response: The explanation in this comment does not address serpentine influenced soils. In any case, serpentine soils generally contain scattered Jeffrey pines and may contain other tree species, but growing conditions are generally poor and stands on serpentine soils generally have canopy closures less than 40% which do not meet the definition of late-successional forest habitat.

The photos attached to this comment show a large diameter overstory tree and a large sugar pine marked for removal. These are not likely to occur on serpentine soils. Additionally, the context of these trees is unknown. Taking two trees from the entire sale and displaying them as typical of the mark is not realistic nor does it provide adequate information to assess the validity of a stated concern.

6. *Comment:* Concerns expressed about protection of Survey and Manage plants and lack of surveys, contrary to recommendations in the Watershed Analysis.

Response: The EA addendum states that protection measures will be applied to known populations and individual plants (EA addendum pp. 11, 12) of both Survey and Manage *and* Special Status species. Vascular and non-vascular plant surveys were conducted in all areas where actions are proposed. A watershed wide survey is not required in areas where project activities are not proposed.

7. *Comment:* Impacts of OHVs on sensitive species have not been adequately considered and

project design features will not adequately protect sensitive species as evidenced by current levels of OHV use.

Response: Effects to sensitive species by OHVs are addressed (EA p. 48; EA Addendum pp. 5, 6). The majority of effects identified in the EA from OHVs are because of illegal use. The EA cannot control illegal use; however, the BLM strives to minimize illegal OHV use with such measures as building of fences or other obstructions to block OHV entry to sensitive areas and signing areas as closed to OHVs.

8. *Comment:* Follow all recommendations of your watershed analysis.

Response: The comment does not state which recommendations have not been considered or followed. In any case, while the interdisciplinary planning team strives to follow recommendations in the watershed analysis where feasible and appropriate, competing objectives may prevent some recommendations from being incorporated into site specific project designs.

9. *Comment:* Survey and Manage protection for all known sites. Address red tree vole viability in the long term.

Response: All known sites for red tree voles have been buffered as per Management Recommendations for the Oregon red tree vole (version 2.0, 2000). Del Norte salamander sites are protected as per RMP stipulations. Contrary to the comment, the BLM is not relying on stable populations elsewhere, but has buffered all active sites.

10. *Comment:* Discussion of the Pacific fisher is lacking and does not address the FWS Status Review.

Response: The EA discusses pertinent data and habitat requirements of the west coast population, specifically the local population in the Southern Oregon Cascades and the Siskiyou Mountains. The commenter states that scientific literature from the FWS Status Review on the Pacific Fisher is not discussed in the analysis. However, many of the references cited in the Status Review are also cited in the EA. Effects to the Pacific fisher are discussed in the EA addendum (pp. 32-34).

11. *Comment:* Northern Spotted Owls are inadequately addressed and there is no indication that surveys were conducted. How is habitat enhanced by an "edge effect?"

Response: Protocol surveys are not required for spotted owls prior to ground disturbing activities. Seasonal restrictions are in effect for known sites and no activities will occur that will disturb owls during this period (EA p. 19; EA Addendum p. 6). There are no known spotted owl sites in the project area. Sites adjacent to the project area will be surveyed to determine nesting status prior to any activities that could disrupt spotted owl nesting. The EA as well as the Biological Assessment/Biological Opinion (log #1-15-03-F-511), under which this project is covered, addresses impacts of project activities on the spotted owl and its habitat. Extensive

discussion is found in the EA and in the EA addendum on the current state of the spotted owl and the project's effects on owls, suitable habitat and owl prey species (EA pp. 26-28) including new information from the 2004 Sustainable Ecosystems Institute (Courtney et al. 2004) and the Five-year Status Review (USFWS 2004).

In southwest Oregon, an edge effect has been noted to enhance Northern Spotted Owl fecundity (Franklin et al. 2004) who stated that both survival and reproductive output was "positively associated with the amount of edge between spotted owl and other habitats." A suitable habitat component of approximately 40% within the home range of a pair of spotted owls results in maximum reproductive success of owls in this province. This is likely due to increased reproduction and availability of prey species for the spotted owl.

12. *Comment:* Canopy closure is unlikely to recover from 40% to 60% in 10 to 15 years.

Response: The commenter does not present any evidence to support that claim or that would contradict practical experience on the Grants Pass Resource Area that has shown that 10 to 15 years is a good estimate for canopy closure to recover.

13. *Comment:* The Biological Opinion is invalid.

Response: The Biological Opinion regarding the 2004-2008 timber sale program for the Medford District BLM has not been found to be invalid.

14. *Comment:* Does the watershed meet the NWFP 15% retention standard of late-successional forests?

Response: The percentage of late-successional habitat in the West Fork Illinois watershed is 77% as per the 15% Late-successional Standards and Guidelines (Instruction Memorandum OR98-100).

15. *Comment:* Do not want to see brush component increase in partial cuts.

Response: As "partial cuts" are not identified, it is difficult to address this comment. Effects of commercial thinning, as proposed in this project, are identified in the EA and EA Addendum (EA pp. 63-69; EA Addendum p. 41). Brush encroachment is not anticipated to be a significant component of forest reestablishment and canopy closure. Furthermore, the EA (p. 15) addresses fuel hazard reduction maintenance 3-10 years following project implementation.

16. *Comment:* The BLM will not be able to provide assurances that stands will not be "regenerated" once canopy closure increases following proposed thinning.

Response: Future actions that are not reasonably foreseeable are beyond the scope of this project. It is impossible to determine what will happen beyond 5 years from now.

17. *Comment:* Fire management: Focus fuel reduction where little resource investment may be

able to create relatively fire resilient stand conditions

Response: Fuel hazard reduction treatments consider slope, aspect and relationship to CAR, WUI and other important resources as well as other factors to maximize benefit with lowest resource investment.

18. *Comment:* The EA should address the potential for reduced canopy closure to increase solar radiation, ground level wind speed, and surface fuel moisture and flammability.

Response: These issues are addressed in the EA Addendum (p. 41). It also addresses treatment of flammable activity fuels (slash and other fine materials).

19. *Comment:* Several known pairs of Northern Spotted Owl reside in the analysis area. Thinning is not compatible with conservation of critical habitat.

Response: There is no designated critical habitat in the project area. There are no known spotted owls in the project area. There may be a pair on Forest Service land near the east side of the project area. Seasonal restrictions will reduce or prevent disturbance to these owls.

20. *Comment:* The EA tiers to illegal RODs

Response: The 2001 S&M EIS/ROD has not been found to be illegal. The West Fork LMP EA complies with the 2001 ROD, not the 2004 S&M ROD. The 2004 ACS ROD has not been found to be illegal. The project is in compliance with ACS objectives (EA pp. 7-10).