

I. Purpose and Need for Action

Introduction

The planning area covers approximately 22,000 acres within the Phillips and Willow Creek Watersheds, part of the Upper Grande Ronde Subbasin. Forest Road 3100, State Highway 204 and the Forest Boundary, form portions of the planning area boundary. Major streams within the planning area include Phillips Creek, East Phillips Creek, Pedro Creek, Little Phillips Creek, Dry Creek, and Finley Creek. A portion of the North Mount Emily Roadless Area is in the southwest corner of the planning area. The legal location is T. 1 N. R. 37 E. sections 1 and 12; T. 2 N. R. 37 E. sections 25 and 36; T. 1 N. R. 38 E. sections 1 to 6; T2 N. R. 38 E. sections 3 to 5, 7 to 11, 14 to 19 and 26 to 35; T. 3 N. R. 38 E. sections 33 to 35, Willamette Meridian.

Current Forest Plan Management Areas are A3, Viewshed 1, 1,466 acres; A4, Viewshed 2, 1,231 acres; A5, Roaded Natural, 302 acres; A9 Special Interest Area, 9 acres; C1, Dedicated Old Growth, 722 acres; C3 Big Game Winter Range, 880 acres; C4, Wildlife Habitat, 8,320 acres; C5, Riparian and Wildlife, 1,204 acres; C8, Grass-Tree Mosaic, 4 acres; E2, Timber Management and Big Game, 7,835 acres; and F3 High Ridge Evaluation Area, 23 acres.

Proposed Action

The Proposed Action uses a landscape approach to restore ecosystem functions on approximately 9,200 acres using prescribed fire and timber harvest. Timber harvest would be used to reduce stocking levels and modify the fuel structure prior to igniting prescribed fire. Harvest is focused in stands displaying structural components that demonstrate deviations from historic fire regimes and would be at risk for catastrophic damage. There would be approximately 14.4 million board feet of timber harvested from 1,560 acres. A forwarder would be used on 830 acres and a helicopter on 730 acres. Silvicultural prescriptions include shelterwood, seedtree, thinning, and improvement harvest. Improvement harvests would improve stand composition and quality while retaining a fully stocked stand. The volume would be sold under two timber sale contracts: the Pedro Timber Sale and Colt Timber Sale. There would be approximately 7 miles of road reconstruction and 3.1 miles of road obliteration associated with this action. Logging slash would be treated using a variety of methods including: understory burning (1,320 acres), grapple piling and burning of piles (220 acres) or hand piling (20 acres) in visual corridors along State Highway 204 or Forest Road 31.

Once heavy concentrations of fuels have been reduced and ladder fuels removed, landscape underburning would occur within the frequent fire regime and the portion of the mixed fire regime that historically had frequent, low intensity wildfires. Landscape prescribed fire, using aerial and hand methods, would be ignited on approximately 7,800 acres. Some stands may take multiple ignitions to reach the desired fuel composition. The landscape treatments would occur over a ten to fifteen year period. The intent is to restore landscape resilience and diversity by using prescribed fire to mimic historic fire intensities and return intervals.

Other actions include: 1. Restoration of riparian vegetation along Phillips Creek; 2. Mechanical treatment of noxious weed sites along the haul route; 3. Approximately 1.5 miles of obliterated roads would become a trail for fire access.

Purpose and Need for Action

The Phillips/Willow subwatershed has had several studies to identify problems with sustaining current resource and desired resource uses. The findings from these studies were used to provide the basis for the purpose and need.

- The Governor of Oregon's Eastside Ecosystem Advisory Group for the Blue Mountain Demonstration Area performed a focused watershed scale assessment to identify the highest priority watersheds for restoration. They used road densities, the amount of land in the frequent fire regimes that has deviated from its historical condition, risk to insect and disease, and the general condition of the watershed functions to rank watersheds within the Grande Ronde Basin. The Phillips/Willow subwatershed is a high priority for reducing the risk to wildland fire and road density.
- Fifty-five percent of the planning area is within the frequent fire regime and thirty-seven percent is in the mixed. The landscape mosaic would cause the mixed fire regime to have the character of a short fire return interval. Currently, 92 percent of the frequent fire regime and 44 percent of the mixed fire regime is outside historic conditions having missed two or more fire return cycles. Stocking levels have increased placing the landscape at risk to catastrophic damage from wildfire and insect and disease and changing the historic stand structure from predominately open to closed canopy. The landscape's resilience to natural disturbances such as wildland fire, insects, and disease would be restored. Management actions are needed to increase early seral, fire resistant, tree species (ponderosa pine and western larch) and allow wildfires to burn at lower intensities. The landscape character would more closely resemble that maintained by the frequent fire regime. The area is a priority for treatment under the objectives of the Healthy Forest Initiative and National Fire Plan to increase fire fighter and public safety, reduce the risk of epidemic insects, treat areas of disease and restore frequent fire conditions to the landscape. (see EA pages 37 and 49 - 52)

- The National Fire Plan and the Federal Register / vol 66 no 160/ Friday, August 17, 2001 / Notices for Urban Wildland interface communities identifies the southern boundary of the planning area as a wildland-urban interface. The town of Elgin, Oregon, is 3.5 miles to the southeast and Tollgate is 6 miles to the north. Much of the forest along the boundary has a frequent fire return interval and displays the character of condition class 2, having missed several fire return intervals. The stands have a moderate risk to losing key ecosystem components and the vegetation attributes have been moderately altered. There is a need to reduce fuels and potential fire severity along the Forest boundary.
- The Umatilla Forest Plan gives direction to provide wood fiber to meet social and economic needs. The Forest Plan allows scheduled harvest on over 90 percent of the planning area. Stands have become overstocked with tree species that lowers their resilience to natural disturbance processes and places them at risk to catastrophic damage. There is an opportunity to provide wood fiber and restore resilience to disturbance processes.
- The Phillips/Willow Creek watershed has a high priority for improving temperature, sediment transport, and flow of the Grande Ronde River as determined by the *Upper Grande Ronde Subbasin Water Quality Management Plan*. The Grande Ronde River is a water quality limited stream. The lower reaches of Willow Creek, below the Forest Boundary, has year round flow and high sediment levels. Phillips Creek and Dry Creek do not flow year round going subsurface in July. Improved water quality and flows in these tributaries would improve conditions in the Grande Ronde River. Sediment, temperature, and habitat modification are the primary concerns in meeting water quality standards on forested lands. Strategies to improve water temperature by providing shade or increasing habitat complexity by restoring instream large wood and pools would help to improve the quality of water reaching the Grande Ronde River.
- Both diffuse and spotted knapweed occur along many of the roads and within some of the riparian areas. The weeds are located low in the transportation system and pose a risk of infesting new areas or expanding. There is a need to mechanically treat these sites to reduce the risk of noxious weeds spreading to new locations and downstream onto private lands.

Forest Plan Amendments

- There is a need to move the C1, Dedicated Old Growth boundary where it is adjacent to Forest Road 3200. The standard and guideline does not allow the removal of hazard trees from C1 areas. Moving the boundary 100 feet off the road allows the Forest to remove hazards to public safety. Making the move also allows greater flexibility for future management of old growth by protecting current late old structure stands from future management. There would be no net loss in acres of C1. There is no need to remove hazard trees at this time. The amendment is needed to allow future hazard trees to be removed.
- Management Area C3, Big Game Winter Range, would be changed to C4, Wildlife Habitat. Years of monitoring the C3 area by the District Wildlife Biologist indicate that the area is not used during average winters. Snow depth is too great so the animals move to lower elevations. The 880-acre size makes questionable application of the HEI standard when it is intended for use on areas larger than 2,000 acres. The plant community type is maintained by the frequent fire regime that generates open forests that would not meet HEI standards for C3. The area provides early spring forage within an open forest.

Healthy, diverse, and resilient ecological systems would be restored to minimize the potential for uncharacteristically intense or large-scale disturbance caused by wildland fire, insect epidemics, or disease. Off Forest property values would be protected through reductions in fuel structure and loading on National Forest System (NFS) lands as well as with the treatment of noxious weeds. Beneficial water uses associated with steelhead trout would be improved through riparian habitat restoration along Phillips Creek and the obliteration of roads.

The Purpose of this action is:

- To restore the resilience of the landscape to frequent fire events. Missed fire return intervals has changed the expected fire behavior and increased forest mortality.
- To protect the values of adjacent local communities, water beneficial uses, and listed or indicator species habitat by lowering the risk to catastrophic disturbance.
- To restore ecosystems so they function within, or closer to, the range of disturbance processes from which they evolved.
- To provide products or work in support of local community economic development.
- To reduce the cost, losses, and damage caused by wildland fires by decreasing the potential for fire reaching crowns and the severity and size of wildfires.
- To improve public and/or fire fighter safety. Protect private land and developments by improving fire suppression capability.

Laws, Regulations, and Other Plans

This Environmental Assessment process and documentation has been done in accordance with the direction contained in the *National Forest Management Act (NFMA)*, the *National Environmental Policy Act (NEPA)*, the *Council on Environmental Quality (CEQ) Regulations*, the *Clean Water Act*, and the *Endangered Species Act*.

This Environmental Assessment is tiered to the *Umatilla National Forest Land and Resource Management Plan FEIS* and *Record of Decision* approved June 11, 1990 and the accompanying *Land and Resource Management Plan (Forest Plan)*. This includes clarifying direction of Plan Amendment #10 *Interim Strategies for Managing Anadromous Fish-producing Watersheds in Eastern Oregon and Washington, Idaho, and Portions of California (PACFISH)*, dated February 24, 1995 and Forest Plan Amendment 11 *Continuation of Interim Management Direction Establishing Riparian, Ecosystem, and Wildlife Standards for Timber Sales (ECOSCREENS)*, dated June 12, 1995. Clarifying direction provided in the *National Marine Fisheries Biological Opinion* for the Umatilla Land and Resource Plan (for portions of the Forest within the Snake River Drainage) is also included. The *Managing Competing and Unwanted Vegetation FEIS (Veg FEIS)*, its *Mediated Agreement*, and *Record of Decision (December 8, 1988)* guide the management of vegetation. This EA also incorporates by reference the *Environmental Assessment for the Management of Noxious Weeds* (Noxious Weed EA) and its *Decision Notice* (May 24, 1995). Additional guidelines and finding from the *Canada Lynx Conservation Assessment and Strategy* have also been incorporated into the project design.

Decisions to be Made

The Environmental Assessment documents the results of the environmental analysis conducted for the proposed action and its alternatives. The Forest Supervisor of the Umatilla National Forest will determine which alternative best implements the Forest Plan at this time. Specific determinations needed are:

1. Whether harvest and prescribed landscape fire along with associated activities and restoration activities should occur, and if so, how much and where.
2. What monitoring measures should be taken?
3. What Forest Plan amendments are needed?

Scoping

Scoping is used to identify major issues and determine the extent of environmental analysis necessary for an informed decision on a proposed action. Scoping for this project began May 25, 2001. The District received 4 written responses from a mailing to 112 individuals, organizations and governments including the Confederated Tribes of the Umatilla Indian Reservation.

Treaty Rights

The Forest Service, through the Secretary of Agriculture, is vested with statutory authority and responsibility for managing resources of the National Forests. No sharing of administrative or management decision-making power is held with any other entity. However, commensurate with authority and responsibility to manage is the obligation to consult, cooperate, and coordinate with Indian Tribes in developing and planning management decisions regarding resources on National Forest system lands that may affect tribal rights.

Locally, the planning area lies within the area ceded to the United States government by the Confederated Tribes of the Umatilla Indians (CTUIR) by the Treaty of 1855. As a result of the treaty, elements of Indian culture, such as tribal welfare, land, and resources were entrusted to the United States government. Trust responsibilities resulting from the Treaty dictate, in part, that the United States government facilitate the execution of treaty rights and traditional cultural practices of the CTUIR Indians by working with them on a government to government basis and in a manner that attempts a reasonable accommodation of their needs, without compromising the legal positions of the tribe or the federal government. Because tribal trust activities often occur in common with the public, the Umatilla National Forest strives to manage ceded lands in favor of the concerns of the CTUIR Indians, as far as practicable, while still providing goods and service to all people.

Specific treaty rights applicable to that land base managed by the Umatilla National Forest are generally articulated in Article I of the CTUIR Treaty of 1855, and include:

“The exclusive right of taking fish in all the streams running through or boarding said reservation is further secured to said Indians; as also the right of taking fish at all usual and accustomed places in common with citizens of the Territory; and of erecting temporary buildings for curing, together with the privilege of hunting, gathering roots and berries, and pasturing their horses and cattle upon open and unclaimed land.”

Although the 1855 Treaty does not specifically mandate the federal government to manage habitats, there is an implied assumption that an adequate reserve of water be available for executing treaty related hunting and fishing activities.

The District has had early involvement with the CTUIR. On February 8, 2001 the District attended a public meeting sponsored by the Tribe with the purpose of providing information about both the Plentybob and Pedro Colt projects: four individuals attended the meeting and no recommendations or modifications were voiced for the Pedro Colt project. The

CTUIR responded during scoping and influenced project design elements for the protection of cultural plant habitat or cultural sites, restoration or protection of fisheries and riparian habitat, and sediment reduction measures. CTUIR shared the following concerns:

- Federal Trust Responsibility to ensure that CTUIR's treaty rights can be exercised and that tribal trust assets are protected. See Chapter IV, American Indian Treaty Rights, Riparian and Fish Habitat, Wildlife Habitat, and Transportation System.
- Riparian areas; the Tribe would like the project to place an emphasis on riparian restoration in Phillips Creek because past management has created open conditions and removed large wood from the stream. The actions include a project that would place large wood in Phillips Creek and the upper reaches of East Phillips Creek where past logging removed the debris.
- Water Quality; efforts need to be made to ensure that the proposed activities do not further degrade water quality. See Management Requirements in Chapter II and Water Quality in Chapter IV.
- Grazing; the impacts from grazing should be analyzed. Grazing was considered as a cumulative effect.
- Fisheries; efforts should be made to enhance steelhead habitat. The project includes placement of large woody debris in Phillips Creek. The large wood would help to create summer habitat by creating pools that intercept subsurface flows and restoring complexity to the instream habitat. The scouring as the large wood embeds into the channel would help sort spawning gravels.
- Roadless Areas; The CTUIR is concerned with any proposal that may jeopardize areas that qualify for protection under the new roadless rule, particularly impacts from additional harvesting. See Chapter IV, Roadless and Undeveloped Areas.
- Roads; The CTUIR supports obliteration of roads. Any new or reconstructed roads should not cause adverse impacts to wildlife or the watershed. See Chapter IV, American Indian Treaty Rights, Water Quality, and Transportation System.
- Cultural Resources; The CTUIR urges the Forest Service to protect cultural resources and access rights to the forest to maintain and exercise treaty rights. See Chapter IV, National Historic Preservation Act.
- Prescribed fire; The CTUIR supports the philosophy of attempting to return the forest to a more natural fire regime, provided it is done in a manner that protects habitat, water quality, and treaty resources. See Management Requirements in Chapter II and Water Quality, Riparian and Fish Habitat, and Wildlife Habitat in Chapter IV.
- Timber Harvest; It is important that the proposed project balances the needs of fish, wildlife, and plants with the overall ecosystem health, and that this proposal is not being put forth merely to provide more trees for harvest. Planned timber harvest should emphasize taking younger trees rather than old growth.

In the proposed project large ponderosa pine greater than 21 inches would not be cut. Other tree species greater than 21 inches may be cut in stands maintained by the frequent fire regime that are Moist Forest. Large trees would not make up more than 5 percent of the volume. Two units are proposed that would remove a portion of the trees larger than 21 inches; the stand would remain late old structure shifting from multistrata to single strata.

- Replacement of C1 along the Dry Creek Road; The CTUIR feels it appears the exchange of areas is not comparable.

The current C1 area contains some Dry Forest type, which makes up approximately 20 percent of the C1 acres. These acres would be replaced with moist forest in the upper reaches of Dry Creek. The reason for the loss of Dry Forest is because the Dry Creek Road passes through the eastern edge of the C1 area and the Dry Forest would remain as a narrow fringe. The narrow fringe of grass tree mosaic is not a supportable ecological unit, being less than 700 feet wide and only 60 percent forested. The Forest Plan used closed canopy criteria characteristic of moist forest types for determining C1 area and used other forest types to round out acres. Prescriptions for Dry Forest would encourage the growth of open forest dominated by large ponderosa pine and be compatible for old growth dry forest wildlife species. When the Forest Plan is updated it should consider standards and guidelines for Dry Forest old growth.

On August 27, 2001 the District and two tribal staff visited the planning area to review the proposed alternatives. Cultural plants, a major travel route connecting the Umatilla and Grande Ronde drainages, and the presence of steelhead trout fisheries provide the basis for interest in the area. The Tribe has been active with the Northwest Planning Council's 2000 Columbia River Basin Fish and Wildlife Program that proposes increased emphasis on Columbia River sub-basin tributaries for recovery of listed species. Plans for tributaries that protect and restore fisheries habitat to meet population goals at the confluence of the Grande Ronde and Snake Rivers are important to the recovery of steelhead trout.

The Columbia River Basin Fish and Wildlife Program – Strategy for Salmon builds outward from core areas of healthy populations in intact habitat. Habitat protection and recovery tactics would differ depending on whether habitat condition is currently “intact”, “restorable”, “compromised”, or “blocked”. East Phillips Creek has intact habitat for steelhead year round. Restoration actions in Phillips Creek could benefit recovery even though much of the stream goes dry for the summer. Known fish barriers can be removed and measures that could lengthen the time of flow encouraged.

Key Issues

Public comments and management concerns generated many issues. The interdisciplinary (ID) team determined key issues. Key Issues are resource or other values that drive the development of an alternative, modifies the action, or identifies "unresolved conflicts regarding uses of available resources" [NEPA sec 102(2)(E)]. Impacts related to the resource that generated the key issue will be displayed in Chapter IV. Chapter II describes how the alternative is responsive to the issue while displaying a synthesis of impacts and values to compare alternatives.

Key Issue 1: The Forest Plan provides inconsistent standards and guidelines between wildlife and achieving forest health, sustainability and biodiversity. The development and maintenance of desired forest structure and composition in the Frequent Fire Regime can be at odds with wildlife standards developed for closed canopy species and big game habitat.

The planning area contains important winter and spring habitat for big game. Available water limits big game use of the planning during the summer. About 77 percent of the planning area is in Forest Plan Management Areas C3, C4, and E2 having big game standards for cover. Currently, all management areas meet Forest Plan standards for cover and Habitat Effectiveness Index (HEI) for big game. There maybe conflict between actions that restore the frequent fire regime to its historical character and the loss of big game cover. Actions within the frequent fire regime changes the satisfactory to marginal cover ratio. Plant associations associated with short fire return intervals are found on 92 percent of the planning area. Most of these stands would be naturally maintained in an open canopy condition well below the 70 percent canopy closure for satisfactory cover but above the 40 percent needed for marginal cover. Satisfactory cover on frequent fire regimes would likely be below Forest Plan Standards in C3, C4, and E2 but meet the standard when higher elevation moist forests are included. The open character of the low elevation stands would better fit the use of big game during winter and spring by providing early forage.

The Forest Plan Standard and Guideline for Ecosystems and Diversity provides direction to maintain or enhance ecosystem functions to provide long-term stability and productivity of biological communities. Much of the planning area, 55 percent, is within the frequent fire regime and another 37 percent is in the mixed fire regime. The mosaic nature of the two regimes favors short fire return intervals that historically maintained open stand conditions on as much as 92 percent of the landscape. For long-term stability and productivity, the character of the frequent fire regime needs to be restored. The restoration of open forests provides habitat for several migratory birds on the species of concern list. The Forest Plan standards were developed for high elevation summer range and are in conflict with the restoration and maintenance of open forest character.

Restoration and maintenance of open forest on a landscape with a frequent fire return interval may require rethinking about the role of satisfactory cover and where it occurs. Satisfactory cover may not occur at the stand level but be found in ½ to 5 acres pockets. Low elevation dry sites do not provide the water found at higher elevations and serve as transition zones between winter and summer range. They often provide high quality forage in the spring calving period as the animals move to the summer range. To apply moist forest standards on dry forest would not be appropriate. This should be resolved during the Forest Plan update. For now, the Forest Plan standards and guidelines can be met without treating the entire frequent fire regime. Restoring the frequent fire regime will require shifting satisfactory cover to the lower end of the recommended percent. In some cases it could appear to drop slightly below because determinations are made on the stand level and the mosaic of satisfactory cover within the stand not counted.

The conflict of restoring open canopy by removing cover is best viewed as a trade-off. The landscape has changed because of missed fire return intervals that would have kept the stands in an open condition. Habitat favoring closed canopy species has increased. When looking over the migratory bird species of concern, it is mainly species preferring open canopies that are listed. A resilient landscape to wildfire, insects, and disease would have lower cover values for species dependent on closed canopies but provide habitat for a group of species showing a declining population trend. The action would likely change big game behavior and use of the planning area.

There is also conflict with a harvest entry that would remove snags, diseased trees, and potential recruitment trees included in improvement harvest or shelterwood/seed tree prescriptions. Research indicating higher snag levels than that recommended by Thomas may be appropriate. Large larch and pine make good snags and mistletoe broom trees are good wildlife habitat. It is important to provide a continuum of defective or stressed trees to sustain primary cavity nesters and as a source of endemic insect populations.

Alternative C is responsive to the issue of retaining closed canopy. Forest management activities would be focused on the dry sites with short fire return intervals. Fuel reduction objectives would be focused to breaking up fuel continuity along ridgetop control lines. Ponderosa pine would be favored. Stands with severe root rots would have harvest and shifted to rot resistant tree species.

Indicators of response include HEI; changes in Big Game cover; acres of early seral species management; Acres of Frequent Fire Regime Treated; Acres of Open Forest Restored; Acres of early successional stages created; and Miles of edge created.

Key Issue 2: Harvest as the Method to Accomplish Landscape Resource Objectives.

There is conflict between local communities, the Forest Plan, and national environmental groups with the harvest of timber. The economies of several of the local communities depend on a supply of wood fiber. In 1996, the publication *Forest*

Management in the Blue Mountains: Public Perspectives on Prescribed Fire and Mechanical Thinning reported findings of the attitudes the Blue Mountain Communities have toward the management practices of prescribed fire and mechanical thinning in dealing with forest health issues. A large majority agrees prescribed fire is useful in decreasing the chance of wildfire (74 %) and reducing excess fuels (70%). The communities responded similarly to the use of mechanical treatment; 79 percent agreed it decreases the chance of high intensity wildfires and 77 percent agreed it effectively reduces the amount of excess fuels in the forest. The data also indicated a solid majority agree the practices are a useful tool in ridding the forest of insects and disease and is beneficial for the rejuvenation of native grasses, plants, and soils. They felt short-term impacts on fish, wildlife, and water quality were acceptable. The study determined that the local community prefers mechanical thinning to prescribed fire almost four to one.

The environmental groups believe that timber harvest is not necessary to meet ecosystem restoration objectives and that prescribed fire can be used to restore single stratum stands to the landscape. Harvest would damage social and economic values associated with natural forests. They feel that non-timber uses and values are far more important to local communities and regional economy. They believe commercial logging on public lands damage ecosystem values associated with intact ecosystems.

Alternative D and portions of Alternative B are responsive to this issue. The district analyzed a landscape prescribed fire only alternative in the *Eden Timber Sale and Fire Reintroduction Project EA* in April, 2000. The alternative did not prove to be feasible. Using prescribed fire as the only treatment creates heavy fuel concentrations, particularly large fuels. Future wildfires would burn with high intensity, placing fire fighter and public safety at risk. See the discussion on Alternatives Eliminated from Detailed Study in Chapter 2. The IDT responded to this issue by asking “what can we do different than using our standard practices?” This generated management actions that were feasible, however they might not be practical because of the way budgets come to the Forest Service.

Alternative B is partially responsive to the issue of harvest. It provides large acres where landscape prescribed fire would be accomplished without harvest. These would be maintenance fires that would kill small diameter trees and reduce fuels over multiple return burns. The targeted tree size and species could be reduced without harvest or creating severe fuel loads. Harvest would not be used on approximately 80 percent of the area proposed for prescribed fire.

Indicators of response include: Gross Acres treated by harvest and underburning, Acres treated by mastication, acres treated without harvest, percent of treatment acres in Condition Class 2 and 3, and percent of treatment acres in the frequent fire regime.

Key Issue 3: Access and Travel Management

The planning area currently has a high road density, 3.8 miles per square mile. The open road density is 1.1 miles per square mile with most of the open roads in the Dry and Finley Creek area. Comments during scoping questioned the need for new construction when the area has been designated as a high priority for road obliteration. New roads and changes to the access and travel management plan increases access of ATVs, leading to wildlife harassment and other resource damage. There is also conflict with obliterating roads that provide access to the Forest to maintain and exercise existing treaty rights.

There also appeared to be confusion over the use of the word “reconstruction”. Several commenters thought it referred to new roads. Reconstruction is work performed on existing roads to improve drainage and drivability. Most of the work is maintenance that gets accomplished in a contract as reconstruction.

There are no new roads proposed. There is one location where short, less than 200 feet, access would be needed for a landing. It was used in the past and the access would be vegetated after use. Reducing road density could not be fully resolved because there is little need for additional road obliteration. There has been over 35 miles of road obliteration in the planning area during the past ten years. The proposed action identified 3.1 miles of road obliteration. Further study indicated 7.5 miles; half of the miles would remain on the system as a trail for fire access. The remaining road system is what is needed for resource management and public recreation access. The Access and Travel Management Plan identified road closures for wildlife and other resource protection needs. The open road density provides protection to wildlife with extensive areas having limited or no motor access. The access and travel management plan restricts motor vehicles from accessing approximately 2/3 of the planning. The proposed obliteration occurs in East Phillips and Pedro Creek systems having high quality fish habitat and are closed roads.

Indicators of response include: Miles of road obliterated, miles of closed roads becoming seasonally opened, miles of closed roads becoming opened, miles of road becoming trail, miles of new system road construction, and Miles of Reconstruction and Maintenance.

Other Public Comments Received during Scoping

In addition to the issues discussed above other comments received during scoping included questions about the way the Forest Service proposed to do analysis involving the scale of analysis or specific resources of concern; some were clarifying questions to understand or shape the proposed action; some comments indicated the reviewer did not understand the action; and some were questions or requests that were beyond the scope of this analysis.

Question about the scale of analysis, whether it would be conducted at a subwatershed or planning area. *Answer: The scale of analysis varies by resources and the question being asked. The scale at which analysis occurs is determined by what area best shows meaningful results whether it is on a unit area basis or a larger scale dealing with the landscape. Water quality issues are viewed at multiple scales from the subwatershed to basin. Big game habitat has standards and guidelines based on Forest Plan Management Areas. Soil impacts are analyzed by activity unit. The Historic Range of Variability (HRV) analysis covers multiple watersheds.*

Management activities needs to protect big game cover and travel corridors, protect riparian habitat and instream habitat, and protect water quality. *Answer: Management requirements were designed to protect these resources during project implementation.*

Concern about replacement of Dedicated Old Growth along Forest Road 3200. *Answer: Roads passing along the edge of dedicated old growth not only interfere with the use of interior habitat but increases safety concerns for Forest users. The Forest Plan does not allow removal of trees from dedicated old growth, including hazard trees. Moving the old growth boundary 150 feet off the road allows for hazard tree removal and formally protects a potential replacement area for the next Forest Plan revision. The 150 foot strip between the Dedicated Old Growth and the road provides a buffer to the old growth area because it is not wide enough for meaningful management actions unless they were made in conjunction with the old growth stand, such as fuel reduction by mastication or prescribed fire. No actions are being proposed within Dedicated Old Growth. It is possible to provide higher quality old forest interior habitat at another location greater than 300 feet from the roads.*

There is concern about harvest and road construction in inventoried roadless, unroaded areas or areas adjacent to inventoried roadless areas. *Answer: There are no activities proposed within the North Mount Emily Roadless Area nor the adjacent 570 acre undeveloped area. Approximately 127 acres of late old structure from a 235-acre undeveloped area, would be protected by becoming dedicated old growth. This is all of the late old structure in the undeveloped area. There would be no actions proposed in a 1,100-acre undeveloped area above Highway 204 because stand conditions do not indicate a need for management actions at this time. The lower elevation portion of a 2,600 acre undeveloped area in East Phillips and Phillips Creek would have harvest to restore old growth ponderosa pine stands by removing grand fir understory. The area of proposed harvest is characterized by grass tree mosaic on dry western exposed slopes. There will be no road construction proposed in any of these areas. A ridgetop road between two of the areas would be obliterated and become a fire access trail.*

Avoid commercial timber harvest and road construction in late-seral forests. Impacts on old-growth species should be discussed in detail. *Answer: Harvest would occur in late-seral forest however they are in stands with short fire return intervals that historically were maintained as open forest single structure. The list of migratory species of concern indicates that open structure forest habitat is becoming limited. The analysis discusses species dependent on closed and open forest habitat. The Forest Plan indicator species are mainly closed canopy species and overlooks species like the white headed woodpecker that is dependent on open, old forest ponderosa pine. There will be no road construction within late-seral forests.*

Many comments stressed the need to address impacts to soil, wildlife, ESA and sensitive species, water, fisheries, noxious weeds, and snags. Impacts are discussed using resource goals and desired conditions identified in the Forest Plan. Management protection measures were identified to reduce the risk of impacts exceeding Forest Plan standards.

Comments from the thirty-day Public Comment Period

The District received a response from two individuals during the public comment period. One individual supported the project but had several concerns with resource management. He felt that “regardless of whether you use basal area, trees per acres, HRV, or crown densities as the scientific guidelines, these units need to be managed to insure significantly reduced density (acceptable scientific levels) to accomplish the goals of the project.” *Answer: The Forest Silviculturist worked with our Blue Mountain ecologist to develop ranges of recommended stocking levels for the various plant communities on the Forest. These stocking levels would be used as guidelines for marking.*

Mechanical thinning should be considered first when economically possible, before the use of fire alone or combined with mechanical treatment. Utilizing fiber for local jobs should be a very high priority of these products as opposed to simply burning the fiber. *Answer: The action alternatives provide a variety of silvicultural treatments ranging from commercial harvest to mastication and prescribed fire based on stocking levels and the size of trees needing to be removed to accomplish fuels reduction, stand structure restoration, and concerns for insect and disease. The Forest Plan has already determined where timber harvest is permitted. When removal of commercial size trees is to restore frequent fire conditions, they are being proposed for utilization. There is one unit proposed in Alternative D and E that would be burned prior to designating the trees for harvest and utilization. The other areas proposed for landscape prescribed fire or mastication target noncommercial trees for removal. A commercial thing is not needed in these areas nor would the volume removal be economical.*

Site-specific prescriptions should serve as the guidelines, not broad sweeping policies that limit options to accomplish goals. Just because a grand fir is 21 inches does not mean it is fire resistant, healthy, or useful for wildlife. *Answer: The constraint on cutting trees larger than 21 inches is a Forest plan Standard and Guideline designed to preserve options for the future.*

The wildlife screen portion of the Eastside Ecoscreens requires a Historic Range of Variability (HRV) analysis and when Old Forest structure is lacking in one biophysical type, there is a constraint on cutting large trees. In order to meet two of the goals in the purpose and need dealing with resilience of the landscape to frequent fire events and restoring ecosystems so they function within or closer to the range of disturbance, ponderosa pines larger than 21 inches would not be designated for removal. Grand fir larger than 21 inches is proposed in two units where the post sale treatment of slash would likely kill the trees.

Riparian areas should not be automatically off limits to treatment when riparian functions can be maintained or enhanced. Large buffers without treatment place the highest fire risk and fuel loads in the most sensitive area. *Answer: This is a real concern as evident by wildfires on the southern portion of the Umatilla National Forest last summer. Extensive riparian areas were lost when stream buffers burned. They also act as corridors that spread wildfire to a larger area. To meet ESA concerns and Forest Plan standards for PACFISH, entries into riparian areas is confined to actions that enhance riparian functions. Harvest of trees does not necessarily enhance riparian functions. Existing information about riparian conditions are being used to determine the type of management actions needed within the riparian areas. The purpose and need would create a landscape with low intensity wildfires with a high ease of control. The desired fuel and stand structure conditions should protect many of the riparian areas. The risk of wildfire burning individual RHCAs would exist in isolated areas where heavy surface fuels occur.*

The other commenter voiced the following concerns: The project does not meet the purpose and need because timber harvest would not reduce the intensity of a wildfire and that prescribed fire post logging has a high risk of escape. *Answer: The purpose and need applies to landscape goals to reduce wildfire intensity, break up fuel continuity to confine a wildfire, restore character of a landscape maintained by short fire return intervals, and control the spread of disease or epidemic insects. The landscape character includes a predominance of early seral tree species (ponderosa pine and western larch) and open stand conditions. Individual units may not fit every objective of the purpose and need, however, the treatments work together for the landscape objectives. Ecological conditions maintained by natural disturbance processes require landscape scale restoration particularly when past management practices and fire suppression efforts change those conditions. A mixture of prescriptions is required, such as proposed in this analysis, involving timber harvest with prescribed fire, mastication of small diameter fuels with and without timber harvest, and areas of prescribed fire only. Timber harvest does create a short-term risk to high intensity wildfires until the fine fuels can be reduced by either prescribed fire or mastication. Prescribed fire has been an effective tool for the reduction of fine fuels. Thinning, followed by a reduction in fine fuels, has also been show to reduce the intensity of wildfires. The Forest Service has been successful in reducing fine fuels and reducing the risk for escape fires when burning within prescribed conditions. The prescriptions include attention to weather patterns and humidity conditions that reduce the risk of escaped fires. See EA pages 81 to 86.*

There was objection to the cutting of trees larger than 21 inches. *Answer: The Historic Range of Variability analysis indicated that the Moist Forest Biophysical type was above historic range for Old Forest in both single strata and multistrata, the cutting of trees larger than 21 inches was permitted. Prescriptions for two units (out of 59 units, or 57 acres of the 1,981 acres of harvest proposed in Alternative E) would cut trees larger than 21 inches. Large grand fir would be removed from these units because the proposed understory burning would probably kill them. See EA pages 45, 49 – 51, 56 – 60, and 104.*

Concern about the use of seedtree harvest in undeveloped areas. *Answer: Approximately 225 acres of harvest and 1,475 acres of prescribed fire are proposed in the 2,600-acre East Phillips Undeveloped Area. The Planning Area has a total of 4,515 undeveloped acres; East Phillips is the only undeveloped area where activities are proposed. Units are predominately located on southern aspects maintained as ponderosa pine by site conditions and disturbance, 188 acres are condition class 2 and 37 are condition class 3. When understory grand fir and Douglas-fir are removed from the stand in preparation for understory burning, the area would look like a seedtree harvest. Two units, Units 14 and 15 (approximately 37 acres), are a dry grand fir plant association with early seral species of ponderosa pine and western larch and Douglas-fir as a mid-seral species. These stands have active centers of two species of root rot in the grand fir. Managing the stands for early and mid seral tree species helps to control the spread of root rots and fits within expected forest development regimes. The units meet the purpose and need for the control of disease and development of character to resist disturbance and are condition class 3. The effects analysis on undeveloped character is found on EA pages 52 - 53 and 100 - 102.*

Resource Protection and Goals Identified in the Forest Plan

During the forest planning process Forest Management Objectives and Standards and Guidelines were developed for various natural resources of the Umatilla National Forest. The standards and guidelines established measures of acceptable impacts to these resources while providing Forest outputs. These resources are listed in the table of contents for Forest Management Direction found on pages iii and iv of the Land and Resource Management Plan, Umatilla National Forest. The impacts to resources in relation to Forest Plan goals will be displayed in Chapter IV, Environmental Consequences. Review of the Forest Plan indicates potential impacts to the following resource groups:

Wildlife Habitat Goal: Maintain or develop effective levels of well distributed wildlife habitat throughout the forest to maintain viable populations of all existing native and desired non-native vertebrate species. The Discussion of effects begins on page 60.

Key Issues 1 will be discussed with this resource value.

Riparian and Fish Habitat Goal; Provide and maintain a diverse, well distributed pattern of fish habitats. The goal applies to all areas dominated by riparian vegetation, including areas containing anadromous and resident fish, perennial and intermittent stream courses, wetlands, and floodplains. The Discussion of effects begins on page 78.

Riparian goals, management objectives, and standards and guidelines for projects have been identified in PACFISH. Compliance with PACFISH guidelines would be met by not harvesting nor allowing ignitions within Riparian Habitat Conservation Areas (RHCA).

Range Goal: Manage the forage resources for an upward vegetation trend in area in less than "fair" condition and an upward or stable trend for areas in "fair" of better condition, while providing for forage productivity and making suitable range available for livestock grazing. Increase the level of forage production where cost efficient and consistent with other resource goals. The Discussion of effects begins on page 88.

The planning area falls within portions of the North End Sheep and Goat Allotment. Restoring open ponderosa pine stands to the landscape may improve forage production and the activity has the potential to impact the timing of use in the allotment due to harvest and prescribed fire activity. Conflicts between the harvest, burning, and grazing actions can be resolved through management requirements.

Ecosystems and Diversity Goal: Provide for diversity of plant and animal communities and tree species consistent with overall multiple-use objectives for the Forest. Maintain or enhance ecosystem functions to provide for long-term integrity (stability) and productivity of biological communities. The Discussion of effects begins on page 56.

A portion of key issue 1 dealing with diversity would be discussed here.

Timber Goal: Provide for production of wood fiber consistent with various resource objectives, environmental constraints, and considering cost efficiency. The Discussion of effects begins on page 91.

Key issue 2 would be discussed here

Water Goal: Manage National Forest resources to protect all existing beneficial uses of water and to meet or exceed all applicable State and Federal water quality standards. Within the Forest capability, maintain or enhance water quantity, quality, and timing of streamflows to meet needs of downstream users and resources. PACFISH goals and objectives for riparian areas apply here as well. The Discussion of effects begins on page 73.

Soils Goal: Manage National Forest lands to maintain or enhance soil and land productivity. The Discussion of effects begins on page 66.

Transportation System Goal: Provide and manage a safe and economical road and trail system and facilities needed to accomplish the land and resource management and protection objectives on the Umatilla National Forest. The Discussion of effects begins on page 89.

The proposed road obliterations would affect the amount of access for various users, such as Tribal members, hunters, contractors, permittees, fire wood cutting, and dispersed recreation. Key issue 3 would be discussed here.

Fire and Fuels Goal: Provide and execute a fire protection and fire use program that is cost efficient and responsive to land and resource management goals and objectives. The Discussion of effects begins on page 81.

Air Quality Goal: Maintain air quality at a level adequate for protection and use of national forest resources and meet or exceed applicable Federal and State standards and regulations. The Discussion of effects begins on page 86.

Pest Management Goal: Protect forest and range resources from unacceptable losses due to destructive forest pests. This includes noxious weeds and insects. The Discussion of effects begins on page 95.

Threatened, endangered, and sensitive species Goal: Maintain or improve habitat for all threatened or endangered plant or animal species on the Forest, and manage habitats for all sensitive species to prevent their becoming threatened or endangered. The Discussion of effects begins on page 97.

Visual Resource: The Forest Plan (pages 4-22 and 4-23) provides visual quality objectives for State Highway 204 and Forest Road 31, the Summit Road. State Highway 204 is listed as a sensitivity level 1 with retention in the Foreground and Partial Retention in the Middle Ground. The goal for visual quality is found in Management Area A3, Viewshed 1. Scenic qualities would be maintained as a natural appearing landscape. Forest Plan pages 4-99 to 4-104.

The Summit Road is sensitivity level 2 with partial retention in the foreground and modification in the middle ground. The goal for visual quality is found in Management Area A4, Viewshed 2. Scenic quality would naturally appear to be slightly altered. Forest Plan pages 4-105 to 4-110.

The Discussion of effects begins on page 94.