UNITED STATES DEPARTMENT OF INTERIOR
BUREAU OF LAND MANAGEMENT
SALEM DISTRICT OFFICE

DECISION RATIONALE FOR THE KLICKITAT TIE LATE SUCCESSIONAL RESERVE ENHANCEMENT PROJECT

I have reviewed the proposal and alternatives for the accomplishment of the Klickitat Tie Late Successional Reserve (LSR) Enhancement project. The Bureau of Land Management (BLM), Marys Peak Resource Area, completed an environmental analysis (Environmental Assessment number OR-080-00-12) for a proposal to manage stand density on approximately 290 acres of 47 to 60 year old conifer stands in the Crooked Creek drainage of the North Fork Alsea River. Activities to enhance late-successional forest habitat include upland and Riparian Reserve thinning, coarse woody debris creation, road decommissioning, instream log placement and conifer release. Activities will occur in T. 13 S., R. 7 W., sections 9, 15 and 21, W. M. The affected environment, proposed action and potential environmental consequences of the proposed project and associated activities are described in the Klickitat Tie LSR Enhancement Environmental Assessment (EA). The EA and Finding of No Significant Impact (FONSI) were made available for public review from December 20, 2001 to January 22, 2002.

Programmatic documents covering this proposal are the:

Record of Decision and Standards and Guidelines for Amendment to the Survey & Manage, Protection Buffer, and other Mitigation Measures Standards and Guidelines (*S&M ROD*, January 2001)

Final Supplemental Environmental Impact Statement For Amendment to the Survey & Manage, Protection Buffer, and other Mitigation Measures Standards and Guidelines (*S&M FSEIS*, November 2000).

Salem District Record of Decision and Resource Management Plan (RMP, May 1995*)*

Record of Decision for Amendments to Forest Service and Bureau of Land Management Planning Documents Within the Range of the Northern Spotted Owl (ROD, April 1994*)*

Final Supplemental Environmental Impact Statement on Management of Habitat for Late-Successional Forest Related Species Within the Range of the Northern Spotted Owl (SEIS, February 1994)

Western Oregon Program-Management of Competing Vegetation Final Environmental Impact Statement (VMFEIS, February 1989*)* and the *Western Oregon Program-Management of Competing Vegetation Record of Decision (*August 1992*)*.

The EA is tiered with the aforementioned environmental documents. All of these documents may be reviewed at the Salem District BLM office, Marys Peak Resource Area, 1717 Fabry Rd. S., Salem Oregon. Office hours are Monday through Friday, 7:30 AM to 4:00 PM, closed on holidays.

Decision Record

Considering public comment, the content of the EA and supporting project record, the management recommendations contained in the *North Fork Alsea Watershed Analysis* (July 1996), the *Late Successional Reserve Assessment, Oregon Coast Province - Southern Portion (RO267, RO 268)* (*LSRA*, June 1997)and the management direction contained in the *RMP*, I have decided to implement the selected action as described in the EA proposed action and project design features with the following clarifications and modifications:

Clarifications

- As stated in the FONSI, the project was determined to be "likely to affect, not likely to adversely affect" coho salmon by the Level 1 Team, but subsequent to the Level 1 finding, coho salmon were delisted by order of Judge Michael Hogan as a result of a lawsuit brought against National Marine Fisheries Service (NMFS). After the FONSI was signed, the 9th Circuit Court of Appeals stayed the delisting pending the outcome of an Appeal. Therefore, a Letter of Concurrence was signed by NMFS and received in our office on April 9, 2002.

- Coho salmon are present in Yew Creek only to the east property line of section 9, which is not as far upstream as shown on the original Map 1. (See revised Map 1, which is attached)

- The EA states on page 13 that improvements to existing roads would occur prior to hauling and would include adding sediment traps to ditches above culverts. Approximately 30 sediment traps will be installed by the purchaser according to specifications and drawings supplied by the BLM. BLM will flag the spots where the sediment traps are required and they will be installed before the beginning of the haul season.

- Page 12 of the EA states that all newly constructed roads would be decommissioned after the sale. Decommissioning will include ripping the roads to a minimum 18 inch depth to accomplish total de-compaction, installing waterbars, pulling sidecast material back on fill slopes over 3 feet in depth, and seeding with native grasses.

Modifications

- Page 15 of the EA states that 16 to 20 logs would be placed by helicopter in Cabin Creek and that the logs would be as long as practicable and with diameters of stand average. The logs will be a minimum of 17 feet long and 16 inches in diameter and will come from the right-of-way in Unit 2. Some logs over 20 inches DBH reserved from yarding may be included.

- As suggested by Oregon Natural Resources Council in their comments, all roads to be decommissioned will be blocked. Blocking will be accomplished by placing root wads at road entrances.

- A cross drain pipe will be installed on road 13-7-10, above the unnamed 1st order tributary to Crooked Creek, which intersects the road in section 10. (See revised Map 1, attached)

- The EA indicates in Table 2 (page 13) and states on page 12 that Road T-8 (in Unit 9) would be surfaced. However, it will remain natural surface unless the purchaser chooses to rock it. The purchaser will also have the option to add rock to Willamette Industries road 3-7-22.1, leading to T-8, and the spur road leading to the helicopter landing in section 10.

- The EA states on page 9 that understory conifers less than 7.0 inches would be retained where possible. Understory conifers less than 6.0 inches will be retained where possible.

- The EA failed to designate a seasonal restriction for in-stream work in Cabin Creek. The seasonal restriction is June 15 to October 1.

Placing logs over 20 inches DBH in Cabin Creek: The *LSRA* requires leaving all trees 20 inches DBH and larger in LSR projects. Where they must be cut for safety or operability they must be left on site. We think that placing some of these logs in Cabin Creek for in-stream structure meets the intent of the *LSRA* and LSR Standards and Guides in the *RMP*. Ecologically, in-stream structures will benefit coho salmon and other aquatic and aquatic dependent species in Cabin Creek. We expect that most logs over 20 inches will be left in the right-of-way, especially those few logs over 24 inches, because of helicopter load (weight) restrictions.

Blocking Roads: Blocking the decommissioned roads will restrict access from four wheel drive and all terrain vehicles. This will allow the roadbed to fully recover more quickly.

Installing a Cross Drain Pipe on Road 13-7-10: Water drains down the ditch line on road 13-7-10 and directly into the unnamed intermittent tributary to Crooked Creek in section 10. A cross drain pipe will be installed to route the water and sediment away from the stream and into vegetation below the road where it will re-infiltrate into stable soils.

Allowing the Purchaser to Rock Road T-8: No winter hauling will be allowed from the landing on Road T-8. Therefore it will not be rocked unless the purchaser decides to. This will make decommissioning this road more cost effective and efficient and is not likely to cause any sedimentation since no hauling will take place in wet weather.

Retaining 6.0 inch DBH trees: All trees with a 16 foot log and a 5 inch top are considered merchantable, and many trees 7.0 inches DBH in the project area meet these criteria. Therefore we chose to retain 6.0 inch DBH trees.

Seasonal Restriction on In-stream Work in Cabin Creek: The permit obtained from the Division of State Lands for in-stream work in Cabin Creek restricts log placement to the period between June 15 and October 1.

Decision Rationale

My rationale for this decision follows:

1. The selected action addresses the identified purpose and need for action in that it will meet the need for forest habitat as described in the *RMP* on pages 1 and 2.

   Monitoring activities related to this sale will be done as described in Appendix J of the *RMP* (page 64) and Appendix G of the EA.

2. Alternatives 2, 3 and 4 were not selected for the following reasons:

   Alternative 2 - Environmental effects between Alternative 1 and 2 are essentially equal, therefore project goals would be achieved on fewer acres if Alternative 2 is selected.

   Alternative 3 - Alternative 3 would create a high risk of bark beetle infestation in healthy remaining green trees, and an increased risk of catastrophic fire within the project area and adjacent stands due to the large increase in fuels. The interdisciplinary team determined that the environmental risk of yarding and road building primarily on ridges and stable soils was less over the long term than the environmental risk of bark beetle infestation and catastrophic fire.

   Alternative 4 - The "no action" alternative was not selected because it would not meet *RMP* objectives for LSRs and Riparian Reserves; nor would it meet the project goals of increased stand structural complexity, increased species diversity, accelerated development of desired tree characteristics, and creation of terrestrial and aquatic woody debris.

A FONSI was issued with the original EA. The clarifications and modifications do not change the scope of the project analyzed in EA number OR-080-00-12, and do not affect the adequacy of the analysis described in the EA. My conclusions in the FONSI have not changed.

Public Involvement/Coordination/Consultation

Scoping

Efforts to involve the public in planning for the proposed action were as follows:

! The general area was allocated Late-Successional Reserves in the *RMP* and the *ROD*. These documents were widely circulated in the state of Oregon and elsewhere, and public review and comment were requested at each step of the planning process.

- A letter was mailed to interested parties on June 8, 2000 outlining the proposed action and requesting initial public input.

- A description of the proposal was included in the Salem Bureau of Land Management *Project Update* and mailed in July and September 2001 to more than 1200 individuals and organizations on the mailing list.

- A legal notice announcing availability of the EA for public review and comment was submitted to the *Corvallis Gazette-Times* and published on December 20, 2002. .

- On December 18, 2001, copies of the EA were mailed to individuals, interest groups and agencies who responded to our letter of June 8, 2000 with initial public input. Letters to other interested individuals, interest groups and agencies were sent informing them that the EA was available for review on the internet and at the Salem District office. The **public comment period** for the FONSI/EA was December 20, 2001 to January 22, 2002.

- The EA and FONSI have been available for review on the internet at Salem BLM's website, http://www.or.blm/salem (under Planning) since December 19, 2001.

Comments

Two letters were received from organizations, and one from an individual. Appendix A summarizes the substantive comments and includes our responses.

Consultation

The proposed project will not affect suitable habitat for the northern spotted owl or marbled murrelet. However, it was determined that this proposed action "may affect" both of these listed species. To address this concern, consultation was completed with the U.S. Fish and Wildlife Service, under the *Programmatic Biological Assessment of Fiscal Year 2001 Projects in the North Coast Province which would modify the habitats of Bald Eagles, Northern Spotted Owls, or Marbled Murrelets* (August 11, 1999). A final Biological Opinion was received on October 4, 2000, which

concluded that the entirety of the planned actions for the fiscal year were not likely to result in jeopardy to these listed species. This Biological Opinion will remain in effect for fiscal year 2002 timber sales. All applicable terms and conditions from the Biological Opinion have been incorporated into the project design features for this proposed action.

The project area is in the North Fork Alsea River drainage. This watershed has anadromous fish adjacent to the project area. The Biological Assessment (BA), which assessed potential impacts to listed fish in the Oregon Coast Evolutionary Significant Unit (ESU) was submitted to NMFS in August 2001. A Letter of Concurrence dated April 9, 2002 concluded that the proposed project is "not likely to adversely affect" Oregon Coast coho salmon, Oregon Coast steelhead trout and sea-run cutthroat.

Conclusion

As Field Manager of the Marys Peak Resource Area, I reviewed the record for this proposed project and have decided to implement Alternative 1, the proposed action as described in the EA, along with the modifications described in the Decision Record.

A Finding of No Significant Impact was signed on December 17, 2001. The conclusions reached in that document have not changed.

Protests

In accordance with forest management regulations at 43 CFR 5003.2, the decision for this timber sale will not become effective or be open to formal protest until the Notice of Sale is published "in a newspaper of general circulation in the area where the lands affected by the decision are located." Protests of the sale must be filed within 15 days of the first publication of the notice. For this project, the Notice of Sale will be first published in the ***Corvallis Gazette-Times*** on or before May 31, 2002. The planned sale date is June 26, 2002.

Protests must be addressed to the Field Manager, Bureau of Land Management, 1717 Fabry Road SE, Salem, Oregon, 97306. Upon receiving a timely protest, I will reconsider my decision in light of the statement of reasons for the protest and other pertinent information. I will prepare a written response to the protest(s) and send my response(s) to the protesting party or parties. My response(s) to the protest(s) may be appealed to the Interior Board of Land Appeals.

Cindy Enstrom

Cindy Enstrom
Marys Peak Field Manager

May 6, 2002

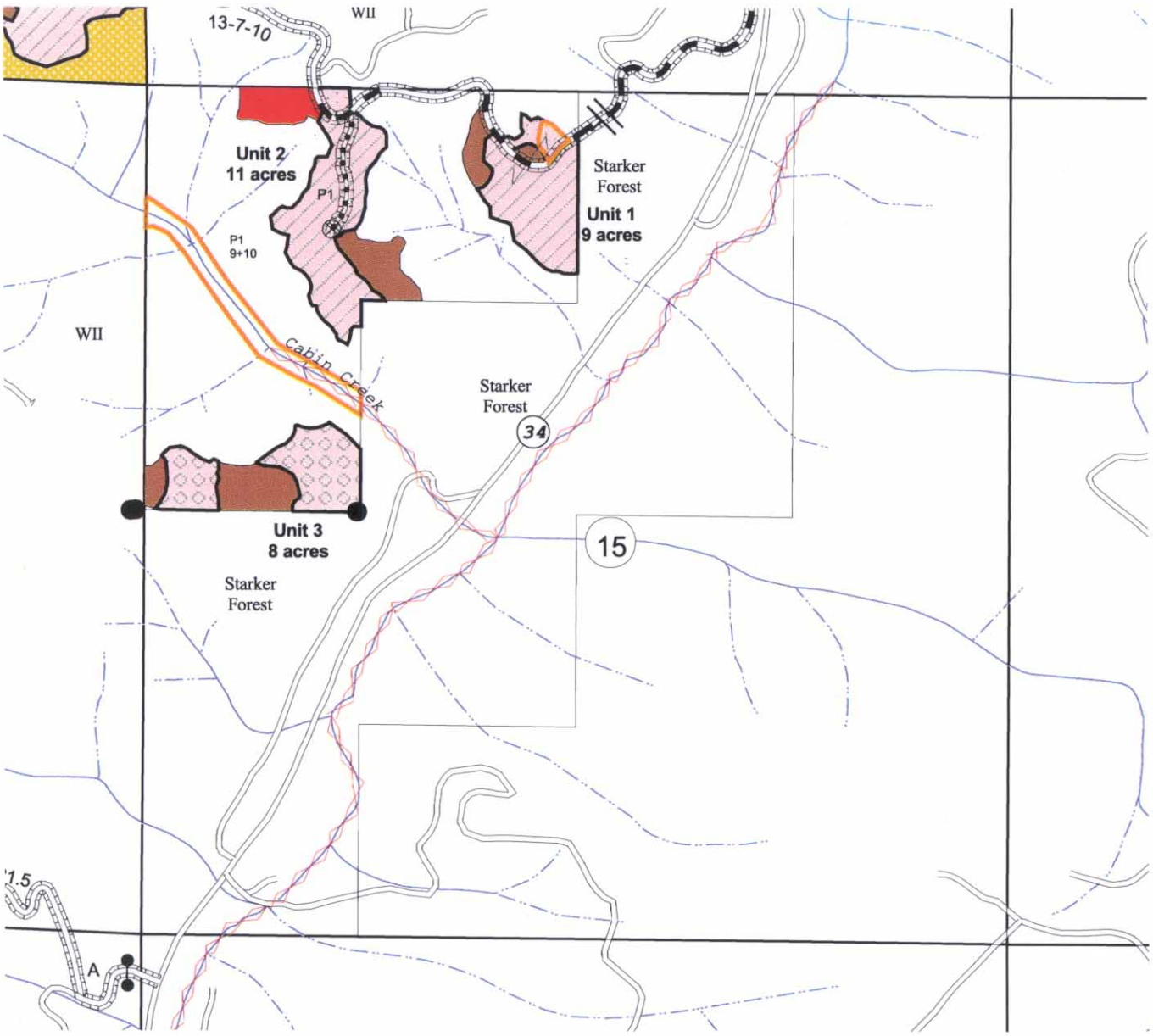
Date

April 17, 2002

United States Departement of the Interior
BUREAU OF LAND MANAGEMENT

KLICKITAT TIE EA MAP - Alternative 1

T. 13 S., R. 7 W., Section 15, W. M. - SALEM DISTRICT - OREGON



LEGEND

Scale: 1" = 1,000'

N

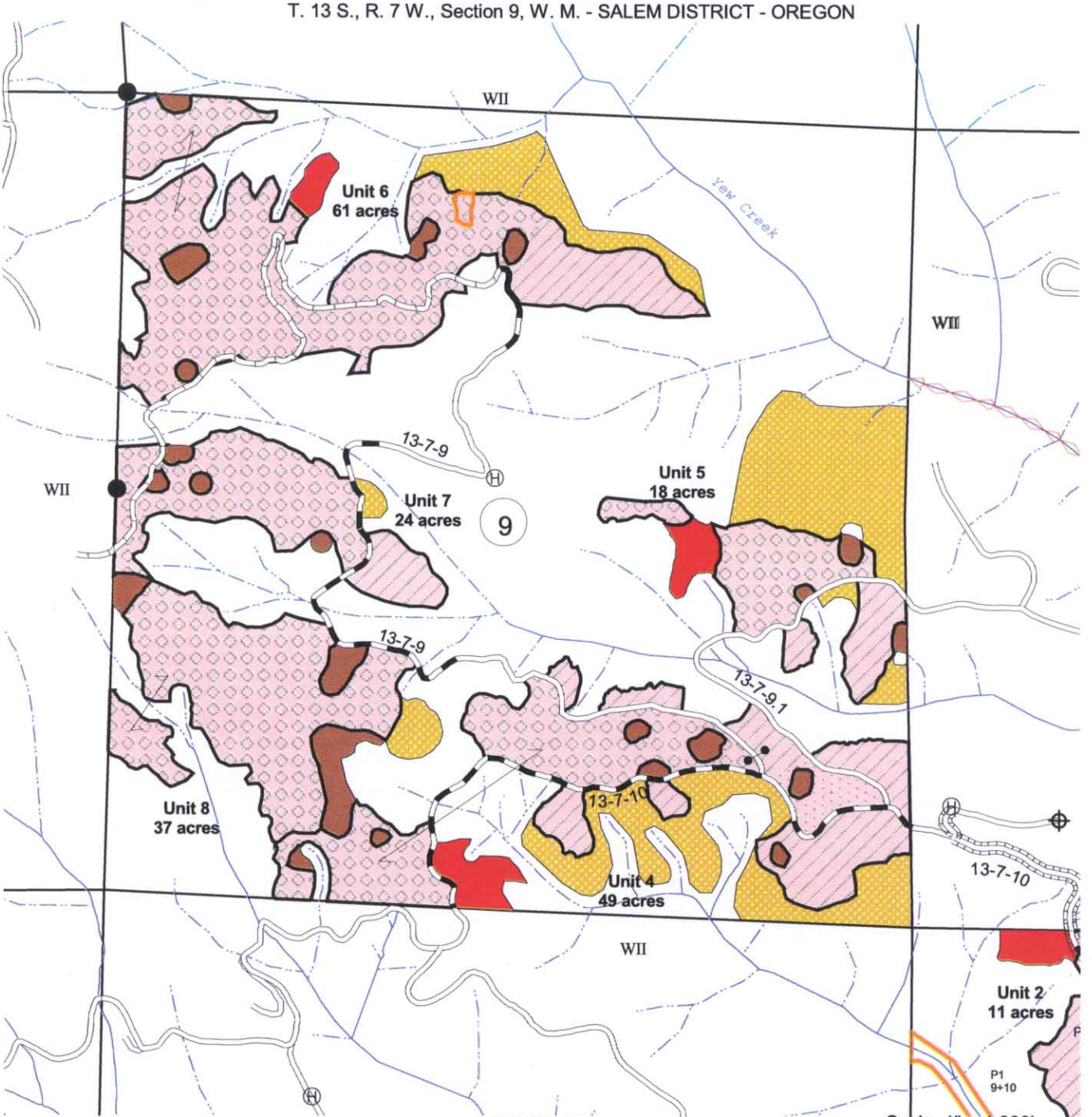
- Helicopter landing
- Service landing
- Landing
- Fishbearing Streams
- Non-Fishbearing Streams
- Coho presence
- Conifer release area
- Existing Road
- Overgrown or Impassable Road
- New Construction
- Reconstruction
- Road to be renovated
- Winter haul route
- Fungus Protection Area
- Red Tree Vole Protection Area
- Aerial yarding
- Ground based yarding
- Skyline yarding
- CWD treatment outside the sale area
- Corner found
- Cross drain pipe

April 17, 2002

United States Departement of the Interior
BUREAU OF LAND MANAGEMENT

KLICKITAT EA MAP - Alternative 1

T. 13 S., R. 7 W., Section 9, W. M. - SALEM DISTRICT - OREGON



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April 17, 2002

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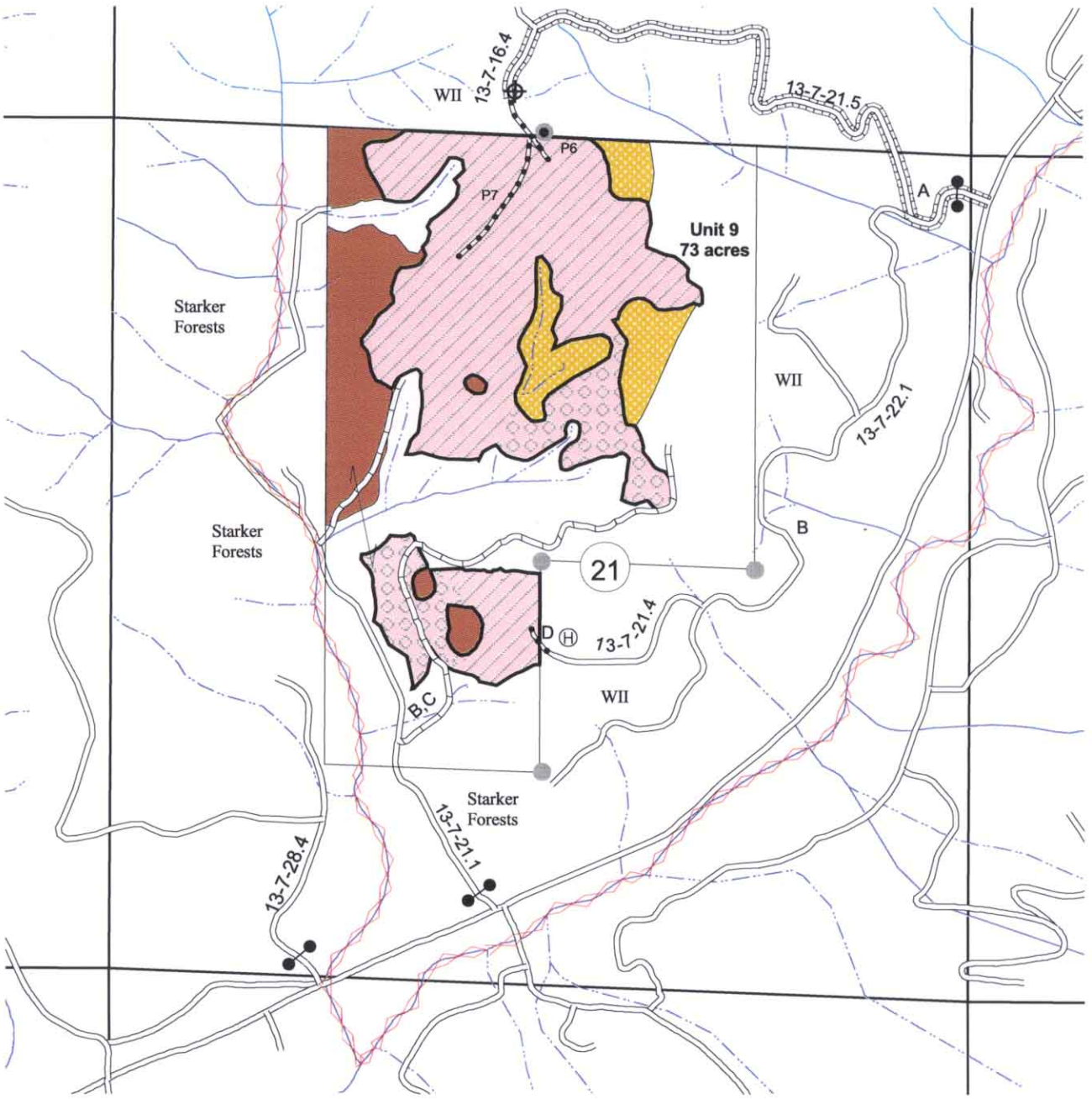
KLICKITAT TIE EA MAP - Alternative 1

T. 13 S., R. 7 W., Section 21, W. M. - SALEM DISTRICT - OREGON



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APPENDIX A
PUBLIC COMMENTS AND BLM RESPONSES

Silviculture Prescription

Oregon Natural Resources Council (ONRC): *Openings should be closer in size to ½ acre than 1 acre due to the large number of early seral stands already in the watershed.*

Although there are a large number of early seral stands in the watershed, the goal of the proposed project is to create structural complexity which includes creating small early seral openings combined with other areas of denser stocking within the context of a relatively large thinning area. This patchiness creates habitat for a larger variety and number of species than any one of the treatments would alone. In addition, creating an opening as large as an acre allows enough light for understory conifers to grow. These openings within a thinning matrix, combined with areas of denser than average or untreated stocking, are well supported in the latest research (Carey, A.B., D.R Thysell and A.W. Brodie. 1999c *The Forest Ecosystem Study: Background, Rationale, Implementation, Baseline Conditions, and Silvicultural Assessment*. U.S.D.A. Forest Service Gen. Tech. Rep. PNW-GTR-457, Portland, OR. http://www.fs.fed.us/pnw/pubs/gtr_457.pdf). Our method for creating horizontal complexity on this large project was to use a diameter limit thinning prescription, generally without regard for spacing. Because of the stocking and diameters in this particular project, there are no openings as large as an acre.

Snags and Coarse Woody Debris

ONRC: *This project may result in a loss of soft snags and coarse woody debris. Replacing large soft snags (destroyed by logging) with small size snags removes a decay cohort critical to wildlife.*

We believe the silvicultural prescription retains a sufficient density of green trees in proximity to existing standing snags to provide adequate protection for this resource. Along with design features described on page 8 of the EA, standing snags will be afforded enough protection to ensure a high level of retention. In addition, the EA states (page 10): "If monitoring determines there are less than the target level of hard snags/logs per acre, then additional trees having a greater than average stand diameter (post-treatment) would be girdled, topped, or felled to achieve the target."

We feel it is important to retain the option to create coarse woody debris (CWD) by various methods. Our experience in this vicinity is that we are likely to get most of the CWD recruitment as blowdown from winter storms following treatment (such trees are likely to be root sprung or have full rootwads). If this is the case, then additional CWD treatment is likely to favor snag creation which does not involve felling.

Roads and Yarding

ONRC: *BLM should develop alternatives that do not include new road construction. BLM should develop an alternative that incorporates some helicopter logging.*

Aerial yarding the entire sale was an alternative considered by the ID team but eliminated. As explained on page 17 of the EA, the cost of aerial yarding could not be justified in areas of the proposed project where roads could be constructed in stable locations. The preferred alternative aerial (helicopter) yards 60 % of the sale area.

As required by the *LSRA*, new road construction was kept to a minimum. Roads will be built following Best Management Practices in the *RMP* (p. C- 4, 5) and were located on ridge tops and stable locations. In addition, all new roads will be decommissioned. The most recently published, long-term study supports our practice of road decommissioning as an effective tool to minimize undesirable effects of logging roads. (M.A. Madej. 2001. *Erosion and Sediment Delivery Following Removal of Forest Roads*. Earth Surface Processes and Landforms. Vol. 26, 175-190.)

ONRC: *Where BLM uses ground based yarding, we should require cable yarding up slopes to existing roads (in other words, avoid ground based yarding).*
American Lands Alliance (ALA): *The use of ground based yarding systems will inhibit the attainment of ACS objectives, particularly ACSO 5*.

Ground based yarding is planned for three areas on approximately 6 acres in this 290 acre sale. These areas are not in Riparian Reserves, and are on slopes ranging from 10 to 20%, which is ground flatter than required by the *RMP* Best Management Practices (p. C-2). Ground based yarding will only be allowed for 2 and ½ months during the driest part of the year (August 1st to October 15th), with the requirement that it will be stopped if necessary to avoid excessive soil and water resource impacts. In addition skid trails will be approved by the Administrative Officer and will be spaced 150 feet apart to minimize the number; the operator will be required to maintain slash on them to minimize compaction (EA p. 11).

The EA states on page 41 that the total area of soil disturbance from all proposed activities is estimated to be 2.1 percent. This includes all road building, cable yarding and ground based yarding. The RMP allows 10% as the maximum acceptable level for soil disturbance/compaction (p. C-2). Therefore, we are in compliance with the *RMP* Best Management Practices and do not think road building or ground based yarding will retard or prevent attainment of ACS objectives.

As stated in Appendix A of the EA, stream protection zones were applied to all stream channels in the project area, and hence large areas of riparian vegetation were excluded from treatment under this proposal. In addition, any sediment from ground based yarding would have to travel at least 300 feet over vegetation and slash covered slopes (high surface roughness which functions to trap any overland flow and sediment) before reaching any streams. For these two reasons, we conclude that our project will not inhibit attainment of ACS objective 5.

ONRC: *Where cable yarding is not appropriate, use rubber tired equipment rather than tracked skidders for ground based yarding.*

We have not specified rubber tired skidders as allowable equipment due to our past experience with this equipment, which often results in much more tree damage, wider skid roads, and greater disturbance. This is due to the higher speed that rubber tired skidders operate at. There is also more ground pressure with some machines due to the lower total area of the equipment "foot print" in relation to equipment weight. More deep rutting occurs with skidders due to the higher psi and increased slippage of the tires on the ground.

ONRC: *BLM should place barriers at decommissioned roads.*

At ONRC's suggestion, all roads constructed for the sale will be barricaded after decommisioning.

ALA: *Construction of new logging roads will inhibit the attainment of ACS objectives, particularly ACSO 5.*

As stated in the EA (p. 48), all the proposed road construction and reconstruction locations have been reviewed in the field for potential effects to water quality and watershed hydrology. As indicated in the EA, the risk of measurable impacts posed by this proposal is extremely low. The timing, volume, rate, and character of sediment input, storage, and transport is unlikely to be altered in a measurable way, either in the short term or long term, by this proposal. Therefore, it was determined that the proposal will likely *maintain the current sediment regime* in this watershed.

Alterations to stream channel morphology as a result of road construction are also of low probability. New road locations are unlikely to alter peak flow response in the project area by intercepting and delivering surface and ground water more quickly to the stream system because they will not be physically connected to the stream system. There would be no additional ditches or relief culverts routing water to stream channels. Water from these surfaces will be routed to stable soils where it will re-infiltrate. Therefore, it was determined that the new road construction will likely *maintain the current flow regime* in this watershed.

Jan Wilson: *Roading and yarding associated with removal of the wood will disturb the top layer of the forest floor and will compact the soil along the yarding trails which impacts the hydrologic function of the forest.*

For reasons cited in the EA on pages 48 and 49, *(* high levels of residual slash on yarding corridors, no-treatment zones in riparian areas, the relatively small size of trees being yarded, and helicopter yarding over approximately 60% of the area) the proposal would cause only minimal surface disturbance within treatment units. This disturbance would not be of a significant nature and will not likely result in any measurable alteration of watershed hydrology.

Newly constructed roads are limited to positions along ridges and low gradient slopes that will have little influence over watershed hydrology. These roads will not enter into riparian zones and will not cross stream channels and therefore are of very low risk for altering watershed hydrology. Construction techniques required by the *RMP* Best Management Practices (p. C-3) will be employed to minimize road surface capture of water and will route this water to stable soils where it is likely to re-infiltrate.

ALA: *Implement Alternative 3 to avoid road construction.*
Jan Wilson: *Alternative 3, which would avoid any roading and yarding, is much more likely to achieve the objectives of the project.*

As explained elsewhere, new roads will be constructed in stable locations where our analysis shows we will have little impact on watershed hydrology or increased sedimentation.
The number of trees planned for felling was chosen to meet the goals of restoring structural complexity to the stands and accelerating development of desired tree characteristics (EA, page 21). Felling fewer trees or increasing mortality of healthy green trees would not meet those goals. Felling trees in September may mitigate some loss from bark beetles, but the fuel loading would be large enough to pose risk of catastrophic fire as well as long term fire hazard within the project area and adjacent stands. If we implemented a multi-year felling program following Siuslaw guidelines, as suggested by ALA, it would take us approximately 30 years to fell all the trees, which would not meet the goals of the project. We would rather not establish a base-line for determining the risks of Douglas-fir bark beetle on such a large scale. We do, however, plan to create down wood in some surrounding areas on a smaller scale. These areas are shown on Map 1 and the project is explained in the EA on page 10.

Impacts to Marbled Murrelets

ALA: *Allowing logging between April 1 and August 5 has a significant chance of disturbing murrelet nesting.*

It is true that design features for this action do not totally exclude project activities during the critical part of the marbled murrelet nesting period (April 1 to August 5). However, restrictions on harvest operations to avoid bark slippage during the Spring will ensure that only a portion of the overall harvest might occur during the critical period of the marbled murrelet breeding season, and the remaining activities will occur outside of this season. Furthermore, a design feature described on page 9 of the EA provides for a seasonal restriction to be imposed if any listed wildlife species is found occupying forest stands within 0.25 miles of the proposed units (current survey efforts have found no listed species occupying this area).

We believe the existing design features strike a reasonable balance between operational flexibility and species protection. Concerns for federally listed species were also addressed in a required consultation with the U.S. Fish and Wildlife Service. That consultation concluded that this action was not likely to result in jeopardy to any listed wildlife species.

In-Stream Work

ONRC: *Wood slated for placement in Cabin Creek is too small. BLM should use larger wood pulled from roads and reservoirs. BLM should double check whether or not the culvert on the old stream crossing has been removed.*

Diameters of logs will range from 16 inches to over 20 inches, with log lengths a minimum of 17 feet. This size was chosen to maximize the size of logs, while considering the availability of logs and the load a helicopter expected to be used on the project can reasonably lift.
We think that wood this size will be adequate to survive larger winter storm events and provide structure in the stream. The standard length for wood being added to channels for in-stream structure is approximately 1.5 to 2 times the channel width. This length is standard for in-stream structures and is used so logs do not move long distances and / or get washed up on the flood plain. Because Cabin Creek has a bank full width of approximately five to seven feet, we expect that the risk of the logs added to the creek moving downstream will be low.

The section of Cabin Creek these logs will be placed in already has moderate to large amounts of wood, however this wood is in an old decay class. The addition of green logs will provide additional channel complexity until the surrounding stand gets larger and has the potential to become in-stream structure in Cabin Creek.

BLM does stock pile large wood for in-stream use. However, using available logs on site will cause less disturbance than bringing in material from outside the project area. In addition, placing logs in the stream while logging equipment is available makes the project more cost effective and efficient.

The culvert and road on Cabin Creek near Highway 34 is owned and managed by Starker Forests Inc. BLM employees visited this site incidentally in order to assess the risk to the public from a *hypothetical* debris torrent initiated on public lands upstream. The risk is low (the risk assessment is in the project file). Acting as a good neighbor, BLM notified Starker of the partial culvert blockage at this location. We received a phone call in response in which a representative of Starker thanked us for the information and stated that the blockage had been removed. BLM does not have the authority or responsibility to monitor activities on private land.

Fuel loading

ONRC: *With as much as 35 tons of slash being generated, BLM should consider more slash piling than just near roads and landings to minimize the risk of fire.*

The EA states on page 43 that the *increase* in fuel loading is expected to be 5 to 15 tons, not 35 tons. 35 tons would be an upper limit of **total** fuel loading which would include the pre-existing dead and down material, snags etc. plus slash generated from the proposed activity. Most of the total tonnage is in the form of large material over 6 inches in diameter. Slash less than 5 inches and limbs would

range in the 2 to 6 ton range. Leaving this type of thinning slash has not proven to be a problem with past thinning units over several decades of operation. It is not expected that slash in these units will pose any greater risk than with past operations. Certainly there are no indications that would justify the need to cause additional disturbance or incur additional risk by piling and burning the scattered slash in the units.

Noxious Weeds

ONRC: *BLM should collaborate with other landowners to eradicate populations of invasive weeds.*

As stated in the EA (p. 27), the noxious weeds found in the project area are well established and widespread throughout the Marys Peak Resource Area and the Salem District. Eradication is not practical using any proposed treatment methods. In this project, *decrease* in the establishment of noxious weeds will be accomplished by seeding with native grass seed all exposed soils within new road construction, ground-based yarding roads and landing locations (EA p. 14).
Collaboration with other landowners to eradicate invasive weed populations is outside the scope of this project and decision. The Salem District is involved in integrated weed management and is forming partnerships with other landowners for that purpose.