



# United States Department of the Interior

BUREAU OF LAND MANAGEMENT  
MEDFORD DISTRICT OFFICE  
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IN REPLY REFER TO:

546011792  
TS97-12  
Boise Cascade  
Middle Thompson  
A6710(SA:jl)

FEB 19 2002

Dear Interested Citizen.

In July 2000, the Bureau of Land Management (BLM) published a Supplemental Environmental Assessment (SEA) analyzing the proposed Middle Thompson Shaded Fuelbreak No. 4 in accordance with the Stipulation for Dismissal (Civil No. 99-3042-CO) between Headwaters and the BLM. In May 2001, the BLM sent the SEA and the associated revised "Study Plan to Investigate the Effects of a Shaded Fuelbreak on Siskiyou Mountains Salamander" to the Regional Ecosystem Office (REO) for review.

In a memo dated February 5, 2002, the REO authorized a research exemption from the standards and guidelines of the Northwest Forest Plan (NFP) for this project and associated study plan. Following REO's approval of a research exemption, I signed a Finding of No Significant Impact (FONSI) and Decision Record (DR) for this project (enclosed). In accordance with the Stipulations for Dismissal (Civil No. 99-3042-CO), a notice of this decision is being published in the Medford Mail Tribune and a copy of this letter and attached FONSI and DR mailed to "those persons and organizations which have commented on the supplemental EA." This decision will be subject to the protest and appeal procedures established for forest management decisions found at 43 CFR §5003. The 15-day protest period will begin on approximately February 25, 2002 with publication of this Decision in the Mail Tribune.

The BLM has now met all requirements of the Stipulation for Dismissal (Civil No. 99-3042-CO) and plans to proceed with this project. Thank you for your participation in this process. If you have any additional questions or comments, please contact Bill Yocum at (541) 618-2200.

Sincerely,

Richard J. Drehobl  
Field Manager  
Ashland Resource Area

Enclosure (as stated)

## Finding of No Significant Impact and Decision Record for

### Shaded Fuelbreak Unit No. 4 of the Middle Thompson Timber Sale EA NO. OR-110-96-09s

The Medford District Bureau of Land Management (BLM) proposes to implement Shaded Fuelbreak No. 4 of the Middle Thompson Timber Sale in the Applegate Adaptive Management Area (AMA). This project will be carried out in accordance with the "Study Plan to Investigate the Effects of A Shaded Fuelbreak on Siskiyou Mountains Salamander, *Plethodon stormi*, Abundance and Site Microclimate." The Middle Thompson Timber Sale covered approximately 2,670 acres and was implemented in 1997. The implementation of the 93 acre Shaded Fuelbreak No. 4 is the final component of this project. Shaded Fuelbreak No. 4 was originally analyzed in the amended Middle Thompson Environmental Assessment (OR-110-96-09) and subsequently analyzed in the Supplemental Environmental Assessment (SEA) (OR-110-96-09s). In a memo dated February 5, 2002 (attached), the Regional Ecosystem Office (REO) authorized a research exemption from the standards and guidelines of the Northwest Forest Plan (NFP) for this project and associated study plan. Copies of the SEA are available at the Medford District BLM office at 304 Middle Road, Medford, OR 97504.

The project site for Shaded Fuelbreak No. 4 provides habitat for the Siskiyou mountains salamander (PLST), a survey and manage species requiring protection buffers under the Northwest Forest Plan (NFP). Shaded Fuelbreak No. 4 will be implemented with mitigating measures designed to lessen the impact to the species and retain PLST on site. A study plan authored by leading PLST researchers Lisa Ollivier, Dave Clayton, and Hartwell H. Welsh, Jr. will "investigate the effects of a shaded fuelbreak on *P. stormi* abundance," and "document changes in microclimate and vegetation structure associated with the proposed land management."

I have reviewed the SEA for Shaded Fuelbreak No. 4, the associated revised "Study Plan to Investigate the Effects of A Shaded Fuelbreak on Siskiyou Mountains Salamander, *Plethodon stormi*, Abundance and Site Microclimate," and the comments and concerns raised by Headwaters, Klamath-Siskiyou Wildlands Center, the Siskiyou Project and others. Although the comments received raised many important issues, I found that all of these issues had been previously analyzed by BLM resource specialists. Many of these concerns were addressed directly in the SEA and are addressed again below. I have also reviewed and taken into consideration comments submitted by the United States Fish and Wildlife Service (USFWS) and by study plan author Lisa Ollivier.

On the basis of the information contained in the SEA and all other information available to me as summarized above, it is my determination that the proposed action alternative does not constitute a significant impact affecting the quality of the human environment as defined by 40 CFR § 150827. For this reason, an Environmental Impact Statement will not be prepared. Rationale for this decision and a review of the issues involved are discussed below.

  
Field Manager      2-19-02  
Date

## Decision Rationale

My decision to proceed with the proposed action as described in the SEA is based on my belief that in order to protect a species, we must also be able to manage for ecosystem health. With regard to the proposed action, I cannot dispute that from a fuels perspective, a lower canopy closure may be more desirable, and from a wildlife perspective, a higher canopy closure may be more desirable. This project, however, is about finding a balance between the two. This forest no longer exists in a natural state where cool underburns periodically reduce fuel loading. Instead, the lack of fires during the past century has created a fire hazard that presents a risk to all species in the forest ecosystem.

I believe that only a very short-sighted perspective can see the need to protect PLST habitat from all projects involving harvest, while leaving it vulnerable to the risk of stand-replacing wildfire. One need look no further than the fires that swept across the West in 2000 and 2001 to understand the biggest threat facing the Applegate AMA. This project will study whether or not a balance can be achieved between reducing the threat of severe wildfire while still providing adequate protection for the species at risk. The Applegate AMA provides the perfect place to test this idea. It would be irresponsible to do less.

All described project design features (PDFs) will be fully implemented. This decision will not be implemented until the baseline information needed for the “Study Plan to Investigate the Effects of A Shaded Fuelbreak on Siskiyou Mountains Salamander, *Plethodon stormi*, Abundance and Site Microclimate,” is complete.

As a result of comments from USFWS and Lisa Ollivier, minor changes designed to clarify the project and associated project design features have been made to the SEA. Throughout the document, ‘talus’ has been replaced with ‘surface rock’ in order to more closely mirror the language used in the Survey Protocol for the Siskiyou Mountains Salamander (Version 3.0). References in the SEA to ‘habitat’ or ‘suitable habitat’ follow the definitions in the Survey Protocol. Changes to PDFs specify the retention of existing coarse woody debris on site, and additional limits on post-harvest prescribed burning (SEA, 8).

The discussion that follows reviews the concerns raised about this project through the public involvement process, and examines issues as they relate to significance as defined by Council on Environmental Quality (CEQ) regulations (40 CFR § 1508.27).

### *Concerns About Impacts to the Siskiyou Mountains Salamander*

Most of the concerns raised on this project focused on the significance of the impact to the Siskiyou mountains salamander. The Siskiyou mountains salamander, *Plethodon stormi* (PLST), is a Survey and Manage Species under the Northwest Forest Plan (NFP). Known only from southwestern Oregon and northwestern California, the PLST is found in Siskiyou County, CA and Jackson and Josephine Counties, OR. In Oregon, most of the reported populations are within the upper Applegate River drainage in the Applegate Adaptive Management Area (AMA). As noted in many comments, the Applegate AMA is very important to the persistence of the species.

The species' known range is 339,000 acres (529 square miles) and within that range the species is generally limited to a specific habitat type.<sup>1</sup> Most of the species' known range is on federal land (84 percent), and as such is generally subject to the provisions of the NFP. PLST habitat on private land in California also receives some protection from ground-disturbing activities under state law. Twenty-seven percent of the species' known range occurs in Late Successional Reserves, and 38 percent is in the Applegate AMA. Perhaps more importantly, 67 percent of the known sites are in the AMA<sup>2</sup>. It is the very importance of the AMA to this species that makes this project and the research associated with it necessary.

Throughout the AMA the PLST exists in a variety of stand types including dense stands with increased potential for stand-replacing fire. The salamander habitat in the proposed project site is in an area classified as moderate to high wildfire hazard. A 1987 wildfire resulted in significant reductions in adjacent PLST habitat. Recent projects in the AMA have been designed to increase the ecological health of forests while reducing wildfire hazard. By adhering to protection measures in the NFP standards and guidelines, we could potentially harm this species by not addressing the fire hazard in these areas. It is entirely reasonable to investigate whether a conservative approach to the logging associated with fire hazard reduction may mitigate adverse impacts to the species. As described in the SEA, this project is designed to reduce fire hazard while maintaining conditions favorable to the continued existence of the PLST on site.

Comments on the SEA expressed concerns that the proposed action would contribute to a trend toward listing the species under the Endangered Species Act of 1973 (ESA). The SEA predicts that the proposed project would reduce the number of salamanders on-site (SEA, 17) but determined that the PDFs (SEA, 7-8) would mitigate the impacts of fuel hazard reduction on salamanders and increase the likelihood of retaining PLST on site after the construction of Shaded Fuelbreak No. 4 (SEA, 18). In the event that the proposed project completely extirpates PLST from the proposed project site, the effects on the PLST population range-wide would be minimal and would not contribute to a trend toward listing under the ESA (SEA, 18).

Commenters disagreed that the loss of this site would have minimal impacts on the species as a whole. They stated that "this population must be protected in order to maintain genetic interchange among the members of this species." They also noted that "The Tallowbox Mountain site could be the hottest and driest portion of the PLST known range." As such, "that particular population could therefore make an important contribution to the distribution and genetic variation for this narrow-ranging, endemic species."

It is important to clarify that the PLST at the project site do not represent a population, but a known site (one of 163 sites). The fuelbreak itself is approximately 100 acres (40.5 ha) of the estimated 339,000 acres (137,000 ha) in the known range of the species (0.03%). Looking only at

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<sup>1</sup>Clayton et. al. 1999. Survey Protocol for the Siskiyou Mountains Salamander. Version 3.0.

<sup>2</sup>IBID

the site itself is too narrow a view to address population viability. Maintenance of population viability does not require protection of all individuals or individual sites. Stand-replacing fire across thousands of acres in the species' known range would be far more likely to contribute to a trend toward listing the species under the ESA than would the implementation of this project.

This site is approximately five miles from the edge of the known range, but is not the hottest or driest portion of the range. Several known sites are located to the north, east and west of the fuelbreak. The Tallowbox Mountain site is located in a drier type of vegetation than those found on the upper middle fork of the Applegate and in Elliot Creek, but large areas of the range in northern California are substantially drier and hotter. Also, in comparison to sites in northern California, sites in Oregon have a greater detection rate (occupancy rate; 30% in Oregon vs. 20% in California). Another important consideration is that the species is never on the surface when conditions are hot and dry.

Research shows that genetic variability among the PLST populations north of the Siskiyou Crest is very low.<sup>3</sup> Suitable habitat for this species is patchily distributed throughout the range and it is estimated that as little as three percent of the species range may be suitable habitat. Additionally, even within suitable habitat the species is not equally likely to be present. A recent study in Oregon found them at 30 percent of sites with suitable habitat.<sup>4</sup> Because of both the patchy nature of the habitat distribution within the known range and the low level of occupancy that can be confirmed, genetic interchange is very infrequent. Researchers estimate that genetic interchange need only be one animal every 1000 years in order to maintain genetic variability. Due to the lack of genetic variability, the potential loss of this one site is unlikely to be of any genetic import. The genetic information in the PLST at the project site does not differ from the whole northern half of the species range. Additionally, the ridge habitat is not separate from the larger protected habitat area at this site, so the genetic information from this site would not be entirely lost if PLST are extirpated from the ridge portion.

Comments also disputed that a stand replacing wildfire would destroy PLST habitat, stating that "PLST evolved in a landscape dominated by fire." It is absolutely true that historically fire was a key natural disturbance in shaping the landscape within the Applegate AMA. Many species, including the PLST evolved with the type of cool underburns that historically characterized this region's fire regime. However, almost 100 years of organized fire suppression has prevented the periodic removal of dead and down fuel and understory vegetation by wildfire. The area of the proposed shaded fuelbreak has a dense overstory with ladder fuels in portions of the stand creating favorable conditions for the occurrence of crown fires which could result in large stand replacement fires. The PLST did not evolve to survive the effects that this type of fire has on

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<sup>3</sup>Communication with Lisa Ollivier, March 6, 2001.

<sup>4</sup>Clayton, D., et al. 2001. Ollivier, Lisa. Habitat Correlates and Range of the Siskiyou Mountains Salamander, *Plethodon stormi* (Caudata: Plethodontidae). Final Report to the California Department of Fish and Game.

habitat.

The purpose and need statement in the SEA noted that the *Middle Applegate Watershed Analysis* recommended, as a high priority, the construction of shaded fuelbreaks along main ridge lines in order to reduce the risk of loss from the occurrence of stand-replacing wildfire. As comments point out, the same watershed analysis also recommended as high priority the protection of PLST through buffers as outlined in the NFP ROD. The comments accuse BLM of placing fuelbreak construction over the protection of salamanders. This issue gets at the very heart of this project. The BLM is not favoring shaded fuel breaks over species conservation. In situations such as this one, salamanders exist in an environment with a high fire hazard. One of the primary objectives of this project is to learn how to incorporate mitigating measures for the PLST into the design of shaded fuelbreaks and other stand treatments in a way that minimizes the impact on this species. Reducing fire hazard on a landscape basis could be beneficial for the species or local populations in the long-term by reducing the risk of stand-replacing wildfire.

#### *Concerns about the Purpose and Need Statement and Array of Alternatives*

Several comments expressed concern about a limited array of alternatives, and a narrow purpose and need statement. They suggested that the BLM should have separately analyzed alternative fuels reduction methods, such as cutting chipping, and scattering fuels. The SEA is not a stand alone document; it supplements the Middle Thompson EA (as amended) and was written to specifically address the impacts of Shaded Fuelbreak No. 4 to PLST in the Middle Thompson Creek project. The “Stipulations for Dismissal” (CIVIL No. 99-3042-CO) between HEADWATERS (Plaintiff) and BUREAU OF LAND MANAGEMENT (defendant) signed August 1999 specifically required BLM to “prepare for public comment a full supplemental environmental assessment of the proposal to carry out the logging and research project on Shaded Fuelbreak Unit No. 4 of the Middle Thompson timber sale.”

The SEA outlined two very specific project objectives in the purpose and need statement (SEA, 4). These objectives describe the need to complete a planned system of shaded fuelbreaks in the Thompson Creek Drainage while learning how to incorporate mitigating measures into the design of shaded fuelbreaks and other stand treatments in a way that minimizes impact on PLST. The original analysis for the Middle Thompson EA (as amended) and the Medford District Resource Management Plan reviewed a broader range of alternatives. The implementation of the Middle Thompson Creek project has already been completed with the exception of Shaded Fuelbreak No. 4.

Project specialists considered alternatives that differed from the objectives of a fuelbreak and decided that they did not meet the purpose and need. The alternatives suggested in the comments focus on reducing fuel, but do not take into consideration the full span of objectives accomplished by the construction of a shaded fuel break. These objectives include: 1) providing broad zones where firefighters can conduct safer and more efficient suppression operations, 2) reducing the severity of wildfires within treated areas, 3) disrupting the continuity of hazardous fuels across a landscape and 4) providing anchor points to facilitate subsequent prescribed burning.



The BLM has used the cutting, chipping and scattering method recommended in the comments on material less than eight inches in diameter in many projects where the terrain and site conditions are conducive. In this particular project, the above-described method would not achieve several of the fuelbreak objectives. Cutting and scattering material does not remove fuel from the site. Leaving the material on site would result conditions resembling a slash fuel model and impacts fire behavior parameters such as flame length, fire intensity and duration that would not meet the project's stated purpose and need (SEA, 2). The project site terrain also makes it infeasible to employ such a method. Even if it was feasible to use this method, the ground disturbance caused by a mechanical chipper would exceed the current project's proposed levels of ground disturbance.

*Concerns Relating Directly to Significance as Defined by 40 CFR § 1508.27*

Many of the comments received questioned the significance of the impact to the environment as defined by the Council of Environmental Quality (40 CFR § 1508.27). The SEA supplements the Middle Thompson Environmental Assessment (as amended) (EA OR-110-96-09) and is tiered to the Medford District Resource Management Plan and Final EIS. (RMP)/FEIS. This project deviates slightly from the scope of the Medford District RMP in that the Medford RMP assumed the survey and manage protocol for PLST would be implemented. However, the SEA analyzed the potential impacts of not implementing the survey and manage protocol for the PLST and determined that there would not be any significant impacts beyond those already described in the Medford District RMP FEIS.

The SEA is also tiered to and in conformance with the NFP ROD. Adaptive management is a key component of the NFP. As such, the NFP plan allows for research exemptions approved by the Regional Ecosystem Office (REO). A February 5, 2002 memo from REO to the BLM State Director on the PLST Study plan stated that "The REO finds that the project does not pose any significant or otherwise unacceptable risks to AMA-related objectives of the NFP..."

The possible effects on the human environment are neither highly uncertain nor do they involve unique or unknown risks as listed in 40 CFR § 1508.27(b)(5). The SEA clearly analyzed the risks of this project to the PLST on site. As this is a research project, we will not know the site-specific impacts until completion of the project. However, the specialists working on this project, including the salamander experts, are confident that they know the extent of the project's potential negative impact to the project site involved. Negative impacts, if any, will be extremely local in nature, taking place on approximately 100 acres out of the salamander's known range of 339,000 acres.

Although comments indicate an opposition by some groups to this project, the actual effects on the quality of the human environment are not likely to be highly controversial as listed in 40 CFR § 1508.27(b)(4). The SEA analysis included a worst-case scenario in which all of the PLST on-site are extirpated and determined that in the context of the greater PLST population, the impacts from this site-specific event would be minimal (SEA, 18). None of the comments received offered any new scientific or technical findings that were not taken into consideration by our

specialists during the analysis process. Much of the evidence offered to suggest that the effects of the project will be substantially different from the analysis of the project are based on outdated or inaccurate information. While the BLM appreciates and has taken into consideration these comments, opposition by itself does not dictate an EIS.

The BLM and salamander researchers are hopeful that the research knowledge gained from this project will be used in future analyses. However, neither this project or the outcome are inherently precedent setting. The BLM has been granted a one-time research exemption from REO for this project. Through the study plan, researchers hope to learn more about effective ways to mitigate impacts to salamander habitat. Although the research could demonstrate that there are ways to mitigate impacts to salamanders while reducing fire hazard, it could also demonstrate the opposite. Nothing in either the SEA or the study plan set a “precedent for future actions with significant effects (40CFR § 1508.27(a)(6).” Any future decisions would be subject to a new analysis.

The cumulative effects of this project have been appropriately analyzed in a local and regional context. Shaded Fuelbreak No. 4 is directly related to other fuel hazard reduction and density management projects in the watershed. The SEA discusses the need for additional fuels reduction in association with a future project in Star Gulch. It is not possible to analyze this project in greater detail as there are no site specific plans. A future project in Star Gulch would be covered under the Medford District EIS, and any cumulative effects would be considered in a site specific EA. Although these are complementary projects in the bigger picture, the proposed fuelbreak is more directly connected with the fuel reduction activities that have already taken place in the Middle Thompson Creek Drainage.

As this EA supplements the original Middle Thompson EA (as amended), the effects of this project were considered in combination with all of the Middle Thompson projects. At a larger scale, the Northwest Forest Plan FEIS and Medford District Management Plan FEIS both considered the cumulative effects of harvest on the PLST by assuming that habitat on private land would be continually reduced. Outside of this project, federal logging operations avoid salamander habitat through implementation of the NFP standards and guidelines. The SEA did not identify any additional cumulatively significant impacts as listed in 40CFR § 1508.27(a)(6).

The conifer stands in the proposed fuelbreak are classified as suitable habitat for the northern spotted owl, a species listed under the Endangered Species Act of 1973. The Medford District BLM consulted with the United States Fish and Wildlife Service (USFWS) over potential adverse affects to the northern spotted owl, The USFWS concluded that the projects covered in the consultation were not likely to jeopardize the survival of the spotted owl as a species. The stands affected by the project may still function as dispersal habitat for this species after treatment, depending on the post-treatment canopy closure. The impacts to the northern spotted owl will not be significant as listed in 40CFR § 1508.27(a)(9).

The following critical elements of the human environment are not discussed in detail as no

substantive site specific environmental changes would result from implementing this project as described in the SEA: air quality, Areas of Critical Environmental Concern, cultural resources, environmental justice, farmlands, floodplains, Native American religious concerns, invasive, nonnative species, hazardous/solid wastes, water quality, wetlands/riparian zones, Wild and Scenic Rivers, and Wilderness.

#### Additional Concerns

A variety of other questions about this project were raised during the comment period. Although these concerns were more directly related to the logistics of the project than the issue of significance, the questions raised merit additional discussion.

#### *Canopy Closure*

Shaded Fuelbreak No. 4 will leave a minimum of 40 percent canopy closure across the landscape and in many places canopy closure is expected to be higher. Commenters, however, doubted whether 40 percent would be sufficient “for the populations on the east edge of the species’ range where it’s hot and dry.” They doubted the BLM’s ability to accurately predict post-harvest canopy closure and asked for assurances that canopy closure would not fall below 40 percent. They also questioned whether or not the retention of 40 percent canopy closure would adequately meet fuels treatment needs.

A recent habitat association study<sup>5</sup> for PLST found that for areas north of the Siskiyou Crest more than one-third of the sites with salamanders had a canopy closure of less than 50 percent, indicating a substantial range of tolerance by this species. These sites probably had other mitigating factors leading to continued occupancy. These mitigating factors might include depth and quality of subsurface refugia, aspect of site and a lack of ground disturbance. As noted before, the proposed project site is not in the hottest and driest part of the species range. Furthermore, at the proposed project site a majority of the occupied habitat within the fuelbreak is located on the north side of the ridge; this factor may assist in mitigating the opening of the canopy. Ground disturbance in suitable habitat will be minimized through directional felling and helicopter removal of logs.

This project will maintain a 40 percent canopy closure. In a monitoring analysis for a previous project (Buncom), tree canopy was measured by diameter class. In the proposed project, diameter measurements have been recorded for each of the trees that will remain after harvest. Analysis of data from the previous monitoring effort and the leave-trees from Shaded Fuelbreak No. 4 shows that canopy closure will not fall below 40 percent after the completion of Shaded Fuelbreak No. 4. The only places where canopy closure will be below 40 percent are places where canopy closure is not currently above 40 percent.

As discussed in the SEA (16), the design criteria for Shaded Fuelbreak No. 4 is different from the other fuelbreaks in the Middle Thompson Creek project. However, there are no absolute

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<sup>5</sup>Clayton, D., et al. 2001.

standards for the width of a fuelbreak or fuel treatments within a fuelbreak. The SEA determined that the project specifications would still meet the objectives of a shaded fuelbreak

#### *Concerns about Shaded Fuelbreak No. 4*

Some of the comments noted that logging “changes the natural fire prevention characteristics of the closed canopy and increases the chance of wildland fire.” Shaded fuel break No. 4 was designed taking the above issue into consideration so that implementation of this project would not increase the risk of a wildland fire. It is true that by opening a forest canopy, fine fuels can dry out earlier in the year. However, due to the wet weather in southwest Oregon during the time of year when fine fuels would dry out faster, this change would not contribute to the likelihood of a stand-replacing wildfire. During the latter part of fire season, fuel moisture varies little between timber stands on different aspects and with different canopy conditions.

As stated in the SEA (2), the fuelbreak is not considered a stand-alone strategy in fuels reduction and as such was designed in the context of the surrounding landscape. Comments questioned the efficacy of Shaded Fuelbreak No. 4 during the “interim period before essential fuels reduction work takes place outside the action area.” Essential fuels work has already taken place outside the action area. Shaded Fuelbreak No. 4 completes a planned system of shaded fuelbreaks in the Thompson Creek drainage. This system, along with the thousands of acres of density management that have taken place in association with these fuelbreaks, greatly reduces the risk of stand-replacing wildfire in this drainage. None of the fuelbreaks in the Thompson Creek drainage have had fuels treated beyond 200 feet along the flanks that are outside of this drainage. Density management, however, has already taken place on the Thompson Creek flank of Shaded Fuelbreak No. 4 outside of PLST habitat. Although a fuels reduction project in Star Gulch would increase the efficacy of the proposed fuelbreak by treating a broader area, the fuelbreak would play an important role in hazard reduction and potential fire suppression activities without additional work in Star Gulch.

Commenters also questioned the ability of the BLM to maintain Shaded Fuelbreak No. 4, stating that “shaded fuelbreaks must be maintained to be effective.” The Ashland Resource Area has an aggressive fuels management program and is committed to maintaining all fuel treatment projects, including shaded fuelbreaks. To date all established fuelbreaks in the Thompson Creek Drainage have been monitored and maintained as needed. Maintenance needs will continue to be met on fuelbreaks throughout the resource area.

Another comment suggested that the NEPA document must consider the proposed action together with fire suppression because it “cannot or will not proceed unless other actions are taken previously or simultaneously 40 CFR 1508.25(a)(1)(ii).” In the event of a wildfire, fire suppression will happen in some manner regardless of fuelbreak construction. The construction of a fuelbreak may help facilitate fire suppression, but they are not connected actions as described by NEPA regulations 40 CFR 1508.25(a)(1)(ii). Fire suppression is not a predictable activity, and is exempt from NEPA as an emergency action.

Several comments expressed concern that the shaded fuelbreak would reduce connectivity between watersheds. Connectivity was an issue considered by the Interdisciplinary Team, but not analyzed in detail (SEA, pg 6). Wildlife specialists determined that the project design features included in the project would also help mitigate the impacts to wildlife species that use this ridge for travel. Habitat connectivity is a species-relative concept. How well habitats are connected in a landscape depends on each species natural dispersal ability (eg. flying vs. crawling). Another measure of connectivity is the ability of the species in question to cross “inhospitable” gaps in suitable habitat. The mitigation measure in the project that calls for retention of canopy closure (retaining 40% closure) meets the generally accepted canopy closure level needed for dispersal habitat for spotted owls, and will probably meet the dispersal requirements of most mobile forest species. The fuel break may present a barrier of some degree to some species of less mobile life forms such as mollusks and salamanders. However, the species living in the Applegate Valley have adapted to and survived in a much more open forest situation than exists today. There is no reason to believe that Shaded Fuelbreak No. 4 will present a significant long term barrier to population connectivity and the flow of genetic material. The size and nature of the “gap” created by Shaded Fuelbreak No. 4 is not outside that natural range of variability of those barriers that the species almost certainly encountered in the pre-euroamerican settlement period.

#### *Red Tree Voles*

Several comments asked about protection for red tree voles in the project area. In the spring of 2000, salamander researchers identified potential red tree vole activity. Subsequent surveys identified three active red tree vole nests (and several inactive associated nests) were found in the proposed project area. The appropriate protection buffers, as per the current RTV Management Recommendations, were applied and result in the elimination of approximately 4.5 acres from the proposed project area. Portions of the protection zones around these RTV sites fell outside the shaded fuelbreak and into areas already protected for the salamander. The 4.5 acres does not represent all of the protected area for these RTV sites, only the portion within the project site. Language has been added to the SEA to reflect these changes (SEA, 19).

#### *Endangered Species Consultation with USFWS*

Another comment requested that the BLM reconult with the USFWS on this project. The BLM consults with the USFWS on projects that “may affect” or result in “take” of species listed under the Endangered Species Act as Threatened, Endangered, or Proposed for listing as Threatened or Endangered. Consultation with the USFWS regarding the Siskiyou mountains salamander is not required as it is not included in one of the above categories.

The BLM consulted with the USFWS on the Middle Thompson project in 1996. The entire Middle Thompson project, including Shaded Fuelbreak No. 4, was covered by that consultation. Nothing about Shaded Fuelbreak No. 4 has changed substantially with regard to ESA listed species in the time since the consultation process for the project was completed and there is no need or requirement to reinitiate consultation on Shaded Fuelbreak No. 4. The USFWS is well aware of the proposed research project associated with Shaded Fuelbreak No. 4. The USFWS has representatives assigned to the Regional Ecosystem Office (REO) which reviewed the study

proposal and granted the conditional research exception discussed elsewhere in this document.

### *Survey and Manage Requirements*

Reviewers also commented that the SEA requires a new decision and that the survey and manage provisions of the NFP apply. The BLM does not consider the SEA to be a new decision. The decision to proceed with the Middle Thompson Creek Project and Shaded Fuelbreak No. 4 was made in the 1997 Amended Middle Thompson Creek EA. The SEA was required by the “STIPULATION FOR DISMISSAL” (CIVIL No. 99-3042-CO) between HEADWATERS (Plaintiff) and BUREAU OF LAND MANAGEMENT (defendant) signed August 1999. The purpose of the SEA is to determine whether or not BLM will proceed with the original decision. For purposes of assessing compliance with the NFP as interpreted by Judge Dwyer, this project was implemented prior to 1999 and pre-disturbance surveys for survey and manage strategy two species are not required.

### *Technical Advisory Panel*

Commenters expressed concern that the BLM violated the Northwest Forest Plan by not receiving approval from the Adaptive Management Area (AMA) technical advisory panel. Technical Advisory Panels are meant to provide a manager with advice and information about a project. The Applegate AMA does not currently have a technical advisory panel, and therefore the project was not reviewed by one. The project, however, was presented to the Applegate Partnership and the research plan has been peer reviewed. The Regional Ecosystem Office and the United States Fish and Wildlife Service have also served in an advisory capacity.

### *Stipulated Agreement with Headwaters*

Headwaters has voiced concern that the BLM violated the settlement agreement signed by Headwaters and the BLM in August 1999 by publishing the SEA prior to a research exemption from REO. However, in a letter from the REO dated March 22, 2000 to BLM OR/WA State Director Elaine Zielinski, the REO stated that “Contingent upon a finding of no significant risk in these NEPA analyses, the REO finds no reason to require cancellation of the project and no reason to deny the request of a research exemption for study activities that are otherwise inconsistent with the PLST Protection Buffer Standards and Guidelines.” The REO required that BLM submit the final NEPA analysis prior to a decision on the research exemption. In publishing the Supplemental EA for public review, BLM followed REO’s direction to complete the NEPA analysis so that REO could make a final decision. I believe that the BLM has upheld all agreements reached in the stipulated agreement between Headwaters and BLM.

*Concerns about the “Study Plan to Investigate the Effects of A Shaded Fuelbreak on Siskiyou Mountains Salamander, Plethodon stormi, Abundance and Site Microclimate”*

Although the SEA did not analyze the Study Plan (REO reviews the final study plan), it was an appendix to the SEA and several comments were directed toward the study plan and the proposed research. These comments are discussed below.

Commenters stated that the risks to the objectives of the standards and guidelines (of the NFP) are great, and are not worth the small amount of scientific knowledge to be gained through the proposed research. They felt that “the proposed research project will contribute little to scientific knowledge needed to implement the Northwest Forest Plan” as there is already a “plethora of published and unpublished research on the Del Norte salamander, a very similar species.” The proposed project has been reviewed by REO. The purpose for the REO review was to determine whether or not the project poses any unacceptable risks to the objectives of the NFP standards and guidelines.

In a February 5, 2002 memo to the BLM Oregon State Director, REO not only granted the BLM a research exemption, but made clear that this project is consistent with the “AMA-related objectives of the NFP.” REO also found that the project posed no significant or otherwise unacceptable risks to the principles of the NFP. In particular, REO noted that “the project reflects an attempt to improve the health of the resources in the relevant area over the longer term by reducing the risk of catastrophic fire while being mindful of potential short-term adverse effects, particularly on the SMS.” In addition, the RMG determined that the “project reflects a scientifically sound approach.” REO also noted that a substantial level of interagency input resulted in “a better designed project that will yield results of greater utility and value.”

Although the Del Norte salamander (PLEL) is the sister species of the PLST, a habitat associations study recently completed on the PLST<sup>6</sup> indicates many similarities in habitat, as well as some differences. While there may be a plethora of research on the Del Norte, all of the studies to date have been retrospective, meaning they assume that if the suitable habitat exists on the site, PLEL could have been there historically. This may be true on a majority of sites, but local extinction events have and will continue to occur regardless of human activities. This study provides new insight in that it is prospective in nature; sampling will occur before the disturbance event to determine if and where PLST are present on the fuelbreak. Also, previous studies did not control for time since disturbance or level of disturbance. This study has a pre-described level of disturbance, the effects of which will be monitored over time. The adjacent control will monitor for year-to-year natural variation in surface activity. Information from this study should be applicable to the northern portion of the species range.

Commenters also expressed concern that the study plan did not “represent credible science because there is not a large enough sample size of pretreatment salamander abundance data.” The sample size estimated for this study is 30 sites inside the fuelbreak and 30 sites in the

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<sup>6</sup>Clayton, D., et al. 2001.

control. This estimate took into account the low detectability rates for this species and the need to be able to detect a significant decline over time. Every site will be searched in each year of sampling. While it would be preferable to have more than one year of pretreatment data, in that more is always better, researchers determined that 30 sites are sufficient coupled with all years of data from the adjacent control in order to determine if a significant decline has occurred on the site as a result of the fuelbreak. Researchers will use the data from the control to pattern the abundance rates on the fuelbreak had no logging occurred and to remove variability associated with year to year stochastic variation. The control will be sampled at the same time as the fuelbreak in each year to ensure that they are compatible.

The final concern about the study plan was that “the outcome of this project will not be applicable to other PLST sites because the location is very dry, relatively high elevation, and sub-optimal habitat.” The location of the proposed project does not match the above description. Since the original standards and guidelines for the species were written, the elevation range has increased to 6000' and the geographical range has extended 18 km to the south, 11 km east, and 16 km west, all significant increases given the small spatial extent of its range<sup>7</sup>. The hottest, driest sites known for the species are in northern California. The proposed study site is fairly typical of the vegetation type in this portion of the PLST range and responses and abundance should also be fairly typical. Abundances previously reported from the area of the fuelbreak indicate that this site is typical in both range and average abundance. Research results from this site should be applicable to a vast amount of PLST habitat.

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<sup>7</sup>Clayton et. al. 1999.

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## MEMORANDUM

DATE: February 5, 2002

TO: Elaine Y. Zielinski, State Director, Bureau of Land Management OR/WA

FROM: Stephen J. Odell, Executive Director

SUBJECT: Review of Middle Thompson Siskiyou Mountains Salamander Research Project/Study Plan

In response to an earlier Regional Ecosystem Office (REO) memorandum concerning review of the above-referenced project as potentially qualifying for a research exception from certain Northwest Forest Plan (NFP) Standards & Guidelines (S&Gs), the Bureau of Land Management (BLM) has submitted a revised study plan and draft versions of a Finding of No Significant Impact (FONSI) and Decision Record for the project, as well as a Supplemental Environmental Assessment (SEA) and point-by-point response to the issues raised by the Research and Monitoring Group (RMG) upon its evaluation of the project as originally submitted for review. Because this review is being performed to assess the applicability of a research exception, REO has referred all materials it has received in support of the request in the first instance to the RMG, an affiliated interagency group of scientists with which the REO closely works that was formed to provide, among other things, independent scientific review, evaluation, and analysis in support of NFP implementation.

The REO, in close coordination with the RMG, has completed its review of the referenced research project and revised study plan and has determined that the project does not pose a significant or otherwise unacceptable risk to any objectives of the NFP. In light of its findings in this regard, the REO does not recommend to the Regional Interagency Executive Committee that the project needs to be canceled or further modified in order to qualify for a research exception under the NFP.

### REO Review of Research Exceptions under the Northwest Forest Plan

Research projects may be proposed in all Land Allocations established by the NFP so long as they are assessed for a determination of consistency with the objectives of relevant NFP Standards & Guidelines (S&Gs). S&Gs at C-4. Certain research projects may be undertaken even if they are inconsistent with one or more NFP S&G objectives under prescribed circumstances. S&Gs at C-4.

The REO may be asked to review specific research projects within the context of the foregoing guidance. On the basis of its review, the REO may recommend to the Regional Interagency Executive Committee (RIEC) modification, up to and including cancellation, of any such projects that pose an unacceptable risk to the objectives of relevant NFP S&Gs. S&Gs at C-4. The REO notes that this is the first newly proposed research project it has been asked to formally review since adoption of the NFP and, in that vein, the process used for this review should not be viewed as establishing a hard-and-fast precedent or signifying the necessary content or framework for future such reviews, as REO will continue to look for ways to adapt and improve the timeliness and methods with which it carries out its responsibilities in this regard based on ongoing experience.

### Procedural Background

In a letter dated January 31, 2000, the BLM submitted the original version of the project's study plan to REO for review pursuant to a stipulation in *Headwaters v. BLM*, Civil No. 99-3042-CO (D. Or.), pursuant to which BLM agreed not to proceed with project implementation "unless the

decrease as a result of the construction of Shaded Fuelbreak No. 4, the analysis indicates that, all other things being equal, it is reasonable to conclude that a decrease of some measure will result. The recent analysis of environmental effects in the S&M SEIS expressly states that "[c]atastrophic disturbances and stochastic events could have a disproportionately more severe effect on [the SMS] due to its extremely small known range." S&M FSEIS at 357. Likewise, the FEMAT Report notes that small populations of amphibians, including SMS, "are at risk of local extirpation through either land management activity or large-scale habitat modification due to natural events." FEMAT Report at IV-146. It is instructive to note in this regard that agency efforts to more effectively integrate and simultaneously serve the dual management goals of reducing the risk of future, large-scale, high-intensity fire and conserving habitat for S&M species was recently recognized expressly as a particularly important need in future implementation of the NFP. S&M ROD at 11-12.

#### Objectives re: Applegate AMA and Adaptive Management Areas generally

The entirety of the project under consideration for a research exception lies within the Applegate AMA. Consequently, the NFP objectives for AMAs in general (specifically as they relate to research projects) and the Applegate AMA in particular, also are relevant to this review.

The NFP broadly describes AMAs as "landscape units designated to encourage the development and testing of technical and social approaches to achieving desired ecological, economic, and other social objectives." S&Gs at D-1. In general, the objectives of AMAs are "to learn how to manage on an ecosystem basis in terms of both technical and social challenges, and in a manner consistent with applicable laws. It is hoped that localized, idiosyncratic approaches that may achieve the conservation objectives of [NFP] standards and guidelines can be pursued. These approaches rely on the experience and ingenuity of resource managers and communities rather than traditionally derived and tightly prescribed approaches that are generally applied in management of forests." S&Gs at D-1. The S&Gs expressly provide that "scientific and technical innovation and experimentation" are technical objectives of AMAs, while the primary social objective of AMAs is "the provision of flexible experimentation with policies and management." S&Gs at D-3 & D-4.

There are also several references in the management direction for AMAs that shed light on properly construing AMA objectives for purposes of this review. With respect to research, the S&Gs explicitly authorize carefully designed research projects to be conducted within AMAs. S&Gs at D-7. The ROD similarly states that research in AMAs "will provide information needed to improve implementation." ROD at 63. In addition, the S&Gs confirm that fuels management in AMAs, as with respect to other kinds of management actions in AMAs, is "intended to be innovative and experimental," while going on to state that wildfire suppression actions "should use accepted strategies and tactics, and conform with specific agency policy." S&Gs at D-8. Finally, the emphasis of the Applegate AMA is described as "[d]evelopment and testing of forest management practices . . . that provide for a broad range of forest values, including late-successional forest and high quality riparian habitat." S&Gs at D-12. These provide the backdrop for the next portion of this review evaluating the potential risks posed by the project to NFP objectives related to AMAs.

The REO finds that the project does not pose any significant or otherwise unacceptable risks to AMA-related objectives of the NFP, but rather is largely consistent with such objectives for two primary reasons. First, the project has as one of its primary purposes to systematically evaluate the effects of specifically tailored fuel break treatments on the SMS and to make the knowledge gained from that evaluation available for use in other contexts. The SEA states that one of the project's key objectives is to "[l]earn how to incorporate mitigating measures for the SMS in the design of shaded fuelbreaks and other stand treatments in a way that minimizes the impact on SMS populations, . . . [t]he resulting knowledge will be used to design management activities that protect SMS habitat in the long term." SEA at 4. Likewise, the project is designed to "study

exception is sought are designed to benefit that species. At the time the NFP was adopted, the SMS had its own separate "Protection Buffer" S&G and also was identified as a species to be protected under S&M S&Gs. S&Gs at C-28 & C-59. In the recently adopted amendments to the S&M-related S&Gs of the NFP, direction for the SMS was merged into a revised S&M mitigation-measure framework that provides for management of a number of species according to their assignment into one of six categories, A-F. The SMS was assigned to Category C for uncommon species for which the agencies have determined carrying out pre-disturbance surveys is practical. S&M S&Gs at 10. The BLM has concluded that the original 1994 S&Gs remains applicable to the referenced project. Draft Decision Record at 11. For purposes of this review, the REO notes that it does not matter which S&Gs apply to the project at hand, for the objectives underlying both the original and recently amended S&Gs are, for all intents and purposes, the same. This was made clear in the description of the recently amended S&M S&Gs, where it is stated that "[o]bjectives for maintaining species persistence for these standards and guidelines are the same as those described in the Northwest Forest Plan ROD." S&M S&Gs at 4. In general, these objectives are "to help the [NFP] provide for the persistence of late-successional and old-growth forest related species." S&M S&Gs at 4. The objectives of the management direction that more particularly applies to Category C species such as the SMS are similarly expressed as "provid[ing] for reasonable assurance of species persistence." S&M S&Gs at 10. Likewise, in the original NFP Record of Decision, the objective for the S&Gs with respect to vertebrate species such as the SMS is also framed in terms of persistence – i.e., to "provide an amount and distribution of habitat adequate to support the continued persistence of vertebrate species in the planning area." NFP ROD at 45. Thus, this portion of the review focuses on whether the project poses a significant or otherwise unacceptable level of risk to the NFP objective of supporting a reasonable assurance of persistence for the SMS.

Based in large measure on review of the BLM's analysis of the potential risks of the project to persistence of the SMS, three reasons stand out in support of the REO's finding that the project does not pose a significant or otherwise unacceptable risk to objectives of the NFP related to the SMS in particular or S&M in general. First, after acknowledging that the project will most likely negatively affect salamanders in the proposed project area and in occupied habitat within several hundred feet, the BLM describes a series of project design features that have been incorporated into the project in order to reduce impacts to salamanders in the proposed fuel break. SEA at 16. The analysis in the SEA then concludes that these project design features will serve to increase the likelihood of retaining salamanders on the project site after construction of Shaded Fuelbreak No. 4.

Second, the SEA concludes that, even if the project design features are inadequate to avoid extirpation at the project site, impacts to the SMS overall are not expected to be significant. Specifically, the SEA states that, "[i]n the event that the proposed project completely extirpates [the SMS] from the proposed fuelbreak, the effects on the SMS population rangewide would be minimal." SEA at 17. In support of this conclusion, the SEA cites to the facts that the number of known sites for the SMS have tripled and that its known geographic range has doubled since the SMS S&Gs were originally adopted. SEA at 17-18. In addition, the BLM has found that the project site represents just one of more than 160 known species sites and only approximately 100 of the estimated 339,000 acres within the known range of the species. Draft Decision Record at 4.

Third, whatever level of risk the project presents for the SMS also needs to be viewed in the broader context of what may reasonably be expected to occur in terms of ameliorating such risk over the longer term. This amelioration takes two basic forms. To begin with, the project has the potential to ameliorate to at least some extent risks posed to the SMS in the project area because the results of the research study will be available to improve management of the SMS across a larger portion of the species' range. Moreover, even though the SEA acknowledges that it is difficult to specifically assess the degree to which the potential for high-fire hazard and risk (and consequent risk to salamanders and SMS habitat near the project site from stand-replacing wildfire) would

proposal is accepted by the REO as a research exception to the standards and guidelines which would otherwise be required under the Northwest Forest Plan." The project at issue is Shaded Fuelbreak Unit No. 4 of the Middle Thompson timber sale, to be carried out in accordance with the study plan that is designed to investigate the effects of a shaded fuel break on Siskiyou Mountains Salamander (SMS) abundance and to document changes in microclimate and vegetation structure.

The REO referred the study plan to the RMG, which issued a report outlining a series of recommendations and suggestions for modifications to the study plan that were passed on to the BLM for consideration and evaluation. Based on its review of the original study plan and with substantial reliance on the results of RMG's initial review, REO sent a memorandum to the BLM dated March 22, 2000, stating that it found no reason that would justify cancellation of the project or indicate a research exception pursuant to the NFP was not warranted, contingent upon a finding of no significant risk emerging from the National Environmental Policy Act (NEPA) analysis the BLM intended to conduct for the research project. The REO also requested that the final iteration of the study plan be submitted along with the supplemental NEPA analysis for a final review.

The BLM followed up by preparing a Supplemental Environmental Assessment (SEA) for the project and revising the study plan in light of RMG's recommendations and suggestions. Upon receiving the revised Study Plan, the REO referred it again in the first instance to the RMG for a final evaluation. RMG then requested, and was provided, an itemized description of the ways in which the revised study plan addressed the issues expressed by the RMG in its initial review report. RMG has completed its follow-up evaluation to the work it performed on the above-referenced research exception request and has provided final recommendations to the REO as requested.

The RMG has concluded that the revised study plan and supporting materials reflect adequate consideration of its suggestions and appropriately responded to the recommendations identified in the initial review. On that basis as well as its overall evaluation, RMG has finalized its earlier tentative determinations that the project reflects a scientifically sound approach, will be conducted by qualified principal investigators, has a reasonable probability of successfully producing scientific results relevant to the NFP and contributing to NFP implementation, is appropriately located in an Adaptive Management Area, and could not achieve its fundamental purposes while conforming to NFP Standards and Guidelines applicable to the SMS. In sum, the RMG has determined there is no reason for the REO to recommend cancellation or modification of the project or deny the request for a research exception for the project at issue.

### **Findings of REO Review**

The REO has reviewed the revised study plan, SEA, Draft FONSI and Decision Record, and other materials the BLM provided to facilitate this review, which include several public comment letters on the Draft SEA. As referenced above, in its March 2000 memorandum following review of the study plan as originally submitted, REO stated that, "[c]ontingent upon a finding of no significant risk [based on the NEPA analysis to be prepared by BLM for the project], the REO finds no reason to require cancellation of the project and no reason to deny the request of a research exception." The reference to risk in this context concerns risk to the objectives of the NFP, for such objectives are the principal criterion on which the REO is to focus in reviewing any potential research exception under the NFP. S&Gs at C-4. The NFP S&Gs of greatest importance to this review, and the objectives of which REO therefore primarily focused in its review, are those related to the SMS (and Survey & Manage generally) as well as Adaptive Management Areas (AMAs).

### Objectives of SMS/Survey and Manage S&Gs

The major focus of the REO's review is the SMS, given that the S&Gs for which the research

whether or not a balance can be achieved between reducing the threat of severe wildfire while still providing adequate protection” for the SMS. Draft Decision Record at 2. In this sense, the project fits well within the general AMA objectives to provide specifically delineated land allocations in which innovative approaches to managing resources as to more effectively and fully accomplish all of the objectives underlying the NFP are particularly to be encouraged and intentionally pursued.

Second, well-crafted research projects represent a subset of activities explicitly referenced and authorized in AMAs pursuant to which management adaptations may be tried and evaluated within such areas. The RMG – composed of senior research scientists, and on whose analysis the REO largely relies in this area – has assessed the project’s study plan and made a series of determinations that support the conclusion that the research project has been carefully designed to achieve its purposes. As noted above, these determinations include that the project reflects a scientifically sound approach, will be conducted by qualified principal investigators, has a reasonable probability of success, addresses scientific and other issues of relevance to the NFP, and will produce results with the potential to contribute to NFP implementation. In addition, the BLM took a number of steps to improve the design of the study plan directly in response to suggested recommendations the RMG made upon its assessment of the original iteration of the plan. These include having Pacific Southwest Region Research Station statisticians review the study plan, leading to a determination by one of these statisticians that the plan is statistically sound; describing the anticipated inferences and applicability of the results of the project to the NFP and SMS-related issues; and expanding the number of research plots by more than fourfold to help ensure meaningful and useful results.

#### Other Relevant Objectives

To the extent they may be relevant, this review also briefly addresses the proposed research exception in light of the five overarching principles underlying the NFP, which are as follows:

- Be mindful of and responsive to human and economic dimensions of issues
- Protect long-term health of forests, wildlife, and waterways
- Ensure management is scientifically sound, ecologically credible, and legally responsible
- Produce predictable and sustainable level of timber sales and non-timber resources that will not degrade or destroy the environment
- Reflect a coordinated, interagency approach to the issues to the extent practicable

The project under review poses no significant or otherwise unacceptable risks to any of the foregoing principles, three of which warrant specific mention briefly. With respect to the second principle, the project reflects an attempt to improve the health of the resources in the relevant area over the longer term by reducing the risk of catastrophic fire while being mindful of potential short-term adverse effects, particularly on the SMS. As for the third principle, it has already been noted that the RMG determined that the project reflects a scientifically sound approach. Finally, with respect to the fifth principle, the project, particularly as revised, reflects a considerable amount of interagency input, in large measure as a result of the REO/RMG reviews. Both REO and RMG are interagency entities that have been specifically created to facilitate and support a more coordinated and effective implementation of the NFP that takes advantage of the collective perspectives, expertise, and experience of the myriad agencies represented on them. The BLM made substantial changes in the design of the project and study plan as a result of the input of these interagency groups. The result is a better designed project that will yield results of greater utility and value.

Enclosure

cc: RIEC & IAC  
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