

Appendix H – Response to Scoping Comments

On (May 18, 2007), the Responsible Official mailed a scoping letter to other agencies, tribal organizations, and interested public listed in Chapter 4.

The Interdisciplinary Team has responded to the following comments received during scoping:

Submitter	Comment	Response and Where Addressed in the EA
<p>Michael Karnosh, Ceded Lands Coordinator, Confederated Tribes of Grand Ronde, Grand Ronde Oregon</p>	<p>Potential Impacts to Cultural and Archaeological Resources is not currently listed as a preliminary issue. Since the Project Area is within the Tribe’s ceded lands and the proposed project includes ground-disturbing activity, the preliminary issues should include Potential Impacts to Cultural and Archaeological Resources.</p> <p>When analyzing stream crossing structures for fish passage, potential for passage by Pacific lamprey should be evaluated along with passage by other aquatic specie</p>	<p>This issue was not considered significant because Federal laws and regulations require that cultural resources be protected either through avoidance or data recovery. Cultural resource surveys of the proposed project area have been completed. All surveyed and inventoried significant cultural resource sites in the Bridge Thin Project area would be buffered and excluded from resource management activities.</p> <p>Current fish surveys have not documented Pacific Lamprey in the streams affected by crossing structures. Considerations are made for Lamprey with the Western Brook Lamprey being the species documented to date.</p>
<p>Jacob Groves, Western Oregon Field Forester, American Forest Resource Council, Eugene, OR</p>	<p>AFRC would like to see all timber sales be economically viable. Appropriate harvesting systems should be used on all units to achieve an economically viable sale and increase the revenues to the government.</p> <p>AFRC would like to voice support for management activities that enhance big game foraging habitat.</p> <p>From 1991 to 1995, National Council for Air and Stream Improvement Scientists Dr. John G. Cook, Dr. Larry L. Irwin, along with DR. Jack W. Thomas, and others studied the effects of thermal cover on elf.</p>	<p>Economic viability discussed in Chapter 3 with values shown in Table 35.</p> <p>An analysis of big game habitat is found in chapter 3 and acknowledges new science on findings of thermal cover as it relates to the Elk model.</p>

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	<p>Their findings showed that providing thermal cover for elk was not a suitable solution for inadequate forage conditions and they suggested that habitat management based on the perceived value of thermal cover should be reevaluated. It is important, in light of this new research, that elk habitat adequately incorporates the importance of nutritional needs and does not over emphasize the importance of thermal cover.</p> <p>In addition to restoring “open oak savannah”, AFRC would like to suggest the use of multiple small patch cuts (3-5 acres in size) to provide early successional habitat for Roosevelt Elk. Early successional habitat is not provided by typical thinning treatments. Thinning treatments do not provide the quantity or quality of forage that would be sufficient to sustain wild ungulate populations. Northwest Forest Plan states that early successional habitat will be provided for these species on federal lands.</p> <p>Seasonal and wildlife restrictions often make timber sales extremely difficult to complete within contract timelines. AFRC would also like to encourage the Forest Service to offer sales that will allow winter harvesting on improved roads or allow for roads to be improved so winter harvesting can be accomplished.</p> <p>AFRC also would like to voice support for thinning treatments in the riparian areas of the Bridge Thin Project EA. By prescribing small no cut buffers (25-60 feet) to be left to maintain stream temperatures and thinning the remaining acres inside the riparian reserves you can achieve the management objectives of moving them into late seral habitat faster. By reducing the no cut buffers to 25-60 feet and thinning down to that distance, the forest also harvests more volume during the sake thus reducing unit cost. We encourage the Forest Service to continue to use silvicultural thinning treatments in riparian reserves on future projects to accelerate the development of desired riparian conditions.</p>	<p>Group selection is the term used to describe small patch opening and are described in Chapters 2 and 3.</p> <p>Chapter 2, Wildlife Mitigations describes required seasonal restrictions. There are only two restrictions required.</p> <p>Riparian Thinning treatments are addressed in Chapters 2 and 3. Table 7 summarizes riparian reserve management.</p>
Karl Morgenstern, Drinking Water Source Protection	Scope and planned operations associated with development of the Blue River, Mill Creek and Mill Creek Overlook rock quarries. The EA	The Mill Creek rock quarry is the only quarry to be carried forward with this project. Rock volumes

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<p>Coordinator, Eugene Water & Electric Board</p>	<p>should include adequate discussion of the volume anticipated to be removed from these quarries, how operations will be conducted to minimize runoff during storms and spills/leaks of fuel, oil, hydraulic fluids, etc. from equipment and what the post harvest plans are for these quarries. These types of areas can be magnets for trash dumping and other illicit activity after use of quarries stops.</p> <p>More details about the four waste-areas to better understand how these areas will be setup, used, maintained and closed to minimize storm even runoff, water quality impacts, invasive weed production and reduce attractiveness of these areas as illegal dumping grounds. Provide adequate discussion of how the waste areas will be developed and managed.</p> <p>Reduce hazardous fuels, improve defensible space along urban interface areas and employ fire treatments as a restorative tool. EWEB fully supports these concepts. Include a discussion about the existing fire risks, how these risks compare to fire risks in the rest of the forest and how the proposed harvests will address these risks. EA should also evaluate if the proposed fuels reduction projects are addressing high fire risk areas where geologic conditions could influence fire behavior and pose a higher risk for post-fire landslides.</p> <p>Provide adequate discussion on the types and frequency of monitoring that will be conducted as part of this project to determine if the project met its stated objectives.</p>	<p>are less than 15,000 cubic yards as stated in Chapter 2. The quarry is located behind a gate with a year round closure that helps prevent trash dumping and other illicit activities.</p> <p>Existing waste areas are being used with no new ground disturbance as discussed in Chapter 2.</p> <p>The Fire and fuels section in Chapters 2 and 3 discusses hazardous fuels reduction, urban interface, fire regimes, and fuel profiles.</p> <p>Monitoring is discussed in the monitoring section in Chapter 3.</p>
<p>Chandra LeGue, Healthy Forests Advocate, Western Field Office, Eugene, OR</p>	<p style="text-align: center;"><u>Road Management</u></p> <p>Please provide a map of the proposed road management associated with this project in the EA.</p> <p>Some weed introduction and soil disturbance from logging can be offset by enhanced understory diversity and increased growth of conifers brought about directly by the canopy reduction. However, extensive road construction or reconstruction will not be justified by a small</p>	<p>Roads to be closed and decommissioned are listed in Tables 4 and 7. Figures 7,10, and 12-25 depict proposed haul routes, culvert replacements, and temporary roads to be used for this project.</p> <p>A discussion of the effects of harvest treatments on soils and invasive plants can be found in the Soils</p>

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	<p>restoration thinning effort. And ground based logging that allows heavy equipment off of roads may cause significant soil disturbance that will not be offset by any intended benefits to the vegetation.</p> <p style="text-align: center;">Thinning Concerns and Guidelines</p> <p><u>Variable density thinning</u></p> <p>We urge you to use these stands, which will allow them to develop into more complex and resilient forests. This means that thinning should be done in a way that creates ¼ to ½ Acre gaps, dense patches lightly thinned, moderately thinned, and heavily thinned patches in every stand. Please incorporate the principles of VDT into the harvest prescriptions for this project.</p> <p><u>Natural stands</u></p> <p>We generally ask that the agency avoid commercial timber harvest, roads, and mining in late-seral forests. In this case, the proposed action would enter 420 acres of healthy, naturally-regenerated 100+ year old forests. We do not support this portion of the project proposal.</p> <p><u>Legacy features</u></p> <p>Treatments should include explicit safeguards for protecting all existing snags and large down logs in the harvest units.</p> <p><u>Riparian Reserves</u></p> <p>In young stands in Riparian Reserves, we support thinning activities that enhance the development of trees to shade streams and become sources of coarse woody debris, as long as these activities do not result in yarding corridors, roads, or other yarding activities impacting water quality and aquatic habitat.</p> <p><u>General Guidelines for thinning</u></p> <p>Use the historic range of variability as a guide, but don't just focus on seral stage. Consider also the historic abundance of ecological attributes like large trees, large snags, roadless areas, etc. all of which</p>	<p>and Invasive Plants section in Chapter 3.</p> <p>Variable density thinning with group selection (small gaps) are discussed in Chapters 1 (pg 17), 2 (pg 69) and 3 (pp 78-83).</p> <p>There are six commercial harvest units that are proposed to be harvested in fire regeneration stands under Alternative B (140 acres) but not in Alternative C.</p> <p>Existing snags >12" dbh are recommended for protection when not a safety concern.</p> <p>Riparian Thinning treatments are addressed in Chapters 2 and 3. Table 7 summarizes riparian reserve management.</p>

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	<p>have been severely reduced from historic norms.</p> <p>Treatments in forests with naturally mixed-severity fire regimes should be carefully scrutinized to ensure those areas are really outside of the HRV and treatments are really needed. Treatments in mixed severity fire regimes should be patchier and leave behind more structure, more snags and large dead wood.</p> <p>Prioritize treatment of the dense young stands that are most “plastic” and amenable to restoration. Another priority is to carefully plan and narrowly target treatments to protect specific groves of fire-resistant, old-growth trees that are threatened by ingrowth of small fuels, but don’t focus on rigid density reduction targets. Leave all medium and large trees that show old-growth characteristics.</p> <p>Thin from below, retaining the largest trees or use “free thinning” with a diameter cap so that some trees of all size classes are retained.</p> <p>Retain all large trees and most medium sized trees so they can recruit into larger classes of trees and snags. Regardless of size, retain all trees with old-growth characteristics such as thick bark, flat top, asymmetric crown, broken top, forked top etc. these trees have important habitat value and human values regardless of their size or age. Allow natural processes of succession and mortality turns some of these medium and large trees into ecologically valuable snags and down wood.</p> <p>Don’t thin to uniform spacing. Use variable density thinning techniques to establish a variety of microhabitats, break up fuel continuity, create discontinuities to disrupt the spread of other contagious disturbances such as disease, bugs, weeds, fire, etc. Retain patch clumps of trees which are the natural pattern for many species.</p> <p>Use your creativity to establish diversity and complexity both within and between stands. Use skips and gaps within units to help achieve diversity</p> <p>Thin heavy enough to stimulate development of some patches of understory vegetation, but don’t thin so heavy that future development</p>	<p>A thorough discussion of thinning and the rationale for various proposed silvicultural treatments including variable density thinning can be found in Chapters 2 and 3.</p>

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	<p>of the understory becomes a more significant fuel problem than the one being addressed by the current project.</p> <p>Retain and protect under-represented species of conifer and non-conifer trees and shrubs. Retain patches of dense young stands as wildlife cover and pools for recruitment of future forests.</p> <p>Retain abundant snags and course wood and green trees for future recruitment of snags and wood. Retain wildlife trees such as hollows, forked tops, broken tops, leaning trees, etc.</p> <p>If using techniques such as whole tree yarding with tops attached to control fuels, the agency should top a portion of the trees and leave the greens in the forest in order to retain nutrients on site.</p> <p>Avoid impacts to raptor nests and enhance habitat for diverse prey species.</p> <p>Take proactive steps to avoid the spread of weeds. Avoid and minimize soil disturbance. Retain canopy cover and native ground cover to suppress weeds.</p> <p>Buffer streams from the effects of heavy equipment and loss of bank trees and trees that shade streams.</p> <p>Acknowledge and consider the following potentially significant issues in the NEPA analysis:</p> <p>Removing commercial sized logs, and associated roads and slash disposal, often conflicts with other resource values such as soil, water, weeds, wildlife habitat, fire hazard, and carbon storage.</p> <p>Removal of commercial sized logs can make the stand hotter, dryer, and windier, making fire hazard worse instead of better;</p> <p>Commercial logging tends to present significant risks of weed infestations because of soil disturbance and canopy reduction;</p> <p>Removal of commercial logs necessitates road related impacts on soil and water resources. Machine piling and pile burning tend to cause</p>	<p>Snags and down wood are addressed in Chapter 3.</p> <p>Known nests are protected as well contract clauses that allow protection of discovered nests.</p> <p>Mitigation Measures in Chapter 2 addresses steps to avoid spreading weeds including equipment washing.</p> <p>Riparian Thinning treatments are addressed in Chapters 2 and 3. Table 7 summarizes riparian reserve management</p>

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	<p>significant adverse impacts on soil and water, especially when combined with road impacts and other logging disturbances.</p> <p>“Capturing mortality” reduces future snag habitat that is already deficient. Increasing vigor via thinning delays recruitment of snag habitat that is already deficient.</p> <p style="text-align: center;"><u>Fuels Management Concerns</u></p> <p>We are, however, concerned about whether fuels reduction on adjacent private land will be done to make the Forest Service’s efforts more effective. We hope so, as cooperation with local landowners is an important step in ensuring effective fuels reduction.</p> <p>Consider a NEPA alternative that treats only surface and ladder fuels and controls stocking while retaining canopy cover that maintains cool, moist fuels, suppresses future ladder fuels, and provides wildlife habitat.</p> <p style="text-align: center;"><u>Water Quality</u></p> <p>In general, we usually ask that any commercial harvest activities or road construction in key watersheds or municipal watersheds should be avoided in order to protect water quality. You should minimize impacts to fish habitat and drinking water quality through the project proposal.</p> <p style="text-align: center;"><u>Roadless Areas</u></p> <p>In general, Oregon Wild asks the agency to avoid timber harvest, roads, mining, development and motorized recreation in roadless areas > 1000 acres or any roadless adjacent to existing wilderness or parks and all inventoried roadless areas. We have identified a few small unroaded areas and some roadless extensions to inventoried roadless areas within the project area: Scout Creek area (1300 acres) and additions to the Mount Hagen IRA and McClennan Mountain IRA. (see map below)</p> <p style="text-align: center;"><u>NEPA Alternatives</u></p> <p>We propose, as noted above in several places, an action alternative that is based on restoration principles and small diameter fuels reduction.</p>	<p>Potential project effects on the spread of Invasive plants is discussed in Chapter 3.</p> <p>Impacts to soil and water resources are discussed in the sedimentation and roads section in Chapter 3.</p> <p>A Community Wildfire Protection Plan is intended to involve community members in “living with fire” as discussed in the Fire and Fuels section of Chapter 3.</p> <p>The non-commercial reduction of ladder fuels of small diameter , <7” dbh material is proposed in Alternatives B and C. These areas are in the Wildlnd Urban interface.</p> <p>This project is not within a key watershed.</p> <p>Significant issue #1 is Water Quality/Aquatic resources and is addressed in chapters 2 and 3. Riparian management is discussed in Chapter 3.</p>

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	<p>We believe such alternative would still meet the purpose and need while better contributing to overall forest health in the wildland-urban interface.</p>	<p>There are no treatments planned in Inventoried Roadless Areas. Unroaded areas are present the project area and are discussed in Chapters 1 and 3. Effects of activities in unroaded areas are presented on pages 155-157.</p> <p>Considerations were made for a host of potentially significant issues. The significant issues as well as non significant issues are discussed in Chapter 1. Alternative C responds to some of these concerns, removing harvest in stands over 80 years old.</p>