



United States Department of the Interior



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IN REPLY REFER TO
5400 (014)

DATE:
July 29, 2008

**DECISION RECORD
FOR
PVJ Timber Sale EA #OR-014-07-01
PROJECT: PVJ Timber Sale**

INTRODUCTION

The effects of the proposed PVJ Timber Sale are analyzed in the PVJ Timber Sale Environmental Assessment (EA) # OR-014-07-01. This Decision Record applies only to the PVJ Timber Sale and follow-up hazardous fuel reduction treatments as proposed in the EA. The timber sale is scheduled to be sold August 27, 2008.

The Klamath Falls Resource Area (KFRA) interdisciplinary team designed the PVJ Timber Sale EA and analyzed the impacts of proposed actions based on: (a) current resource conditions in the project area, (b) the results of monitoring the previous decade of timber harvest activities, and (c) the need to meet the objectives and direction of the KFRA Resource Management Plan (RMP). The proposals presented and evaluated in the PVJ Timber Sale EA reflect what the interdisciplinary team determined to be the best balance and integration of resource conditions, resource potentials, competing management objectives, expressed interests of the various publics that commented, and the concerns for surrounding communities.

DECISION

It is my decision to implement the Proposed Action in the PVJ Timber Sale EA. As part of this action, Best Management Practices (BMPs) in Appendix D of the Klamath Falls Record of Decision and Resource Area Resource Management Plan (ROD/RMP), the mitigation measures described in this EA, and the Project Design Features in Appendix B of the EA will be applied. The approved action will result in the implementation of the PVJ Timber Sale within the analysis area. Specifically, this decision will result in:

Commercial Timber Harvest:

- Approximately 1.3 million board feet (MMBF) of timber being harvested on 850 acres.

Silvicultural Prescription – Variable Density Thinning:

- Commercial and noncommercial/submerchantable variable density thinning on approximately 850 acres in the Matrix designed to improve tree vigor; reserve an array of stand stocking levels, tree sizes, and forest structure; produce a sustainable supply of timber and other forest commodities; and maintain and enhance the existing ecological functions of the stand,

including wildlife habitat. The thinning is designed to reserve an array of tree sizes and forest structure and maintain and enhance the existing ecological functions of the stand including wildlife habitat. Based on pre-treatment monitoring plots taken within the proposed PVJ Timber Sale area, Figure 1 (below) shows the expected distribution by diameter class of trees designated for cutting (take trees) and retention (leave trees) (Trees less than 7"DBH not shown on Figure 1).

- Noncommercial/submerchantable variable density thinning on approximately 371 acres outside the timber sale area designed to improve tree vigor, promote uneven-age management, reduce ladder fuels, and modify species composition.

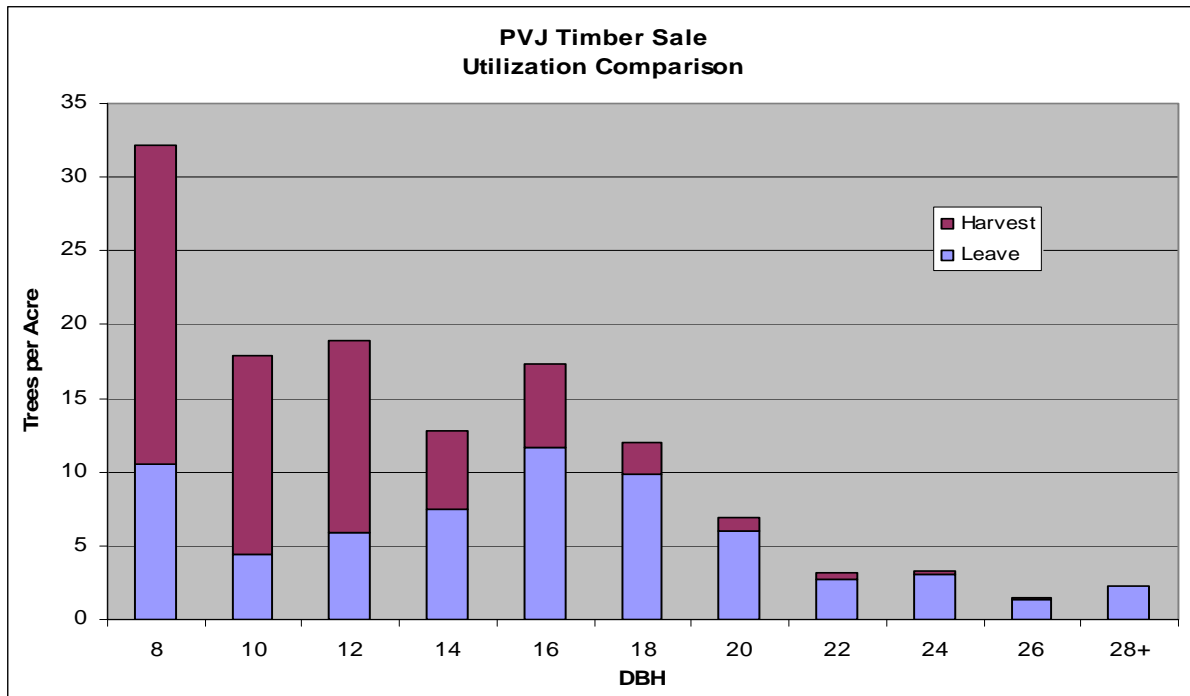
Fuel Reduction:

- Fuel reduction designed to reduce hazardous fuels and associated risks of high severity wildfires through implementation of the following integrated treatments: prescribed fire, submerchantable/noncommercial thinning, and biomass removal on 1,221 acres (approximately 850 acres in the commercial timber sale area and 371 acres outside the timber sale area).

Road Treatments:

- Road improvement (resurfacing) - Approximately 1.3 miles
- Spot rocking – Approximately 2.5 miles
- Road renovation (grading & brushing – road maintenance) - Approximately 6.3 miles
- Road decommissioning (blocking) – Approximately 0.6 miles of roads
- Road obliteration - Approximately 2.4 miles
- New road construction – Approximately 0.2 miles

Figure 1 – Data From Tree Marking Quality Control Plots Showing Comparison of Proposed Harvest Versus Leave Trees Per Acre by 2" Diameter Class.



(Note: Tree retention less than 7"DBH not shown. Trees less than 7" DBH will be thinned on a 16'X16' spacing.)

Monitoring

The KFRA ROD/RMP (Appendix K) requires that at least twenty percent of the timber sales, silviculture projects, or other ground disturbing activities be monitored annually. The KFRA has issued an Annual Program Summary (APS) and Monitoring Report on a yearly basis since the signing of the Resource Management Plan in 1995. The Annual Program Summary documents the results of annual timber sale monitoring as well as on-going monitoring of other resources. The 2007 Annual Program Summary and Monitoring Report, Table 19-5 on page 34, lists all the sales that have been sold and those that have been monitored to date. Monitoring related to timber harvesting has included analyzing soil impacts, stand attribute changes (basal area, trees per acre, species composition, structure, etc.), numbers and spacing of skid trails, coarse woody debris and snag requirement compliance, establishment and adherence to riparian reserve buffers, threatened and endangered species buffers, cultural resources buffers, and seasonal use restrictions. The PVJ Timber Sale may have some or all of these attributes monitored.

Mitigation

The mitigation measures described on pages 27-28, PDFs and BMPs described in Appendix B of the PVJ Timber Sale EA, and the BMPs in Appendix D of the KFRA ROD/RMP that pertain to timber harvesting and affected resources will be implemented.

Resources Not Present

The following resources are not present within the proposed PVJ Timber Sale Area: Areas of Critical Environmental Concern (ACECs); prime or unique farmlands, mining claims, paleontological resources, roadless areas, wilderness areas, wilderness study areas, floodplains, wetlands, solid or hazardous waste, and Wild and Scenic Rivers.

Environmental Consequences

The effects of implementation of the proposed actions analyzed in the PVJ Timber Sale EA are consistent with the KFRA RMP EIS. The PDFs and BMPs from the PVJ Timber Sale EA and the BMPs from the KFRA ROD/RMP, and the mitigation measures will minimize the effects to the affected resources and result in no effects that are greater than those described in the EA and the KFRA RMP EIS.

RATIONALE FOR SELECTION OF PROPOSED ACTION

The decision to implement the Proposed Action meets the purpose and need identified in the EA (page 3) and furthers the intent established in the RMP to harvest timber and protect other resource values. The Proposed Action is designed to meet the purpose and need for the project by improving vigor of forested stands, reducing wildfire hazard conditions, and providing a sustainable supply of timber.

The No Action Alternative is rejected because it does not meet the purpose and need identified in the EA or the resource management objectives for the Matrix identified in the Klamath Falls RMP and the Northwest Forest Plan (NWFP) (*Record of Decision for Amendments to Forest Service and Bureau of Land Management Planning Documents Within the Range of the Northern Spotted Owl*, 1994). Beneficial economic opportunities from timber harvesting would be foregone and no thinning or fuel reduction benefits would be realized.

Other alternatives considered but dropped from analysis (see EA pages 11 and 12) include a Fuels Only Alternative, Restoration Only Alternative and a Citizen Proposed Alternative. These alternatives were rejected because they would not meet one or more parts of the Purpose and Needs section of the EA.

CONSULTATION AND COORDINATION

Section 7 Consultation with the U.S. Fish and Wildlife Service (FWS) was completed for the proposed PVJ Timber Sale. A biological assessment dated April 30, 2008, addressed the actions proposed in the PVJ Timber Sale EA.

For the PVJ Timber Sale a determination of “May Affect, Not Likely to Adversely Affect” was made by the BLM for the northern spotted owl. The FWS concurred with this determination (concurrence letter April 30, 2008; 8-10-08-I-0032). A “No Effect” determination was made for all other listed species.

PUBLIC INVOLVEMENT

The KFRA requested public comments on the PVJ Timber Sale EA on two different occasions. The first was an initial scoping letter dated January 11, 2007 and mailed to approximately 150 individuals and groups on the KFRA’s EA mailing list. That letter outlined the proposed treatments for the analysis area. The resource area received comments from three individuals/organizations. The issues and concerns raised were considered in formulation of alternatives for the PVJ Timber Sale EA (Chapter 2), analysis of the alternatives (Chapter 3) and development of mitigation measures. Issue statements and responses resulting from the scoping process are presented in the PVJ Timber Sale EA (p. 5-8).

Upon completion of the EA, the public was notified on June 9, 2008 through a legal notice published in the Klamath Falls Herald and News and through an EA availability letter mailed to those on the EA mailing list. Two individuals and three members of two different organizations requested and were mailed copies of the EA. Two comment letters were received from two different organizations during the formal thirty (30) day public comment period. Following are responses to relevant issues raised during the EA comment period:

Carbon Storage and Climate Change

Comment: The reduction in carbon storage as a result of timber harvests needs to be examined as a cumulative impact of harvesting.

Response: Scoping for this project identified resources to analyze, compare, or describe the environmental effects of the proposed actions for illuminating or predicting the potential effects. The assessment addressed direct, indirect, and cumulative impacts of each action associated with the proposed timber sale and fuel treatments to soils, wildlife, vegetation, hydrology, and other resources. All critical issues identified during scoping were subsequently analyzed in the EA. Environmental organization raised broad questions about carbon storage and climate change in comments made during public review of the EA. I believe the 1994 KFRA RMP [Final] FEIS addresses this issue sufficiently but I will clarify here.

While it is not speculative that some change in climate conditions will occur in the future, it is not possible to reasonably foresee the specific nature or magnitude of the changes. This uncertainty within the scientific community regarding global warming and climate change was noted in the 1994 FEIS (See Page 4-7 and 4-8). The PVJ Timber Sale ties to the analysis in the 1994 FEIS, which addressed Effects on Global Climate on pages 4-7 and 4-8. The FEIS analysis assumed a reduction in carbon storage capacity as a result of harvesting old growth forests and an increase of carbon dioxide into the atmosphere from prescribed burning on BLM lands. The FEIS analysis also assumed that some carbon storage loss from harvesting old growth would be offset by the beneficial effect of thinning younger forest that promotes growth, reduces wildfire risk, and results in greater carbon storage capacity. Most of the PVJ timber sale consists of second growth with very little old growth planned for harvesting. The impacts of this timber sale as part of the entire planned vegetation management program are within the assumptions of the level of activities analyzed in the 1994 FEIS. There is no information that the effects of this sale are any greater than those already analyzed for the RMP.

Harvest of wood products via sustainable silvicultural systems such as density management and uneven-aged management practiced by KFRA can contribute to carbon storage in a variety of ways. Wood products can be manufactured into long lasting products like lumber and plywood and substituted for steel and concrete (which require much more energy to produce) (OFRI 2007). In addition, some of the residual noncommercial material is proposed for converting into biomass to produce energy, fuel, and electricity. Generally, biomass plants release 96-98% less CO₂ into the atmosphere compared to open pile burning (Placer County Air Pollution Control District & U.S. EPA AP-42, TSS Consultants, Feb. 2008). Therefore, the proposed treatments will provide carbon storage and reduced CO₂ emissions benefits as well as the retention of a vigorously growing uneven-aged, thinned forest that will actively continue to store carbon.

The use of harvested materials to create wood products merely reallocates the carbon from the bole of the tree into wood products. Manufactured wood products decay slowly and release carbon gradually as they do, while biomass can be used to produce energy that provides an alternative to fossil fuels (Millar et al. 2007). The combined carbon sequestration value of an existing forest and wood harvested from the same forest and used as a substitute for concrete outweighed that of pure carbon sequestration in an old growth forest (OFRI 2007). This could allow for more carbon sequestration in the long run while still achieving economic objectives.

In addition, the thinning process will increase individual tree vigor and reduce the risk of mortality as a result of insects, disease, or stand replacing fire (Millar et al. 2007, OFRI 2007). “During the 2002 U.S. wildfire season, approximately 92,000 ha of forest land experienced catastrophic stand replacing fire in four of the season’s largest fires. We found that had these 92,000 ha been thinned prior to the fire events there would have been a 59.6% reduction in CO₂ released.” (Hurteau et al 2008)

The downed woody debris requirements in the KFRA ROD/RMP (p. 23) and the Northwest Forest Plan (Page C-40) require that 120 linear feet of logs, 16” DBH or greater be left on each acre of harvested land in areas of regeneration harvest. There are no regeneration harvests proposed in the PVJ Timber Sale. Any existing down woody debris on the ground is not proposed for harvesting. Follow-up prescribed burning operations will address the need to retain large coarse woody debris in the burn plans. Historically, the KFRA implements early cool

spring prescribe burns to retain stand attributes like coarse woody debris and as well as minimize mortality to residual trees.. These measures will help address the need for carbon to be returned to the soil as organic matter in the form of large woody debris. These stands are considered young to mature, not old growth. Therefore, thinning to improve tree vigor and species diversity will benefit the eventual late seral stage stand. For the above reasons, the cumulative impact of density management will have minimal effects on the overall carbon storage potential of the project area.

Fire/Fuels

Comment: Logging may increase fire hazard by making the stand hotter, dryer and windier.

Response: Harvesting of trees by itself can increase wildfire risks through accumulation of slash and changes in canopy cover. However, the PVJ Timber Sale harvests mostly smaller diameter trees, 3"-20" DBH (Diameter at Breast Height) and relatively few of the larger trees, >20" DBH (See Figure 1). In addition, the proposed action includes several fuels reduction treatments that when integrated together will minimize the generation of activity fuels and reduce fire severity and risks (PVJ Timber Sale EA, p. 1) These treatments include; whole tree yarding, submerchantable and commercial thinning of overstocked areas, and post treatment prescribe fire. Suppression costs and resource impacts are expected to be reduced as a result of the proposed treatments. The overall effect of the proposed action is expected to modify the present fuel condition class that will more resemble historic conditions thereby benefiting multiple resources. As a result of all actions proposed including harvesting, the wildfire severity and risk is not expected to increase.

One of the objectives of the proposed action is to thin fuels to reduce the potential of a stand-replacing fire but maintain sufficient canopy to meet wildlife and other resource objectives. Recent findings have validated that thinning of forested stands can reduce hazardous fuels and fire intensities. The Cone Fire occurred on September 26, 2002 within the Blacks Mountain Experimental Forest on the Lassen National Forest. The fire was unique in that it burned into several mechanically thinned and underburned units. The fire effects changed from predominately a stand replacing crown fire in the unthinned area to a ground fire with lower intensities when it reached the thinned units. More trees survived in the thinned unit than in the unthinned unit (Jablonski, October 2003). The proposed PVJ treatments are similar in design to those that were implemented on the Blacks Mountain. Experimental Forest as well as other thinning/fuel reduction treatments implemented on the KFRA where similar successful results have been achieved.

Comment: Fuel Reduction should focus on reducing ladder fuels and restoring ecological processes.

Response: Thinning and fuels reduction objectives for this project do focus on treating ladder fuels, smaller trees, surface fuels, and activity fuels. Follow-up fuel reduction treatments (thinning, piling, yarding and underburning) are proposed to meet fuels management objectives and modify the present Condition Class III. The overall effect of the proposed action is expected to modify the present fuel condition class that will resemble historic conditions thereby benefiting multiple resources.

Comment: Disclose the potential of a stand replacing fire.

Response: The EA identifies that by not treating dense, overstocked stands and reducing fuels, the potential for stand replacing fires is greater under the No Action Alternative (refer to pages 15, and 21-25). The study area occurs in Fire Regime I, Condition Class III (PVJ Timber Sale EA, p. 14). This means that the area historically contained high frequency, low intensity fires, however there has been a high level of departure from this historic forest condition. This puts the risk of loss of key ecosystem components from stand replacing fires between moderate and high.

Monitoring

Comment: *Standards and guidelines are not supported by credible monitoring data.*

Response: Guidelines for monitoring management actions are described in the KFRA RMP (p. 85-86). Results of current and past monitoring can be found in the Annual Program Summary and Monitoring Reports. Monitoring data found in these documents demonstrate the successful compliance and monitoring of management objectives laid out in the KFRA RMP.

Biomass

Comment: *Do not remove biomass if it requires entering the area twice in order to remove it.*

Response: As the KFRA has successfully implemented for years, the 3" to 7" material will be thinned concurrent (single entry) with the commercial harvest operation to address fuel hazards and for silvicultural benefits. This will also reduce cumulative impacts to soils because there will be only one entry.

Roads

Comments: *Reduce the # of short road segments in sections 1,9,10 and 15. Examine roads in section 15 for rutting. Consider using a different haul route rather than the main road through section 8 as it passes through a seasonally wet meadow.*

Response: Roads in the project area will be improved where necessary and obliterated where feasible to reduce total road density. The project proposes a net reduction in road density. Map 3 (PVJ Timber Sale EA, p. 53) shows all of the mapped roads within the project area as well as which roads will be decommissioned, obliterated and improved. Road segments that are necessary for access to private land must be retained. Harvest operations will not take place during the seasonally wet portion of the year thereby minimizing damage. In addition proposed road improvements will repair present drainage problems.

Vegetation

Comment: *Protect oaks, thin around them.*

Response: Oaks will not be harvested in this timber sale as they are not a commercial species. The general thinning and reduction of stand densities will benefit the residual oaks.

Comment: *Mature forests need to be maintained in order to preserve the habitat and comply with the NWFP "15% late successional standard".*

Response: The NWFP standard states that 15% of the federal lands in a fifth field watershed must remain in late successional habitat. The standard is to not reduce the Late Successional Habitat below this threshold on federal lands.

The PVJ Timber Sale will not reduce the amount of Late Successional Habitat in the fifth field watershed below that level. The uneven-aged/density management silvicultural prescriptions in the Klamath Falls Resource Area RMP are designed to maintain the structural and functional late-

successional characteristics in those stands proposed for treatment. The proposed timber sale would maintain dispersal habitat for spotted owls and other wildlife species. No designated critical habitat occurs within the project area. Therefore, the proposed treatments are expected to result in no reduction of late-successional habitat within the PVJ analysis area and no significant impacts are expected beyond those analyzed in the RMP

Comment: Do not cut trees greater than 20.9" DBH

Response: The KFRA ROD/RMP (p. E-3) specifies that "...trees in all size classes are eligible for thinning in order to reduce stocking to site capacity." The KFRA monitors stand structure and forest conditions on an annual basis (see Fiscal Year 2007 KFRA Annual Program Summary and Monitoring Report p. 84-88). The general density management prescriptions implemented on the KFRA are designed to harvest mostly smaller and mid diameter trees while protecting and maintaining many of the larger trees.

According to marking and cruise data, the bulk (92%) of the trees designated for harvest under the PVJ Timber Sale, are 20 inches DBH and smaller. While retaining all large trees may be desirable to some of the public, there is no basis for an arbitrary tree diameter limit for this project. Stand diversity has been maintained in similar previous projects as verified by monitoring (refer to KFRA Annual Program Summaries). Wildlife habitat and stand diversity is expected to be maintained with this project as well. Therefore, the KFRA sees no need to modify its prescription to limit harvesting to certain diameters when current prescriptions are meeting the multiple RMP objectives.

The PVJ Timber Sale EA (p. 3) addresses the need to reduce overstocked stands and reduce wildfire risk. Figure 2 (PVJ Timber Sale EA p. 10) shows that the majority of the trees to be removed under the PVJ Timber Sale are in the 8" to 18" size classes and that relatively few trees over 20" inches DBH would be removed. In addition, thinning around larger high resource value trees is prescribed in the harvest prescription to enhance their resiliency and reduce fire risk (see Appendix B, p. 47). Therefore, the long-term maintenance and recruitment of large trees is expected.

Comment: Attain a high degree of variability by implementing lots of large unthinned "skips" and small, heavy thinned "gaps."

Response: The KFRA implements silvicultural prescriptions that result in variable stand densities. A typical density management unit may contain patch cuts, stands with a residual density of 60 to 180 square feet of basal area per acre, and thermal clumps (>180 square feet of basal area per acre) where no harvest is implemented. The residual density of the PVJ Timber Sale in Density Management areas is expected to vary from a basal area of 60 to 140 square feet per acre to untreated thermal clumps and reserve areas. The Annual Program Summary and Monitoring Reports show a summary of similar timber sale post treatment attributes that includes canopy closure, basal area, trees per acre, and snag data (2007 APS, p. 86). The summary shows stand data indicating that the residual stand contains a considerable amount of variation thereby validating that Density Management results in retention of variable stand densities.

Snags

Comment: Snag estimates/monitoring are not sufficient to provide nesting/foraging habitat for wildlife. Assumptions concerning snag habitat standards are outdated. Agencies have not adjusted their management plans. Agencies need to prepare an EIS to examine this.

Response: Snag retention requirements have been increased based on new information and the RMP has been revised. As described in the EA (Appendix B, p. 49), a minimum of 2.6 snags per acre would be retained (where available) to meet the 60% optimum cavity nesting habitat in project areas and to meet snag requirements from the 2001 Record of Decision and Standard and Guidelines for Amendments to the Survey and Manage, Protection Buffer, and other Mitigation Measure Standards and Guidelines (2001 ROD) for white headed woodpeckers, black backed woodpeckers, pygmy nuthatches and flammulated owls (p. 33-34 2001 ROD). No additional EIS is necessary to address this issue.

More specifically, because PVJ is primarily a density management harvest where approximately 25%-35% of the trees (by basal area) are removed, mostly from the smaller diameter classes, there is expected to be sufficient recruitment trees available to meet future snag and down woody debris requirements, therefore negating the need to retain all large snags. However, no existing snags were designated for harvest during sale preparation. Only existing snags that present a hazard to logging operations or public use will be designated to cut in the PVJ Timber Sale during the administration of the timber sale contract. These include snags immediately adjacent to landings and main public roads. Any other snags that are designated for cutting are trees that were marked to cut when they were alive and have subsequently died. In addition, no snags are designated for harvest/removal in the riparian reserves.

Monitoring of post-harvest snag totals varies from data collected in plots to 100% tallies of a given portion of the harvest area. The 2007 Annual Program Summary and Monitoring Report presents snag data from the Thin Sheep Timber Sale. Total snags/acre remaining in the Thin Sheep Timber Sale area was 8.61 (p. 86). Public comments received recommend 6-10 snags/ha (4.2 snags/ac). This means that our recent sale contains twice the number of post harvest snags that were recommend. Previous Annual Program Summaries also document compliance with RMP snag objectives.

Wildlife

Comment: The EA does not evaluate the project area for consistency with the final NSO recovery plan.

Response: The Final Recovery Plan for the Northern Spotted Owl (USDI FWS 2008) was published after the development of the spotted owl analysis of the PVJ Timber Sale Environmental Assessment. Therefore the analysis was based on the Draft Recovery Plan for the Northern Spotted Owl. However, the PVJ Timber Sale EA is consistent with the Final Recovery Plan. The Final Recovery Plan strategy has three essential elements; barred owl control, dry forest landscape management strategy, and Managed Owl Conservation Areas. The PVJ timber sale area is considered a dry forest landscape. In the Final Recovery Plan recovery action six and seven address the dry forest landscape on the east slope of the Cascades.

Recovery Action 6: Identify, maintain, and restore approximately 30–35percent of the total dry forest (ponderosa pine, Douglas-fir, and dry grand fir plant association group) habitat-capable area as spatially dynamic high quality spotted owl habitat patches, and approximately 50–75

percent of the total moist forests (moist grand fir, western hemlock, and Pacific silver fir plant association groups) habitat-capable area as high-quality spotted owl habitat patches.

The PVJ timber sale project is consistent with Recovery Action six of the Final Recovery Plan. Within the PVJ timber sale area there would be no habitat that would be identified as high quality spotted owl habitat. As stated on p. 19 of the EA, the majority of the habitat within the sale area is classified as dispersal habitat (1147 acres) with a smaller component of foraging habitat (415 acres). No spotted owl habitat is classified as suitable nesting habitat (high quality) within the project area. As stated on p. 18, no spotted owl nests occur within the project area. No timber harvest will occur within a spotted owl territory. There is a small portion (46 acres) of a spotted owl territory that does overlap a prescribed fire unit. Therefore the habitat within the PVJ Timber Sale project area would not be considered high quality habitat and would not be amongst the 30-35 percent identified to maintain or restore under Recovery Action Six.

Recovery Action 7: Manage lands in these Provinces outside of the high quality habitat patches to restore ecological processes and functions, and to reduce the potential for significant losses by stand-replacement fires, insects, and disease.

The PVJ Timber Sale project is also consistent with Recovery Action Seven of the Final Recovery Plan. The proposed timber sale and fuel treatments are outside of the high quality patches of spotted owl habitat. The Purpose and Need for the proposed action as stated on p. 3 of the EA are consistent with those stated in recovery action seven of the Final Recovery Plan; reduce the potential for significant losses by stand replacement fires, insects and disease.

Grazing

Comment: The cumulative effects of grazing are not sufficiently addressed in the EA.

Response: The current level of livestock grazing has no measurable effect on timber or soil resources in the project area. The PVJ Timber Sale lies within portions of the Chicken Hills (#0141) and Chase Mountain (#0101) livestock grazing allotments. Cattle grazing is permitted within the PVJ Timber Sale area, though due to thick timber and limited herbaceous growth, most of the area receives little if any grazing. More information is available in the PVJ Timber Sale EA p. 33. A complete description of the grazing activities in this allotment, including current use levels, historical use, allotment boundaries, etc. is available in the Topsy-Pokegama Landscape Analysis, July 1996. Additional information is found in the KFRA RMP/FEIS, KFRA ROD/RMP and Rangeland Program Summary. The KFRA ROD/RMP recognizes and provides for livestock grazing as a legitimate use of the public lands (p. 62 and Appendix H).

Noxious Weeds

Comment: Address the locations of noxious weeds in the project area.

Response: Noxious weeds are addressed in the PVJ Timber Sale EA on p. 17.

Soils

Comment: In the interest of protecting soil resources, do not operate in seasonally wet conditions and harvest the 3"-7" material with one entry..

Response: Soil issues and concerns are addressed in detail in the Topsy-Pokegama Landscape Analysis (p. 35-46) and in the KFRA RMP (p. 28 to 30 and Appendix D). In addition, p. 25-28 of the PVJ Timber Sale EA address the soil impacts expected from the proposed action. The effects

of ground based logging are also discussed and analyzed. The KFRA annual soil monitoring results can be found in the Annual Program Summary and Monitoring Report and monitoring to date indicates that effects of similar timber harvest activities are within the RMP standards. Soil disturbance does not necessarily equate to soil compaction. The KFRA limits ground based operations to those periods when the soil moisture is twenty percent (20%) or less at six (6) inches in depth regardless of the time of year. Operations are normally limited to May 15 to November 1 depending upon the soil moisture criteria stated above (see EA, Appendix B section 3). Therefore, the effects to soils have been sufficiently analyzed and potential effects are within those thresholds analyzed in the KFRA RMP/EIS.

Comment: Address specific logging concerns on the steep Greystoke soils in sec 9 and 15.

Response: Soils impacts are addressed in the PVJ Timber Sale EA on p. 26-27, and specific mitigation is provided on pages 27-28.

Alternatives Considered

Comment: The EA should have considered a wider range of alternatives. Considering only one action alternative violates NEPA's mandate for informed decision-making.

Response: Two alternatives were considered in depth; No Action as well as the Proposed Action. The Proposed Action meets the purpose and need identified in the EA (page 3) and furthers the intent established in the RMP to harvest timber and meet other resource objectives; wildlife, soils, snags, coarse woody debris, improving vigor of forested stands, and reducing wildfire hazard conditions. Three other action alternatives were considered but dropped from detailed analysis (see EA pages 11 and 12). The Fuels Only Alternative, Restoration Only Alternative and a Citizen Proposed Alternative were rejected because they would not meet one or more parts of the Purpose and Needs section of the EA.

Literature Cited

Forests, Carbon and Climate change: Exploring the role of trees in reducing atmospheric carbon. *Oregon Forest Resources Institute. 2007.*

Hurteau, M.D., G.W. Koch, and B.A. Hungate. Carbon Protection and Fire Risk Reduction: Toward A Full Accounting of Forest Carbon Offsets. *Frontiers in Ecology and the Environment* 2008; 6.

Millar, C.I., N.L. Stephenson and S.L. Stephens. Climate Change and Forest of the Future: Managing in the Face of Uncertainty. *Ecological Applications*, 17(8), pp. 2145-2151.

Tahoe Basin Biomass Facility Feasibility Assessment, Placer County Executive Office & TSS Consultants, February, 2008.

CONCLUSION

A. Consideration of Public Comments

I have reviewed the public comments summarized above and have discussed them with the interdisciplinary team of specialists on my staff. The EA and this DR contain sufficient site specific information to implement the proposed action. The comments received do not provide any substantially new information or new analysis, nor do they identify substantial new data gaps

that would indicate additional analysis is needed. Finally, the comments do not identify any significant new data which would alter the effects described in the EA or in the RMP EIS. I am confident that the PVJ Timber Sale EA represents a thorough analysis of impacts to affected habitats and species, in light of the more comprehensive analysis done in the Klamath Falls Resource Area RMP to which the PVJ Timber Sale EA is tiered. The responses to public comments contained in this Decision Record also provide an explanation of BLM's assumptions and basis for conclusions.

B. Plan Consistency

Based on the information in the PVJ Timber Sale EA and in the record, I conclude that this action is consistent with the Klamath Falls Resource Area Resource Management Plan. The action will help to move this portion of the landscape towards the desired future conditions considered in development of the RMP. The actions will comply with the *Endangered Species Act*, the *Native American Religious Freedom Act*, cultural resource management laws and regulations, and Executive Order 12898 (Environmental Justice). This decision will not have any adverse effects to energy development, production, supply and/or distribution (per Executive Order 13212).

C. Finding of No Significant Impact

No significant effects were identified. No effects beyond those anticipated in the KFRA RMP EIS would occur. Refer to the accompanying Finding of No Significant Impact.

D. Summary

In consideration of public comments, the consistency with the RMP and the finding that there would not be any significant impacts, this decision would allow for activities related to the PVJ Timber Sale.

As outlined in 43 CFR § 5003 Administrative Remedies at § 5003.3 (a) and (b), protests may be made within 15 days of the publication date of a notice of sale. Publication of such notice in *The Klamath Falls Herald and News*, Klamath Falls, Oregon constitutes the decision date from which such protests may be filed. Protests shall be filed with the authorized officer and contain a written statement of reasons for protesting the decision.

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 or facsimile protests. Only written and signed hard copies of protests that are delivered to the Klamath Falls Resource Area office will be accepted.

/s/ Donald J. Holmstrom
Donald J. Holmstrom, Manager
Klamath Falls Resource Area
Lakeview District, Bureau of Land Management

7/29/08
Date

Figure 2 – Proposed PVJ Timber Sale Contract Map

Timber Sale: PVJ
 Willamette Meridian
 T.41S., R.7E., Sec. 7, 9, 10 & 15
 Units 1, 2,3,4 and 5 793 acres

Timber Sale Contract Map
 Contract No.: OR014-TS8-03
 Exhibit A
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