

**United States Department of the Interior  
Bureau of Land Management  
Cottonwood Field Office  
1 Butte Drive, Cottonwood ID  
208-962-3245**

**DECISION RECORD  
Sheep Fire Timber Salvage Project  
DOI-BLM-ID-C020-2013-0003-EA**

This documents my decision, as the Field Manager of the Bureau of Land Management (BLM), Cottonwood Field Office, to proceed with implementation of the Sheep Fire Timber Salvage Project (NEPA Register No. DOI-BLM-ID-C020-2013-0003-EA). The project area encompasses 941 acres in Idaho County approximately 2.5 miles north east of Lucille, ID in the 2012 Sheep Fire perimeter (see attached map).

## **Project Summary**

Action is needed to reforest portions of BLM lands affected by the 2012 Sheep Fire and to capture economic value of dead and dying timber. This project has been planned to meet forest vegetation and related resource management objectives of the Approved Cottonwood Resource Management Plan (RMP) (BLM, 2009). Private and BLM roads provide access to the area. The project will harvest dead and dying trees on 889 acres through commercial harvest and reforest those 889 acres plus an additional 52 acres for a total of 941 acres of planting. Up to 1.96 miles of temporary road may be constructed during timber harvest operations, and then decommissioned after treatment. Purposes of this project are to:

1. Accelerate meeting the Desired Future Conditions specified in the RMP.
2. Provide forest products to help meet local and national demands by expediting salvage to capture economic return.

Reforestation of 230 trees per acre will accelerate meeting of Desired Future Conditions. Harvest of 889 acres will provide an estimated 13.1 million board feet of timber. Approximately 4.76 miles of existing roads will be rehabilitated including deep ripping and seeding. One gate will be installed to implement travel management designations set forth in the RMP. One live stream crossing will be rocked to reduce sediment delivery to the Middle Fork of John Day Creek.

## **Compliance with the National Environmental Policy Act**

In accordance with the National Environmental Policy Act (NEPA), BLM completed an environmental assessment (EA) for the Sheep Fire Timber Salvage Project in June 2013. An errata sheet to the Environmental Assessment reflecting minor changes to the proposed action and clarifications will be issued with this Decision Record. My review of the analysis concluded with a Finding of No Significant Impact (FONSI) for implementation of the Proposed Action as

it is described in the EA.

## **Public Involvement, Agency and Tribal Consultation and Coordination**

The BLM posted information about the proposed project on the internet in November 2012. On November 13, 2012 the BLM sent scoping letters describing the proposal to the Nez Perce Tribe, adjacent landowners and potentially interested individuals, businesses, organizations and agencies. Substantive issues identified by comments from interested parties, including two individuals, six organizations and two agencies, were addressed in identification of issues and development of the alternatives for analysis in the EA. Issues identified during scoping that are addressed in the EA are listed in section 1.3.1. They include concerns for snag retention, soil resources including compaction and erosion, habitat for sensitive, threatened and endangered species including the black-backed woodpecker and Canada lynx, the potential effect on fisheries, the density of existing roads and the proximity to the John Day Roadless Area, the length and possible sediment contribution of temporary roads, the potential for mass movement, the need to use a peer-reviewed scientific methodology to determine which trees would be considered live, a request to incorporate more restoration into the proposal, the potential of the area to reburn, several requests to consider adding additional acreage and volume to the proposal, whether there is an ecological need to harvest timber post fire and the effect of wildfire suppression.

The Cottonwood Field Office issued the EA for a 15-day public comment period the week of June 17, 2013. The Cottonwood Field Office received comment letters on the EA from Idaho Conservation League, Friends of the Clearwater, Idaho Forest Group, Evergreen Forest and Camp 34. Review of substantive comments resulted in the publishing of an errata sheet to the EA to make clarifications and several revisions. The BLM's responses to substantive comments are included as Appendix B of this Decision Record.

The BLM completed an intensive cultural resource inventory of the project area and found no properties listed, or eligible for listing, in the National Register. Coordination with the Nez Perce Tribe did not identify issues affecting Nez Perce Treaty Rights or their ability to exercise those rights.

Consultation under section 7 of the Endangered Species Act was completed with the US Fish and Wildlife Service and the National Marine Fisheries Service. The project design includes protection of listed fish and their critical habitat, including bull trout, sockeye salmon, fall Chinook salmon, spring/summer Chinook salmon and steelhead trout.

This Sheep Fire Timber Salvage Project Decision Record will be available with the EA errata sheet and FONSI on the internet at <http://on.doi.gov/12Owz1Z>, and the interested public will receive notices of this decision in accordance with BLM regulations for forest management decisions.

## **Decision**

It is my decision to implement the Sheep Fire Timber Salvage Project, as shown on the attached map and described below. This includes modifications to the proposed action analyzed in the

June 2013 EA to implement the Terms and Conditions of the Biological Opinions (BO) provided by the US Fish and Wildlife Service and the National Marine Fisheries Service and summarized below. My decision is based on consideration of the protective resource design and mitigation measures information contained in EA, management requirements of applicable laws and policies, and the comments received from public involvement and agency consultations for this project.

### *Management Activities*

Salvage Timber on approximately 889 acres including retention of a minimum of 6 snags per acre, 3 of those being between 10 inches and 20 inches in diameter and 3 of those being greater than 20 inches in diameter where they exist. These treatments would be accomplished by commercial logging using tractor (554 acres), 280 acres of cable, and Jammer (82 acres) yarding methods.

Reforest 941 acres including the 889 acres of harvest units plus a 52 acre plant only unit. Reforestation would include planting approximately 230 trees per acre comprised of Douglas-fir, western larch and ponderosa pine. Planting units would be prioritized to complete planting required as a term of the Biological Opinion's and those units that require access via temporary roads first. The herbicide hexazinone may be applied around Douglas-fir and ponderosa pine seedlings in areas with heavy grass and brush competition. A minimum of 15 tons of slash per acre will be left onsite to reduce erosion and aide in nutrient cycling. Other residual slash as a result of harvest operations will be piled at the landing and burned following an approved prescribed fire burn plan.

Approximately 12 miles of existing roads will be used to access the harvest and planting units. Up to 1.96 miles of temporary roads will be constructed. Temporary roads would be fully obliterated and re-contoured to near natural slope. The temporary road segment accessing units 5Z and 5-B-3 (in the southwest quarter of section 32, Township 26 North, Range 2 East) would be decommissioned immediately following harvest. Other temporary roads would be decommissioned following all post-harvest activities including planting and burning of slash piles.

Approximately 4.76 miles of existing roads will be rehabilitated including deep ripping and seeding. The approaches to one live water crossing of an unnamed tributary to the Middle Fork of John Day Creek would be rocked under a permit from the Idaho Department of Water Resources.

### *Implementation of the Biological Opinion Terms and Conditions*

To implement the terms and conditions this decision includes the following modifications to the proposed action:

- No treatment will occur in the previously identified Short Cable Unit 8-D (6 acres)
- The width of RCA's will be doubled from the original proposed PACFISH no harvest buffers as described below

Stream Type	Original RCA Buffers	Final RCA buffers
Fish Bearing	300 feet	600 feet
Non Fish Bearing-perennial	150 feet	300 feet
Ephemeral	100 feet	200 feet

This will reduce the acreage of unit 9-B by 5 acres. No other harvest units will be affected.

- The mid-slope temporary road segment accessing units 5-Z and 5-B-3 (in the southwest quarter of section 32, Township 26 North, Range 2 East) will be shortened by 2,000 feet. This reduces the total acreage for unit 5-Z by 9 acres.
- Project related erosion/sediment reaching stream channels will have erosion control measures implemented (i.e. sediment traps, mulching placement of slash/large woody debris, etc.).
- The BLM will require partial suspension while cable logging on moderate and high severity burn areas.
- The BLM will submit for NMFS approval engineering plans showing topographic details and road drainage design prior to temporary road construction.
- Erosion minimization measures will be implemented prior to winter conditions following harvest operations.

### *Environmental Design Features*

Implementation will use project design and mitigation measures as listed below. Many of the measures are derived from application of best management practices (BMPs) and guidelines from the Cottonwood RMP and the Idaho Forest Practices Act and Stream Channel Alteration Handbook.

### **From EA section 2.1.9-Environmental Design Features**

All treatments in the proposed action and the No Temporary Road Alternative would follow established agency management plans, policies, and procedures, including the Idaho Forest Practices Act (Idaho Administrative Code, Title 38, Chapter 13). The following design features would be implemented to avoid or minimize potential impacts to resources:

#### **Air Quality (Smoke Management)**

- Conduct prescribed fires in accordance with the procedures outlined in the *Montana/Idaho State Airshed Group Operating Guide* (Montana/Idaho Airshed Group 2010) in order to minimize air quality impacts from smoke on local communities and individuals.
- Employ dust abatement measures on roads to reduce fugitive dust.

#### **Forest Vegetation**

- Develop silvicultural prescriptions in accordance with the Cottonwood RMP, Appendix C, Desired Future Conditions for Forest Vegetation/Wildlife Habitat (USDI-BLM 2009). Develop slash treatment and burn guidelines to meet desired stand conditions of species composition, structure, and watershed sediment guidelines.

### **Soils and Water Resources**

- Prohibit timber harvest in areas of high landslide hazard as determined by resource specialists.
- Modify, via site-specific mitigation measure(s), timber harvest or temporary road construction in areas of moderate landslide hazard as needed to protect slope stability. Examples would include, but not be limited to, requiring partial suspension on cable logging; and/or constructing and applying mulch or slash on yarding corridors where bare soil is exposed.
- Restrict tractor skidding operations to the use of a tracked tractor. No rubber tire skidders would be used.
- Restrict activities when soils are wet to prevent resource damage (indicators include excessive rutting, soil displacement, and erosion).
- Construct slash filter windrows at the toe of fill slopes on newly constructed landings and roads concurrent with construction. Limit height of windrows to 3 feet. Provide breaks and limit length of windrow to allow easy passage of wildlife.
- Reduce road surface erosion by rocking the approach and departure of existing stream crossings as needed.
- Prepare and implement a Spill Prevention Control and Countermeasures Plan (40 CFR 112) that incorporates the rules and requirements of the Idaho Forest Practices Act Section 60, Use of Chemicals and Petroleum Products; and US Department of Transportation rules for fuel haul and temporary storage; and additional direction as applicable. Erosion control measures including removal of log culverts and construction of temporary cross drains, drainage ditches, dips, or berms will be required on all temporary roads before operations cease annually.
- Scarify non-excavated skid trails and landings that are compacted or entrenched 3 inches or more.
- Scarify and re-contour excavated skid trails and landings to restore slope hydrology and soil productivity.
- In the event of winter logging activities, snow plowing will maintain a minimum of two inches of snow on the road, leave ditches and culverts functional, side cast material will not include dirt and gravel, and berms will not be left on road shoulders unless drainage holes are opened and maintained.
- Buffer Riparian Conservation Areas from mechanical treatment.
- In the event an unknown seep, spring, or watercourse is discovered, apply Riparian Conservation Area buffers. .
- Place slash and woody debris as needed within cable logging corridors to inhibit erosion.
- Rip and/or mulch compacted areas (i.e., log landings) to inhibit them from generating overland flow and surface erosion, and maximizing their infiltration rate. Mulch may be straw or other materials and should provide at least 65 % soil cover, particularly in areas burned at high severity.
- Orient linear features created by logging operations, such as skid trails and cable rows, across slope to the maximum extent possible to inhibit any creation of new channels.

Ensure waterbars are installed diagonally to skid trails and are larger than normal to promote enhanced inhibition of overland flow.

- Locate skid trails and landings prior to cutting operations, to minimize the delivery of surface runoff and sediment to the nearest stream channel, especially in areas burned at high and moderate severity. To the extent possible, harvest units should be located upslope of unburned areas or areas burned at a lower severity.

### **Invasive, Non-Native Species**

- Treat existing noxious weed infestations along access roads prior to project implementation.
- Clean all off-road equipment of soil, plant parts, seeds, and other debris before entering the treatment units.
- Ensure all rock used for road surfacing is free of noxious weed seed. Borrow pits and stockpiles will not be used if it is determined they are infested with undesirable invasive plants.
- Inventory disturbed areas for new weed introductions and implement weed control treatments 1-year post project and followed up for a second year if staff and funding is available.
- Ensure any mulch or seed products used will be certified as noxious weed free.
- Revegetate, as needed, disturbed areas with an approved seed mix. If desired species in the mix are not available, substitutions may be made upon approval from the Cottonwood Field Office. Ensure the seed mix is certified noxious weed free. Target areas will be permanent and temporary roads, road rehabilitation areas, log landing areas, and severely disturbed cable corridors and skid trails.
- Accomplish seeding the first spring or fall after disturbance.
- All weed herbicide treatment will occur in accordance with the ROD for the Cottonwood Integrated Weed Treatment Program, DOI-BLM-ID-C020-2011-0017-EA available for review at the Cottonwood Field Office.

### **Wildlife**

- Retain snags and snag replacement green trees and use coarse woody debris in accordance with the Cottonwood RMP, Appendix C, Desired Future Conditions for Forest Vegetation/Wildlife Habitat.
- Maintain existing motorized vehicle restrictions within the area for wildlife security purposes. Do not allow contractors or their representatives to hunt or trap while accessing federal lands using motorized vehicles on restricted routes. Use signs where needed to prohibit public use of roads that are closed to motorized public use, but open for logging use. Use signs where needed to prohibit public use of closed roads that are used for logging.
- Provide a 450 foot non-disturbance and non-treatment buffer (10-15 acres) around occupied nests for BLM sensitive raptor species. Provide a 300 foot buffer around occupied nest for all other raptors. Buffer size may be modified upon review by BLM Biologist depending on potential for disturbance from an activity or project.
- Follow the requirements of the Bald and Golden Eagle Protection Act; BLM ID IB2010-039 ( Seasonal Wildlife Restrictions and Procedures for Processing Requests for Exceptions on Public Lands in Idaho); and the 2008 US Fish and Wildlife Service Guidelines for Raptor Conservation in the Western United States.

Seasonal restrictions for potentially disruptive construction or other human activities, will generally apply for raptors from February 1 through July 31 unless an exception is granted by the BLM Field Office Manager. Temporary exceptions can be granted in situations where the raptor nest has been destroyed (e.g., by wind, wildfire, lightning), or is not currently active (i.e., young have fledged or if the nest is unused in the current nesting season). Exceptions or temporal deviations from the established February 1 - July 31 timeframe may also be granted based on species, variations in nesting chronology of particular species locally, topographic considerations (e.g., intervening ridge between construction activities and a nest) or other factors that are biologically reasonable. Biologists should review the Bald Eagle Management Guidelines, Draft Guidelines for Raptor Conservation in the Western United States, and Interim Golden Eagle Technical Guidance documents for additional details and protocols.

### **Aquatic and Riparian Habitat**

- Prohibit log landings within RCAs.
- Prohibit fuel storage, equipment maintenance, or fueling within RCAs.
- Prohibit timber harvest and temporary road construction within RCAs. Prohibit removal of large woody debris within RCAs.
- Prohibit use of hexazinone herbicide within 200 feet of watercourses.

### **Threatened and Endangered, and Sensitive Species**

- Notify the BLM Biologist of threatened, endangered, or sensitive species sightings made by BLM employees or contractors. If needed apply appropriate conservation measures to minimize impacts to these species.

### *Monitoring*

The BLM will conduct monitoring to determine effectiveness of the proposed harvesting, reforestation treatments, and the environmental design features. The BLM will conduct effectiveness monitoring to evaluate achievement of desired objectives for forest health and habitat diversity, soil and water resources, effectiveness of road closures, road decommissioning, fish habitat and riparian areas, and special status fish, wildlife, and plant resources. Monitoring of deposited sediment, stream turbidity and bull trout spawning surveys will be conducted. The BLM will also monitor for rills and gullies created from temporary roads as well as any project generated active erosion from harvest units or roads.

### **Rationale**

1. In addition to the Proposed Action, a no temporary road alternative action and a no action alternative were analyzed in the EA. The Proposed Action was selected because it best meets the need for treatments to both obtain the Desired Future Condition as quickly as possible and expedite salvage to capture economic returns.

2. The project is consistent with Federal, state and local laws and requirements. It conforms to 2009 Cottonwood Resource Management Plan (EA, section 1.2), specifically with direction for Forest Products, Action FP-1.3.1 on page 37 to “In forest stands that... have mortality related to wildfire, expedite salvage to capture economic return.” In addition Vegetation-Forests objective VF-1.1.1 directs the BLM to design treatment projects to “enhance forest health and/or habitat diversity (consistent with Appendix C, Desired Future Conditions for Forest Vegetation/Wildlife Habitat)”.

3. The action will not violate other Federal, State, and local laws or requirements for the protection of the environment (FONSI, Intensity factors 9 and 10). Viable populations of species would be maintained as required by the Endangered Species Act and BLM Special Status Species policy (EA, sections 3.2.5, 3.2.6, 3.2.10 and 3.2.11). The BLM has planned the project to incorporate applicable Federal, State and local requirements Clean Air Act, Clean Water Act, Idaho State Water Quality Standards, Idaho Forest Practices Act, and Idaho Stream Channel Protection Act. Burning activities would implement the EPA and Idaho Department of Environmental Quality permit procedures outlined in the North Idaho Smoke Management Memorandum of Agreement (EA, sections 2.1.5 and 3.2.14).

### **Authority**

This is a forest management decision made under the authority of 30 U.S.C. 601, as specified in 43 CFR 5400.0-3.

### **Approval and Implementation Date**

In accordance with Code of Federal Regulations at 43 CFR 5003, this decision is approved for implementation 16 days after publication of the notice of sale in the *Lewiston Tribune*, unless I receive a protest as specified below.

/s/

7/26/13

\_\_\_\_\_  
William Runnoe, Field Manager

\_\_\_\_\_  
Date

### **BLM Administrative Review Procedures**

The decision to implement this forest management project to complete timber harvest and prescribed burn treatments may be protested under 43 CFR Subpart 5003 – Administrative Remedies. As outlined in 43 CFR 5003 (a) and (b), protests may be made within 15-days of publication date of the notice of the decision in the *Lewiston Tribune*, Lewiston, Idaho. Protests must be filed by close of business (4:30 p.m.) on the last day of the protest period with the authorized officer at the Cottonwood Field Office. As interpreted by the BLM, the regulations do not authorize acceptance of protests in any form other than a signed, paper document that is delivered to the physical address of the BLM office within the 15-day period.

43 CFR 5003.3 (b) states that: “Protests shall be filed with the Authorized Officer and shall contain a written statement of reasons for protesting the decision.” This precludes the acceptance of electronic mail or facsimile protests. Only written and signed hard copies of protests that are delivered to the authorized officer at the following address will be accepted:

Field Manager  
BLM Cottonwood Field Office  
1 Butte Drive  
Cottonwood ID 83522-5200

The protest must clearly and concisely state which portion or element of the decision is being protested and the reasons why the decision is believed to be in error. Regulations at 43 CFR 5003.3 (c) state that, ‘Protests received more than 15 days after the publication of the notice of decision are not timely filed and shall not be considered.’ Upon timely filing of a protest, the authorized officer shall reconsider the project decision to be implemented in light of the statement of reasons for the protest and other pertinent information available. The authorized officer shall, at the conclusion of the review, serve the protest decision in writing to the protesting party. Upon denial of a protest, the authorized officer may proceed with the implementation of the decision as permitted by regulations at 5003.3(f). If no protest is received by close of business within 15 days after publication of the notice of decision, this decision will become final.

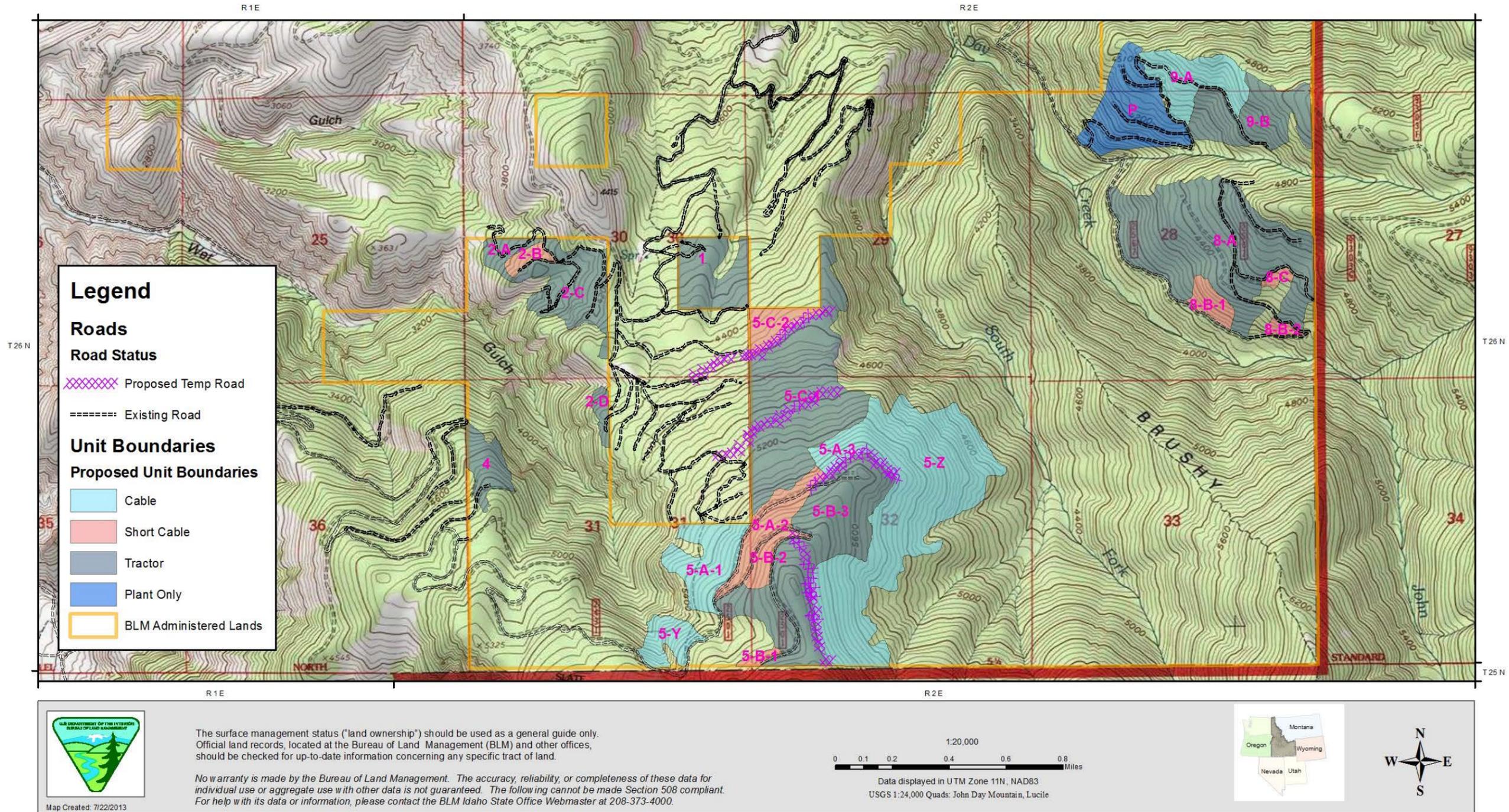
## **Contact**

For additional information concerning this BLM decision and administrative review process, contact Zach Peterson, Cottonwood Field Office, 1 Butte Drive, Cottonwood, Idaho 83522, telephone 208-962-3594.

## **Appendices**

- A. Sheep Fire Timber Salvage Map
- B. Response to Public Comments

# Sheep Fire Timber Salvage Decision Record Map



## Appendix B. Response to Public Comments

CMT #	Commentor	Comment	BLM's Response
ICL-1	Idaho Conservation League (ICL)	<p>For instance the BLM states, “of the area burned, burn severity was generally high” (EA, p. 30). According to the table 8 (EA, p. 30) 20% of the watershed burned in a high-severity fire, with 80% of the watersheds unburned, low or moderate. Throughout the entire burn area, Forest Service BAER monitoring indicated that only 6.8% of the burn is characterized as high severity. Again, we do not dispute that in localized areas, the fire may have more significant impacts, however the characterization of the fire as a “generally high severity” fire appear overstated.</p>	<p>The BLM agrees that much of the fire burned at low severity. Within the Watershed Analysis area approximately 20% burned at high severity and 40% burned at moderate intensity. On the ground inventory has shown that very few live trees are present within the moderate and high burn intensity areas at least within the project area where intense inventory has taken place. Moderate intensity areas, as designated by BAER monitoring, generally have needles and small twigs still present on the trees as opposed to high intensity burn areas where nearly all needles have been burned off, however, these moderate intensity areas generally have 100% crown scorch and very few if any trees are designated as live per the Scott et. al. 2002 methodology for determining if trees likely to persist longer than one year post fire (EA section 3.2.1.1). Within the project area, fire intensity was generally high as shown in Figure 10 of the EA. The BLM has revised the EA to clarify this (see Errata Sheet Item 2e).</p>
ICL-2	ICL	<p>The BLM relied upon the WEPP model to estimate sedimentation and soil erosion resulting from the project. The Final EA should recognize the limitations of this model. In general WEPP, and other similar models, are most useful in comparing action alternatives. We do appreciate that the EA recognized that the accuracy of the WEPP runoff or erosion rates could be off by a factor of half (50%), however we are concerned that the estimates may still be well below the on-the-ground sediment and erosion that may be realized.</p>	<p>We acknowledge that sediment models such as WEPP are useful for comparing alternatives through relative sediment yield estimates, and recognize the accuracy is no better than plus or minus 50 percent. The WEPP model has been developed with empirical data and has the advantage of allowing the user to simulate the effects of wildfire. The WEPP model provides estimates of soil erosion and sediment yield considering site-specific information about soil texture, climate, ground cover and topographic settings. To best apply the model, we were able to field verify the assumed soil types and slopes, as well as calibrate the local climate for the site. The values and assumptions we used are described in Section 3.2.3.2 of the EA, Direct and Indirect Effects of Alternatives under the heading "Methods, Assumptions and Limitations".</p>

CMT #	Commentor	Comment	BLM's Response
ICL-3	ICL	<p>We do appreciate that the BLM sought to minimize disturbance on steep slopes and in landslide prone areas. At the same time we are concerned that the partial cable suspension of logs has the potential to channelize sediment. As a result, we suggest mitigation measures be required to minimize sedimentation.</p>	<p>Environmental design features of the proposed action (EA section 2.1.9) have been incorporated into the project design to minimize sedimentation and reduce the risk of channelization. Specifically the BLM will "Orient linear features created by logging operations, such as skid trails and cable rows, across slope to the maximum extent possible to inhibit any creation of new channels. Ensure waterbars are installed diagonally to skid trails and are larger than normal to promote enhanced inhibition of overland flow" and also "Place slash and woody debris as needed within cable logging corridors to inhibit erosion". Implementation of a term and condition of the US Fish and Wildlife Service's Biological Opinion states "The Bureau will ensure that up to four felled logs (one per 100 feet, based on 400 foot corridor) remain on cable yarded (both short cable and partial suspension) corridors to increase sediment/soil retention (i.e., decrease erosion) on impacted corridors. These logs will be anchored and angled slightly to the slope". The BLM feels that these design measures adequately minimize the risk of channelized sediment.</p>

CMT #	Commentor	Comment	BLM's Response
ICL-4	ICL	<p>With regards to the adjacency of BLM unroaded areas to the John Day Roadless Area, we feel that the EA was inadequate. While we recognize that the Idaho Roadless Rule does not apply to the BLM, we are troubled by the lack of any recognition of the individual or cumulative impacts associated with logging in an unroaded area.</p>	<p>The 2008 Idaho Roadless Rule (36 CFR 294 subpart C) does in fact pertain only to the Forest Service. As noted in the Little Slate FEIS (USDA-FS 2012) the final rule designated 250 Idaho Roadless Areas and established 5 management themes, which include Wild Land Recreation, Special Areas of Historical and Tribal Significance, Primitive, Backcountry Restoration, and General Forest, Rangeland, Grassland. Allocation to a specific theme does not mandate or direct the Forest Service to propose or implement any action; however, the management themes provide an array of permitted and prohibited activities. It is important to note that certain activities (road building, mineral development, and timber cutting) vary from theme to theme, while other activities (motorized travel, grazing, motorized and mechanized use) is not changed by this rule. Nez Perce Forest Plan management direction states that roadless areas will not be managed for wilderness.</p> <p>The John Day Roadless Area is allocated to the Backcountry theme (USDA Forest Service 2008). This Theme does allow timber harvest activities. The roadless characteristics associated with the area include:  Natural Integrity: On the whole, natural processes are intact and operating, although there are heavy impacts on some sites.  Undeveloped Character: Human activities are not far away from this area. The impacts noted above are noticeable, as are off-site intrusions listed below. Roads or logging are visible from nearly all viewpoints.  Opportunities for Experience: Since the area is at or near the top of a ridge, one does not have the opportunity to experience the Solitude of an enclosed drainage.  Manageability: Other than the portion of the western boundary that is also the forest boundary, avoidance of existing roads has been the guiding factor in establishing the perimeter of the area. Managing this area as a wilderness would be difficult due to irregular boundaries and small size. Administrative costs per acre would be high.</p> <p>The 2008 Idaho Roadless Rule does not apply to the BLM. The entirety of the proposed project is in areas designated in the Cottonwood RMP as being in the Commercial Forest Land Base and thus open to harvest</p>

CMT #	Commentor	Comment	BLM's Response
			<p>to meet forest management objectives. Harvest in the South Fork John Day Creek subwatershed will assist in meeting the purpose and need as stated in the EA (section 1.1). The BLM is not proposing any temporary roads that would enter the Forest Service's John Day Roadless Area. The BLM is not changing route designations for any road as part of this project. Environmental Design Features of the Proposed Action (EA section 2.1.9) minimize impacts to affected resources. Road densities as shown in the EA (section 3.2.5.1, Table 33) will not change in the long term. All temporary roads will be fully obliterated following post-harvest activities that includes reforestation. As noted above "Roads or logging are visible from nearly all viewpoints" in the John Day Roadless Area. For these reasons, this issue had been considered but not analyzed in detail (Revised EA section 1.3.2).</p> <p>Citations:  USDA Forest Service. 2008. Roadless Area Conservation – National Forest System Lands in Idaho Final Environmental Impact Statement, Appendix C – Idaho Roadless Areas, Volume 3: Clearwater, Idaho Panhandle, Kootenai, Nez Perce, and Wallowa Whitman National Forests.  USDA Forest Service. 2012. Little Slate Project Final Environmental Impact Statement.</p>

CMT #	Commentor	Comment	BLM's Response
FOC-1	Friends of the Clearwater (FOC)	Of the two main elements of the purpose and need, one may not be met by this project, rapid reforestation. We are concerned that, as the EA states on page 9 reforestation would occur, "depending on availability of funding and seed supply." It seems that the one of two purposes and needs that BLM identified for this project may not be met. As such, the project seems ill-advised. Further, it seems there should have been an alternative that met that need. A planting only alternative should have been considered.	The proposed action is to plant as many acres as possible as quickly as possible given constraints of budget and seed availability (EA section 2.1.4). Furthermore, the US Fish and Wildlife Service's Biological Opinion requires as a term and condition the planting of riparian areas near the project area. By implementing this decision, the BLM is making the commitment to allocate as much funding and effort as possible for several fiscal years to ensure rapid reforestation occurs. Local seed sources have been identified and in some cases excess seed has been purchased to ensure enough seed is available to the BLM to fully reforest harvested areas. The BLM will ensure that Idaho Forest Practices Act standards for reforestation are met within 5 years (EA section 2.1.9). Furthermore, the revised environmental assessment (Errata Item 2d) reflects that the BLM considered a plant only alternative but dropped it from further analysis because it did not meet the purpose and need and would duplicate portions of the decision for the previously approved Emergency Stabilization and Rehabilitation Plan.
FOC-2	FOC	How does BLM weight the impacts from post-fire logging versus the value of the logs. The EA admits that the proposed action is the worst for cavity nesters, lynx, fisher, water quality, listed fish species, and other resources.	The BLM is a multiple use agency operating under the Federal Land Policy and Management Act of 1976. Impacts to resources are stated in the Environmental Assessment. The Field Manager has determined that a Finding of No Significant Impact (FONSI) is appropriate and his rationale for the FONSI is described in that document. The decision record takes into account all impacts and the purpose and need for action. This project has been designed to minimize impacts to all resources to the greatest extent possible while still meeting the purpose and need for action (EA section 2.1.9. - Environmental Design Features). Furthermore, in regards to listed fish and wildlife species, the FWS and NMFS have concurred with the determinations made in the BLM's biological assessments as described in the EA (section 3.2.5.2, table 39, for fish and section 3.2.10.1, table 53, and 3.2.10.3, table 56, for wildlife). Terms and Conditions made in Biological Opinions of the FWS and NMFS have been fully incorporated in to the decision record.

CMT #	Commentor	Comment	BLM's Response
FOC-3	FOC	The EA did not evaluate the roadless nature of the land contiguous to the John Day roadless area managed by the US Forest Service. This issue was raised in our scoping comments.	See ICL-4 above.
FOC-4	FOC	The EA conflates moderate severity and high severity fire into a high severity (page 35). This is misleading as the map clearly shows that high severity fire was not the dominant (page 34) and was apparently less than one-third of the project area. It seems this was done to support the myth that ponderosa pine and Douglas fir stands did not historically exhibit stand-replacing fire and somehow this fire burned out of the normal range. There is ample evidence this is not the case. (See attached).	The EA on page 35 (section 3.2.1.1) does lump moderate and high severity fire. This is due to on the ground inventory that showed both to have near 100% mortality. Harvest in this project is based on dead trees, not fire severity although the two are correlated. Live trees will not be harvested regardless of the burn severity polygon they fall in. In areas of moderate severity as mapped in the BAER report, the trees have often retained their needles and small twigs on the trees have not burned off in contrast to the high severity areas in which one and ten hour fuels were completely consumed by the wildfire including the needles and small twigs on the trees. However, nearly all of the moderate severity areas at least within the project area have 100% or near 100% mortality. The BLM does not suggest this fire was outside the historical range of variability, nor do staff specialists contest Douglas-fir and ponderosa pine stands historically burned at all severities, including stand-replacing severity, depending on weather conditions, available fuels and topography.
FOC-5	FOC	Why are there so many nonnative cultivars in the seed mix? Why can't native seeds be used?	Only 1 of the 7 species used in the mix is non-native, annual ryegrass. This species is being seeded at a low rate which comprises 4% of the total seed in the mix. Annual ryegrass is a winter-active annual with a rapid rate of establishment from seed. It has been included in the mix because rapid establishment in the fall or early spring is expected to further decrease soil erosion potential on disturbed sites until the desired perennial species in the mix are able to establish. In this area, annual ryegrass, particularly when seeded at the rates in this mix has not been seen to persist on site.

CMT #	Commentor	Comment	BLM's Response
FOC-6	FOC	<p>The proposed action would detrimentally disturb [soils] two units at or above 15% and eight units at or above 13%. While there appears to be no hard and fast rule to avoid unnecessary and undue degradation, the amount may be excessive. Mass wasting is greater under the action alternatives and greatest for the proposed action. In terms of sediment yield, the models show under all alternatives an increase in sediment.</p>	<p>Referring to section 3.2.2.3 of the EA, Cumulative Impacts under the Soil Resource section: "Current understanding is that site productivity will be maintained if less than 15% of an area is detrimentally impacted after disturbance (Page-Dumroese et. al., 2000)." These soil disturbance estimates were prepared as part of the analysis to compare alternatives and to insure that excessive soil displacement or compaction would not occur. BLM does not have a soil disturbance standard, but the estimated levels are within or very close to USDA Forest Service standards. Moreover, in these soil types there may be an unquantified, but beneficial effect, of breaking up the hydrophobic layer in some localized high burn severity areas. We concur and have disclosed that an increase in WEPP estimated sediment yield is shown under all the alternatives, including No Action. This is discussed in the EA and is expected after a fire of this size.</p>
FOC-7	FOC	<p>Further, the EA does not look at hauling and the amount of sediment it produces. There is a study from your sister agency, the Forest Service (Randy Foltz), that notes more sediment is produced on areas with logging traffic. How many log truck trips are expected under the various alternatives? What about road maintenance such as ditch cleaning and blading and stream crossing (versus culverts)? How does that effect sediment production?</p>	<p>As described under the water resources section of the EA (3.22), much of the proposed temporary road construction is located relatively high on the slope, where long slope distances to the drainage channels and generally straight to convex shaped slopes are factors that reduce sediment delivery efficiency to stream channels. There are no live water crossings associated with new temporary road construction (EA section 2.1.2). Roads will be maintained during the project and then obliterated as described in the EA. Sediment impacts from temporary roads are expected to be relatively minor under both action alternatives (EA section 3.2.3.2). Sediment impacts from hauling on existing roads will be minimized by implementing proper erosion control measures including maintaining culverts, rolling dips in the road and by applying water to the road when dry and dusty conditions are present (EA section 2.1.9). The EA errata sheet item 2b shows that the proposed action would result in approximately 2,620 log truck trips (1,785 in the no temporary road alternative, errata sheet 2c).</p>

CMT #	Commentor	Comment	BLM's Response
FOC-8	FOC	The BLM proposes to use herbicides within 200 feet of streams when RCA buffers are 300 feet for fishbearing streams. How does this meet RCA goals?	<p>The project design feature of a 200 foot buffer was added because this buffer, paired with the low toxicity of this herbicide for aquatic species, the limited amount of active ingredient to be applied per acre (well below the maximum labeled rate), and the spot treatment only around trees resulted in the analysis showing there was negligible risk of the herbicide reaching live water (see EA Section 3.2.16.2). Therefore, there is no concern in relation to herbicide use for ESA fish habitat. The buffer was not prescribed because of a concern with herbicide use being contrary to RCA goals. The use of herbicide would comply with the Cottonwood Integrated Weed Treatment Program, DOI-BLM-ID-CO20-2011-0017-EA by incorporating applicable standard operating procedures, design features, and mitigation measures for the use of herbicides as described in the program document. This document specifically details that herbicides may be used within RCAs and analyzes their use in such areas. Hexazinone is being used in this project to increase the opportunity for successful establishment of conifer species to replace those which were lost in the Sheep Fire and therefore achieve goals for RCAs as provided in the Cottonwood RMP <i>Objective VR-1.1 - Strive to improve degraded riparian and wetland vegetation relative to site potential and potential natural vegetation composition and habitat diversity</i>. Herbicides use is not prohibited in RCAs in the CFO.</p>

CMT #	Commentor	Comment	BLM's Response
FOC-9	FOC	<p>These are all important questions, as the EA does not include the biological opinion from NOAA or USFWS regarding the listed fish species—salmon, steelhead and bull trout. In particular, bull trout are extremely sensitive to conditions that affect cold clear water.</p>	<p>The FWS came to the following conclusion in their Biological Opinion with regards to bull trout: "The Service has reviewed the current status of bull trout, the environmental baseline for the action area, the effects of the proposed action, and the cumulative effects. The Service concludes that direct and indirect effects to bull trout will be limited to harm from increases in erosion and sediment delivery (including sediment from landslide events initiated by salvage logging and temporary road construction) to habitat occupied by all bull trout life stages in the John Day Creek local population; a resident bull trout population subjected to previously degraded habitat conditions that have been exacerbated by the recent Sheep Fire. Although the full extent of impacts to the John Day Creek resident local population of bull trout from the Sheep Fire is unknown, current and expected conditions resulting from short- and long-term responses to the Sheep Fire are presumed to be negative. The added impacts from project implementation will negatively impact the John Day Creek local population of bull trout. The design features incorporated into the project will minimize, but not eliminate, the risk of significant impacts. While impacts to the John Day Creek local population of bull trout are expected, we are not expecting the project to appreciably reduce the likelihood of persistence of the Little-Lower Salmon River core area, the Salmon River management unit, or the Columbia River interim recovery unit. Therefore, the Service concludes that the proposed action will not jeopardize the coterminous population of bull trout." Terms and Conditions of the FWS Biological Opinion for bull trout have been incorporated into the decision record for this project.</p>

CMT #	Commentor	Comment	BLM's Response
FOC-10	FOC	The EA is not clear whether additional replacement snags (green trees) will be maintained. Could you please explain precisely how the RMP will or won't be met?	All live trees, or trees that can reasonably be presumed alive using methodology from Scott et. Al. 2002, will be retained. The harvest of live trees is not proposed as part of this project (EA section 2.1.1). RMP conformance is discussed in Section 1.2 of the EA - BLM Land Use Plan Conformance. The RMP action pursuant retention of green trees is VF-1.1.1-"Design treatment project to enhance forest health and/or habitat diversity (consistent with Appendix C, Desired Future Conditions for Forest Vegetation/Wildlife Habitat)." Managing for Desired Future Conditions as stated in the RMP is a major component of the proposed action. Thus, this project is in conformance with the Cottonwood Field Office RMP.
FOC-11	FOC	The EA notes that lynx habitat would be logged under both action alternatives. No biological opinion is yet available. Did the BLM consider the latest court case on lynx from the Montana District Federal Court?	<p>The Fish and Wildlife Service (FWS) concurred with the BLM's Biological Assessment on Canada lynx resulting in a finding of not likely to adversely affect based on the following rationales provided by the FWS:</p> <p>"1. The project occurs in one Lynx Analysis Unit (LAU): LAU 2090204. Only four percent of lynx habitat in the LAU is located on Bureau lands (96 percent of the LAU is located on the Nez Perce National Forest). The project will harvest 14 acres of denning habitat, and 99 acres of foraging habitat which represents one percent of the suitable habitat within the LAU. Effects to lynx habitat from project implementation will be insignificant.</p> <p>2. Lynx are unlikely to be present in the project area during implementation. These lynx are thought to be animals dispersing from Canada during cyclic high population levels. Given the cyclic nature of such dispersal events, the relatively low number of anecdotal sightings of the lynx, and the varied level of confidence regarding correctly identifying lynx via visual observations (without the benefit of evidentiary standards to verify lynx presence, the potential exists that many of these anecdotal sightings were actually bobcats (<i>Lynx rufus</i>)), the likelihood that a transient lynx would be present during project implementation is very low. In addition, should a transient lynx happen to be present in the vicinity of project activities, there is sufficient adjacent habitat available for lynx to avoid the project area. Furthermore, lynx are considered to be generally tolerant of human presence and activities. Given these considerations, we conclude that</p>

CMT #	Commentor	Comment	BLM's Response
			<p>the risk of direct effects to lynx from project implementation is discountable.</p> <p>3. Because there is no evidence of resident or breeding lynx in the project area, the project is not likely to adversely affect lynx denning or reproductive behavior.</p> <p>4. Decommissioning all temporary roads and restoration of 4.76 miles of existing roads through deep ripping, seeding, and mulching is likely to benefit the lynx by reducing the potential for humans to directly impact (e.g., through incidental trapping) transient lynx, if present, by eliminating motorized access to suitable lynx habitat. These activities are not expected to significantly affect transient lynx or lynx habitat.</p> <p>5. Maintaining Riparian Conservation Areas (RCAs) as no harvest zones will continue to provide adequate travel corridors for transient lynx, if present, to move securely through the project area.</p>
FOC-12	FOC	Given the questions surrounding TES species, roadless, and water quality, an EIS needs to be prepared. This is a major action, given the current conditions of the area.	The BLM disagrees. Rationale is included in the Finding of No Significant Impacts (FONSI).