



United States  
Department of  
Agriculture

Forest  
Service

July 2004

# Final Supplemental Environmental Impact Statement

## Rimrock Ecosystem Restoration Projects



Heppner Ranger District, Umatilla National Forest

Grant, Morrow, and Wheeler Counties

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F14-HP-08-04

**FINAL SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT**  
for the  
**RIMROCK ECOSYSTEM RESTORATION PROJECTS**  
*Commercial harvest and Pre-commercial Thinning*  
*in the C3 Management Area*  
Grant, Morrow and Wheeler Counties, Oregon

***Abstract:***

This Final Supplemental Environmental Impact Statement for the Rimrock Ecosystem Restoration Projects has been developed to meet the requirements in 40 CFR 1502.9. Substantive comments submitted on the Draft Supplemental Environmental Impact Statement (DSEIS) released in April 2004 are included along with the response to the comments. The changes to the DSEIS resulting from public and agency comments were minor and are displayed on an errata sheet. The entire DSEIS with a new cover sheet will be filed as the Final SEIS (40 CFR 1503.4[c]).

Lead Agency:	USDA Forest Service
Responsible Official:	Jeff Blackwood, Forest Supervisor Umatilla National Forest
Further Information:	Janet Stefani Heppner Ranger District 117 S. Main PO Box 7 Heppner, Oregon 97836

**Errata**  
for the  
**Rimrock Ecosystem Restoration Projects**  
**Supplemental EIS**

*Insert in FSEIS at the bottom of page ii.*

APPENDIX M: Response to Comments.....120

*Insert in FSEIS at the bottom of page 7.*

**Close 24 miles to 47 miles of road** - Closing from 24 miles up to 47 miles of road was considered but not analyzed in detail (see DSEIS page 72) because this action would not be responsive to the purpose and need and would be outside the scope of this decision. While it is possible to seasonally or permanently change the status of road from open to closed to improve HEI; doing so was not proposed by this agency at this time for this specific location. The need to “reduce motorized vehicular disturbance to water, soil, vegetation and wildlife resources” was addressed in the Motorized Access and Travel Management decision signed in 1992 for the Heppner Ranger District.

The purpose and need for action for this specific project was mainly forest health and fuels (FEIS, pages 5 to 10, FSEIS, pages 1 to 5). Future projects that are intended to improve habitat effectiveness index in this location may occur and may someday be proposed by the Forest Service. Future proposals to improve HEI are not precluded by this purpose and need and not precluded by this proposed action nor is the attainment of an HEI of 70 prevented in the future.

## ***Appendix M: Response to Comments***

**Doug Heiken**

**<onrcdoug@efn.org>**

05/16/2004 01:37 PM

Please respond to onrcdoug

To: Comments-pacificnorthwest-umatilla-heppner@fs.fed.us, jblackwood@fs.fed.us

cc:

Subject: ONRC comments on the Rimrock SDEIS (big game management area)

Jeff Blackwood

Forest Supervisor

Umatilla National Forest

[Comments-pacificnorthwest-umatilla-heppner@fs.fed.us](mailto:Comments-pacificnorthwest-umatilla-heppner@fs.fed.us)

Subject: ONRC comments on the Rimrock SDEIS (big game management area)

Dear Forest Service:

Please accept the following comments from Oregon Natural Resources Council concerning the Rimrock SDEIS dated April 2004.

1. Units 170, 173, 175, 176, 181, 185, 260, 266 are located in an uninventoried roadless area larger than 1,000 acres which is part of a larger complex of roadless areas with significant ecological value. Any restoration activity in these areas should be low-impact, preferably non-commercial restoration. All large trees (dead and alive) must be retained. No roads should be built. The area should be left in a condition that is eligible for wilderness designation. The Forest Service has a NEPA obligation to disclose the existence of these roadless areas and the environmental consequences of logging in them. See ONRC's July 2003 Rimrock appeal.
2. The Forest Service is relying on habitat as a surrogate for populations of management indicator species (MIS) and then using MIS as a surrogate for the health of the representative ecosystem. The courts have invalidated this "proxy-on-proxy approach" to management indicator species.
3. The SDEIS does not disclose the effects of logging on "migratory corridors" for big game as required by the LRMP.
4. The Forest Service analysis of dead wood habitat fails to adequately disclose the habitat requirements of each of the 11 primary cavity excavators that occur in the planning area. In order to manage habitat for these management indicator species, it is critical to know the extent to which they compete with one another for territory, food, etc. The Forest Service cannot know how many snags per acre to retain unless it knows the answer to this question of inter-species competition. In any case, it is almost certain the snags per acre required in the LRMP are inadequate to meet the needs of all these species, and even after almost 15 years, the Forest Service lacks monitoring data to back up the meager management standards in the LRMP.
5. The potential population method of determining habitat value for cavity associated species has been discredited in the scientific literature. The Umatilla NF must revise its LRMP to account of the changing science. Until the revision is complete, the UNF must

either refrain from adversely affecting any habitat element for cavity species, or fully disclose and discuss the scientific arguments on both sides and conduct a full cumulative impacts analysis and disclosure. See ONRC's July 2003 Rimrock appeal.

6. The Forest Service has not disclosed the cumulative effects of all the incremental plan amendments that revise big game HEI requirements in order to facilitate logging. The Forest Service must look at this issue comprehensively rather than incrementally. This is especially important given the length of time since the last cumulative review was completed when the forest plan was approved.
7. The purpose and need for the project violates the LRMP for big game. The project violates the LRMP which requires that the road system be managed to meet forest plan management direction. In order to meet big game requirements, 24 miles of road must be closed. See SDEIS pp 72, 110.
8. The SDEIS indicates that the various alternatives will have no difference in effects on big game. This indicates two NEPA violations: (1) an inadequate range of alternatives, and (2) analytic tools that lack the sensitivity to fully disclose impacts of the alternatives. The Forest Service should have considered an alternative that closed 24 miles of roads in order to meet LRMP requirements for HEI, and the Forest Service should have used more sensitive analytic tools that highlight the differences (however subtle) between alternatives. Loss of cover and increase of roads will unquestionably reduce big game habitat value but the SDEIS fails to disclose that fact.
9. We hereby incorporate by reference our previous comments on all phases of the Rimrock project as well as the concerns raised in our July 7, 2003 administrative appeal.

Sincerely,

/s/

Doug Heiken  
Oregon Natural Resources Council  
PO Box 11648  
Eugene OR 97440  
541-344-0675

**Oregon Natural Resources Council, Doug Heiken**

**Comment:** *“Units 170, 173, 175, 176, 181, 185, 260, 266 are located in an uninventoried roadless area larger than 1,000 acres which is part of a larger complex of roadless areas with significant ecological value. Any restoration activity in these areas should be low-impact, preferably non-commercial restoration. All large trees (dead and alive) must be retained. No roads should be built. The area should be left in a condition that is eligible for wilderness designation. The Forest Service has a NEPA obligation to disclose the existence of these roadless areas and the environmental consequences of logging in them. See ONRC’s July 2003 Rimrock appeal.”*

**Response:** The effects of the proposed activities on areas without roads were disclosed on pages 110 and 111 in the Rimrock Ecosystem Restoration Projects FEIS. All of the areas without roads within the project area are narrow and irregular in shape and the most isolated portions of the areas are generally within one-half mile of an existing classified road. No special features were noted in any of the undeveloped areas. All undeveloped areas are considerably smaller than 5000 acres and thus, do not meet the size criteria for wilderness designation. There are no Rare II areas located in the project area and none of the undeveloped areas are adjacent to Rare II areas. Units 170, 173, 175, 176, 181 and 185 are planned for helicopter logging. Units 260 and 266 are adjacent to an existing classified road and logs will be yarded to landings along this road. No new classified road construction or temporary road construction is proposed for these units.

**Comment:** *“The Forest Service is relying on habitat as a surrogate for populations of management indicator species (MIS) and then using MIS as a surrogate for the health of the representative ecosystem. The courts have invalidated this “proxy-on-proxy approach” to management indicator species.”*

**Response:** The effects to management indicator species (MIS) and their habitat are disclosed in the FSEIS on pages 70 to 76 and in the FEIS on pages 134 to 136 for terrestrial wildlife and effects for aquatic species are disclosed on pages 45 to 47 in the FSEIS and pages 115 to 117 in the FEIS. All effects disclosed for MIS are consistent with the Forest Plan (FDEIS, pages 85 to 91) and consistent with NFMA (FEIS, pages 152 to 156).

**Comment:** *“The SDEIS does not disclose the effects of logging on “migratory corridors” for big game as required by the LRMP.*

**Response:** Effects to connectivity is disclosed in the FSEIS on pages 21, 60 and 61 and in the FEIS, Appendix pages 77 to 78. Specific migration corridors for elk have not been designated on the Forest. In addition, migration corridors would not occur in winter range (C3), since winter range is the culmination of “migration” for big game (elk).

**Comment:** *“The Forest Service analysis of dead wood habitat fails to adequately disclose the habitat requirements of each of the 11 primary cavity excavators that occur in the planning area. In order to manage habitat for these management indicator species, it is critical to know the extent to which they compete with one another for territory, food, etc. The Forest Service cannot know how many snags per acre to retain unless it knows the answer to this question of inter-species competition. In any case, it is almost certain the snags per acre required in the LRMP are inadequate to meet the needs of all these species, and even after almost 15 years, the Forest Service lacks monitoring data to back up the meager management standards in the LRMP”.*

**Response:** A summary of habitat requirements for primary cavity excavators can be found on page 29 in the FSEIS, Table W-6 (Thomas 1979, Ehrlich et al 1988, Degraaf 1991, Johnson and O’Neil 2001, and Marshall et al 2003). The effects to deadwood habitat (snag and downwood) are disclosed in the FSEIS, pages 62 to 70 (Dead Wood Habitat).

**Comment:** *“The potential population method of determining habitat value for cavity-associated species has been discredited in the scientific literature. The Umatilla NF must revise its LRMP to account of the changing science. Until the revision is complete, the UNF must either refrain from adversely affecting any habitat element for cavity species, or fully disclose and discuss the scientific arguments on both sides and conduct a full cumulative impacts analysis and disclosure. See ONRC’s July 2003 Rimrock appeal”.*

**Response:** Effects to primary cavity excavators and dead wood habitats are disclosed in the FSEIS, pages 28 to 30 and 62 to 70 and in the FEIS, pages 87 and 135 to 136. National Forest Management Act consistency is disclosed in the FEIS pages 152 to 156. Umatilla National Forest LRMP consistency is disclosed in the FSEIS, pages 103 to 119. The 1990 Umatilla National Forest LRMP decision (as amended) will remain in effect until revision is completed, estimated to be late 2007.

**Comment:** *“The Forest Service has not disclosed the cumulative effects of all the incremental plan amendments that revise big game HEI requirements in order to facilitate logging. The Forest Service must look at this issue comprehensively rather than incrementally. This is especially important given the length of time since the last cumulative review was completed when the forest plan was approved”.*

**Response:** The change in HEI standard from 70 to the existing condition of 67 applies only for the Monument Winter Range for the duration of the Rimrock project. None of the alternatives would change the habitat effectiveness index standard in other C3 winter ranges across the forest. Cumulative effects to big game habitat effectiveness index are disclosed in the FSEIS starting on page 72 (Cumulative Effects in C3). The cumulative habitat effectiveness index in the Monument Winter Range is 67. Because there are no measurable cumulative changes in the habitat effectiveness index there are no additive impacts to HEI outside this individual winter range.

**Comment:** *“The purpose and need for the project violates the LRMP for big game. The project violates the LRMP which requires that the road system be managed to meet forest plan management direction. In order to meet big game requirements, 24 miles of road must be closed. See SDEIS pp 72, 110.”*

**Response:** The FSEIS (pages 2 and 3) documents that a forest plan amendment is needed for the forest plan habitat effectiveness index standard. Consistency with the forest plan is documented in the FSEIS (pages 85 to 91). The FSEIS page 72, paragraph one and two, discloses the relationship between the purpose and need of the Rimrock Ecosystem Restoration Projects and the habitat effectiveness index for the Monument Winter Range. Closing 24 to 47 miles of road was considered (FSEIS page 72) and while it is possible to seasonally or permanently change the status of road from open to closed to improve HEI; doing so was not proposed by this agency at this time for this specific location.

The purpose and need for action for this specific project was mainly forest health and fuels (FEIS, pages 5 to 10). Future projects that are intended to improve habitat effectiveness index in this location may occur and may someday be proposed by the Forest Service. Future proposals to improve HEI are not precluded by this purpose and need and not precluded by this proposed action nor is the attainment of an HEI of 70 prevented in the future.

**Comment:** *“The SDEIS indicates that the various alternatives will have no difference in effects on big game. This indicates two NEPA violations: (1) an inadequate range of alternatives, and (2) analytic tools that lack the sensitivity to fully disclose impacts of the alternatives. The Forest Service should have considered an alternative that closed 24 miles of roads in order to meet LRMP requirements for HEI, and the Forest Service should have used more sensitive analytic tools that highlight the differences (however subtle) between alternatives. Loss of cover and increase of roads will unquestionably reduce big game habitat value but the SDEIS fails to disclose that fact.”*

**Response:** Alternatives considered are disclosed in the FEIS, Chapter 2, the FSEIS, pages 7 to 18, and the errata. The method prescribed and used to calculate habitat effectiveness index is described in the Forest Plan, Appendix C. The effects to MIS: Rocky Mountain Elk are disclosed in the FSEIS, pages 70 to 73 with additional information in the project file. Closing 24 to 47 miles of road was considered as described in the FSEIS page 72, project file, and the errata (also see response to previous comment about closing road above).



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10  
1200 Sixth Avenue  
Seattle, Washington 98101

May 11, 2004

Reply To  
Attn Of: ECO-088

Ref: 99-018-AFS

Jeff D. Blackwood, Forest Supervisor  
U.S. Department of Agriculture - Forest Service  
Umatilla National Forest  
2517 S.W. Hailey Avenue  
Pendleton, Oregon 97801

Dear Mr. Blackwood:

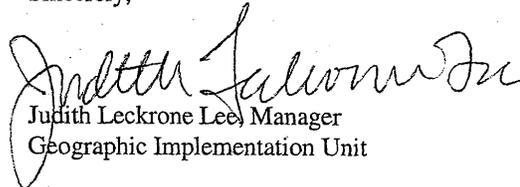
The U.S. Environmental Protection Agency (EPA) has received the Draft Supplemental Environmental Impact Statement (DSEIS) for the proposed **Rimrock Ecosystem Restoration Project** (CEQ No. 040147) for review in accordance with our responsibilities under the National Environmental Policy Act and Section 309 of the Clean Air Act.

Our review of the DSEIS, in addition to our conversation with Janet Sefani of your staff, informs us that there are no changes in proposed actions for the Rimrock Ecosystem Restoration Project from those reported in the May 2003 Record of Decision for the project. The DSEIS was developed to disclose that the Habitat Index for Management Area C3 in the May 2003 final EIS was incorrect and to provide the corrected Habitat Index value.

We still have concerns regarding impacts to air quality as a result of prescribed burning, the funding of K-V projects and impacts from roads. These concerns were discussed in detail in our November 1, 2000 letter to the Forest Service on the original draft EIS. We refer you to those comments for additional details. Based on our review, we have assigned a rating of EC-2 (Environmental Concerns - Insufficient Information) to the DSEIS based on the Agency's preferred alternative. This rating and a summary of our comments will be published in the *Federal Register*. A copy of the rating system used in conducting our review is enclosed for your reference.

Should you have any questions, please contact Mike Letourneau of my staff at (206) 553-6382.

Sincerely,

  
Judith Leckrone Lee, Manager  
Geographic Implementation Unit

**United States Environmental Protection Agency, Judith Lee**

**Comment:** *“We still have concerns regarding impacts to air quality as a result of prescribed burning, the funding of K-V projects and impacts from roads. These concerns were discussed in detail in our November 1, 2002 letter to the Forest Service on the original EIS.”*

**Response:** See FEIS, Appendix K.