

# **FINAL DECISION DOCUMENTATION**

for

## **Willy Slide Timber Sale**

### **Environmental Assessment Number OR118-05-006**

United States Department of the Interior  
Bureau of Land Management  
Medford District  
Glendale Resource Area  
Douglas County, Oregon

#### **INTRODUCTION**

An environmental assessment (EA, OR118-04-015) for the Willy Slide Project was made available for public review in July, 2004. Since the time of publicizing that EA, all BLM timber sales in Oregon have been under review due to litigation. The interdisciplinary team reviewed the original Willy Slide Project Environmental Assessment for consistency. Based upon a review with agency direction and NEPA (National Environmental Policy Act) adequacy a decision was made by the Glendale Field Manager to prepare a new environmental assessment (OR 118-05-006).

EA OR118-05-006, including a Finding of No Significant Impact (FONSI), was made available for a 30-day public review period on May 11, 2005. Seven letters were received. The Bureau of Land Management's responses to the comments in these letters are found in Addendum 1, Public Involvement. These comments were considered in reaching a final decision.

#### **DECISION**

Based on site-specific analysis, the supporting project record, management recommendations contained in the West Fork Cow Creek Watershed Analysis as well as the management direction contained in the Medford District Record of Decision and Resource Management Plan, I have decided to implement the Willy Slide Timber Sale described in Alternative 2 on pages 10 – 15 of the EA. A few minor changes to Alternative 2 include the use of winged rippers as stated on page 18 of the EA. The modification would limit scarification of the soil to only 6" on skid roads, where determined by the Authorized Official, to prevent damage to roots of adjacent conifer trees. An additional helicopter service landing would be used at the existing junction of the 31-9-23.4, 31-9-23 and 31-9-23-7 roads. 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.

#### **ALTERNATIVES CONSIDERED**

The alternatives considered in detail included the Proposed Action (Alternative 2) which initiated the environmental analysis process and the No Action Alternative (Alternative

1) which serves as the baseline to compare effects. A description of each alternative is found on pages 10 – 15 of the EA.

## **REASONS FOR THE DECISION**

My rationale for the selection of Alternative 2 is as follows:

1. Alternative 2 addresses the purpose and need of implementing the Medford RMP through harvesting timber by producing a sustainable supply of timber and other forest commodities to provide jobs and contribute to community stability” (RMP, p. 38) and providing early-successional habitat” (RMP, p. 39).
2. Alternative 1 was not selected because this alternative would not meet the purpose and need of the project (described in Chapter 1) of harvesting timber and implementing the Medford RMP at this time. Harvest would, however, occur at another location under separate NEPA analysis in order to meet harvest commitments identified in the RMP (pp. 3, 17). Selection of this alternative would not constitute a decision to reallocate these lands to non-commodity uses. Future harvesting in this area would not be precluded and could be analyzed under a subsequent EA. Road maintenance would be dependant on funding and reciprocal road use agreements. Additionally there would be no gating or improvement of roads.
3. Appendix 1 of the EA contains a determination that there were no alternative uses of resources. The interdisciplinary team developed an alternative in response to a public comment which entailed the thinning of approximately 76 acres using a combination of helicopter and conventional logging systems. This alternative was dropped from further consideration as it was not economical due to the high costs associated with helicopter logging that would not be offset by the anticipated volume from thinning 76 acres. If the alternative had been analyzed in detail the effects of such an alternative would have been similar to the No Action Alternative.
4. The seven letters received in response to the 30-day comment period on the EA and FONSI urged the BLM to stop logging in spotted owl habitat and not to build new roads for salmon recovery (Addendum 1). Chapter 3 of the EA discloses the impacts from implementing Alternative 2 on both of these resources. None of the effects identified, including direct, indirect, and cumulative effects, are considered to be significant and do not exceed those effects described in the *Medford District Resource Management Plan/Final Environmental Impact Statement* (June 1995). Furthermore, consultation pursuant to the Endangered Species Act has been completed with both the United States Fish and Wildlife Service and NOAA Fisheries (EA, p.47).

Although there are four new reports produced in 2004 and 2005 concerning spotted owls, the reports do not find a direct correlation between habitat conditions and changes in spotted owl populations. As disclosed in the EA, the

spotted owl population in southern Oregon is stable and Alternative 2 would not affect this population trend. Alternative 2 meets the Medford District Resource Management Plan goal regarding conservation of species while providing a sustainable supply of timber.

**FINDING OF NO SIGNIFIANT IMPACT**

Seven letters were received during the 30-day review period for the EA and FONSI. Those letters did not provide new information, nor did it 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 2 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.

**PROTEST PROVISIONS**

In accordance with the BLM Forest Management Regulations (43 CFR § 5003.2(1)), the decision for Willy Slide Timber Sale will not become effective, or be open to formal protest, until the first Notice of Sale appears in a newspaper of general circulation in the area where the lands affected by the decision are located.

To protest a forest management decision, a person must submit a written protest to Glendale Field Manager 200 NE Greenfield Road, Grants Pass, OR 97526 or Medford District Office, 3040 Biddle Road, Medford, OR 97504 by the close of business (4:00 p.m.) not more than 15 days after publication of the Notice of Sale. The protest must clearly and concisely state the reasons why the decision is believed to be in error.

**IMPLEMENTATION DATE**

If no protest is received by the close of business (4:00 p.m.) within 15 days after publication of the Notice of Sale, 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

**CONTACT PERSON**

For additional information contact Katrina Symons, Glendale Field Manager, 200 Greenfield Road Grants Pass, OR 97526; telephone 541-471-6920

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Katrina Symons Field Manager, Glendale Resource Area Medford District, Bureau of Land Management	Date
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# ADDENDUM 1

## PUBLIC COMMENT TO ENVIRONMENTAL ASSESSMENT OR118-05-06 AND BLM RESPONSE

The Environmental Assessment (EA) and Finding of No Significant Impact (FONSI) were released for public comment from May 11, 2005 to June 10, 2005. A public notice was placed in the Daily Courier newspaper of Grants Pass, Oregon on May 11. The EA and FONSI were sent to 27 parties that had expressed an interest in the project. A total of seven letters were received as a result of this scoping. Public comments (direct quotes) and BLM's (Bureau of Land Management) response to those comments are presented in this addendum to the EA.

### **George Sexton, Conservation Director, Klamath Siskiyou Wildlands Center**

*comment a: The Willy Slide EA is inadequate because it does not present or analyze an adequate range of alternatives to the proposed action as required by NEPA. In our previous comments we requested and suggested **consideration** of an action alternative that proceeds with the 153 acres of thinning units, while retaining the late-successional forests proposed for "regeneration" or "selection" in this highly fragmented, highly impacted watershed. We additionally requested that the BLM at least **consider** an alternative that does not construct new roads in this very highly roaded Key Watershed.*

### **BLM Response:**

The National Environmental Policy Act directs federal agencies to study, develop, and describe appropriate alternatives to recommended courses of action in any proposal which involves unresolved conflicts concerning alternative uses of available resources (Oregon Natural Desert Ass'n v. Singleton, 47 F.Supp.2d 1182, 1194 (D.Or. 1998). Parties claiming a NEPA violation involving failure to consider a reasonable alternative, must offer a specific, detailed counterproposal that has a chance of success. Morongo Band of Mission Indians v. Federal Aviation Admin., 161 F.3d 569, 576 (9th Cir. 1998). An agency does not have to consider alternatives that would not accomplish the purpose of the proposed project. City of Angoon v. Hodel, 803 F.2d 1016, 1021 (9th Cir. 1986).

As stated on page 8 of the EA:

The purpose of the Proposed Action is to meet the need of implementing the Medford RMP through harvesting timber. The Medford RMP identified a minimum age for regeneration harvesting at 100 years (RMP, p. 74). Regeneration harvests are even-aged silvicultural systems that "create new-even-aged stands through harvesting while retaining both living and dead structural elements" (RMP, p. 180). Commercial thinning is a silvicultural system generally applied to younger commercial size stands to "control stand density, maintain

stand vigor, and place or maintain stands on developmental paths so that desired stand characteristics result in the future” while providing an entry that is economical (RMP, p.85).

The Willy Slide Timber Sale EA acknowledged KS Wild’s comment by stating in Appendix 1 of the EA that:

KS Wild made a proposal for another alternative that did not decrease late-successional cover, build new roads or increase openings in the transient snow zone. The IDT developed an alternative in response to this public comment which entailed the thinning of approximately 76 acres using a combination of helicopter and conventional logging systems. This alternative was dropped from further consideration as it was not economical due to the high costs associated with helicopter logging that would not be offset by the anticipated volume from thinning 76 acres. If the alternative had been analyzed in detail the effects of such an alternative would be similar to the No Action Alternative.

Since there were no unresolved conflicts concerning alternative uses of available resources identified by the interdisciplinary team, there was no procedural requirement to develop additional action alternatives (EA, p. 10). KS Wild’s Alternative would only defer the harvest until a later date as stated on page 10 of the EA regarding the No Action Alternative:

Harvest would, however, occur at another location under separate NEPA analysis in order to meet harvest commitments identified in the RMP (pp. 3, 17). Selection of this alternative would not constitute a decision to reallocate these lands to non-commodity uses. Future harvesting in this area would not be precluded and could be analyzed under a subsequent EA.

The Medford District RMP also recognizes the Oregon and California Revested Lands Sustained Yield Management Act (O & C Act) which requires the Secretary of the Interior to manage O & C lands for permanent forest production in accord with sustained yield principles (RMP, p.17). Sustained yield principles identified in the RMP include regeneration harvesting.

comment b: *The RMP objectives for timber management are not reflected in the Willy Slide EA or the purpose and need statement. For instance, the RMP contends that "Managed late-successional reserves will be established within Matrix lands where Del Norte and Siskiyou Mountain salamanders are found." Page 38. Yet the EA fails to account for or protect these species. Indeed, the survey and manage, LSR and ACS objectives as they relate to timber management in the RMP, are not being followed. The BLM has simply eliminated those portions of the survey and manage and ACS standards and guidelines found in its RMP that actually protect resource values from logging.*

**BLM Response:** The Planning area is outside the range of the Siskiyou salamander. The

Del Norte is a Bureau Tracking species, and as stated in the EA (p. 65), are not considered special status species for management purposes, and do not require management or mitigation (IM OR-2003-054).

comment c: *The RMP contends that the BLM will "Prevent watershed degradation rather than using mitigation or planned restoration to correct foreseeable problems caused by management activities." Page 42. Yet tractor yarding, new roading, and logging in the transient snow zone are proposed as part of the timber management purpose and need. These practices have degraded the watershed in the past and will degrade the watershed in the future. The Glendale RA has no intention of following the standards and guidelines for timber sale activities contained in its own RMP.*

BLM Response: The Willy Slide Timber Sale EA identified project design features and appropriate management practices to minimize the risk of watershed degradation. The hydrologist for the Willy Slide EA determined that:

According to Watershed Professionals Network, there is potential risk of peak flow enhancement when 40% of a watershed is in the TSZ (above 2500 feet in the Planning Area) and when more than about 75% of the acreage in the TSZ has less than 30% canopy closure. Although about 40% of the Gold Mountain 6<sup>th</sup> field watershed is in the TSZ, no more than 23% is presently in open condition. That is, at least 77% is functioning at hydrologic potential (Table 3-9). GS treatments (Table 3-10) would create 23 one acre openings in the forest canopy across five widely separated harvest units (11-1, 15-2, 17-1a, 17-1b and 27-6) and there would be only a four acre RH unit. All other harvest would retain at least 30% canopy closure, including OR units, which have advanced conifer reproduction in the understory in addition to hardwoods and brush that would respond quickly to removal of overstory conifers. It is therefore highly unlikely that proposed harvest in the TSZ would have any measurable effect on peak flow and streambank stability or on survival of fish (including OC coho salmon), amphibians or other aquatic species" (pp. 39,40).

comment d: *The purpose and need, and the preordained action alternative, are so narrowly defined as to ignore the recommendations contained in the West Fork Cow Creek Watershed Analysis (WA). Despite recommendations from the WA that the extreme road density found in this Tier-1 Key Watershed be reduced, and that suitable NSO habitat be retained, the BLM's single action alternative proposes building 1.5 miles of new logging road in order to log suitable NSO habitat.*

BLM Response: As stated on page 9 of the EA "Parts of the *West Fork Cow Creek Watershed Analysis* are incorporated by reference. Watershed analysis is an analytical process and not a decision-making process as provided in the Record of Decision for the Northwest Forest Plan (p. B-20)." In regards to roads the EA states that

It is estimated that 19.5 miles of existing roads would be renovated (brought back to original condition) and approximately 1.5 miles of temporary roads would be

built and then decommissioned. A replacement gate would be installed on road 31-9-26 that would reduce vehicle access to approximately 6 miles of roads. No permanent road construction would occur under this alternative” (p. 11).

comment e: *Despite being informed by the public for years that Spotted Owl habitat should be managed for **recovery** of the owl, the BLM continues to propose illegal (and immoral) destruction of Spotted Owl habitat without developing a recovery plan for the species.*

BLM Response: The development of a spotted owl recovery plan is outside the scope of this project.

comment f: *The BLM posits that "a shift to increasing numbers of owl sites in maturing large reserves is expected to contribute to the recovery goals and conservation needs of the spotted owls by providing multiple clusters of breeding spotted owls." Willy Slide EA II page 24. Yet the BLM does not and cannot point to a Medford BLM LSR where this is in fact the case. The Elk Creek LSR has **less** owls now than at the inception of the Forest Plan. The Fishhook-Galice LSR has **fewer** owls now than were there at the inception of the Forest Plan. Undisclosed in the BLM "analysis" is the fact that the nearby Kelsey Whisky timber sale calls for "taking" owls that currently reside in the Fishhook-Galice LSR.*

BLM Response: The citation is taken from the USFWS Biological Opinion:

The reduction of suitable habitat and degradation to owl sites within matrix land is within the assessment of the NFP and the FY 04-08 Biological Assessment, and a shift to increasing numbers of owl sites in maturing large reserves is expected to contribute to the recovery goals and conservations needs of the spotted owls by providing multiple clusters of breeding spotted owls (USDA/USDI 2003 BO, p.103).

Demographic data from northern spotted owls in the Klamath Demographic Study Area collected from 1985 – 2003 indicate that populations appear to be stable in the Klamath study area as a result of high survival and number of young produced by territorial females, which were stable over the period of the study (EA, p. 24).

comment g: *The BLM must still disclose cumulative impacts from its widespread old-growth logging program. Just as in the Willy Slide timber sale, Kelsey Whisky also calls for logging old-growth in CHU OR-67. The Glendale timber planners fail to disclose the cumulative impacts of its old-growth logging program on CHU OR 67.*

BLM Response: The concerns of whether to harvest old-growth trees, whether to allow commercial timber harvest of these lands, or whether to use timber harvest in general, to achieve landscape management objectives were already decided upon. The Medford District BLM has already completed an Environmental Impact Statement for the Resource Management Plan, known as the 1995 Medford District Resource Management

Plan/Environmental Impact Statement (RMP-EIS). The RMP is itself an implementation of the Northwest Forest Plan (NFP) which was also prepared by federal agencies, including the BLM. These EISs, and the corresponding RODs, specifically contemplated the ecological significance of the areas in which commercial and non-commercial timber harvest activities would be planned. The Willy Slide Timber Sale EA conforms to the analysis of these impacts already contained in these programmatic EISs

As mentioned in the EA (p. 28) only:

unit 33-1 falls within Critical Habitat Unit OR-67. The unit lacks late-successional habitat structure for nesting. Unit 33-1 would commercially thin 33 acres to 60% canopy cover. Habitat would be degraded, but continue to function as dispersal quality habitat, also providing a reduced level of roosting and foraging opportunities for 1-2 years, as undergrowth responds to increased light levels. The canopy reduction would last for 10-20 years. The removal of suppressed or defective trees would degrade the effectiveness of the habitat to develop into suitable owl habitat. Retaining 60% canopy and minimum stand diameter of 11" DBH would retain high level of constituent elements for dispersal habitat in CHU-OR-67.

Cumulative impacts from fire, disease, private harvesting, road development, fuels treatments, are expected to remove and degrade habitat in CHU OR-67. Biological Opinion (USDA/USDI 2003) evaluated proposed activities and summarized that CHU would continue to function at the landscape scale. SW Oregon Administrative Units that comprise the CHU system in the Rogue and South Coast Basins would continue to provide high quality habitat for spotted owls within the action area and the function this CHU system to provide habitat would not be precluded by the Proposed Action (p. 104).

comment h: *The EA and draft FONSI fail to disclose or analyze the impacts of the logging and habitat destruction associated with building "temporary" roads through NSO habitat. This is particularly important for the excessive spur roading (and helicopter landing pad construction) proposed in unit 33-1. Please note that unit 33-1 is located in NSO critical habitat. Once the trees are felled for your new "temporary" logging roads, they will not magically re-appear once the so-called "temporary" road is decommissioned. The impacts from such roads on NSO habitat and forest fragmentation are fully ignored in the EA and draft FONSI.*

BLM Response: The EA points out that 0.41 miles of temporary roads would be built and then decommissioned to access unit 33-1. The amount of impact would be a road width of 20', which is within the typical spacing range for a commercial thin unit retaining 60% canopy. Adjacent tree canopies are expected to expand and occupy any gaps in the canopy. The total impacted area would be less than one acre (approximately 2,100 feet by 20 feet) for temporary roads. This impact was considered and disclosed in the impact analysis conducted for Unit 33-1 (EA, p. 28).

comment i: *The Willy Slide EA inexplicably cites to the Medford BLM RMP and the 1994 Northwest Forest Plan to support its (extremely) questionable contention that "The effects of disturbance, loss and degradation of habitat due to fire, harvesting, road construction, manifested in the spotted owl population decline rate, are not greater than was analyzed in the RMP and NFP." Willy Slide EA II page 27. How can the BLM cite to 1994 documents to support its contention that those documents anticipated events such as the Biscuit fire, barred owl competition, the West Nile Virus, and rampant LSR and CHU logging on spotted owl recovery? How can documents written in 1994 tell one whether or not the assumptions made in 1994 are still valid in 2005.*

BLM Response: As stated on page 24 of the EA "Demographic data from northern spotted owls in the Klamath Demographic Study Area collected from 1985 – 2003 indicate that populations appear to be stable in the Klamath study area as a result of high survival and number of young produced by territorial females, which were stable over the period of the study."

The finding on page 27 of the EA states that:

The Cow-Upper watershed baseline suitable habitat is 30,924 acres. The cumulative removal of 27 acres of suitable habitat combined with other projects consulted on within the watershed, is less than 1% (450 acres of 30,924 acres, USDA/USDI 2003 Table 9 p. 73) with loss of suitable habitat reasonably distributed throughout the Cow-Upper watershed. The Proposed Action was designed under the guidelines of the NFP and RMP, and project design criteria would minimize impacts to the spotted owl. The spotted owl sites in the Planning Area affected by the Proposed Action are not expected to change the population trend in the Klamath Province. The survival of spotted owl sites within the Klamath Demographic Study Area would remain stable, and contribute to a stable population within the Klamath Province (USDA/USDI 2004b 4).

Also see response to comment j below.

comment j: *The impact of the barred owl on the spotted owl was barely considered when the Northwest Forest Plan was approved in 1994. One of the implications of barred owls competition and the overall decline of the spotted owl is that the agencies may need to protect all the remaining mature and old growth forest habitat in order to increase the chances that spotted owls and barred owls can co-exist. In order to retain options while this issue is being sorted out the agency must consider protecting all remaining old forest. When we are losing population "sinks," conserving the remaining population "sources" become even more important.*

BLM Response: The southern Oregon spotted owl populations are stable (EA, p. 24), not declining as your comment suggests. The following four reports were reviewed: *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); *US Fish and Wildlife Service 5-Year Status*

*Review* (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, Technical Coordinator, 2005). These reports did not find a direct correlation between habitat conditions and changes in northern spotted owl populations. As such, there is no scientific basis for protecting “all the remaining mature and old growth forest habitat” as your comment suggests. Additionally, these reports do not identify cause for changing the basic conservation strategy outlined in the Northwest Forest Plan and Medford District Resource Management Plan which provides for species conservation while providing a sustainable supply of timber.

comment k: *The BLM ignores peer-reviewed scientific literature that runs counter to the agency's pre-ordained decision to log late-successional forests at any cost. For instance, on page 23 of the second EA, the BLM makes the blanket assertion that "recent research indicates that a reduction in crown fuels outweighs any increase in surface fire hazard." This bold and unequivocal statement of supposed fact is supported by a reference to literature developed by Omi and Martinson.*

*The unreviewed and unpublished Omi and Martinson (2002) letter does not make the claim the BLM attributes to it. Please provide a page citation to support the conclusion drawn by the agency.*

BLM Response: The “Effect of Fuels Treatment on Wildfire Severity” by Professor Philip Omi and Research Associate Erik Martinson from the Western Forest Fire Research Center at Colorado State University was submitted to the Joint Fire Science Program Governing Board in 2002. This statement was in their conclusion on page 25. This document is also cited in the **Healthy Forest: An Initiative for Wildfire Prevention and Stronger Communities** which is found on the Whitehouse web page <http://www.whitehouse.gov/infocus/healthyforests/sect4.html>.

comment l: *As fire is continually excluded and stand densities continue to increase, the risk for higher proportions of high severity fire effects increase." (Willy Slide EA II page 22). The BLM cites no evidence to support its contention. The idea of uncharacteristic fuel build-up does not apply to much of the western United States and therefore should be tested at a local scale (Anderson et al. 1999, Johnson et al. 2001, Keeley 2002, Odion et al. 2004, Shinneman and Baker 1997, Veblen 2003).*

BLM Response: It is commonly recognized by ecologists and the fire community in southern Oregon that as stand densities increase, high severity fire effects increase. Although not contained in the EA, Atzet and Martin (1991) state in “Natural Disturbance Regimes in the Klamath Province” that “results seem to be consistent with the fact that as the fire return interval increases, fire severity increases.” There is a general consensus from more than 90 years of fire research that fires burn hotter and spread faster when there is more fuel available to feed it.

comment m: *Of the three methods commonly proposed by the Medford BLM to mitigate the significantly increased fire hazard created by logging slash, two generally are not*

*effective. Computer simulations run by van Wagtendonk (1996) projected that low thinning combined with a pile-and-burn slash treatment on flat ground yielded nearly identical fire behavior to thinning without any slash treatment because pre-existing surface fuels were not affected. Lop-and-scatter practices "significantly increased subsequent fire behavior." In contrast, underburning (or broadcast burning) is the only method known to reduce fire intensity below pre-logging conditions. Burning in logged areas is an effective hazard reduction practice because fire consumes the finest fuels that present the greatest hazard (Deeming 1990). Other reviewed and published studies reach similar conclusions about the range of slash treatment options (Fahnestock 1968, Stephens 1998).*

BLM Response: As stated on page 4 of the EA: "fuels reduction treatments on 197 acres is a very small portion of the fifth-field watershed (0.35 percent) and the cumulative effect of increasing the fire risk is minimal." There is no significant increase to fire hazard. In regard to Wagtendonk, treatments that don't address surface fuels, particularly in areas that had frequent fires historically and have been excluded from burning, will not essentially affect the surface fire behavior characteristics. Thinnings, especially thinning from below, is an activity to address fire behavior characteristics of crown fire initiation and crown fire sustainability (Scott and Reinhardt 2001, Carlton 1999, Graham et al 1999 and 2004). The surface fire spread and intensity is only one of the issues to be addressed in a fuels reduction activity.

comment n: *In our Willy Slide comments of August 24, 2004, we included a copy of a recent peer reviewed paper by Odion et al. entitled Patterns of Fire Severity and Forest Conditions in the Western Klamath Mountains, California. Published in Conservation Biology, Volume 18, No. 4 August 2004 pages 927-936. We explicitly requested that the BLM ID team address the scientific controversy raised in the paper concerning the impacts of logging on fire behavior.*

*Rather than address research that might inhibit its old-growth logging program, the BLM chose to simply ignore the request to address scientific controversy.*

BLM Response: As stated on page 4 of the EA "fuels reduction treatments on 197 acres is a very small portion of the fifth-field watershed (0.35 percent) and the cumulative effect of increasing the fire risk is minimal." With only 52 acres of regeneration harvests, there is no significant increase to fire hazard.

Odion and others argue that the fuel build-up scenario resulting from fire suppression is not appropriate for the Klamath-Siskiyou region. By studying the severity of fire effects in the northern California of the Klamath National Forest, the authors concluded that closed canopy forests burned with less severe fire effects and that forests become less combustible with time. The study does not identify what defines closed canopy, nor the role of stand age. In addition Odion et al uses no local or specific weather data from the 1987 study on stand type and severity except for an acknowledgement that droughty conditions from previous years may have had an effect on burn conditions. The well known inversion conditions during these fires may have had a distinctive effect on the

way these landscapes burned.

Odion's study links open canopies with increased severe fire effects. Because the study concludes that the proportion of high severity fire (resulting in substantial to complete stand mortality) has not changed in the last 80 years (despite increasing human intervention resulting in roads, tree plantations, and opened canopies), one of two situations regarding open canopies must have existed historically. There was less open canopy (because less human manipulation early in the 20th century), so severe fire effects were more abundant in closed canopies; or (2) there has always been a specific proportion of the forest with open canopy, and fire suppression has resulted in increased amounts of closed forest canopy. Without knowing the historic role of forest canopy, the study has limited utility in analyzing the significance of severe fire effects in open and closed canopy forests on a landscape scale.

The authors further describe the role of shade in shaping the effects of wildfire, especially those forests that have not burned within the last 80 years or so. Essentially, the study merely confirms that as timber stands age, they become more fire resilient. This is due to the spatial location of fine fuels (needles, small branches, etc.) in relation to adjacent trees, and other sources of forest fuels such as forest floor debris and brush. Older stands with closed canopies allow little if any light for brushy species and young trees to persist, thereby naturally reducing the flashy fuels that may result in fire "laddering" from the ground to tree canopies resulting in a crown fire. Young stands cannot benefit from the shade phenomena, simply because the young trees themselves provide the flashy, ladder fuels, due to proximity of the tree canopy to the ground. Therefore, stand age is very important, because it relates to tree size and heights to forest crowns/canopies which have a direct bearing on the development of crown fire.

*comment o: The BLM's inadequate, misleading, incomplete, and conclusory cumulative effects analysis for fire and fuels is an example of the failure of the agency to consider any cumulative effects on any serious environmental issues from the known past and future late-successional logging projects that the Resource Area is so fond of.*

BLM Response: As stated on page 4 of the EA "fuels reduction treatments on 197 acres is a very small portion of the fifth-field watershed (0.35 percent) and the cumulative effect of increasing the fire risk is minimal." There is no significant increase to fire hazard.

*comment p: To the extent that uneven-age management in the form of commercial thinning and group selection cutting strives to create relatively open forest stand conditions, changes to fire climate and intensified fire behavior are likely to occur after timber harvest. The EA should address the potential for reduced canopy closure to increase solar radiation, ground level wind speed, surface fuel moisture and flammability to result from proposed timber harvest. Implications for fire suppression effectiveness and worker safety also should be addressed.*

BLM Response: Commercial thinning is considered an intermediate even-aged harvest

treatment on younger commercial sized trees until approximately 100 years, when stands are scheduled for regeneration harvesting as stated in Purpose and need on page 8 of the EA. As stated on page 4 of the EA “fuels reduction treatments on 197 acres is a very small portion of the fifth-field watershed (0.35 percent) and the cumulative effect of increasing the fire risk is minimal.” Omi and Martinson state that “where fire threatens societal values, fuels treatments can facilitate suppression by providing safe access and egress for firefighters (page 25). There is no significant increase to fire hazard.

comment q: *The Willy Slide late-successional logging EA tiers to the 2001 ROD to weaken the survey and manage program, the 2004 ROD to eliminate it, and the 2004 ROD to weaken the Aquatic Conservation Strategy. These RODs all illegally eliminate important and necessary conservation elements of the Northwest Forest Plan in order to facilitate the illegal logging of our old-growth forests.*

BLM Response: These comments are opinions and outside the scope of the EA.

comment r: *We also hereby provide the BLM with notice that the programmatic biological assessment 1-14-03-F-511 (FY 2004-2008) violates the Endangered Species Act by failing to ensure NSO recovery, and therefore cannot be legally relied on to support the BLM's owl-killing logging program.*

BLM Response: These comments are opinions and outside the scope of the EA. Under the Endangered Species Act, the BLM is required to consult on the northern spotted owl. The U.S. Fish and Wildlife Service (USFWS) was fully apprised of the potential effects to both the spotted owl and its critical habitat through the Medford BLM and Rogue River and Siskiyou National Forest’s biological assessment (BA). Further, they issued a Biological Opinion (B.O. #1-14-03-F-511), fully aware of the full impacts to the species and habitat of the proposed action: the degree to which habitat (critical or not) would be degraded or removed, and the proportion of the existing habitat “critical or not” that would be affected, the location of affected Critical Habitat Units (CHUs) in relation to late-successional reserves (LSRs) and the potential for connectivity that would be affected.

comment s: *The BLM fails to analyze or disclose the impacts of constructing even more logging roads, skid trails and landings in this heavily impacted watershed.*

BLM Response: As stated on page 4 of the EA “activities that are proposed under this alternative would cause soil displacement, compaction and loss of productivity. Harvesting would result in compaction on about 4% of cable harvest units, 1% of helicopter-logged units, 12% of tractor logging units. Compaction would result on about 0.0015 % of the Planning Area with temporary road construction. These levels are within RMP/EIS guidelines of 12% (pp. 4-12-13).”

comment t: *While temporary roads are often not counted toward road density figures, KS Wild believes that road construction (temporary or not) often has long-term significant impacts to soil resources.*

BLM Response: See response to comment s above.

comment u: *The impacts of late-successional tree-removal for "temporary" road construction on NSO, critical habitat, and other late-successional forest values is notably absent from both EAs. Please note that road construction is planned in NSO critical, suitable, and dispersal habitat within this Key Watershed.*

BLM Response: See response to comment h above

comment v: *The term "ripping" is often referred to by the BLM as a soil mitigation or restoration measure. Ripping is not a soil mitigation nor a restoration measure. It is however a road decommissioning technique. Subsoiling is a possible soil rehabilitation measure however its effectiveness is extremely soil specific. Subsoiling is an agronomic term used for breaking up plow pans generally at depths of 8 to 12 inches. Forestry has started to utilize this technique to break up compaction of soils created by excessive use of equipment. This compaction generally extends down well beyond the 12 inch depth and consequently creates the problem of lifting great weights of soil to be fractured. In so doing, if the soil is moist, it generally is compacted from below due to the lifting action. This can increase the degradation of soil rather than start the rehabilitation process. Soils that exhibit plastic characteristics generally are negatively impacted by subsoiling. This, as well as, all restoration or rehabilitation measures need to take soils individually into consideration. This consideration also needs to address the soils current condition as to vegetation present, slopes, aspects, depths, topsoil characteristics etc. Restoration and rehabilitation also need to take into consideration time frames that are commonly are tens to hundreds of years for soil recovery.*

BLM Response: The BLM does not state in the EA that ripping is a soil mitigation or restoration measure. As stated in the EA on page 44 implementing Best Management Practices (BMPs) in Appendix D of the RMP should prevent unacceptable degradation of the soil resource (RMP EIS Volume 1, pp. 4-12 and 13). Cable yarding would result in compaction on about 4% of each harvest unit and about 1% of helicopter-logged units. About 12% of the ground in tractor logging units (using designated skid roads) would experience moderate compaction (Clayton; Dyrness). Additionally, ripping compacted ground would shatter soil compaction by as much as 80% (Froehlich and Miles; Andrus and Froehlich; Davis). Compaction from harvest activities are within the amount of compaction levels identified in the RMP. Sub-soiling would further reduce those impacts.

comment w: *The BLM repeatedly contends that "a study by Luce and Black showed substantial reductions (about 80 percent) in sediment delivery to roads in the Oregon Coast Range where well-vegetated or armored (covered with rock fragments) ditch lines or rocked roads were left ungraded." Yet the BLM refuses to acknowledge or discuss all of the peer-reviewed studies regarding substantial environmental impacts associated with new "temporary" road construction submitted by KS Wild in our comments of August 24, 2004.*

BLM Response: The Luce and Black study pertains to roads that are insloped and have ditchlines. Temporary roads, which would be built and decommissioned (ripped, waterbarred, mulched and seeded) within the same operating season (May 15 to October 15) under the proposed action, are located on stable ground, are on or near ridges, are several hundred yards from any streams, and have no ditchlines so they have no hydrologic connection to stream channels. They therefore would not contribute sediment to streams (EA, p. 38).

comment x: *There is no good evidence that the application of BMPs can reduce the impacts of logging and road construction at the watershed scale to an ecologically insignificant level, especially in light of existing conditions of the existing road density.*

BLM Response: There is no permanent road construction or net increase of roads from this project. See response to comment v above.

comment y: *None of the proposed Best Management Practices or Project Design Features reflect variability among soil types. The BLM has referenced generic "one-size-fits-all" mitigation measures that it will apply to all soils in the project area regardless of their unique characteristics. Mitigation measures have not been assessed for their effectiveness on a site-specific basis.*

BLM Response: No relevant soil issues were identified but soils were analyzed and sufficiently addressed on pages 43 – 45 of the EA. On any given landscape there are an infinite number of soil considerations; it would be infeasible to address every single one in detail.

Natural Resource Conservation Service Douglas County Soil Survey maps and tables were used in determining suitability of individual sites. Survey maps and tables were used in determining suitability of individual sites. Tables contain chemical and physical characteristics of the soil series, including soil depth and associated vegetation. Soil characteristics were verified on the ground by the soils specialist. As mentioned on page 44 of the EA “All proposed harvest units have been examined for current and potential slope stability problems by a qualified resource specialist. For instance, part of the hillside east of lower Panther Creek containing units 27-1 and portions of 27-2 were deferred from further consideration because of concerns about potential slope instability.”

The RMP ROD considers BMPs in Appendix D to be appropriate for use on all soil types, with the exception that BMPs for fragile soils (part VI, page 155), would be substituted for BMPs that are appropriate for other soil types. There are no FG (fragile slope gradient), fragile mass movement (FP), fragile surface erosion (FM) or fragile groundwater (FW) soils in any harvest unit or where temporary roads would be constructed.

comment z: *The 33 acres of proposed tractor yarding will have permanent adverse impacts on soil productivity and compaction.*

BLM Response: See responses to comments s and v above.

comment aa: *C-7 of the NFP and page 22 of the RMP require that the BLM "Reduce existing system and nonsystem road mileage" in the Key Watershed.*

BLM Response: There is no permanent road construction or net increase of roads from this project. Other projects in this Key Watershed have reduced the amount of mileage such as the Mr. Wilson Timber Sale, which has a net decrease in roads.

comment bb: *The EA does not disclose if the BLM is continuing to exceed the "non-interchangeable component of the annual allowable sale quantity attributable to key watersheds." RMP page 23. How much volume does the BLM anticipate logging from other key watersheds in the same fiscal year as the Willy Slide Key Watershed old-growth logging?*

BLM Response: The non-interchangeable annual volume is 9 million board feet. From 1995 to 2004 the Medford BLM offered 30 million board feet, approximately 1/3 of the allowable sale quantity. For 2005 the non-interchangeable volume is expected to be no more than 8 million board feet.

comment cc: *Currently 26% of the Gold Mountain Creek 6th field watershed is in a hydrologically unrecovered condition. Willy Slide EA II page 46. Yet the sole action alternative calls for further logging and (unanalyzed) "temporary" road construction in the watershed. Please note every study referenced by the BLM on page 41 of the EA indicates that the risk of peak flows is elevated when less than 25% of a watershed is hydrologically unrecovered. The WA clearly recommends that the BLM refrain from placing over 25% of this watershed in an unrecovered state. By further elevating the risk of peak flows in the Gold Mountain watershed, the BLM is directly inhibiting the attainment of the objectives of the Aquatic Conservation Strategy.*

BLM Response: Percentage of acres in hydrologically unrecovered condition in the Gold Mountain HUC 6 is probably closer to 18% rather than the 26%, because the 26% figure includes the 1338 acres that were harvested between 1974 and 1984, 18 to 28 years ago (based on 2002 satellite imagery). All acres that have been harvested in the watershed since 1974 do not remain in open canopy condition forever. Rather, forested acres in the watershed regrow into a matrix of mixed age classes, reflecting years since last major canopy disturbance, and move toward hydrologic recovery over time. Acreage that was harvested between 1974 and 1984 is now largely or in fully hydrologic functioning condition.

Watershed Professional Network (1999) estimates that there is a potential risk of peak flow enhancement when 40% of a watershed is in the transient snow zone and when more than 75% of the acreage in the watershed has less than 30% canopy closure (EA, p. 39). Gold Mountain Creek HUC 6, which has 40% of its acreage in the transient snow zone, has no more than 26% in open condition, probably closer to 18%. 86% (27 of 197 acres)

of all proposed harvest acres would retain at least 30% canopy closure and 24 of those acres are 1 acre openings surrounded by forest that is in fully functioning hydrologic condition. It is therefore highly unlikely that proposed harvest would have any measurable effect on peak flow.

comment dd: *It is unclear if the Glendale Resource Area intends to yard trees through the riparian reserve near unit 27-4. At page 9 of the first Willy Slide EA the BLM acknowledged that it hoped to punch yarding corridors through riparian reserves adjacent to unit 27-4. Now the BLM claims that "No yarding would occur through riparian reserves." Willy Slide EA II page 16. We hope this is true, but we are able to find no change in the silvicultural prescription for that unit. Please confirm whether or not the agency intends to yard through riparian reserves.*

BLM Response: There is no harvesting in or yarding through riparian reserves.

comment ee: *The EA contends that ACS compliance will meet the needs of listed Coho Salmon. Unfortunately the project will not maintain or restore many of the objectives of the ACS and hence is not likely to meet the needs of listed fish species. Furthermore, impacts to Coho were only analyzed at the 5th field scale. The EA must address potential impacts at the level of 6th and 7th field watersheds. Additionally, the EA must examine both short and long term impacts to these watersheds.*

BLM Response: The Willy Slide EA does not contend that meeting ACS Standards and Guidelines will meet the needs of coho salmon. Habitat for coho salmon in the Planning Area is below optimum for several reasons that are related to past timber harvest. This project is not restorative in character; it can only maintain existing conditions and it does that by implementing appropriate Standards and Guidelines and Best Management Practices.

Contrary to your statement, effects of the proposed action on fish, including coho salmon, are addressed at the 6<sup>th</sup> and 7<sup>th</sup> field watershed scales (page 38, paragraphs 1 and 3; page 39, paragraph 2; page 40 paragraph 1; and page 43, paragraphs 2 and 3.

comment ff: *Please note that the Northwest Forest Plan ROD (at B-10) requires that the BLM establish knowledge of a natural range of variability and that the decision maker will use the results of watershed analysis to support the finding of ACS compliance. B-10 also requires that "In order to make the finding that a project or management action meets or does not prevent attainment of the ASCO's, the analysis must include a description of the existing condition, a description of the range of natural variability of the important physical and biological components of a given watershed, and how the proposed project or management action maintains the existing condition or moves it within the range of natural variability.*

BLM Response: The EA describes existing conditions in the planning Area, while the West Fork Cow Creek Watershed Analysis (May 1997) discusses historic conditions and trends (Chapter 3, page 10). Additionally, a March 1999 supplement to the WA,

compares present conditions to the range of natural variability that is believed to have existed during the period 3,000 years ago to 200 years ago (pre-European). This information was used during project development to evaluate whether or not the proposed timber sale falls within the range of natural variability. The proposed timber sale does indeed fall within the range of natural variation because the Planning Area, like virtually everywhere in southern Oregon, has experienced frequent wildfire in the past, under a variety of fire intensities. Effects of historic wildfire likely resulted in far greater acreage in open condition (no or minimal ground cover or canopy closure) and higher peak flows than at present. Existing stream channel capacity reflects peak flow conditions under historic wildfire regimes. It's also highly likely that any sediment that road renovation contributes to streams would be indistinguishable from baseline and that it would be immeasurable more than several hundred feet downstream of road crossings.

By signing the final decision for this timber sale EA, the Field Manager signifies that the proposed action is within the range of natural variability for the watershed and that the project would not prevent attainment of ACS objectives at the 5<sup>th</sup> field watershed scale (USDA and USDI 2004).

comment gg: *Despite the abysmal non-functioning state of riparian reserves in the Planning Area, on page 38 of the EA the BLM inexplicably contends that "Any soil that enters stream channels would be initially stored in small headwater streams behind abundant woody debris in 1st, 2nd and 3rd order streams." This is an extremely odd contention given that "only 36% of BLM riparian reserves are more than 80 years of age." Willy Slide EA II page 35. Where did this allegedly abundant woody material originate from?*

BLM Response: Although only about 36% of BLM riparian reserves in the Gold Mountain Creek HUC 6 are in proper functioning condition, it does not mean that streams are devoid of large and small wood. Wood that falls into stream channels persists for many decades, long after the surrounding forest has been removed through timber harvest or wildfire. Most importantly, small streams (e.g. 1<sup>st</sup>, 2<sup>nd</sup> and 3<sup>rd</sup> order) function primarily on small wood and do not require large tree boles to trap and control the routing of sediment and organic material from the headwaters to the mouth and to dissipate stream energy. Young conifer stands continue to contribute wood to streams through self-thinning. All riparian reserves on public land that are less than 80 years of age are in various stages of ecological recovery, and will continue on this trajectory as long as BLM continues to manage them under direction of the Northwest Forest Plan and the RMP ROD. The proposed action does not include any thinning in or yarding through riparian reserves, nor any road construction in these areas.

comment hh: *Willy Slide proposes old-growth logging in known Red Tree Vole (RTV) habitat. The BLM is aware of RTV presence in the timber sale units. Yet not only does the BLM refuse to disclose or analyze the impacts of the timber sale on RTVs, the words "Red Tree Vole" never even appear in the EA.*

BLM Response: Red tree vole is not a "Threatened and Endangered" or "Special Status"

species. It was removed from any Survey and Manage listing through the 2003 Survey and Manage Annual Species Review (signed December 19, 2003). Conducting surveys and protecting known sites are not required. The red tree vole is a Bureau Tracking species, and as stated in the EA (p. 65), are not considered special status species for management purposes, and do not require management or mitigation (IM OR-2003-054).

*comment ii: The cumulative effects "analysis" contained in the Willy Slide EA is woefully inadequate. The EA's treatment of the cumulative impacts of private lands logging, past BLM logging, and foreseeable BLM logging is particularly vague and lacking in any detailed discussion or analysis.*

*The EA overlooked concurrent and reasonably foreseeable federal and private logging operations in the same watershed. Private land activities have by far the greatest impact on aquatic ecosystems (WA 47-50). Cumulative effects are also important to threatened and sensitive species, soil productivity, forest health, and fire hazard. The EA never addressed the site-specific cumulative effects of this action on any of those factors.*

BLM Response: As stated on page 5 of the EA:

The interdisciplinary team evaluated the Proposed Action in context of past, present and reasonably foreseeable actions. Significant cumulative effects are not predicted. A complete disclosure of the effects of the Proposed Action is contained in Chapter 3 of the EA.

*comment jj: The BLM proposes to remove 68 acres of goshawk nesting habitat despite knowledge of a "possible site" in the Planning Area. Willy Slide EA II page 64. The EA does not fully analyze or disclose the impacts to Northern goshawks.*

BLM Response: This was addressed on page 64. A goshawk was not found.

*comment kk: The EA does not adequately analyze or disclose potential impacts to Pacific fishers. The Pacific fisher is a candidate for listing under the Endangered Species Act. The U.S. Fish and Wildlife Service recently affirmed the continued threat of habitat loss to this species by issuing a positive 90-day determination that it should be considered for listing. The Glendale BLM, however, is removing and degrading its habitat at an alarming rate and is thus taking actions would lead to the need to list this species under the ESA.*

BLM Response: As stated on page 29 of the EA, there are no known fisher sightings in the Glendale Resource Area. The nearest known sightings, from three incidental visual observations (2002-2004), are approximately 20 miles southeast. The analysis in the EA determined that:

Due to the small size and isolation of late-successional forest units from previous harvesting on BLM matrix and private lands within the West Fork Cow Creek watershed, it is possible that it may no longer be suitable for resident fishers. The

largest late-successional blocks are expected to continue be restricted to LSRs. The fisher was analyzed in the NFP and failed to pass the species viability screens due to its dependence on interior forest habitat and large, down woody debris. With the cumulative effects of private harvesting, low BLM ownership and few large patches of BLM late-successional habitat at low elevations, the fishers natural rareness, slow re-colonization rates of restored habitats, the species is not expected to be well distributed throughout its range (USDA/USDI 1994a, pp. 53, 470). This project would not change the assessment predicted in the NFP, and the impacts from the Proposed Action are expected to be minor (EA, p. 30).

comment ll: *The EA does not fully analyze or disclose the impacts of logging, road construction, non-functioning riparian reserves, landing construction and log haul on salmon and steelhead. The NLAA call is political rather than biological. The impacts of peak flows, exacerbated from loss of canopy and an obscene road density, will inhibit the hydrological health required by Coho and Steelhead.*

BLM Response: See response to comment c above.

comment mm: *Page 7 of the second EA indicates that "[e]xisting unpaved roads accessing the Planning Area would be analyzed for effects" We are not able to locate any such analysis.*

BLM Response: Your citation neglects to complete the sentence which includes "and are within the Elk Valley HUC sub-watershed." The use of roads within the Elk Valley Creek 6<sup>th</sup> field was considered and NOAA Fisheries issued a letter of concurrence that actions "will not likely to adversely affect" Oregon coast coho salmon (EA, p. 31). Also

"There are 160 miles of perennial and intermittent streams in the Gold Mountain 6<sup>th</sup> field watershed and 119 miles in the Elk Valley Creek 6<sup>th</sup> field watershed, where only log haul on existing roads would be affected. Most harvest units are located in the 7<sup>th</sup> field sub-watersheds of Gold Mountain, Panther and Walker Creek (fish-bearing streams); however, a few units are in small frontal drainages that border West Fork Cow Creek" (EA, p. 33).

comment nn: *The BLM fails to discuss, analyze or disclose the presence (or absence) of non-suitable woodlands in the Planning Area as required by the Medford RMP.*

BLM Response: See response to comment y above. The RMP states that prior to evaluating potential harvest treatments, the existing timber production capability classifications will assist in meeting water quality and soils management objectives (RMP, p. 41). This was done for the Willy Slide Planning Area and no treatments will occur in those areas.

comment oo: *The BLM fails to discuss, analyze or disclose the increased risk of noxious weed spread from logging road and landing construction, and from yarding corridors.*

BLM Response: The EA determined on page 59 that:

The Planning Area has only a few individual scotch broom plants located along two roads, 31-9-27.5 and 31-9-22. Prior to initial move-in and all subsequent move-ins into the Planning Area, heavy equipment would be washed to remove soil and plant parts that could spread invasive and noxious weeds. As such, the Proposed Action is not anticipated to increase the spread of noxious weeds and/or invasive non-native plant species.

*comment pp: The original Willy Slide EA identified Elk habitat, spread of p. lateralis and logging in the transient snow zone as issues of concern to the ID Team. Willy Slide EA I page 7. Interestingly, the second EA does not reflect a concern regarding any of these issues.*

*We are perplexed as to why all elk habitat are omitted from the second EA. As stated in the first EA, "late successional cover is low, and road density is high." Yet the second EA intends to exacerbate both of those impacts on elk habitat without even analyzing the impacts to elk habitat and elk populations.*

BLM Response: The EA states on page 56 that:

The original project was analyzed under the Willy Slide Project EA (#OR118-04-015) and was available for public comment in July, 2004. One comment letter from Klamath Siskiyou Wildlands Center (KS Wild) stated that the two action alternatives were indistinguishable. The interdisciplinary team (IDT) originally developed two action alternatives that were constrained by elk management area objectives (Roosevelt elk is not a threatened and endangered species or special status species). The Glendale Field Manager agreed with the public comment and eliminated Alternative 3.

The EA clearly states on page 21 that only

Those elements of the human environment that were determined to be affected define the scope of environmental concern (**see Environmental Elements in Appendix 2 for full list of elements considered**). The Affected Environment portion of this chapter describes the current conditions and how they came to be. The relevant resources that could be potentially impacted are: affects to **fire risk; special status wildlife species and critical habitat; fish, streams, riparian habitat and soils** as the result of management activity.

As mentioned on page 61 of the EA:

The Proposed Action would not affect elk population levels within the EMA. Deferral of harvesting large blocks of late-successional habitat, no permanent road construction and closure of unnecessary spurs not under right of way

agreements, would maintain stable populations of elk on federal lands. A replacement gate would be installed on road 31-9-26 that would reduce vehicle access to approximately 6 miles of road and improve the effectiveness of elk forage, hiding, and thermal cover by restricting vehicle access and disturbance. Group selection harvest openings would provide early- successional forage habitat.

As mentioned on page 62 of the EA, there is no POC (Port-Orford-cedar) located within proposed treatment units. Also:

A POC Risk Key analysis was conducted and found: 1/ there are no uninfected POC within, near or downstream of the Proposed Action whose ecological, Tribal, or product use or function measurably contributes to meeting land and resource management plan objectives; 2/ there are no uninfected POC within, near or downstream of the Proposed Action that, were they to become infected, would likely spread infections to those trees whose ecological, Tribal, or product use or function measurably contributes to meeting land and resource management plan objectives; and 3/ the Proposed Action does not occur within an uninfested 7<sup>th</sup> field watershed” (EA, p. 62).

Regarding the transient snow zone see response to comment cc above.

comment qq: *Neither EA fully discloses and analyzes the risk of p. lateralis spread from logging and hauling activities.*

BLM Response: The EA discloses the effects of p. lateralis on page 62. See comment pp above.

### **Lydia Garvey, Clinton, Oklahoma**

Comment rr: *I strongly urge you to 1. No logging in Spotted Owl habitat in the W. Fork of Cow Creek, 2. No road building in this key watershed for salmon recovery, and 3. Focus on restoration projects like thinning existing plantations and catching up on road maintenance backlog.*

BLM Response: This project is not a restoration or road maintenance project. The Purpose and Need for this project, as stated in the EA on page 8, is for forest habitat and forest products. See responses to comments c, h, i and j above.

### **Frost Saufley, Boulder Creek, California**

comment ss: *I urge the BLM to refrain from logging Spotted Owl Habitat in the West Fork of Cow Creek, and not to build more logging roads in the West Fork Cow Creek Key Watershed for salmon recovery. It would help them to do so if you also start to focus on watershed restoration projects like eliminating the road maintenance backlog and selective thinning of existing plantations.*

BLM Response: See response to comment rr above.

### **The Robinsons, Phoenix, Oregon**

comment tt: *We urge BLM not to build new logging roads in this watershed, so no new impacts against fisheries values will be introduced.*

BLM Response: See response to comment rr above.

comment uu *Logging should be kept entirely out of the identified spotted owl habitat in the West Fork of Cow Creek.*

BLM Response: See response to comment rr above.

comment vv *We urge BLM to set a high priority on restoring watershed values in this drainage. Any unnecessary roads should be decommissioned. Those roads that are necessary should be brought up to proper condition so they will not cause sediment deposition in streams.*

BLM Response: See response to rr above.

### **George and Frances Alderson, Baltimore, Maryland**

comment ww: *We urge you not to log in Spotted Owl habitat in West Fork, Cow Creek.*

BLM Response: See response to comment rr above.

comment xx: *Build no new logging roads and do not rebuild any old roads.*

BLM Response: See response to comments a and rr above.

comment yy: *Emphasize restoration of watershed values. Concentrate thinning in existing plantations. Work on overdue maintenance of existing roads that are considered essential for long-term management purposes.*

BLM Response: See responses to comments a and rr above.

comment zz: *Retire unneeded roads so their impacts on watershed and fisheries values will be alleviated.*

BLM Response: Most of the roads within the Willy Slide Planning Area are not public roads and are under reciprocal right-of-way agreements with private landowners because of the checkerboard ownership pattern. The BLM does not have the option to close these roads due to the reciprocal right-of-way agreements. Also see responses to comments a and rr above.

**Mark Van Loo (no mailing address)**

comment aaa: *Thinning existing tree plantations, avoiding old-growth timber areas, dealing with the road maintenance backlog, avoiding spotted owl habitats, refraining from more road building in the West Fork watershed: it would adversely affect salmon recovery.*

BLM Response: See responses to comment rr above.

**Ted Kennel, Millbrae, CA**

comment bbb: *The area proposed for logging includes yet more habitat suitable for recovering spotted owl populations; yet the BLM still proposes to cut it down. Your agency should take the opportunity to finally get serious about the recovery of the spotted owl, as well as wild salmon populations, starting right here with the cancellation of the Willy Slide logging project.*

BLM Response: See response to comment rr above.