

APPENDIX 7

Public Comments to the Environmental Assessment and Bureau of Land Management Responses

EA Number OR-086-00-01

On July 28, 2000, a pre-decision letter, along with a copy of the EA (Environmental Assessment Number OR-086-00-01) and preliminary FONSI (Finding of No Significant Impact), were mailed to 11 individuals, groups, and agencies that requested to be placed on the mailing list (Project Record Document 48). Also, a legal notice requesting public comment to the EA and preliminary FONSI appeared in the *Headlight Herald* on August 2, 2000 and *News-Register* on August 3, 2000, newspapers respectively of Tillamook and McMinnville, Oregon (Project Record Documents 50, 51). The EA and preliminary FONSI were available for public review from August 2, 2000 to September 5, 2000.

As a result of the notices for public comment to the EA and preliminary FONSI, two letters were received (Project Record Documents 57-58). All public input was assigned a number and filed in the Project Record. The BLM (Bureau of Land Management) responses to those comments are disclosed below. All comments presented in this document are direct quotations from comments received.

Project Record Document 57 (United States Fish and Wildlife Service)

Comment a: The Service believes that this proposed project is quite valid overall and supports thinning activities within these types of forested stands in order to release the residual stand, increase overall mean diameter, and provide more heterogeneity within the stand.

BLM Response: Comment is supportive of preliminary decision. No response required.

Comment b: The Service supports the use of, and encourages the BLM to require that any purchaser of this proposed sale use harvester/forwarder type equipment to cut and yard this sale.

BLM Response: The preliminary decision provides for the use of this type of equipment, but does not make it a requirement. Although a harvester/forwarder may reduce impacts to the residual stand and reduce soil compaction, the impacts of the use of conventional ground-based yarding equipment are disclosed in the EA and do not exceed the impacts identified in the *Salem District Proposed Resource Management Plan/Final Environmental Impact Statement*. Moreover, by placing this additional restriction on the timber sale, it may result in a "no-bid" situation as many of our potential purchasers do not use this type of equipment. The BLM will encourage the purchaser to utilize a harvester/forwarder, but will not make it a requirement as it is unduly

restrictive.

Comment c: The Service also appreciates and encourages the BLM to continue to provide detailed prescriptions for maintaining and creating down woody material and snag habitat in all of its proposed projects.

BLM Response: Comment noted and shared with appropriate Tillamook Field Office staff.

Comment d: The Service appreciates the very detailed analysis of the existing conditions, including down woody debris and snags of each unit that is found in Appendix 2, the silvicultural prescription. The analysis and presentation of post harvest conditions including the visual representations and thirty year post-harvest projections were also very informative. It would however, also be helpful to include post-harvest canopy closure projections that are available with the ORGANON program to assist in the visualization of the immediate post-harvest stand conditions.

BLM Response: Comment noted and shared with appropriate Tillamook Field Office staff.

Comment e: Although the EA states that all fish-bearing streams will have a no-cut buffer of 100 feet, it is unclear whether or not there are any fish-bearing streams with 100 feet of any unit. If there will be no thinning within 400 feet of a fish-bearing stream, this should be clearly stated in the EA.

BLM Response: The only fish bearing stream within the project area is in the eastern portion of treatment unit 1. Accordingly, a Riparian Reserve width of 440 feet (site potential tree height of 220 feet) was established. Thinning may occur within 400 feet of portions of this fish-bearing stream. The actual distance is dependant upon sale layout, but will not be any closer than 100 feet in order to comply with the 100 foot no-cut buffer design feature.

Comment f: The Service recommends that BLM initiate consultation under section 7 of the Endangered Species Act on this project. We would also recommend that you include an analysis of potential effects, if any, to the spotted owl Pair Activity Center on the Grand Ronde Reservation Lands located west of and within 1.5 miles of the proposed project area.

BLM Response: The BLM initiated consultation as suggested. Section 7 consultation was completed on February 28, 2001 (Project Record Document 65).

Comment g: The Coast Creek EA states that the Tillamook Resource Area's 15 Percent Analysis Documentation shows that 40 percent of the BLM lands in the Willamina watershed are in forested stands of 80+ years. However, the Deer Creek, Panther Creek, Willamina Creek, and South Yamhill Watershed Analysis (1998), indicates that only 28.3 percent of BLM lands in the Willamina watershed are currently 80+ year forested stands (Table 9, pg 26). Notwithstanding the Service's concern at how the 15 percent LSF analysis is conducted, the Service is curious as to why the two data sets generated in the same year are different.

BLM Response: The referenced data set for the watershed analysis was actually generated in 1997, while the 15% Analysis occurred in 1999. According to our Geographic Information System Specialist, the 15% Analysis contains the most reliable information concerning the amount of 80+ year age class forested stands within the watershed.

Regardless of which data set is used, the fact remains that the stands identified for treatment clearly do not meet the definition of LSF and the watershed in question contains more than 15% LSF.

Project Record Document 58 (Doug Heiken, Oregon Natural Resources Council)

Comment a: We support diversifying the Doug fir monoculture out there, but it might be better to thin the younger stands first.

BLM Response: The comment is outside the scope of this project.

Comment b: The EA lacks a discussion of the efficacy of thinning 51-75 y/o trees to accelerate late seral structure. It may be better to leave these stands alone, because the scientific evidence is lacking to show that thinning in such stands will improve habitat.

BLM Response: The EA, Appendix 2 (Silvicultural Prescription), contains a detailed discussion of the predicted effects of the proposed thinning on stand development. This discussion is supported in part by predictions made by ORGANON (Hann et al. 1997), as well as research conducted by Bailey and Tappeiner (1998).

Given the detailed discussion contained in Appendix 2, the BLM is puzzled by your comment. It would be most helpful in the future if you would provide specific information as to the deficiencies or errors in the EA rather than generalized comments. By doing so, the BLM would be able to meaningfully respond to your concerns.

Comment c: Ground-based logging causes some serious soil and water quality impacts that must be balanced against the alleged benefits of thinning to increase late seral structure. The EA lacks this discussion also.

BLM Response: The EA, pp. 16-26, contains a detailed discussion of the predicted effects of the alternatives, including ground-based logging, on the soil and water resources.

Given the detailed discussion of the predicted impacts to the soil and water resources contained in the EA, the BLM is puzzled by your comment. It would be most helpful in the future if you would provide specific information as to the deficiencies or errors in the EA rather than generalized comments. By doing so, the BLM would be able to meaningfully respond to your concerns.

Comment d: It is very important to survey for and protect habitat for dusky red tree voles, a rare subspecies of Red tree vole. All other survey and manage surveys must be conducted according to current protocols and managed appropriately.

BLM Response: As stated in Chapter 3 of the EA, all required surveys have been conducted to protocol and managed accordingly.

Comment e: More roads should be decommissioned.

BLM Response: The comment is outside the scope of this project. We are actively managing our transportation system and roads are being decommissioned or placed in "storage" as funding allows.

Comment f: Water quality and salmon habitat must be protected.

BLM Response: The EA contains a discussion of the predicted impacts to water quality and salmon habitat. The preliminary decision meets the stated purpose and need for action while reducing impacts to these two resources. Pursuant to the Endangered Species Act, the National Marine Fisheries Service issued a Letter of Concurrence for this project on September 6, 2000.