

UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
NORTHWEST OREGON DISTRICT OFFICE

DECISION RECORD

DOI-BLM-ORWA-N050-2017-0006-EA

Thurston Hills Non-Motorized Trails and Forest Management Environmental Assessment (EA)

Decision

Based on the analyses documented in the Thurston Hills Non-Motorized Trails and Forest Management EA (May 2018 EA or EA), the FONSI, the associated project record, and other documents incorporated by reference in the EA, it is my decision to implement a timber harvest and timber sale (the Pedal Power Timber Sale) as described and analyzed under Alternative 3 in the EA (pp. 23-27) and a trail development action as described and analyzed under Alternative 3 in the EA (pp. 23-24). The selected timber harvest action is a 155-acre regeneration harvest implementing the 2016 Northwestern and Coastal Oregon Resource Management Plan (RMP) management direction for the Harvest Land Base – Moderate Intensity Timber Area, including all applicable project design features (EA, Appendix B). The layout of the Pedal Power Timber Sale is included in Exhibit A. The selected trail project is the construction of 8.3 miles of non-motorized trails for hiking and mountain biking, connected to the adjoining Willamalane Park and Recreation District non-motorized trail system. The trail action conforms to the RMP direction for establishing hiking and mountain biking trails in the BLM’s Willamalane Extensive Recreation Management Area (ERMA) The BLM will initiate the selected timber harvest action as soon as possible after receiving a legitimate bid at a timber sale auction and after the Administrative Remedy period is over. The BLM will initiate the selected trail development action as soon as possible after completion of the timber harvest.

Plan Conformance and Legal Compliance

The selected actions are in conformance with the BLM’s 2016 Record of Decision and Northwestern and Coastal Oregon Resource Management Plan (RMP) and the EA tiers to the 2016 Final Environmental Impact Statement for the Proposed Resource Management Plan for Western Oregon.

The BLM did not identify any species or critical habitats pursuant to the Endangered Species Act (ESA) in the Thurston Hills project area, and did not identify any cultural resources eligible or potentially eligible for listing in the National Register of Historic Places, per the National Historic Preservation Act. The project incorporates Best Management Practices (BMPs) to reduce nonpoint source pollution to the maximum extent practicable, as required by the Clean Water Act. The project complies with these and all other applicable statutory requirements.

Rationale for Selection

The BLM’s interdisciplinary team evaluated the direct, indirect, and cumulative effects of the project and presented those analyses in the EA. Based on these analyses, I have prepared a Finding of No Significant Effect (FONSI). In the FONSI, I conclude that the selected actions would not have a significant impact on the human environment and that no further analysis is

required. The EA, the FONSI, and all documents contained in the Thurston Hills EA project file are incorporated by reference into this Decision Record.

In consideration of the project analyses and project decision factors (EA, p. 4), I have determined that the selected timber action would:

- Meet the two purposes and needs for the forest management action, including the attainment of Allowable Sale Quantity (ASQ) and adjustment of forest stand age-class distribution for sustained-yield management, as expressed in the EA (pp. 5-7)
- Accommodate the development of a hiking and mountain biking trail system within the Willamalane Extensive Recreation Area (ERMA) as anticipated by the RMP (EA, pp. 4, 24, and 37-38)
- Provide the highest net revenues of all the timber harvest alternatives (EA, p. 45)
- Implement forest management activities within the ERMA prior to trail development so that subsequent trails to be constructed within the ERMA would not be impacted by regeneration harvest soon after their construction (estimated in the EA to be 10-20 years) (EA p. 1).

In consideration of the project analyses and project decision factors (EA, p. 4), I have determined that the selected trail development action would:

- Meet the purpose and need for trail development in the ERMA, namely, providing a new recreational opportunity for hiking and mountain biking in proximity to the greater Eugene urban area, as expressed in the EA (pp. 4-5)
- Represent the best alternative in terms of public investment. This alternative would construct trails subsequent to a regeneration harvest in the HLB.

Public Involvement

The BLM offered a 30-day public comment period during scoping which began March 17, 2017, and ended April 30, 2017. During the scoping period, the BLM held a public meeting in cooperation with the WPRD on April 13, 2017 and solicited comments from the public. The BLM also sent coordination letters to the Confederated Tribes of Siletz, the Confederated Tribes of Grand Ronde, and the Confederated Tribes of Warm Springs, inviting them to consult. The BLM did not receive a response from any of the Tribes.

In addition to the scoping meeting, the BLM engaged a public involvement specialist who conducted in-depth interviews with stakeholders in September 2017. After developing a preliminary range of alternatives and issues in response to public comments, the BLM held a public open house on November 7, 2017, to solicit input on the range of alternatives and issues the BLM proposed to consider in the EA.

The BLM reviewed all public comments from scoping, stakeholder interviews, and public meetings when developing alternatives and issues for the EA (EA, pp. 8-9). Public comments were reflected in six (6) issues considered but not analyzed in detail, one (1) issue analyzed in detail, and four (4) alternatives considered but eliminated from detailed analysis.

The BLM posted the EA and Preliminary Finding of No Significant Impact (FONSI) on April 23, 2018, for a 15-day public comment period ending May 8, 2018, during which 6 comment

letters were received. The BLM prepared responses to substantive comments, included with this Decision Record in Appendix A.

The BLM added additional language and context to the EA as a result of public comments and internal review. That additional language did not include additional analysis or change the conclusions of the EA. The EA accompanies this Decision. The BLM has notified the public through the interested stakeholders list (by email) of its release.

Administrative Remedies

The decisions described in this document are forest management decisions and are subject to protest by the public. In accordance with Forest Management Regulations at 43 CFR Subpart 5003 Administrative Remedies, protests of these decisions may be filed with the authorized officer, Michael Kinsey, within 15 days of the publication date of the notice of the decision or timber sale advertisement in the *Eugene Register-Guard*, Eugene, Oregon.

43 CFR § 5003.3 subsection (b) states: “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 (email) or facsimile (fax) protests. Only written and signed hard copies of protests that are delivered to the Northwest Oregon District, Upper Willamette Field Office, will be accepted. The full address is as follows: ATTN: Michael Kinsey, Upper Willamette Field Manager, BLM Springfield Interagency Office, Northwest Oregon District, 3106 Pierce Parkway, Suite E, Springfield, Oregon 97477. 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.

43 CFR § 5003.3 subsection (c) states: “Protests received more than 15 days after the publication of the notice of decision or the notice of sale 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 to her. The authorized officer shall, at the conclusion of the review, serve the protest decision in writing to the protesting party(ies). 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 the close of business (4:00 p.m.) within 15 days after publication of the decision notice, the decision will become final. If a timely protest is received, the decision will be reconsidered in light of the statement of reasons for the protest and other pertinent information available, and the Northwest Oregon District will issue a protest decision. For further information, contact Michael Kinsey at the above address.

Signature of the Responsible
Official:

/s/ Michael Kinsey

Michael Kinsey

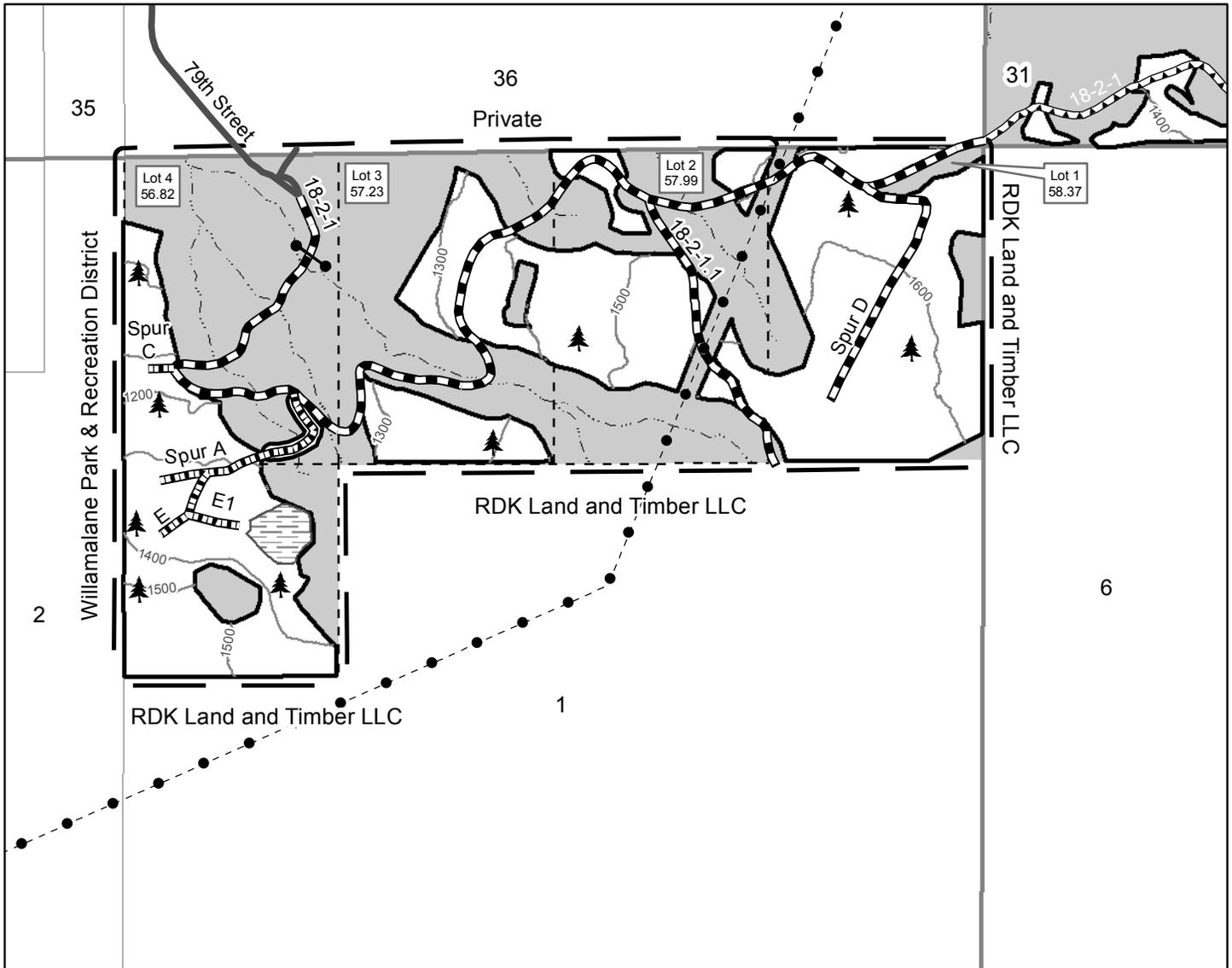
Upper Willamette Field Office Manager
Northwest Oregon District

Date: *May 30, 2018*

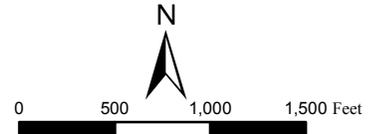


**UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT**

PEDAL POWER TIMBER SALE CONTRACT NO. ORN05-TS18-513
T. 18 S., R. 2 W., SEC. 1, WILL. MER., NORTHWEST OREGON DISTRICT



- | | | | |
|--|--|--|--|
| | Boundary of Cutting Area - Posted, Painted | | Construction |
| | Regeneration Harvest Area | | Improvement |
| | Special Yarding Area | | Renovation |
| | Contract Area | | Paved Road |
| | Reserve Area | | Stream |
| | Special Right-of-Way Area | | BPA Transmission Right-of-Way |
| | Gate | | Approximate Location of Wildlife Trees |



TOTAL FOR SECTION 1	
HARVEST AREA	134.00
RIGHT-OF-WAY (CLEARCUT)	4.00
RESERVE AREA	132.41
CONTRACT AREA	<u>270.41 Acres</u>

GRAND TOTAL FOR SECTIONS 1 & 31	
HARVEST AREA	143.00
RIGHT-OF-WAY (CLEARCUT)	4.00
RESERVE AREA	<u>208.99</u>
CONTRACT AREA	<u>355.99 Acres</u>

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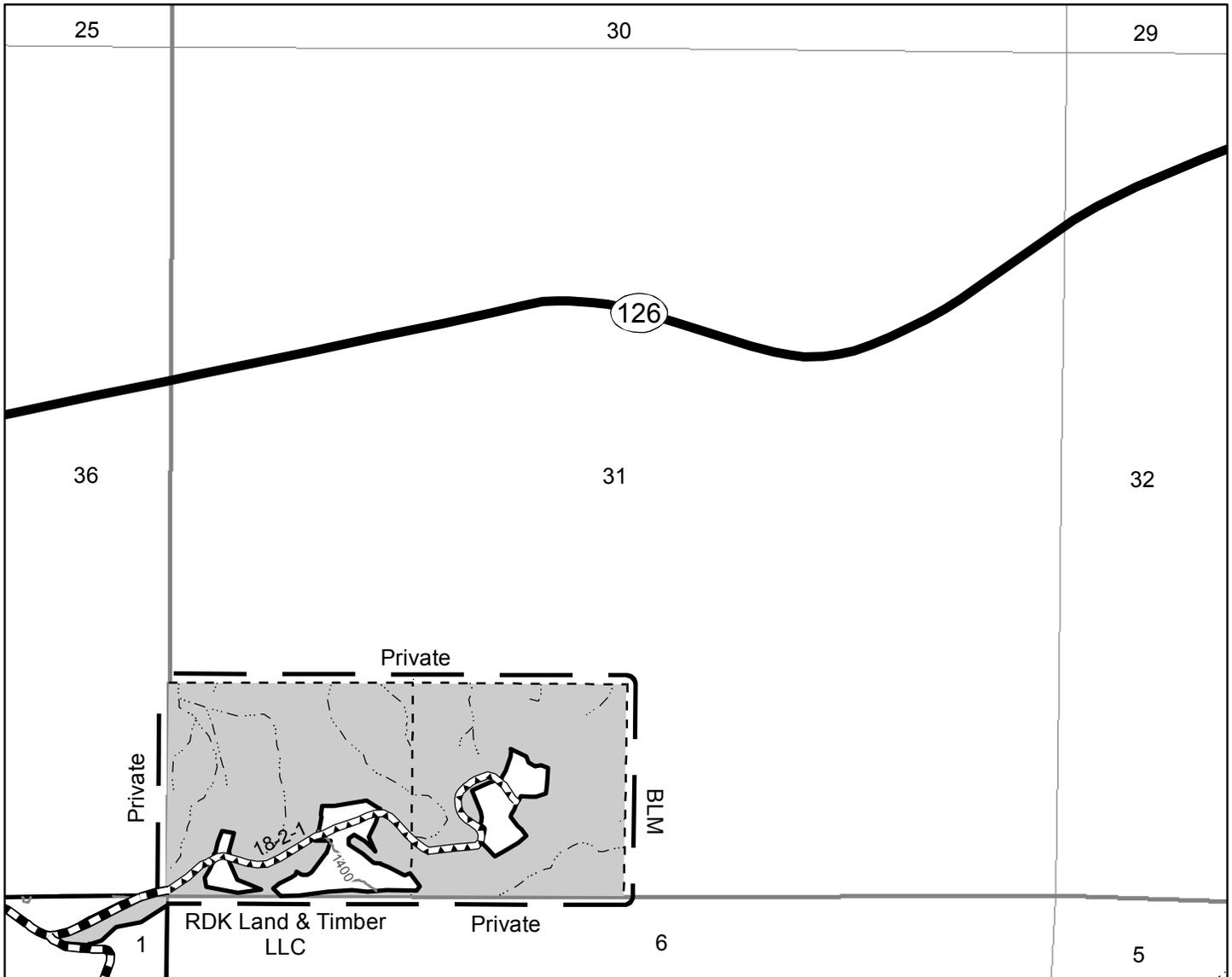


**UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT**

EXHIBIT A

Sheet 2 of 2

PEDAL POWER TIMBER SALE CONTRACT NO. ORN05-TS18-513
T. 17 S., R. 1 W., SEC. 31, WILL. MER., NORTHWEST OREGON DISTRICT



- | | |
|--|---------------|
| Boundary of Cutting Area - Posted, Painted | Improvement |
| Regeneration Harvest Area | Renovation |
| Contract Area | State Highway |
| Reserve Area | Stream |

TOTAL FOR SECTION 31	
HARVEST AREA	9.00
RESERVE AREA	<u>76.58</u>
CONTRACT AREA	85.58 Acres

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APPENDIX A - RESPONSE TO COMMENTS

Six comment letters were received on the April 2018 EA. Two letters contained substantive comments. The BLM prepared responses to substantive comments. Substantive comments are those that do one or more of the following: 1) question, with reasonable basis, the accuracy of information in the EIS or EA; 2) question, with reasonable basis, the adequacy of, methodology for, or assumptions used for the environmental analysis; 3) present new information relevant to the analysis which, if used, could have changed the results of the analysis; 4) present reasonable alternatives other than those analyzed; 5) could result in changes or revisions to one or more alternatives. Comments that are not considered substantive are: comments in favor of or against the proposed action or alternatives; comments that agree or disagree with BLM policy or resource decisions; comments that don't pertain to the project area or the project (including those beyond the scope of the project); and comments that take the form of vague, open-ended questions.

Comment numbers, substantive excerpts, and BLM's responses are presented below. Note that the EA page numbers refer to April 2018 EA.

AFRC - 1

Comment Excerpt: *“In the context of the O&C Act, we would recommend a more appropriate “Need 1” to be “a need to comply with the sustained-yield mandate of the O&C Act.”; and the adjoining “Purpose 1” to be “conduct silvicultural treatments consistent with those vegetation models that were developed to ensure the sustained-yield management mandated by the O&C Act.” [Emphasis in original.]*

Response: The BLM has appropriately identified the purpose and need based on the direction in the 2016 RMP FEIS and ROD, which, for timber harvest, the BLM developed to comply with the O&C Act. The BLM identified the purpose and need based on the language of the management direction in the 2016 ROD. The purpose and need is therefore appropriate to this project, and does not need to be revised.

DOD - 1

Comment Excerpt:

“I am concerned that the EA has not fully addressed the impacts to recreational trail users from the timber harvest proposal. I suggest that the differences in resulting forest cover type between alternatives is a major difference to the trail user overall enjoyment and experience and that trail design, construction techniques, and green tree aggregates do not make up for the loss of the intrinsic value of recreating in a mature forest setting.”

Response: The analysis of Alternative 3 in the EA on page 36, under Issue 1 (*How would the trail development plan provide for different recreational experiences and levels of difficulty for mountain biking and hiking?*), describes conditions for recreational users under the non-harvested Alternative 2 (pp. 34-35) and post-harvested conditions including loss of mature tree canopy, open trail exposure, and new roads (pp. 36-37). Since there are no existing trails and no existing recreational users under existing conditions, the analysis appropriately focuses on the

setting, experience, and opportunity to be expected under each of the alternatives rather than impacts to a user group that is not currently present.

OW-1

Comment Excerpts:

"This new-fangled NEPA analysis is unacceptable.....Tiering to the RMP FEIS for site-specific issues is not the way NEPA is supposed to work."

"Since these significant new issues were not properly considered in the RMP Revision FEIS, the agency needs to address them [in] project level NEPA analyses like this one."

"The RMP FEIS does not fulfill BLM's obligation to take a hard look at the site-specific environmental effects of logging."

Response: The BLM signed a Record of Decision (ROD) approving the Northwestern and Coastal Oregon Record of Decision and Resource Management Plan (2016 ROD/RMP) on August 5, 2016. As mandated by the Federal Land Policy and Management Act (FLPMA), the BLM implements projects in accordance with its authorizing RMP. The BLM developed the Thurston Hills project in accordance with the RMP management direction for the timber harvest in the HLB - MITA and in accordance with the RMP management direction for trail development within the Willamalane Extensive Recreation Management Area (ERMA).

Tiering is appropriate when it helps the agency to focus its NEPA analysis on issues which are ripe for decision and can exclude those issues which have already been analyzed and decided in higher level analyses (such as an RMP EIS). (See 40 CFR 1502.28). The BLM NEPA Handbook (BLM Manual H-1790-1, page 27) also notes that, *"Tiering is appropriate when the analysis for the proposed action will be a more site-specific or project-specific refinement of the existing NEPA document."* The RMP FEIS assumed that there would be regeneration harvest and associated activities (such as road building, fuels reduction, and reforestation) in the HLB - MITA, including the HLB - MITA lands in the Thurston Hills project area. The RMP FEIS assumed that there would be non-motorized trails for hiking and mountain biking developed within the Willamalane ERMA, within the same geographic bounds assumed by the Thurston Hills project. Therefore, the proposed actions in the Thurston Hills EA are the same as actions analyzed by the RMP FEIS. The EA is therefore a more project-specific refinement of the RMP FEIS and tiering is extremely appropriate. Tiering is a form of incorporation by reference and provides an opportunity to reduce paperwork and redundant analysis.

Tiering is not appropriate, nor was it used, for every issue analyzed in the EA. It is appropriate to tier a project-level analysis to an overarching RMP FEIS when the following conditions apply: 1) the proposed action was assumed as an action in the RMP FEIS; 2) the location of the proposed action was assumed by the RMP FEIS; 3) the issue being incorporated by reference was analyzed by the RMP FEIS; 4) the project-level data is the same as or essentially similar to the data used by the RMP FEIS and site-specific data collected for the project do not substantially change the circumstances assumed by the analysis; and 5) the proposed project action follows the RMP management direction for the relevant resource (issue). When these conditions apply, the effects of the project-level action were anticipated by the FEIS, such that the site-specific analysis would mirror the results of the FEIS and would not provide the decision-maker with any new information. The BLM NEPA Handbook (H-1790-1) outlines

tiering criteria on pages 23 and 27-28, which expand on the tiering authorizations set forth in 40 CFR 1508.28.

The specialists for the Thurston Hills EA only utilized tiering when tiering was appropriate, and examined site-specific data to ensure that there were no data anomalies or extraordinary circumstances which would pose significant effects from the proposed actions beyond those disclosed in the 2016 RMP FEIS.

During evaluation of potential issues, specialists considered new information published since the issuance of the 2016 RMP, to assess whether new information would be relevant in analyzing project effects. Where potentially relevant, that information was considered. The BLM has examined the topics and references cited by the commenters as new information, and has found no cause for supplementing or changing the EA analysis methods or results. The BLM is not, in this project level EA, revisiting or reanalyzing issues already analyzed in the 2016 RMP FEIS, or decisions made in the 2016 ROD.

OW- 2

Comment Excerpts:

“We urge BLM to consider a thinning alternative, e.g. building trails plus thin some of the forests...”

“BLM could meet the purpose of contributing to the ASQ by thinning these stands or others....”

“The alleged need ‘to adjust the age class distribution within the Upper Willamette Field Office’ makes no sense.”

Response: The BLM considered a thinning alternative, as described on page 31 of the EA. A thinning alternative would not meet the purpose and need of adjusting the age class distribution within the Upper Willamette Field Office. Because it did not meet both of the purposes and needs for stand management, it was not a viable alternative and therefore was eliminated from detailed analysis.

The BLM has appropriately identified the purpose and need for timber harvest based on the direction in the 2016 RMP FEIS and ROD, which the BLM developed to comply with the O&C Act. The BLM identified the purpose and need based on the language of the management direction in the 2016 ROD. The purpose and need is therefore appropriate to this project, and does not need to be revised. An alternative which does not meet the purpose and need for a project is not one that is carried forward into further analysis in the EA.

OW- 3

Comment Excerpt: *The EA admits that this project will increase fire hazard for 40 years, but the EA does not disclose that in 40 years, if these stand are not regen logged, they will be even more resistant and resilient to fire.”*

Response: The BLM analyzed the effects of the proposed trail development, timber harvest, and reforestation activities on fire hazard as an *issue considered but eliminated from detailed analysis* in the EA (p. 10). The EA disclosed key findings relative to fire hazard for

implementing a trail building project and a regeneration harvest project. More detailed information available to the decision maker was included in the Fuels Specialist Report. Under the analysis of fire hazard for the No-Action Alternative, the Fuels Specialist Report states, *“Increases in fuel load associated with suppression mortality could be as much as 15 tons per acre, over the next 20 to 30 years, based on estimates from Maxwell and Ward (1980). As stands transition from stem exclusion to understory re-initiation, they would slowly trend from a timber litter model into a timber understory model, which is associated with increased fire behavior and hazard. Initially, stands in sec [Sections] 1 and 31 would remain in the mature structural stages. Over the next 50 years, stands would transition from a mature to a structurally complex stage, and the stand level fire hazard would transition from low to mixed hazard.”* These results indicate an increase, not a decrease, in fire hazard at the site scale over the next 50 years under the No Action Alternative. At the scale of the Thurston Hills analysis (6th field watershed), however, as concluded by the FEIS (FEIS, Volume 2, p. 264) and cited in the EA, *“The BLM’s management... is unable to provide more than slight variation to fire hazards within the planning area due to the checkerboard pattern of the landscape”* (EA, p. 10). This also applies to the No Action Alternative. Also see BLM’s response to OW-5.

The 2016 RMP/FEIS, to which this EA is tiered, analyzed stand level fire hazard, stand level fire resilience, and landscape level fire resilience. The BLM concluded in the 2016 RMP/FEIS that the proposed RMP would over time increase stand level fire resistance and reduce stand level fire hazard. RMP/FEIS p. 223. The BLM also concluded that there would be no change in landscape level fire resilience. RMP/FEIS p. 223. This analysis, combined with the relatively small geographic scale of the proposed action, led the BLM to conclude that there was no reason to analyze this issue in detail. There were no concerns brought to BLM during the public scoping period that would suggest this was an issue that needed detailed analysis, and the BLM did not identify any aspect of this issue that would lead to a reasoned choice between alternatives that has not already been addressed by the 2016 RMP/FEIS.

OW- 4

Comment Excerpts:

“BLM has a NEPA obligation to disclose the effects of logging on globally important resources such as the global carbon cycle...”

“The NEPA analysis should start out with an accurate and up-to-date inventory of carbon storage and carbon flows on federal lands in the project area.”

“NEPA’s requirement to take a “hard look” requires the agency to consider the effects of logging-related GHG emissions.”

Response: The BLM considered the effects of the proposed harvest action on carbon storage and greenhouse gas emissions (GHG) but did not disclose the results in the EA because: a) the evaluation of this issue in the Silviculture Specialist Report (pp. 15-17) concluded that there would be no reasonably foreseeable significant effects of the proposed action beyond those disclosed in the 2016 Final Environmental Impact Statement (FEIS Volume 1, pp. 165-211); and b) the BLM interpreted the only scoping comment about carbon storage as a request to develop an alternative that would respond to a purpose and need of storing carbon in forest ecosystems. The BLM evaluated that alternative and eliminated it from detailed analysis (EA, p. 31). As

noted in the Silviculture Specialist Report, effects of the Thurston Hills proposed timber harvest on carbon storage and greenhouse gas emissions tiers to the analysis in the FEIS. The FEIS analyzed the effects of timber harvesting and prescribed burning on greenhouse gas emissions and carbon storage, and assumed that regeneration harvest and burning would occur within the Thurston Hills HLB - MITA. Conducting a more detailed inventory and analysis of carbon and GHG at the site scale would not provide additional information for the decision maker. [Relative to tiering, please see the BLM's response to comment OW-1).

OW- 5

Comment Excerpt: *"The NEPA analysis did not take a hard look at the effects of regen logging. The BLM failed to identify and analyze several important issues related to the effects of regen, including carbon storage, fire hazard, low summer stream flows, adverse competitive interactions between barred owls and spotted owls, declining social value of timber production to meet ASQ."*

Response: The BLM took the requisite hard look at the potential effects of regeneration harvest relevant to the scope and scale of the Thurston Hills project. Relative to the issues listed in the excerpt, the BLM notes the following:

Carbon storage: See the BLM responses to Comment OW-4.

Fire hazard: The BLM analyzed Fire Hazard within close proximity to developed areas in the FEIS (Volume 3, p. 253). The project area data in the Thurston Hills project area mirror the data analyzed in the FEIS and the project would utilize RMP direction for managing fuels. As stated in the EA (p. 10), the BLM did not analyze this issue in detail because there is no potential for significant effects from the proposed actions on fire hazard beyond those disclosed in the FEIS. Also see BLM's response to Comments OW-1 and OW-3.

Low summer stream flows: Please see the BLM's response to Comment OW-8.

Adverse competitive interactions between barred owls and spotted owls: The BLM analyzed the effects of the Thurston Hills project on spotted owl habitat as an *issue considered but eliminated from detailed analysis* in the EA (pp. 16-17), including ramifications for spotted owl recovery. The BLM evaluated this issue, including the competitive interactions between barred owls and spotted owls, in the RMP FEIS (FEIS, Volume 2, pp. 947-973). The Thurston Hills project is consistent with the assumptions used for that analysis and follows the relevant RMP Management Direction for spotted owls. Therefore, the effects of the Thurston Hills project on competitive interactions between barred owls and spotted owls were anticipated by the FEIS, and site-specific analysis would not provide the decision maker with any information beyond what was disclosed in the FEIS. The BLM thus appropriately tiered this issue to the FEIS analysis.

Declining social value of timber production to meet ASQ: This issue is beyond the scope of the project. The project was designed to conform to the RMP, which directs timber harvest in the HLB in order to contribute to the required ASQ.

OW-6

Comment Excerpt:

“Another issue that BLM should have considered is the scenic and recreational impacts of thinning versus regen harvest.”

Response: Since thinning was not a viable alternative (see response to comment OW-2), the BLM did not evaluate issues relative to effects from thinning. The project’s effect on visual resources was an internally generated issue. The Thurston Hills planning area was designated as Visual Resource Management Class IV (VRM IV) in the 2016 ROD/RMP. This is the lowest visual quality classification, indicating that there are no special high quality visual or scenic resources present, and providing for management activities that require major modifications of the landscape. Per BLM guidance in Manual 8410, proposed actions in VRM Class IV do not require measures to retain or preserve the existing visual character. Based on this classification, none of the proposed regeneration harvest alternatives and none of the proposed trail alternatives would have the potential to cause significant effects on visual or scenic resources and there would be no differences among alternatives to inform the decision maker. The BLM therefore did not analyze this issue in detail and did not include it in the EA. Effects on recreation from the project alternatives were evaluated in detail in Issue 1 in the EA.

OW- 7

Comment Excerpts:

“The EA lacks site-specific analysis of several important NEPA issues such as effects to late successional wildlife and snag associated species. The EA just tiers to the programmatic NEPA analysis in the RMP FEIS. This is not appropriate.

The EA fails to provide a detailed site-specific description of the existing environmental conditions, such as the actual age of each stand proposed for logging, the existing trees per acre, the existing species composition, whether there are legacy trees or other special features....what species use the forest and the streams, how those species will be impacted by logging and trail development, etc.”

Response: The BLM presented the effects of the Thurston Hills project on the development of late-successional habitat features and snags/down woody material as an issue not analyzed in detail in the EA (pp. 16-17). This is because the BLM evaluated the issue of forest structural stages and snag/down woody material in regards to wildlife habitat development in the RMP FEIS on pages 833-852. The Thurston Hills project is consistent with the assumptions used for that analysis and follows the relevant RMP Management Direction for the management of snags, down woody material, and legacy trees over 39” DBH that were regenerated before 1850. Therefore, the effects of the Thurston Hills project on late-successional habitat features, snags/down woody material, and the species that use them were anticipated by the FEIS, such that site-specific analysis would not provide the decision maker with any information beyond what was disclosed in the FEIS. This issue is therefore appropriately tiered to the FEIS analysis. When evaluating the appropriateness of tiering, the wildlife biologist investigated and reported on site-specific habitat conditions, including existing habitat type, snag and down woody material levels, the numbers of legacy trees present, and the potential for various wildlife species to use the proposed units (Wildlife Report, pp. 1-5).

The BLM includes detailed information about existing conditions in an EA when such detailed information is necessary to analyze effects and to weigh differences in effects among alternatives. Per CEQ guidance, “*An EA is intended to be a concise public document that provides sufficient evidence and analysis for determining the significance of effects from a proposed action (40 CFR 1508.9) and that serves as a basis for reasoned choice. The CEQ has advised agencies to keep EAs to no more than approximately 10-15 pages (Question 36a, CEQ, Forty Most Asked Questions Concerning CEQ's NEPA Regulations, March 23, 1981).*” The BLM has not yet achieved the page limits recommended by CEQ but does implement issue-based analysis in order to maintain focus on the details relevant to the analysis results for each project (BLM Handbook p.75). The Thurston Hills EA provided sufficient detail on the meaningful parameters used in the analyses, summarized from the more detailed IDT specialist reports. Also see response to comment OW-1.

OW- 8

Comment Excerpt: *The EA fails to disclose the adverse effects of plantation forestry on numerous small streams located within project area....The agencies need to address significant new information indicating that logging and road building cause adverse hydrological effects, including peak flows in the decade immediately following logging, followed by adverse low flows....”*

Response: The BLM analyzed the effects of harvest, road building, and subsequent regeneration on water yield, peak flow, and low summer flow as an internally-generated issue for the Thurston Hills project, and included the results in the hydrologist’s report on *Hydrology Issues Not Analyzed in Detail* (pp. 5-11). The analysis included consideration of Grant et. al. (2008) regarding peak flows, the Perry and Jones (2016) study on summer streamflow deficits, and the Moore et. al. (2004) study on forest evapotranspiration (these references are cited in the report, p.10). The BLM has reviewed the new information referenced in the comment and found no reason to change the methods or conclusions of the analysis. The BLM found the potential for proposed and future harvest to alter streamflow to be inconsequential over time in the Cedar Creek catchment basin. The amount of land in hydrologically mature condition (over 150 years old) would increase as Riparian and Late Successional Reserves mature over time, even with periodic regeneration harvest and some new road construction in the HLB. The issue was not presented in the EA because public scoping comments did not identify it and the BLM’s analysis had concluded that there was no potential for significant effects and no discernible difference between the alternatives to inform the decision maker.