

United States
Department of
Agriculture

Forest
Service

Deschutes
National
Forest

Sisters Rock Ranger District
Post Office Box 249
Sisters, OR 97759

File Code: 1950
Date: October 1, 2001

Subject: Bugs Thinning Project Environmental Assessment: Notice of Decision

Dear Interested Citizen:

On October 9, I made the decision to implement **Alternative 2** of the Bugs Thinning Project Environmental Assessment (EA). This decision will allow thinning of green trees on approximately 630 acres of forest stands where removal of dead trees was previously approved under the Santiam Late Successional Reserve Restoration EA in April 1998. The project area was hit hard in the 1990s by the spruce budworm, and many of the forest stands have moderate to very high mortality. The purpose of the work will be to reduce the risk of losing important habitat for plants and animals and to restore forest health.

I have enclosed a copy of the [Decision Notice](#), as well as [Appendix A](#) of the EA, which provides a response to comments received during the public comment period.

This decision may be appealed under 36 CFR 215. Appeals must be filed within 45 days from the date of publication of notice in *The Nugget* newspaper, Sisters, OR. Instructions for filing an appeal are found at the end of this Decision Notice.

Should you need additional information regarding this project you may contact Alan Heath, Project Team Leader at 541-549-7723, or email at aheath@fs.fed.us.

Sincerely,

/s/ William Anthony
WILLIAM ANTHONY
District Ranger

[Deschutes and Ochoco National Forests Website](#)

<http://www.fs.fed.us/centraloregon/manageinfo/nepa/documents/sisters/bugs/bugsdnletter.html>

Last Update: 10/9/99

R.A. Jensen



DECISION NOTICE AND FINDING OF NO SIGNIFICANT IMPACT

For The

Bugs Thinning Project Environmental Assessment

Sisters Ranger District, Deschutes National Forest

Jefferson County, Oregon

Location

The project area is located approximately 16 miles northwest of Sisters along US Highway 20 (Township 13 South, Range 8 East) in Jefferson County, Oregon ([Figure 1](#)). The project area is on the east slope of the Cascade Mountains at about 4,200 to 4,800 feet elevation.

Decision

Following review of the alternatives and effects disclosed in the Bugs Environmental Assessment (EA), the Santiam Late-Successional Reserve EA (1998) to which the Bugs EA tiers, and careful consideration of public comments, I have decided to authorize implementation of **Alternative 2**. The selected alternative allows thinning of approximately 170,000 board feet on 630 acres. The thinning would occur within 11 units previously analyzed under the Santiam Late-Successional Reserve EA, and within which salvage of dead trees has already been approved under an April 9, 1998 decision.

The logging system would be ground-based (both during winter and summer), except on units 1 and 2, which may be logged by helicopter or cable due to steeper slopes. Thinned trees would be primarily white fir trees with less than 20% healthy crown. In other words, the trees that would be thinned are those that would most likely die within 20 years. After trees are salvaged and thinned, slash will be treated as analyzed in the Santiam LSR Restoration EA. Open areas will be replanted, as needed, to ponderosa pine, Douglas fir and western larch to establish long lived, fire-resistant species.

Reasons For the Decision

I have concluded that thinning would improve our ability to meet wildlife habitat objectives by accelerating development of large tree structure, and that removing dying trees from over-dense stands would improve the health of remaining trees and their resilience to loss from insect, disease or wildfire. In addition, conducting thinning at the same time the dead trees are salvaged would reduce the need to re-enter the stands within the next 12 years. If thinning is postponed, an additional entry into the stand to salvage these trees may be needed, resulting in higher risk of root disease and impacts to the soil. Thinning would also make the operation more economical, since the green trees have less wood deterioration than dead trees.

Thinning was not included in the original proposal because the original ID Team was not sure the required number of green tree reserves (GTRs) for wildlife could be met. After further analysis, the team found declining trees could be removed and still meet GTR requirements.

The selected Alternative would add only about 3.5% of volume to the estimated 4,795,425 board feet of dead trees approved for removal in the Bugs units (approved under the decision for Santiam Restoration EA).

Alternatives Considered

Alternative 1 (No Action) was the other alternative considered in detail. This alternative was not selected because it does not provide the opportunity to improve late-successional habitat conditions as well as Alternative 2, since there would be no decrease in the density of live trees in the analyzed stands. This alternative was also not selected because of the high probability that land managers would need to re-enter these stands within 10-12 years as these trees die, creating increased fuel loads and greater risk of losing late-successional habitat due to severe wildfire. Re-entry into the stands with logging equipment would result in detrimental soil impacts.

Public Involvement

A letter was sent on December 9, 1998 to 443 interested individuals and organizations describing the proposed action and requesting comments. Eleven comments were received, nine in support of the project, encouraging the Forest Service to implement this action before the green trees died. Concerns raised by those opposed were not specific to this action, but more about general distrust of the Forest Service or disagreement that removal of green trees would benefit the future health of the forest. There were no issues or concerns raised by agency specialists during the analysis of this proposed action.

A decision to proceed with the thinning was signed on July 23, 1999 under a categorical exclusion, which was subsequently enjoined under the Heartwood v. US Forest Service litigation on another National Forest. There were no comments or appeals received regarding the Decision.

The current EA was sent to about 350 individuals and organizations. Nine comments were received during the 30-day comment period for the EA. For information about specific comments, and how those comments were addressed, see [Appendix A](#) of the EA.

Finding of No Significant Impact (FONSI)

I have determined that implementing Alternative 2 is not a major Federal action that would significantly affect the quality of the human environment; therefore, an Environmental Impact Statement will not be prepared. This determination is based on the site-specific environmental analysis documented in the Environmental Assessment and supporting documents (e.g. the biological evaluation, biological assessment and concurrence with the USFWS), which describe direct, indirect and cumulative impacts of this decision. This determination is also made with consideration of past, present, and reasonably foreseeable future actions on National Forest land and other ownerships within potentially affected areas, which could have a cumulatively significant effect on the quality of the human environment.

I have found the context of the environmental impacts of this decision is limited to the local area and is not significant. I have also determined the severity of these impacts is not significant, considering the following factors of intensity:

1. Impacts from this site-specific project are both beneficial and adverse. The adverse effects are short-term in nature and will not impair land productivity. The long-term effects are considered to be beneficial, especially for forest health, development of future late-successional habitat, and reduction of risk of loss from fire, insect and disease (Bugs EA, pgs. 10-11).
2. There is only minor potential for adverse impacts to public safety. Prescribed burning will affect air quality for short periods in the immediate vicinity of the activity. Overall, there is a predicted increase in public safety due to the reduced risk of impacts from severe wildfire (Bugs EA, pg. 14) and reduction of hazard trees along public roads and in recreation sites (Santiam Restoration EA, pg. 103).
3. No unique characteristics of the geographic area, such as cultural resources (Santiam Restoration EA, pg. 129) or wetlands (Bugs EA, pg. 15) will be adversely affected. Long-term effects to the Late-Successional Reserve are expected to be beneficial. Proposed actions are intended to have a neutral or beneficial effect on the riparian/aquatic system. Aquatic Conservation Strategy objectives will be met under the selected Alternative (Bugs EA, pgs. 12-13).
4. The effects on the quality of the human environment are not likely to be highly controversial. There were no comments or appeals received on the initial Decision Memo for this project (Bugs

- EA, pg. 4).
5. The environmental effects are predicted to be typical for this type of vegetation management project. The adverse effects will be short-term and are not highly uncertain, nor are there unique or unknown risks involved (Bugs EA, pgs. 8-14).
 6. The decision to implement vegetation management actions in the project area does not establish any future precedent for other actions that may have a significant effect. Future actions will be evaluated through the NEPA process and will stand on their own as to environmental effects and project feasibility.
 7. Cumulative effects for wildlife, plants, and aquatic resources were considered in the EA (pgs. 8-14). These actions are not related to other actions that, when combined, will have significant impacts.
 8. The field surveys for sites, objects, etc., listed or eligible for listing in the National Register of Historic Places have been completed. All known sites have been mitigated by avoidance and no activity will take place which will contribute to the loss or destruction of significant scientific, cultural, or historic resources. Any sites found during operation of the timber sales and related activities will be protected. The Forest Archeologist determined there would be no adverse effect (Santiam Restoration EA, pg. 129), and found the proposed actions in compliance with the 1995 Programmatic Agreement between the Oregon State Historic Preservation Officer and the Forest Service.
 9. As described in the Environmental Assessment (Bugs EA pgs. 8-14), Biological Evaluation, Biological Assessments, and letter of concurrence from the US Fish and Wildlife Service, activities are not likely to adversely impact threatened or endangered plants or animals. Required surveys for sensitive animals and plants that are thought to occur in the project area have been conducted for units included in this decision. Timber harvest and other ground disturbing activities have been designed to avoid adverse impacts to known species (Bugs EA, pgs. 5-6).
 10. This proposal is in compliance with all Federal, state, or local law requirements. Relevant Federal, state and local governments were included in the public participation efforts.

Other Findings

Actions in the selected alternative are consistent with the management direction, standards, and guidelines in the Deschutes Land and Resource Management Plan as amended by the Northwest Forest Plan. The selected alternative is also consistent with recommendations in the Metolius Late-Successional Reserve Assessment and Metolius Watershed Assessment.

All manipulations of vegetation will comply with the requirements of 36 CFR 219.27(b). The harvest and post-harvest vegetation management activities are consistent with the strategy of preventing unwanted vegetation, in accordance with the Pacific Northwest Region's Vegetation Management EIS (1988) and the mediated agreement (1989). Where applicable, the vegetation management treatments will be consistent with direction found in the ROD/FEIS for managing Pacific yew.

Implementation Date

This project will not be implemented sooner than 5 business days following the close of the appeal filing period established in the notice of decision in *The Nugget*. If an appeal is filed, implementation will not begin sooner than 15 calendar days following a final decision on the appeal. Implementation means actually doing the ground-disturbing actions described in this notice. Field preparations may proceed (e. g. marking, layout, or contract preparation) prior to implementation.

Administrative Review

This decision is subject to administrative review (appeal) pursuant to 36 CFR 215. Any written notice of appeal of this decision must be fully consistent with 36 CFR 215.14 and must include the reasons for the appeal. A written notice of appeal must be filed with the Reviewing Officer within 45 days of the date legal notice of this decision appears in *The Nugget* (Sisters, Oregon). The notice must be filed with:

Forest Supervisor
Attn.: 1570 Appeals
USDA Forest Service
Deschutes National Forest
1645 Hwy 20 East
Bend, OR 97701

For further information, contact Alan Heath in the Sisters Ranger District, P.O. Box 249, Sisters, Oregon, 97759, aheath@fs.fed.us , 541 549-7723.

/s/ William Anthony
WILLIAM ANTHONY
District Ranger

10/9/01
Date

[Deschutes and Ochoco National Forests Website](http://www.fs.fed.us/centraloregon/manageinfo/nepa/documents/sisters/bugs/bugsdn.html)

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Last Update: 10/9/01

R.A. Jensen

Appendix A

Bugs Thinning Environmental Assessment

Response to Comments

The Bugs Thinning Environmental Assessment was sent out for public review on July 31, 2001. Nine people or organizations commented; 6 commentors supported the project, 1 had concerns about a few of the project design elements, and 2 opposed the project. Many comments simply expressed opinions and did not require a response. Following is a list of comments about the environmental analysis process or about information used in the process.

Watershed /Streams

Comment 1: Streams need protection w/good structure.

Response: We agree. Effort has been made to design this project so that streams are protected (mitigation measures are listed on pg. 6 of the Bugs Thinning EA). The effects of the project on streams are provided in the Bugs Thinning EA on pages 11-13 and in the Santiam LSR Restoration EA on pages 110-113.

Comment 2: Question the wisdom of pulling culverts on closed roads considering 4wd and snowmobile use.

Response: Closed roads are closed to all motorized traffic so crossings on flowing streams should not be a concern. Actively used roads generally do not have culverts that are pulled. Culverts that are pulled out of the stream crossings are generally on intermittent streams or are culverts that drain the road ditch.

Comment 3: Project activities could cause erosion, depletion of nutrients, increase stream sedimentation, and destabilize channels.

Response: The effects of the project activities on erosion, sedimentation and stream habitats are described in the Bugs Thinning EA on pages 10 through 13 and in the Santiam LSR Restoration EA on pages 64-130. The effects on stream habitats have been

addressed and found to have a short-term effect on fine sediment transport but a long-term effect of speeding the recovery of stands of trees that have high tree mortality. The cumulative effects of the project have been minimized by proposed road obliteration and road closures designed to reduce runoff draining into streams (see mitigation measures, Bugs Thinning EA, pg. 6).

Comment 4: Removal of shading streambank vegetation could cause increased water temperatures, threatening fisheries, amphibians, native insects and/or the aquatic food chain and riparian ecological functioning.

Response: Proposed actions are consistent with the Aquatic Conservation Strategy objectives (Bugs Thinning EA, pgs. 12-13), as directed in the Northwest Forest Plan. The ACS objectives address concerns, such as those listed by the commentor. Stream temperatures were not predicted to be greatly affected by proposed actions because the stream is intermittent and controlled by lake outflow in the spring and winter. In addition, large in-stream wood is being retained within the inner gorge or within 100 feet of the stream channel to protect habitat value in the riparian areas. The effects of the project activities on riparian function are described in the Bugs Thinning Project EA on page 12 and the Santiam LSR Restoration EA on pgs. 110-113.

Comment 5: The EA fails to include required riparian buffers.

Response: Riparian reserves have been identified in the EA and appropriate protections have been addressed. Restrictions on how the riparian reserve areas would be treated are given in the Santiam LSR Restoration EA on pages 23 and 110. The effects of the project on riparian reserve functioning are given in the Bugs Thinning EA, pgs. 11-13.

Comment 6: There should be no stream crossings whatsoever in the project, including seasonal/intermittent streams.

Response: The number of stream crossings will be reduced under the proposed project, and predicted effects to streams and water quality would be reduced.

Thinning and Harvest Activities

Comment 7: Max stem diameter for thinning should be 15 inches instead of 21 and 25 inches...Taking trees up to 21 and 25 inches will leave a pretty thin forest.

Response: Thinning would only occur in stands with greater than 40% canopy cover and would not reduce canopy cover to less than 40% . The effects of thinning are analyzed in

the Santiam LSR Restoration EA, pgs. 74-78 and in the Bugs Thinning Project EA, pgs. 3-5.

Comments 8: A 15 inch tree is still a pretty big one and should be fire resistant.

Science shows trees over 10-12 inch dbh are fire-resistant and shouldn't be removed for a thin.

Response: Tree species, rather than size, is a more important trait for fire resistance. Species such as ponderosa pine, western larch, and to a lesser extent Douglas fir have adapted to survive fire with traits such as thick, platy bark and high crowns. Other species, such as true firs, have thin bark and are poorly adapted to survive fire exposure. Where thinning does occur, the Bugs Thinning Project will emphasize retaining fire-resistant species where they are present and removing those species more vulnerable to fire.

Comment 9: Removal of white fir up to 25 inches is against regional direction for eastside forests, which does not allow for logging of trees greater than 21 inches.

Response: This project area is within lands under the direction of the 1994 Northwest Forest Plan. The proposed actions under this EA meet the standards and guidelines for silvicultural activities in the Northwest Forest Plan (ROD, section C).

Comment 10: Logging will impair, not improve, overall forest health.

Response: The project has been designed with a primary goal of developing healthy, sustainable forest stands that are resilient to natural disturbance processes. Many studies have shown that actions such as the ones proposed under the Bugs Thinning EA and the Santiam LSR Restoration EA, can enhance overall forest health (Wickham 1992) by decreasing the risk of severe impacts from wildlife (Graham et al., 1999), insects (Swetnam et al., 1995), and disease (Brooks et al., 1987).

Comment 11: NEPA requires full disclosure of the science used in determining trees "dying or likely to die within 20 years", which the EA fails to do.

Response: The report "Definition and Procedures for Classifying Stands as Imminently Susceptible to Insect Attack and Wildfire" (May 8, 1996), was completed by the Deschutes National Forest Science Team. The information from this analysis was used during the development of the Metolius Late-Successional Reserve Assessment, within which the Bugs Thinning project occurs. A copy of this report is on file at the Sisters Ranger District.

Economics

Comment 12: Conservation of the environment should be a criterion, not concern for extracting a minimum dollar value on the stumpage.

Response: Ecosystem health is the primary criterion for designing this vegetation management project. Economics are a factor in our ability to get the work done.

Snags and Down Wood

Comment 13: Removal of too many large future logs would leave the area deficient in large woody debris to provide habitat, retain moisture, and return nutrients to soil to maintain healthy nutrient cycling.

Response: Proposed thinning would leave sufficient large trees for future snags and down wood (pg. 5, Bugs Thinning EA), and would be consistent with guidelines on retaining green trees described in the Metolius Late-Successional Reserve Assessment (1996).

Wildlife and Habitat

Comment 14: Have some reservations about loss of habitat for members of the avian population for nesting and cover.

Response: Pages 79-94 of the Santiam LSR Restoration EA outline the effects to the northern spotted owl, bald eagle, and primary cavity excavators (woodpeckers),

Comment 15: Logging within Old Growth forest habitat would remove key habitat elements for old-growth dependent species, such as sufficient canopy closure, multi-layered canopy, large diameter snags, etc.

Response: Proposed actions in the Santiam LSR Restoration and Bugs Thinning EA are intended to enhance habitat for old-growth associated species. Potential effects on wildlife habitat were consulted with U.S. Fish and Wildlife Service and a Biological Opinion (1-7-98-F-065) was issued on January 16, 1998 recognizing those effects.

Comment 16: Removal of old growth fir in a historic natural mixed conifer area would impair native biodiversity and ecosystem functioning and contribute to the extirpation of native old-growth dependent wildlife.

Response: See response to Comment 15 above.

Comment 17: Project activities can be expected to diminish populations or threaten viability of listed Endangered or Threatened species in violation of the Endangered Species Act, and Federal or State listed Sensitive species including: Bald Eagle, Northern Spotted Owl, Canada Lynx, Pacific Fisher, Townsend's Big-Eared Bat, Preble's Shrew, Redband Trout, Bull Trout, and Chinook.

Response: Effects to threatened, endangered, and sensitive species are analyzed in the Santiam LSR Restoration EA, Chapter 4, pages 79-96 (wildlife), pages 110-113 (bull trout and redband trout), and in the Bugs Thinning EA for redband trout and Chinook salmon on pages 11-13. Potential effects on wildlife habitat were consulted with U.S. Fish and Wildlife Service and a Biological Opinion (1-7-98-F-065) was issued on January 16, 1998.

Comment 18: Reduction of canopy below 60% will adversely effect the Pacific Fisher, which depends upon dense, mature and old growth mixed-conifer forest, and require an abundance of dead wood and structural diversity.

Response: Fisher have a low probability of occurrence in the project area. Even with no treatment, stands would not meet the canopy cover requirements for the fisher due to the mortality. Effects to potential fisher habitat are displayed on page 90 of the Santiam LSR Restoration EA.

Comment 19: Proposed activities can be expected to diminish populations or threaten viability of listed "Warranted but Precluded" (for uplisting) sensitive species, such as Bull Trout or others. Predictable impacts are in likely violation of the National Forest Mgmt Act, the Endangered Species Act, and the Forest Plan.

Response: The effects to bull trout are described in the Bugs Thinning EA on page 11, in the response letters from the U.S. Fish and Wildlife Service, and the Santiam LSR Restoration EA, pgs. 110-113. The bull trout is listed as Threatened and is no longer "Warranted but Precluded". The project has been through informal consultation and has received concurrence from the U.S. Fish and Wildlife Service on the "may effect but not likely to adversely affect" determination.

Comment 20: Proposed activities can be expected to diminish populations or viability of Indicator species, including Northern goshawk, Pileated Woodpecker, American Pine Marten, or others.

Response: Project effects to the above mentioned species habitat are displayed on pages 79-87 in the Santiam LSR Restoration EA.

Comment 21: Inadequate documentation of effects of this project to the continued viability and

population health, as well as current status, of other species including: Northern Pygmy Owl, Flammulated Owl, Northern Three-toes Woodpecker, Whiteheaded Woodpecker, Lynx, sensitive toad and frog species, rare native insects or others.

Response: The effects on cascades frog, spotted frog, tailed frog, and the cascade apatania caddisfly are described on page 112 in the Santiam LSR Restoration EA (pg. 112) and in the Bugs Thinning EA (pgs. 11-14).

Comment 22: The project can be expected to diminish populations or threaten viability of species requiring large blocks of relatively intact habitat with adequate hiding cover and extensive areas of high canopy closure such as Wolverine, Cougar, Black Bear or others.

Response: Cougar and black bear are species that are adaptable to a wide range of habitats and generally do not require special management under the Deschutes National Forest Plan (1990). Concerns about these species were not identified during the environmental analysis for the Bugs Thinning project, and specific effects for these species were therefore not addressed.

It is not predicted that the proposed action would have a measurable effect on the population viability of these species.

Effects to wolverine habitat are discussed on page 90 of the Santiam LSR Restoration EA.

Comment 23: The EA fails to disclose the effects of the project on the Threatened Canada Lynx.

Response: The EA addresses lynx (pgs. 7 and 11). Designated lynx habitat does not occur within the project area;, therefore there is No Effect to lynx or its habitat from this project.

Comment 24: The project is in likely habitat for lynx and may adversely affect the quality of the habitat for denning, foraging, and dispersal and is almost certain to adversely affect the lynx's prey base.

Response: There is no designated lynx habitat within the project area.

Comments 25: The Suttle LAU and the Key Linkage Area for lynx were defined "out of existence by the Forest Service's inappropriate and illegal redefinition and remapping of lynx habitat.

The lynx habitat maps that the Forest Service has developed inappropriately exclude areas that have historically been used by lynx and are likely to be used by lynx today.

Declaring that this area does not contain Lynx habitat is highly controversial and is currently being challenged with a large amount of conflicting evidence, including official sightings throughout Eastern Oregon. NEPA requires full disclosure of this and the controversy that currently exists, which the EA

fails to do.

Response: The Lynx Conservation Assessment and Strategy (LCAS) describes lynx habitat by broad geographic areas including the Cascade Range and northeastern Oregon. The project area is within the Cascade Range area.

The first edition of the LCAS described lynx habitat in northeastern Oregon (including the Deschutes National Forest) as "...subalpine fir, moist grand fir and moist Douglas fir habitat types where lodgepole pine is a major seral species..." This definition was used to map potential lynx habitat and to identify LAUs. LAUs are areas delineated for management of habitat characteristics and implementation of Project Design Criteria necessary for the Canada lynx to complete its lifecycle. LAUs are used to assess cumulative impacts to lynx based on agency actions. An LAU contains lands capable of producing the necessary lynx habitat components, where denning and foraging habitat comprise the majority of the area contained within the boundary (Lloyd 1996). LAUs were not mapped or designed to represent the actual home range of lynx or to imply that lynx were utilizing the area.

The second edition of the LCAS qualified the definition of habitat by describing "Primary vegetation that may contribute to lynx habitat is subalpine fir habitat types where lodgepole pine is a major seral species..." Moist grand fir and moist Douglas fir were described later as "secondary vegetation." Another important distinction made in the second edition of the LCAS is the statement that "...at least 10 mi.2 of primary vegetation should be present within each Lynx Analysis Unit (LAU) to support survival and reproduction." In summary, the most recent information has described primary vegetation on the Deschutes National Forest as subalpine fir forests, where at least 10 square miles are needed to constitute a single LAU. Mapping efforts in March 2001 associated with information in the second edition of the LCAS led to the determination that there are not sufficient amounts of primary vegetation to constitute an LAU in this project area.

Based on the March 2001 mapping efforts, the Ochoco and Deschutes National Forests requested informal consultation on the impacts of activities outside of an existing LAU. On May 24, 2001, the U.S. Fish and Wildlife Service concurred with the determination that the Deschutes National Forest Land and Resource Management Plans as amended may effect but are not likely to adversely affect the Canada lynx.

Comments 26: Neither the lynx conservation agreement or the lynx conservation assessment and strategy (LCAS) have been subject to NEPA analysis. The project NEPA document gives merely cursory attention to lynx and relies too heavily on conservation measures in the LCAS to protect lynx without project specific design and analysis.

The project relies on "project design criteria" (PDC) for lynx that have not been subject to NEPA review

and comment. The Forest Service cannot rely on these PDC until they have subjected the PDC and the LCAS to NEPA and considered all environmental impacts and alternatives.

Response: Analysis under the NEPA is triggered when a proposal is made to authorize, recommend, or implement an action to meet a specific purpose and need. There is no requirement to subject the lynx conservation agreement or the LCAS to NEPA analysis because these documents are not proposing an action to meet a specific purpose and need. These are science-based documents. The Bugs Thinning EA does not rely on conservation measures in the LCAS because no lynx habitat has been identified within the project area.

The Bugs Thinning EA does not rely on project design criteria because no lynx habitat has been identified within the project area. See also previous response.

Rare Plants and Habitat

Comment 27: Proposed activities can be expected to diminish populations, threaten habitat, or threaten viability of native plant species, potentially including sensitive and rare species.

Response: Botanical surveys and assessment of effects of the project on rare plants were completed as required. Information regarding botanical surveys for sensitive plants and Survey and Manage species of the Northwest Forest Plan is discussed in the Bugs Thinning Project EA on page 7. Required mitigation measures to protect plants and prevent noxious weed spread are listed on page 6. The effects of the project to botanical resources are discussed in the EA on pages 8, 9, and 13.

NEPA and Process

Comment 28: This proposed action is part of a series of connected actions sharing the same geographic area and timeframe, including the Santiam LSR Restoration project, and it has been so long since the original analysis of the area a full Environmental Impact Statement should be prepared to fully address region-wide and cumulative effects of this and similar connected actions.

Response: The Santiam LSR Restoration EA was completed in 1998. There have not been extensive changes in the conditions of the area that would warrant a new analysis. The primary change observed has been the continued gradual decline and increasing mortality of trees within the stands analyzed.

Comment 29: The Santiam LSR Restoration Project EA should have been sent along with the Bugs Thinning EA and made more readily available to the public to consider both EA's.

Response: The Bugs Thinning Project Draft EA was made available to the public for a 30-day period. At the beginning of that period, interested citizens were provided with a phone number, mailing address, and e-mail address to request a copy of the Santiam LSR Restoration Project EA if desired. No requests were received for the Santiam LSR Restoration EA.

Comment 30: This project is called the Bugs Thinning Project, yet fails to state in the EA what insect or bug species that the area is supposedly in danger of.

Response: The project is planned in an area that suffers from extensive mortality caused by a spruce budworm epidemic in the early to mid-1990s. Project names may or may not describe characteristics of the project area.

Comment 31: The EA fails to offer an alternative that is based solely on restoration and road closures and doesn't include commercial logging and salvage.

Response: The decision to salvage logs has already been made under the Santiam LSR Restoration EA. The scope of the decision to be made (pg. 3, Bugs Thinning EA) under this analysis was whether to add thinning of green trees to harvest units in which salvage of dead trees was already approved. This analysis provided information for that decision.

Comment 32: The EA must, but fails to, analyze the impacts from logging versus thinning.

Response: The vegetation management action proposed and analyzed under the Bugs Thinning EA is thinning. Environmental effects of tree harvest activities, other than thinning, are analyzed in the Santiam LSR Restoration EA, pages 64 through 130.

Comment 33: The EA fails to disclose any of the science used to determine that this project will increase the amount of late successional conditions.

Response: The intent of the proposed action is to reduce the risk of catastrophic loss of existing late-successional habitat. The analysis of predicted effects, and the basis for conclusions, can be found in the Bugs Thinning EA (pgs. 8-14) and in the Santiam LSR Restoration EA (pgs. 64-130).

Roadless

Comment 34: The EA does not disclose the presence of roadless areas greater than 1,000 acres in the planning area.

Response: The project area is adjacent to a portion of the Mt. Jefferson Inventoried Roadless Area (#06198). No treatments would occur within this area (pg. 129, Santiam LSR Restoration EA).

There would be no road construction or reconstruction in areas currently without roads, and the project is in compliance with the interim direction for the Forest Service Transportation Systems, FSM 7712.16.

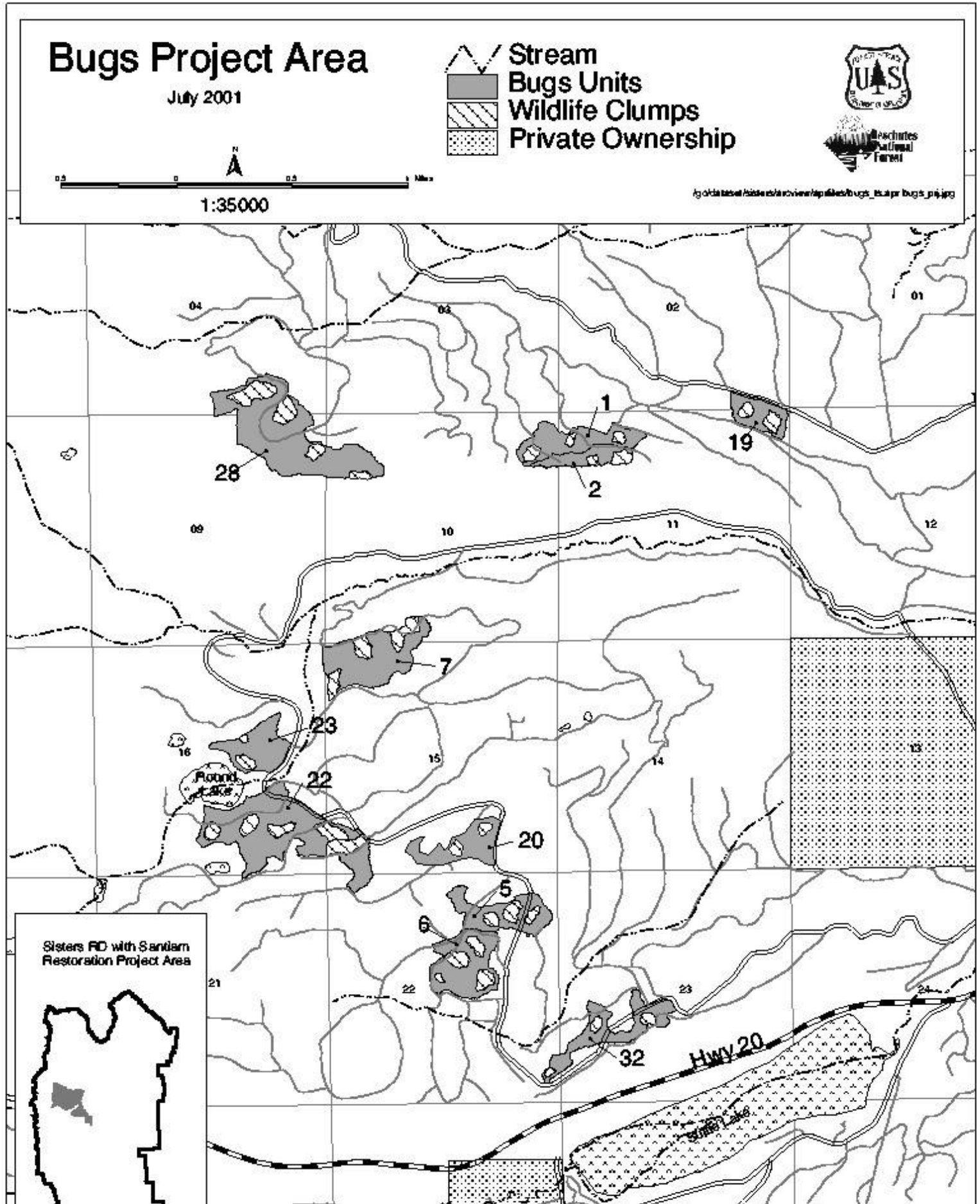
[Deschutes and Ochoco National Forests Website](http://www.fs.fed.us/centraloregon/manageinfo/nepa/documents/sisters/bugs/bugsappendixa.html)

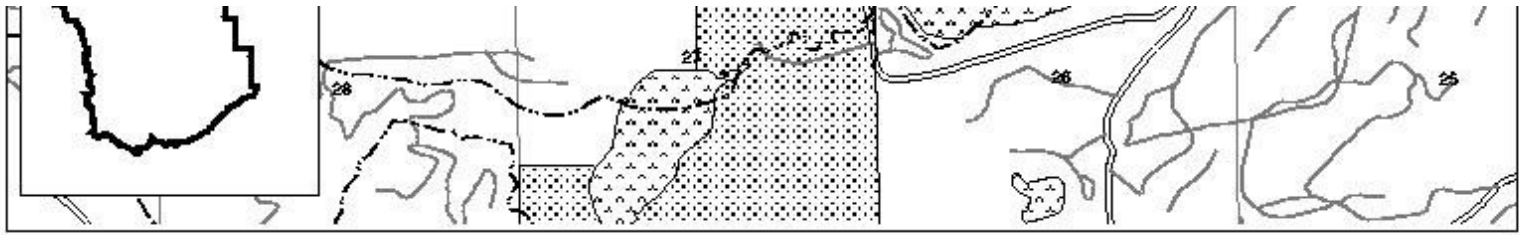
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Last Update: 10/9/01

R.A. Jensen

Figure 1 -- Location Map





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