



United States
Department of
Agriculture

Forest
Service

Umpqua
National
Forest

Umpqua National Forest
2900 NW Stewart Parkway
Roseburg, Oregon 97470
(541) 672-6601 FAX 957-3495

File Code: 1950

Date: May 8, 2008

Dear Interested Citizen:

Enclosed is the Decision Notice and Finding of No Significant Impact for the Doris Thin Timber Sale Project. The EA documents 2 action alternatives and the no action alternative. I have decided to implement Alternative 2 as described in the EA. Alternative 2 authorizes commercial thinning of 1,000 acres of managed plantations yielding about 13.4 million board feet of timber and authorizes burning of activity-generated fuels as well as connected and similar actions. The Environmental Assessment is available on the Forest's website at www.fs.fed.us/r6/umpqua or by calling the Cottage Grove Ranger District at (541) 767-5000.

This decision is subject to appeal pursuant to Forest Service regulations 26 CFR 215.11(a). The appeal must meet the requirements specified by 36 CFR 215.14. The Appeal Deciding Officer is the Regional Forester. Appeals must be sent to Regional Forester, USDA Forest Service Region 6; Attn. 1570 Appeals. PO Box 3623, Portland, OR 97208-3623. Appeals that are hand delivered may be brought to the Regional Office, located at 333 SW First Street in Portland, Oregon, during the hours of 8:00 am – 5:00 pm, Monday through Friday, except for legal holidays. The fax number is 503-808-2255. Appeals may also be electronically mailed to: appeals-pacificnorthwest-regional-office@fs.fed.us. The appeal, including attachments, must be filed with the Appeal Deciding Officer within 45 days of the date that the legal notice of decision is published in the Roseburg News Review, which is the exclusive means for calculating the time to file an appeal. Those wishing to appeal should not rely upon dates or timeframe information provided by any other source. Implementation may occur on, but not before the 15th business day following the date of appeal disposition. In the event of multiple appeals, the implementation date will be established following the last appeal deposition [36 CFR 215.9(b)]. If no appeal is filed, implementation may occur on, but not before, the 5th business day following the close of the appeal filing period [36 CFR 215.9(a)].

Additional information on the proposal or the appeal regulations can be obtained from Deb Schmidt, District Ranger, at the Cottage Grove Ranger District Office, 78405 Cedar Park Road, Cottage Grove OR 97424 or via email at deboraschmidt@fs.fed.us ; a secondary contact for this information is Suzanne Schindler, Interdisciplinary Team Leader at sschindler@fs.fed.us . The District office is open from 8:00 am until 4:30 pm, Monday through Friday, excluding holidays.

Thank you for your interest in the Doris Thin Timber Sale Project.

Sincerely,

/S/ CLIFFORD J. DILS

Clifford J. Dils
Forest Supervisor

Enclosure



**DECISION NOTICE
and
FINDING OF NO SIGNIFICANT IMPACT
for the**

**Doris Thin Timber Sale
Environmental Assessment**

USDA Forest Service-Umpqua National Forest
Cottage Grove Ranger District
Lane County, Oregon

The Doris Thin Timber Sale Environmental Assessment (EA) documents a no-action alternative and two action alternatives that would accomplish commercial timber harvest, precommercial thinning, activity fuel treatments, tree planting, noxious weed treatments, soil rehabilitation, various forms of road work, and other connected actions in the Layng Creek Watershed on the Cottage Grove Ranger District, Umpqua National Forest.

The Layng Creek sixth level subwatershed is located east of the City of Cottage Grove on the Cottage Grove Ranger District (CGRD), Umpqua National Forest (UNF), and is part of the Row River 5th level watershed. The 42,195 acre subwatershed is located in all, or portions of T20S, R1E, sec. 31; T21S, R1E, sec. 5-9, 16-18, Willamette Meridian, Lane County, Oregon.

The project area is located within the boundaries of the Umpqua National Forest, in the Layng Creek sixth-level watershed, in Lane County, on the Cottage Grove Ranger District. The Umpqua National Forest Land and Resource Management Plan (LRMP), as amended is the principle policy under which this action was developed. An analysis of the proposal was conducted in accordance with the National Environmental Policy Act (NEPA) and the implementing regulations of 40 CFR 1508. The purpose and need for the proposed action is described in detail in Chapter 1 (EA pages 10-11).

Decision

I have decided to implement Alternative 2 as described in the Doris Thin Timber Sale Project EA (pages 21-28). This decision also includes three non-significant amendments to Appendix G of the 1990 Umpqua National Forest Land and Resource Management Plan (EA pages 17-19).

My decision to implement Alternative 2 is based on information contained in the administrative record, including the EA, Appendix A (response to public comments), the scoping summary, the mitigation measures and management requirements described in Chapter II of the EA, and the effects analysis described in Chapter III of the EA (pages 49-167). This decision also includes the implementation of best management practices, mitigation measures, monitoring (EA pages 38, 40, 42, 43) and management requirements (EA pages 35-48).

Details of Alternative 2

- Commercial thinning 1000 acres of timber stands using helicopter, ground-based, and skyline logging systems in both the matrix and riparian reserve land allocations to generate about 13.4 million board feet of timber. No thinning would occur on 282 acres of riparian or unique habitat areas, or where protection of rare plant species and soils is a concern.
- Treating activity-created fuels on 609 of the thinned acres by underburning, machine piling, and hand pile and burning.
- Building four new landings for helicopter logging.
- No new system roads would be constructed. Approximately 6.6 miles of existing temporary roads would be used, and another 2.2 miles of temporary roads would be created. All temporary roads would be obliterated after use.
- Road reconstruction work includes replacement of twenty six 18-inch ditch relief culverts along with three new ditch relief culverts and six stream crossing culverts. Road grading and ditch line maintenance would occur on 38 miles of existing road. Replacement of 11 stream crossing culverts will take place.
- Utilizing the existing Silverstairs rock pit as the rock source for the road work.

The areas to be harvested would utilize a combination of skyline (604 acres), helicopter (48 acres), and ground based (347 acres) harvest systems.

The connected and similar actions through the use of timber sale receipts or other funding sources are disclosed in Chapter 2 and are summarized here (EA pages 26-27):

Connected and Similar Actions

- 13 acres of reforestation in openings that are one acre in size;
- 1,870 snags to be created by inoculation with heart rot fungus and 130 snags created from underburning;
- Four acres of revegetation of bare ground for erosion control;
- 180 acres of predicted noxious weed treatments within harvest units and other areas of disturbance;
- 13.19 miles of high priority road inactivation (removing culverts, installing water bars, and blocking entrances) of existing system roads 1746-204 (0.24), 1746-203 (0.51), 1746-205 (0.30), 1746-776 (0.18), 1746-803 (0.29), 1746-827 (0.44), 1746-824 (3.16), 1746-847 (1.74), 1746-440 (1.08), 1746-437 (0.40), 1746-780 (1.66), 1746-830 (0.46), 1746-507 (0.58), 1746-530 (0.12), 1746-531 (1.39), 1746-303 (0.20) and 1746-432 (0.44);
- 70 acres of precommercial thinning in young plantations;
- Replacement of the Harvey Creek fish passage culvert and pump chance;
- 5.21 miles of moderate priority road inactivation (removing culverts, installing water bars, and blocking entrances) of existing system roads 1746-198 (1.70), 1746-536 (1.01), 1746-460 (0.73), 1746-300 (0.46), 1746-805 (1.10), and 1746-510 (0.21); and
- Six fire sumps would be maintained. This maintenance includes: the addition of rock to sump access roads; the excavation of filled-in gravel, soil, and vegetation within the existing sumps; vegetation brushing and mowing along sump access roads.

- Five culverts would be upgraded to reduce potential erosion concerns. These culverts are located on the 1746-763 road at mile posts 0.36, 0.8 & 2.02 and on the 1746-707 road at mile posts 0.75 & 1.09.

Project-Level Forest Plan Amendments

Three project-level Forest Plan amendments would be implemented under Alternative 2. Most of the standards and guidelines in the 1990 Umpqua LRMP were developed in the context of even-aged harvest of most of the remaining old-growth forest. They were crafted to protect areas from high impact logging and site preparation and to retain areas of old growth timber to help mitigate the loss of habitat and to mitigate risks from disturbance. The level of disturbance associated with thinning and gap creation in dense second-growth stands is substantially less than that of clearcutting and broadcast burning old growth. With this changed context, the following project-level Forest Plan amendments are proposed in order to meet the purpose and need in practical and cost-effective ways.

1. The Final Environmental Impact Statement (FEIS) of the Umpqua National Forest Land and Resource Management Plan describes one class of unsuitable land as an unsuited, non-manageable block of land having an unacceptable risk for mass movement within an average 10-year climatic event (FEIS, Appendix B, pp 8-9, 12). Changes to the Forest suitable and unsuitable lands inventory occurs on a continual basis¹ as more detailed information is gathered either during project work or via special inventories. Site-specific reconnaissance carried out during the development of the Doris Project has identified refinements to the Forest Suitability Layer. The Doris project-level Forest Plan amendment reclassifies 364 acres of soil suitability. Specifically, this amendment will reclassify 232 acres from its current classification of unsuitable slope stability to suitable for harvest in Units 6, 12, 14, 18, 19, 20, 21, and 22. Reclassification will occur on 107 acres from unsuitable to Categorically Unsuitable in Units 3, 16, 17, 28, 29, 32, 33 and reclassification from suitable to Categorically Unsuitable slope stability on 12 acres in Units 32, and 33; both types of reclassifications allow thinning without gaps to increase root stability. Finally, 13 acres will be reclassified from suitable slope stability to unsuitable slope stability in Unit 33 (no thinning will be allowed on these acres). These changes are consistent with LRMP standard and guideline #7 (IV-44) and the 1991 Guidelines for Updating Timber Suitability¹.
2. The second project level Forest Plan amendment would allow thinning up to the boundary of hardwood stands designated as unique habitat (Ref. Proposed Action). Currently, prescription C5-1 states that no timber harvest is permitted within 150 feet of inventoried openings; outcrops and hardwood stands are included in the Umpqua LRMP as unique habitat. Vegetation manipulation or structural improvement may occur if it is designed to enhance wildlife (LRMP IV-200). In the case of the hardwood stands within the harvest units, leaving a 150 foot no cut buffer adjacent to the hardwood stands would arbitrarily exclude these areas from thinning, which would preclude and or retard development of the larger diameter trees that may otherwise enhance structural diversity. The project level Forest Plan amendment would allow for thinning adjacent to these hardwood habitats to help develop the desired condition described in the Purpose and Need.

¹ USDA-Forest Service. August 5, 1991. Updating Timber Suitability. Umpqua National Forest. Roseburg, OR

3. The third proposed amendment applies to two of the management guidelines in the Layng Creek Municipal Watershed Plan (Appendix G of the LRMP). The guidelines to limit turbidity in Layng Creek were developed in the context of old-growth, even-aged management. The following guidelines are amended for the Doris project:

A) Disturbed Area guidelines E2 and E3 of the Municipal Watershed Plan (LRMP Appendix G-7) established an annual threshold of no more than 350 acres of newly disturbed area. Disturbed area acres include all new activities where new areas of soil exposure would have less than 50% residual ground cover vegetation the first winter following the creation of new cut and fill slopes on roads, rock pit work, landings, waste disposal sites and any harvest areas where less than 50% crown closure exists. No more than 20% (70 acres) of such new disturbance is to occur as a result of road or landing construction or road reconstruction. Approximately 602 acres of the 1,000 acres proposed for thinning and gap creation would potentially result in overall unit canopy closures of less than 50%. In these units canopy closures would likely range from about 35%-47%, including the areas in gaps, and the thinned and unthinned areas within each unit. To remain economically viable, four of the youngest stands with smaller mean diameters are prescribed 60 trees per acre retention. Average canopy closure for all units thinned to 60 trees per acre is 44%. Thinned overstory canopies begin to close at an average of two percent per year (Chan, et al. 2006).

This Forest Plan amendment increases the threshold to 800 acres of area disturbance associated with the thinning acres, while the annual acres of disturbance associated with road construction, reconstruction, and landing construction would remain under 70 acres as detailed in Appendix G. These disturbed areas would receive treatments (best management practices) that would further mitigate the likelihood of sedimentation (see Chapter Two).

It is unlikely that all 602 acres of the heavier thinning prescription would be thinned within one year; if it were, the unit canopy closures would not be substantially lower than the 50% level. The Municipal Watershed Plan estimated an average removal of 55,000 board feet of timber per acre. The heaviest thinning prescriptions in the Doris units would remove about 20,000 board feet per acre under partial harvest conditions, which is less than half of what was assumed in the Plan. Based on observations following similar types of thinning prescriptions and site preparation, adequate levels of effective ground cover (activity generated slash and residual undisturbed ground cover) have been present. Also, non-treatment stream buffers parallel all perennial streams, which mitigates the delivery of surface erosion to streams. This project-level Forest Plan amendment allows the disturbed acres (from thinning) to exceed 350 acres in any one year in order to meet the watershed protection objectives set forth in the Plan, and to achieve the desired riparian and upland stand density conditions in an economically feasible way.

B) Yarding guideline #3 of the Municipal Watershed Plan (LRMP Appendix G-12) requires a no-equipment zone of 100 feet on each side of stream channels. However, heavy equipment would be allowed in riparian units (RU)² “at

² Riparian Units are defined in the Layng Creek Municipal Watershed Plan (Appendix G of the 1990 Umpqua National Forest Land and Resource Management Plan) as riparian areas designated to protect watercourses from the impacts of soil and vegetation disturbances adjacent to watercourses as well as upslope from disturbed areas.

designated crossings or for specifically planned and authorized activities” (Riparian Unit Guidelines – Part I; Constraints #2 – Heavy Equipment).

Ground based yarding would generally be restricted to designated skid trails located on existing skid trails created in the last harvest entry of the 1950s and 1960s. Another safe guard is to restrict operations to dry weather conditions and to slopes less than 30 percent. This amendment allows such operations within 100 feet of streams during the dry operating periods, thereby achieving desired riparian stand conditions in an economically feasible way.

Best Management Practices, Management Requirements, Mitigation Measures, and Monitoring

This decision also includes implementation of Best Management Practices as required by the Clean Water Act and as disclosed in the EA. The monitoring items that will be implemented include:

- Water quality monitoring will continue with the long-term turbidity monitoring in the main stem of Layng Creek at the City of Cottage Grove Water Treatment Plant (LRMP Appendix G).
- All temporary roads would be reviewed prior to treatment to initiate and finalize the treatment prescription; the effectiveness of the temporary road restoration prescription in preventing erosion and providing suitable plant habitat may be monitored by a resource specialist.
- The Silviculturist would review marking guides and prescriptions for designate by description (DxD) with the presale crew prior to marking, and will monitor for quality on a sample of each type of prescription as funding and staffing allows. It is expected that the prescriptions would meet plus or minus 10 percent of the target. If not, remarking or amending the silvicultural prescription would be necessary.
- The levels of effective ground cover would be monitored by the Forest Service as the project progresses. If monitoring determines that effective ground cover goals are not being met, site specific recommendations would be developed by the sale administrator, soils scientist or fire/fuels management. To determine if soil management objectives are being met, monitoring would include representative samples of each yarding method, fuels treatment, subsoiling mitigation, and tree mortality along treatment areas (S&G#11, LRMP IV-71). Ground skidded units shall be given high priority for soils monitoring.

Decision Rationale

I have decided to implement Alternative 2 because it fully addresses the purpose and need. In meeting the purpose and need, Alternative 2 reduces stand density, thereby improving species and structural diversity, and improving stand fire resiliency in the gentle mountain slope and steep landscape areas (EA pages 8 -10), while producing timber in an economically sustainable manner. Based on the expected return to the Federal government shown in Table 10 in the EA (pages 57-58), Alternative 2 would be above cost. Alternative 3 would be below cost due to more expensive helicopter logging costs. While both alternatives access the same number of acres for thinning, Alternative

2 does so more efficiently and is likely to result in higher bid prices than Alternative 3. Jet fuel prices have risen substantially since April of 2005 (EA page 61). With Alternative 2, slightly more acres (4 acres) are improved for stand fire resiliency as displayed in the EA the Comparison of Alternatives on Table 4, pages 33 and 24.

Alternative 2 has no new permanent road construction and the 2.2 miles of new temporary road will be obliterated after use. The temporary roads will be of native surface (no rock added), have less than 10 percent grades and are small segments, ranging in size of 0.7 mile to 0.22 mile, in 13 of the 35 units to thin (see EA pages 24-25).

While Alternative 2 was designed with minimal temporary road impacts, Alternative 3 is more responsive to the issue of less temporary road building (EA page 14), which was raised by Cascadia Wildlands Project and Oregon Wild (formerly ONRC). The groups state that building 2.2 miles of new temporary road may cause numerous environmental impacts including erosion, channeling water, spreading noxious weeds, increased off-highway vehicle (OHV) use and increased risk of human-caused fires. Oregon Wild also asked that the trade-offs of accessing thinning stands by temporary roads versus thinning by other methods be displayed (EA page 55).

I note that, erosion and sedimentation from temporary roads are expected to be low and a difference in effects between alternatives is not expected to be measurable (EA page 153). This is because site-specific mitigation measures and best management practices will be employed to lessen the magnitude of effects on the beneficial uses (EA page 128). Moreover, the spread of invasive weeds would be minimized in both action alternatives through preventative measures taken prior to, during, and after thinning operations. Project design includes buffers around known weed sites, logging equipment washing, post-treatment survey and weed treatment, and pretreatment of existing weed sites (EA page 114). Temporary road building and the effects to recreation is expected to be short-lived (EA page 158). And finally, fuels would be hand piled and burned along strategic sections of the main roads (EA page 78) to lower risk. As such, I feel that the low level of environmental risk associated with the temporary road building in Alternative 2 is justified. This is especially true in light of the economic efficiencies of Alternative 2 compared to the expensive helicopter logging in Alternative 3.

Other Alternatives Considered

Chapter 2 of the EA includes a description of the other alternatives considered in detail. The following briefly summarizes those alternatives. The reason I did not select those alternatives are described below.

Alternative 1: Under this no-action alternative, no actions would be taken to thin over-dense managed plantations, work on roads, treat activity fuels or accomplish connected actions such as instream restoration, noxious weed control, tree planting, or precommercial thinning.

This alternative was not selected because it would not meet the need for action.

Alternative 3: This alternative was developed to address the issue of less road building. While responsive to the need to reduce the density of the forest stands and restoring species and structural diversity, resulting in the same amount of board feet of timber for both alternatives, Alternative 3 would be a below cost sale. The combination of more

acres thinned by expensive helicopter logging, high fuel cost and the wood market downturn makes the net present value negative by \$14, 258 (EA pages 33, 56-61). If fuel prices continue the current trend, Alternative 3 may result in lower stumpage value and potentially no bids for the timber sale (s).

Alternative 3 is thoroughly described on pages 28-33 of the EA. It includes: Commercial thinning 1000 acres of timber stands using helicopter, ground-based, and skyline logging systems in both the matrix and riparian reserve land allocations to generate about 13.4 million board feet of timber. No thinning would occur on 282 acres of riparian or unique habitat areas, or where protection of rare plant species and soils is a concern. Treating activity-created fuels on 598 thinned acres by underburning, machine piling, and hand piling and burning. Building nine new landings for helicopter. No new system roads would be constructed. Approximately 6.4 miles of existing temporary roads would be used, and another 0.2 miles of temporary roads would be created then obliterated after use. Road reconstruction work includes replacement of twenty six 18-inch ditch relief culverts and six stream crossing culverts. Road grading and ditch line maintenance would occur on 38 miles of existing road. Replace six stream crossing culverts. Utilizing the existing Silverstairs rock pit as the rock source for road work.

The connected actions for Alternative 3 are the same as those for Alternative 2 and are described on pages 26-28 of the EA.

Alternatives Considered, but Eliminated from Detailed Study

In response to the no new temporary roads issue, an alternative was considered that instead of either building new temporary roads or using helicopters to thin, these associated acres would be dropped from thinning. This proposed alternative would reduce thinning by about 170 acres; this option would not meet the Purpose and Need for Action to reduce tree density and improve stand fire resiliency. In addition, this proposed alternative is very similar to Alternative 3, and thus does not need to be considered as it duplicates an existing alternative. This alternative was eliminated from study.

Public Participation and Scoping

Scoping was conducted as part of the analysis process. The scoping process for the Doris Timber Sale is described on page 14 of the EA. The Forest Service listened to all input and addressed as many concerns as possible during development of the proposed action. Formal scoping (a process used to surface issues) began after the proposed action was developed and the project was first listed in the October 2007 Umpqua National Forest Quarterly Schedule of Proposed Actions (SOPA). A scoping notice and field trip announcement was sent to the public in late October 2007 with the intent of introducing the proposed action and soliciting issues. Three members of the public attended a November 2007 field trip, which raised numerous comments and concerns. Follow-up consisted of letters, e-mails and phone conversations. The Doris Project File contains a scoping summary that details the scoping comments received for the project.

Scoping generated one significant issue (EA pages 14) that resulted in an alternative to the proposed action (Alternative 3); issues were resolved by further discussion and clarifying the proposed action (EA pages 15-16) and one non-significant issue was

raised. The no action alternative (EA page 23) was also analyzed. A detailed scoping summary is in the Doris Analysis File.

During the 30-day comment period, 3 written comments were received. I read and considered the comments that were submitted to me prior to making my decision and I have responded to those comments in detail (Appendix A of the Analysis File). Most of the comments I received were positive and supportive of this project.

Several comments asked me to drop all temporary road building; with the obliteration of these temporary roads after use, I believe these temporary roads are necessary to implement a cost-effective and efficient project.

After reviewing those comments and documents, I am certain that we considered and used the best available science in our analysis and that I am fully informed of the effects of the proposal and the benefits and consequences of my decision.

Finding of Forest Plan Consistency

Standards and Guidelines

This decision tiers to the Umpqua National Forest Land and Resource Management Plan Final Environmental Impact Statement (Forest Plan, 1990). I have ensured that the decision is consistent with the Forest Plan goals, objectives, and standards, as amended with this project. All applicable Forest Plan standards and guidelines are listed and discussed throughout Chapter 3 of the EA (pages 49-167). Alternative 2, as it amends the Forest Plan, is fully consistent with all applicable standards and guidelines.

Aquatic Conservation Strategy (ACS)

Based on the project level evaluation of the environmental effects documented in the EA, I find that the project is consistent with and does not prevent attainment of the nine objectives of the Aquatic Conservation Strategy (ACS) as described in the 1994 Record of Decision for Amendments to Forest Service and Bureau of Land Management Planning Documents within the Range of the Northern Spotted Owl. The activities within the Riparian Reserve land allocation comply with Riparian Reserve Standards and Guidelines as discussed on EA pages 123-124. All nine objectives have been discussed throughout the EA (pages 5-11, 63, 64, 106-108, 123, 124, 127, 129, 131, 132, 139-142, 147-149, 153 and 156). Moreover, Alternative 2 was designed to contribute to the maintenance and restoration of natural disturbance processes based on the watershed analysis recommendations, thus helping to maintain the 5th level watershed over the long term, as detailed throughout Chapter 3 of the EA.

Watershed Analysis and Roads Analysis

I have considered the Layng Creek Watershed Analysis and its iteration and the Doris Roads Analysis. These intermediate analyses (intermediate between the Forest Plan and the site-specific EA) provided a foundation for the development of the proposed action and Alternative 3. The project implements numerous recommendations from the watershed analysis. The relevant recommendations are listed throughout Chapter 3 of the EA (pages 49-167).

Consistency with National Forest Management Act [16 USC 1604(g)(3)]

I find this decision to be consistent with the 2005 National Forest Management Act implementing regulations at 219.12(b)(2), specifically:

- A) This project complies with and considers the economic and environmental aspects of resource management (EA Chapter 3);
- B) This project implements the 1990 Umpqua LRMP, as amended and as such, provides for diversity of plant and animal communities based on the suitability and capability of the Matrix land allocation;
- C) This project contains monitoring (as described previously) to ensure that management activities will not produce substantial and permanent impairment of the productivity of the land;
- D) The 1000 acres of thinning authorized by this decision produces approximately 13.4 million board feet of timber, and is part of the Umpqua National Forest's annual sale quantity (ASQ) of about 45 million board feet; this ASQ is less than what was estimated in the 1994 Northwest Forest Plan. As such, this project complies with this subsection by not exceeding the current ASQ.
- E) This project only harvests timber from National Forest System lands on lands that: (i) will not be irreversibly damaged; (ii) can be adequately restocked; (iii) protect streams and water bodies from damage and adverse impacts; and (iv) the harvest systems selected were not selected primarily because they give the greatest return or output of timber.
- F) The clearings that create gaps within the stands are used only where objectives for stand diversity are being met and where the natural disturbance process is being approximated; impacts have been assessed and appropriate protection measures prescribed; they will blend with the natural terrain; are prescribed for the appropriate forest type; and the clearings do not exceed 1 acres in size, which is well below the maximum limit for areas to be cut in one harvest operation.

Forest Plan Amendment

This decision is being made under the 2008 Forest Service planning regulations (36 CFR 219) which allow plan amendments to be made using the procedures from the 1982 planning regulations during the three-year transition period (36 CFR 219.14(b)(2)). This amendment is being made using the 1982 procedures.

FSH 1909.12, Section 5.32, outlines the factors to be used to determine whether a proposed change to the LRMP is significant or not significant, based on National Forest Management Act requirements. A discussion of each of these four factors follows and is detailed on pages 164-165 of the EA.

1. Timing. Determine whether the change is necessary during or after the plan period. In most cases, the later the change, the less likely it is to be significant

for the forest plan. The proposed amendments are necessary now in order to efficiently thin the second growth stands in the Doris Planning Area. The LRMP was written in 1990 when the assumptions were that most harvest would be done through clearcutting of old-growth; this project focuses on thinning second growth stands and many of the protection measures outlined in Appendix G are not needed. Currently, the LRMP is 18 years old and is scheduled for revision in 2008. The plan is currently at the end of the planning cycle. Therefore, timing is not considered to be a significant factor related to the amendments.

2. Location and Size. Define the relationship of the affected area to the overall planning area. In most cases, the smaller the area affected by the change, the less likely it is to be a significant for the forest plan. The proposed amendments are specific to Layng Creek subwatershed, and apply only to a subset of the 1,000 acre treatment in the planning area. Given the acreage of the Forest (about 1,000,000 acres), the proposal affects less than 1 percent of the land area. Therefore, the location and size of the area involved in the proposed amendment are not considered to be significant.

3. Goals, Objectives, and Outputs. Determine whether the change would alter long-term levels of goods and services projected by the forest plan. The proposed amendments would not change existing goals or outputs as defined by the Forest Plan and would not result in changes in the level of goods and services currently being produced, which are consistent with levels projected by the LRMP. Therefore, the goals, objectives, and outputs are not considered to be a significant factor related to the proposed amendment.

4. Management Prescription. Determine whether the change in a management prescription is only for a specific situation or whether it would apply to future decisions throughout the planning area. The proposed amendments would eliminate or waive restrictions on certain yarding, road building, or logging practices within the Layng Creek municipal watershed for this project. No permanent changes to the Standards and Guidelines or Management Prescriptions would occur. The Holland Moonsalt Thin Timber Sale Project, planned for 2009 may also prescribe some of the same practices and require some of the same amendments. However, that project is in the very early stages of planning and it is not known whether or not some of the amendment language proposed for this project would be used. Therefore, the change in management prescription is for this specific situation and project, and is not considered to be a significant factor related to the proposed amendment.

After consideration of these factors, I have concluded that the proposed amendment would not represent a significant change to the LRMP.

Finding of No Significant Impact (FONSI)

Based on the documentation in the Doris Thin EA and Analysis File, I have determined the following with regard to the context of this project:

The Doris Thin Timber Sale project implements direction set forth in the Umpqua National Forest Land and Resource Management Plan, as amended by the Northwest Forest Plan. The Umpqua National Forest is comprised of over 1 million acres; the Cottage Grove Ranger District encompasses about 88,700 acres of the Forest. The Layng Creek 6th Level Watershed is comprised of just over 42,195 acres within the

Cottage Grove Ranger District. The 1,000 acres of Alternative 2 authorized with this decision will implement thinning, burning, and other connected activities on about 4% of the Layng Creek subwatershed, just over 2% of the Cottage Grove Ranger District, and less than one tenth of 1% of the Forest. Given the area affected by the project at both the watershed, District, and Forest scale, I find that the effects of the project are not significant as disclosed throughout Chapter 3 of the EA (pages 49-167), and will have a negligible effect at the watershed, District, and Forest scale.

Based on the documentation in the Doris Thin EA and the Analysis File, I have determined the following with regards to the intensity of this project:

1. The Environmental Assessment provides sufficient information to determine that this project will not have a significant impact (either adverse or beneficial) on the land and its natural resources (EA pages 49-167), including air quality (EA pages 161-164), or water quality (EA pages 125-129).
2. Considering the remoteness of the project in relation to local and regional population centers and the measures taken to ensure compliance with the Clean Air Act (EA pages 125-129), the Clean Water Act as discussed on EA pages 151-155, and the use of a BMP checklist during implementation (EA pages 35-48, and BMP checklist analysis file), the likelihood of the project affecting the public's health and safety is low.
3. The supporting documentation located in the EA and in the Analysis File section of the Doris EA provides sufficient information to determine that this project will not negatively affect any known unique characteristics of the geographic area such as park lands, prime farmlands, wetlands, wild and scenic rivers, inventoried roadless areas, or ecologically critical areas (EA pages 165-166).
4. The degree of controversy with regard to effects on the quality of the human environment are limited and considered not significant. Three comment letters were received during the 30-day comment period. Based on my review and consideration of these comments, documentation of our answers in Appendix A, and personal discussions that the District Ranger and interdisciplinary team have had with members of the public since scoping, I find that there is no scientific controversy with the project. Most of the comments received consisted of requests to not amend the plan or to further reduce road building. This limited controversy does not satisfy the threshold for the preparation of an Environmental Impact Statement (EIS).
5. Similar types of harvest, fuel treatments, tree planting, road work, and other connected actions have occurred previously on the Umpqua, Willamette Valley (EA pages 26-28) and on other National Forests. No impacts to the human environment that are highly uncertain or involve unique or unknown risks have been identified in Chapter 3 (EA pages 49-167) of the analysis.
6. The proposed commercial thinning, burning, and associated activities are well established practices on the Umpqua National Forest and on the Cottage Grove Ranger District and do not establish a precedent for future actions (past actions as documented in the EA pages 49-52).
7. I have reviewed the impacts of those past, present, and reasonably foreseeable actions described in the Environmental Effects Section of the Doris EA (EA pages 49-53) and find that this action will not have a significant cumulative impact on the environment (EA pages 49-167).

8. The Cultural (Heritage) Resources Report and the associated disclosure in the EA (page 160) reveal that no prehistoric sites will be impacted. A mitigation measure is included (EA page 47-50) under Alternative 2, that will protect any prehistoric cultural sites that may be found during implementation. No direct, indirect, or cumulative effects to cultural resources are expected to occur.

9. Based on the information disclosed in the Doris EA (pages 89-125), the wildlife and botanical biological evaluations, and the fisheries disclosure, and the concurrence letter issued by the US Fish and Wildlife Service (April 29,2008), I have determined that this action will not jeopardize any species listed or proposed for listing under the Endangered Species Act.

10. Laws imposed for the protection of the environment provided the framework for the 1990 Umpqua National Forest Land and Resource Management Plan (LRMP), as amended. From the documentation provided in Chapter 3 (EA pages 49-167) of the Doris Timber Sale Thin EA, I find that the project activities do not threaten a violation of Federal, State, or local law imposed for the protection of the environment (EA page 196).

From the preceding, I find that the Doris Timber Thin Sale Project does not constitute a major Federal action that would significantly affect the quality of the human environment. Therefore, an Environmental Impact Statement is not necessary.

Implementation

I have reviewed the Doris EA and its associated analysis file. I feel there is adequate information within these documents to provide a reasoned choice of action. I am fully aware of the short-term adverse environmental effects that are disclosed in Chapter 3 (pages 49-167) of the EA. I have determined that these short-term impacts will be outweighed by the long-term benefits of implementing the restorative thinning of 1,000 acres under Alternative 2. Implementing this project will cause no unacceptable cumulative impact to any resource. There will be no impact to cultural resources, consumers, civil rights, minority groups, environmental justice, or women. There are no unusual energy requirements for implementing Alternative 2 (EA page 166).

Implementation may occur on, but not before the 15th business day following the date of appeal disposition. In the event of multiple appeals, the implementation date will be established following the last appeal deposition (36 CFR 215.9(b)). If no appeal is filed, implementation may begin on, but not before, the 5th business day following the close of the appeal filing period (36 CFR 215.9(a)).

Procedure for Changes during Implementation

Minor changes may be needed during implementation to better meet on-site resource management and protection objectives. In determining whether and what kind of further NEPA action is required based on any such changes, I will consider the criteria for whether to supplement an existing Environmental Assessment in 40 CFR 1502.9(c) and FSH 1909.15, sec. 18, and in particular, whether the proposed change is a substantial change to the intent of the selected alternative as planned and already approved, and whether the change is relevant to environmental concerns. Connected or interrelated proposed changes regarding particular areas or specific activities will be considered together in making this determination. The cumulative impacts of these changes will

also be considered. For example, thinning unit boundaries may be modified if site conditions dictate and if other resource objectives can be met. Minor adjustments to unit boundaries may be needed during final layout for resource protection, to improve logging system efficiency, and to better meet the intent of my decision. Temporary road locations were estimated during field reconnaissance; adjustments to those locations are likely to be necessary in order to minimize impacts to the area. Many of these minor changes will not present sufficient potential impacts to require any specific documentation or action to comply with applicable laws.

Administrative Review

My decision is subject to administrative appeal (CFR 215.11). Organizations or members of the general public may appeal my decision according to 36 CFR Part 215. The 45-day appeal period begins the day following publication of this decision in the Roseburg News Review, the newspaper of record. The Notice of Appeal must be filed with the Appeal Deciding Officer:

Regional Forester, USDA Forest Service
Attn. 1570 Appeals
PO Box 3623,
Portland, OR 97208-3623
Business Hours: 8:00 am-4:30 pm
Fax: 503-808-2255, Email: appeals-pacificnorthwest-regional-office@fs.fed.us

It is the responsibility of those who appeal a decision to provide the Regional Forester sufficient written evidence and rationale to show why my decision should be changed or reversed. The appeal must be filed with the Appeal Deciding Officer in writing. At a minimum, an appeal must include the following (36 CFR 215.14):

1. Appellant's name and address, with a telephone number, if available;
2. Signature or other verification of authorship upon request (a scanned signature for electronic mail may be filed with the appeal);
3. When multiple names are listed on an appeal, identification of the lead appellant and verification of the identity of the lead appellant upon request;
4. The name of the project or activity for which the decision was made, the name and title of the Responsible Official, and the date of the decision;
5. Any specific change(s) in the decision that the appellant seeks and rationale for those changes;
6. Any portion(s) of the decision with which the appellant disagrees, and explanation for the disagreement;
7. Why the appellant believes the Responsible Official's decision failed to consider the substantive comments and;
8. How the appellant believes the decision specifically violates law, regulation, or policy.

Contact Person

For additional information concerning the specific activities authorized with my decision, you may contact:

Suzanne Schindler,
Doris Interdisciplinary Team Leader, District Silviculturist
78405 Cedar Park Road
Cottage Grove, OR 97424
541-767-5000, Business Hours: 8:00 am-4:30 pm
Fax: 541-767-5075
Email: sschindler@fs.fed.us

/s/ Clifford J. Dils
Clifford J. Dils
Forest Supervisor
Umpqua National Forest

5/8/08
Date Signed

Date Published

PUBLIC INVOLVEMENT AND RESPONSE TO PUBLIC COMMENTS

INTRODUCTION

This appendix documents the public involvement process that occurred during the Doris Thin Timber Sale Project, and includes some of the information found in Chapter 4 of the EA. The 30-day public comment process is also described, along with the substantive comments received on the EA and the Forest Service's response to those comments.

PUBLIC INVOLVEMENT PROCESS

Scoping began after the proposed action was developed and the project was first listed in the October 2007 Umpqua National Forest Quarterly Schedule of Proposed Actions (SOPA). A scoping notice and field trip announcement was sent to the public in late October 2007 with the intent of introducing the proposed action and soliciting issues. Three members of the public attended a November 2007 field trip, which raised numerous comments and concerns. Follow-up consisted of letters, e-mails and phone conversations.

Concerns from the public ranged from temporary roads, nutrient loss from burning, water quality, heavy thinning, and economically viable timber sales. The Forest Service listened to all input and addressed as many concerns as possible during development of the proposed action.

AGENCY CONSULTATION

The regulatory agency, US Fish and Wildlife Service, charged with overseeing the Endangered Species Act, was consulted extensively throughout the planning process. Consultation with this agency was finalized before the Decision Notice was signed.

TRIBES THAT WERE CONSULTED FOR THE EA

Cow Creek Band of Umpqua Tribe of Indians

Confederated Tribe of Grand Ronde of Indians

Confederated Tribe of Siletz Indians

RESPONSE TO COMMENTS

The 30-day Public Comment period for the Doris Thin Timber Sale EA opened on April 1, 2008 and closed on May 1, 2008. The public was asked to give comment on Alternative 2 of the EA. Three timely comment letters (paper and electronic) were received.

Written comments were received from the following persons:

1. Jacob Groves, American Forest Resource Council (AFRC)
2. Doug Heiken, Oregon Wild
3. Josh Laughlin, Cascadia Wildlands Project and Francis Eatherington, Umpqua Watersheds

All comments submitted must be considered and addressed. Examples of comments which are most helpful are those which:

- provide new information pertaining to the preferred alternative or an alternative in the analysis;
- identify a new issue or expand upon an existing issue;
- identify a different (alternative) way to meet the purpose and need of the project;
- provide an opinion regarding one or more alternatives, including the basis or rationale for that opinion;
- point out a specific flaw in the analysis, or;
- identify a different source of credible research, which if used in the analysis could result in different effects.

It should be noted that all comments received are valuable. Alternative preferences, values and feelings also contribute to increased understanding and were carefully read and considered.

If your specific comment was not addressed it was grouped with another comment under the same theme, so please take a look under subject of concern to locate that topic in multiple locations.

The following narrative contains the comments, grouped by subject matter and paraphrased where appropriate, followed by the Forest Service's response.

Table A-1. Comments received on the EA, by subject of concern, and the Forest Service’s Response.

Letter Number	Subject of Concern	Comment	Forest Service Response
1	Economics	AFRC would like to see all timber sales be economically viable. AFRC supports Alternative 2 (Proposed Action) as it will best meet the stated purpose and need of the project while utilizing appropriate harvesting systems to meet economic objectives. The EA analysis used log prices from the 3 rd quarter of 2007, since then log prices have continued to fall making Alternative 3 even more a deficit project. To implement all post-sale improvement projects Alternative 2 seem like the best choice given current market conditions.	<p>The Forest Service would also like to see all timber sales be economically viable. This is stated in the Need for Action in the EA on pages 10 and 11 and requires a cost-efficient thinning measured by benefit/cost ratio and net present value.</p> <p>The Economic Efficiency Analysis is displayed on EA pages 56-61 and the difference between action alternatives is five percent. The Benefit/Cost ratio is 1.05 for Alternative 2 and 1.00 for Alternative 3. Alternative 3 is actually slightly below cost at negative \$14,258. at current market value. If markets improve these numbers will increase accordingly.</p>
1	Roads	We do not support the decommissioning of any permanent roads.	On page 55 of the EA in Table 9 it summarizes road activities with each alternative and no road decommissioning is proposed. However, both alternatives propose to inactivate 18.4 miles of roads which consist of removing culverts and blocking entrances. This leaves options open for future access if necessary, while storm proofing for the present and reducing the needs for seasonal road maintenance.
1	Seasonal Restrictions	Seasonal and wildlife restrictions often make timber sales extremely difficult to complete within the contract timelines.	An analysis has been made to reduce seasonal restrictions while still providing resource protection where necessary. See EA page 47. A seasonal restriction for the northern spotted owl (March 1 st through July 15 th) is required on 9 of the 35 units for Alternative 2.
1	Riparian Reserves	AFRC also would like to voice support for thinning treatments in the riparian areas outside of the not cut buffers of the Doris Thin Project EA. By prescribing thinning in the remaining acres not needed to maintain stream temperatures you can achieve management objectives of moving them into late seral habitat faster.	Thank you for your comment.
2, 3	Temporary Roads	Generally a good project. We urge the Forest Service to adopt Alternative 3 to reduce soil and water impacts associated with road building and fuel treatments. Consider whether it is worth it to use relatively long sections of temporary road to accomplish relatively small amounts of	<p>Thank you for your comment.</p> <p>Temporary road construction into units 11, 17 and 35 will be obliterated after logging is complete. Construction of these temp roads is the most economical way to harvest the units. The temporary roads will be of native surface (no rock added),</p>

Letter Number	Subject of Concern	Comment	Forest Service Response
		<p>thinning, e.g. units 11, 17, and 35. Avoid any road construction in riparian reserves. Change unit 28 to helicopter to avoid crossing a new road/stream crossing.</p>	<p>have less than 10 percent grades and are small segments, ranging in size of 0.7 mile to 0.22 mile, in 13 of the 35 units to thin (see EA pages 24-25).</p> <p>The temporary road stream crossing in unit 28 is very gentle sloped (almost flat) and the stream is barely classified as class IV drainage. The road location was reviewed on the ground and felt that the associated disturbance from the temp road construction was not measurable (EA pages 136-137).</p>
2	Streams	<p>We think the Forest Service should give more consideration to intermittent streams by applying a 30 foot no harvest/no equipment buffer for intermittent streams.</p>	<p>Of the 3,212 acres of riparian reserve in the planning area, only 5.5% would be thinned with the action alternatives and less than 2% would be underburned. Moreover, all perennial streams and approximately 50% of the 16,795 feet of intermittent channels would have no cut buffers which would help provide a cooler, dense forest paralleling those stream channels (EA page 137).</p>
2	Heavy Thinning	<p>We agree with the EA (p 67) suggestion that management should “mimic fire disturbance and natural successional development” but to achieve this aspiration the Forest Service must create and/or retain moderately abundant snags. Retaining only 40-60 tpa captures and diverts a substantial portion of future mortality, so this heavy thinning prescription could limit future options for recruiting large wood and snags. This heavy thinning prescription should be kept to a minimum and avoided altogether in riparian reserves and on earthflow terrain where root strength, soil stability, and large wood recruitment is important.</p>	<p>The main needs of the project are to reduce tree density to restore species and structural diversity and to improve the stand fire resiliency; these needs are met in part by heavy thinning. The majority of the units with heavy thin prescriptions are on mid or steep slopes where fire occurs more often and damage is more severe. Most of these thinned stands will have slash reduced through the use of fire. For Doris Thin the target retention is 60 trees per acre; however, 40 to 60 trees is documented in the analysis to give flexibility in attainment due to the infrequent uncertainties in implementation. A review of the 177.5 acres of unthinned areas in the 21 units range from 1/2 to 26 acres and the average acres retained is eight. Within these no thin areas, retained trees average 100 (TPA) depending on their designation as hardwoods, riparian areas, or unique habitats. To mitigate for effects on large snags, the action alternatives would include the inoculation of two trees per acre on 1000 acres. This includes creating 10 snags within 1 acre gaps in units 1, 2 and 25. Mass wasting and earthflow terrain is discussed in the EA on page 148-149; 93 acres was delineated as unstable areas and excluded from timber harvest.</p>

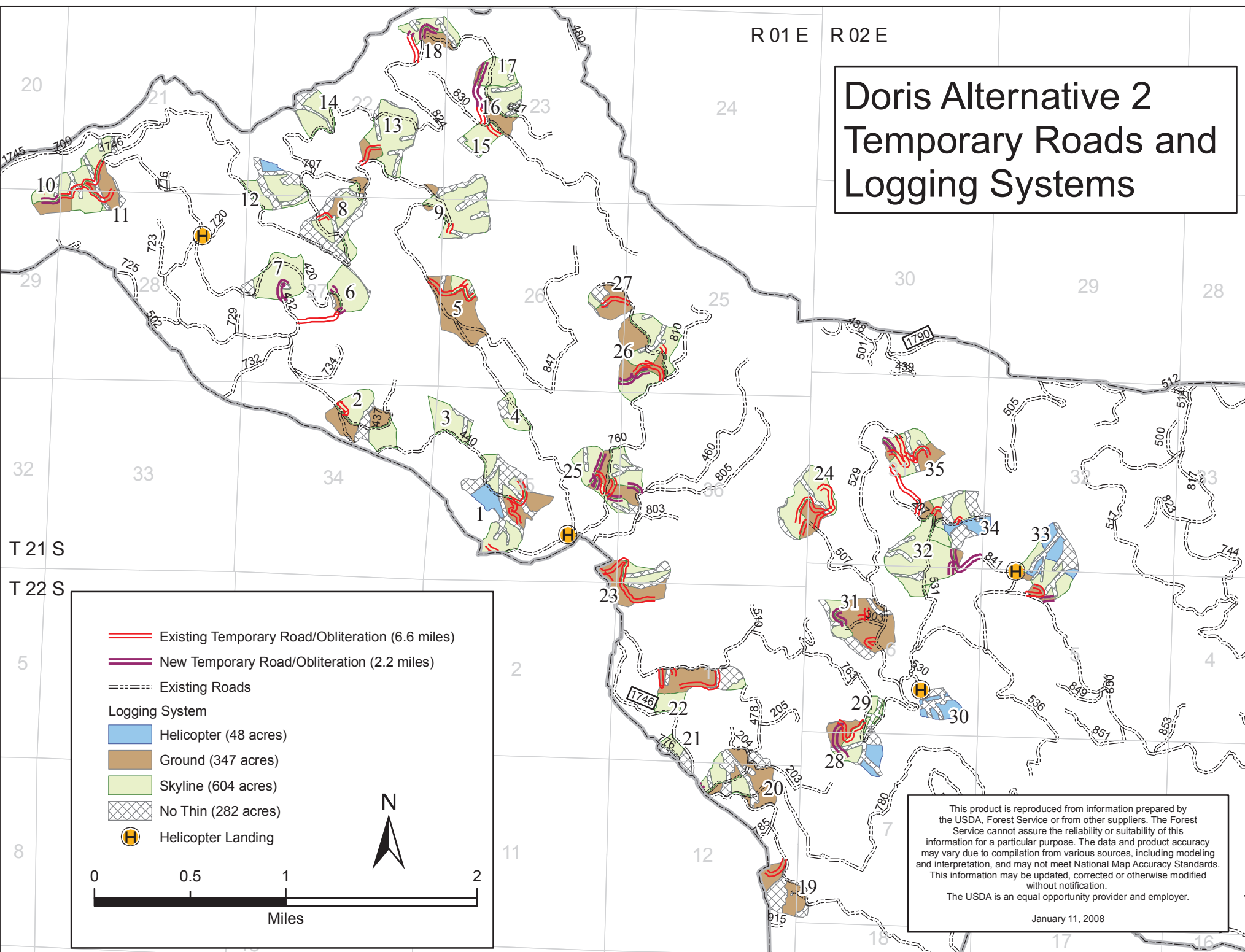
Letter Number	Subject of Concern	Comment	Forest Service Response
2	Large Wood, Snags	<p>The analysis of course woody debris on pages 81-84 of the EA should disclose the effects of thinning and capturing mortality in terms of delaying attainment of ACS objectives, (esp. ACSO #8 structural diversity and complexity). The Forest Service must avoid “retarding” attainment of ACS objectives which could be equated with the 80% tolerance levels of large wood in riparian reserves where large wood recruitment is such an important goal. The EA (p 147) says that sufficient large wood will be retained to meet ACSO #8, but “sufficient” is not defined, and certainly not consistent with the 80% tolerance levels in DecAID or any other reasonable analytic framework. How much mortality can be captured without violating the ACS prohibition on retarding attainment of structural diversity and complexity? Please justify the assertion.</p>	<p>Large snag (≥20” DBH) densities within the stands are currently below the levels advised for in DecAID (4.7 snags/acre – 30% tolerance level). Under the no action alternative this level of snags would not be achieved for another four decades (Figure 16). The action alternatives would delay reaching this level by an additional 20 years (10 years for units thinned to 70 to 90 trees per acre, 20 years for units thinned to 40 to 60 trees per acre). However, the action alternatives would provide other ecological benefits by allowing trees to grow larger and faster, and to develop other suitable wildlife habitat characteristics (e.g., large limbs, crowns, etc.). The gray areas on the graphs represent the 30 to 80% tolerance levels from DecAID, EA page 84. The ACS analysis is incorporated in the appropriate disciplines and some of the reference pages are: 124, 129, 147, and 156. Page 147 states: The restorative riparian thinning would also be consistent with ACS objective #9, because the thinning would provide long-term habitat for riparian dependant species of plants and animals.</p>
2,3	Aquatic Conservation Strategy and Thinning	<p>The EA (p 138) admits logging will “diminish” riparian habitat quality. This violates the ACS. The EA misinterprets the Northwest Forest Plan ROD by confusing accelerated attainment of ACS objectives with ACS compliance. The NWFP ROD actually says that silviculture in riparian reserves is generally prohibited, and allowed only “if needed to attain” ACS objectives, not (as implied by the EA) if needed to “accelerate” ACS objectives. This is a common “group-think” misinterpretation of the ACS. The appropriate evaluation is to ask “will ACS objectives eventually be met without intervention?,” if the answer is yes, then silviculture is technically not allowed. The confusion may stem from the fact that the ACS also has a “do not retard” standard, but this is separate from the “if needed” test, and is itself a criteria to test of proposed active management. The “do not retard” standard cannot be interpreted to <u>require</u> active management whenever and wherever it would</p>	<p>The EA discloses a thorough analysis of this issue and in part addressed in the following paragraphs (p 138): “The large wood recruitment loss to stream channels would be mitigated by the 50-60 foot no-cut buffers since most of the wood that naturally recruits to streams comes from within the first 65 feet of the stream (Murphy and Koski, 1989; McDade et. al 1990). The effects of this snag and down wood recruitment loss include the loss of habitat for aquatic and terrestrial species that depend on these habitat structures. Though habitat quality and quantity would be diminished, the magnitude of the thinning and gap creation effects (in terms of riparian species population declines) is not expected to be great; because only 5.5% of the planning area’s riparian reserves would be affected.</p> <p>The action alternatives would result in long-term beneficial effects to riparian forest structure and composition; development of late-successional conditions would occur sooner than in Alternative One. As such, under the action alternatives, standard and guideline TM-1(c) would be met. The silvicultural practices applied to control stocking in the</p>

Letter Number	Subject of Concern	Comment	Forest Service Response
		<p>accelerate attainment of ACS objectives. That would lead to all kinds of problems, such as cumulative impacts, unintended consequences, and sacrificing some aquatic objectives in the pursuit of others. We are not absolutely opposed to treatment of riparian reserves but we want to avoid the slippery slope of just assuming “it’s all good” without careful analysis and justification.</p>	<p>riparian reserve contribute to meeting the objectives for desired vegetation characteristics as outlined in the Aquatic Conservation Strategy.”</p>
2	Late Successional Development	<p>The analysis of late successional development on pages 70-71 should describe which features of late successional forest take the longest to develop and attain and describe any trade-offs involved in various ways of accelerating those features.</p>	<p>The complexities of displaying different thinning prescriptions on varying existing stand composition on 1000 acres over time through modeling requires choices in terms of brevity, clarity and focus on desired future conditions and features. EA pages 70 and 71 states: Over the 100 year analysis period, both thinning options of the action alternatives obtain all four key attributes; the no action alternative does not develop the multiple canopy layer attribute, and only obtains three of the four attributes. Also important in answering your question is “Reducing overstory tree density through thinning and gaps would also allow more light to reach the understory, which would promote understory development.(page 70)”</p>
2,3	ACS analysis	<p>The ACS analysis (p 138) fails to specify which late successional features are being accelerated, and which may be sacrificed. In riparian reserves, is it more important to develop fewer pieces of larger wood?, more abundant pieces of large (but not quite as large) wood?, or multi-layered canopy? These trade-offs are real and significant but the EA does not illuminate them.</p>	<p>The activities within the Riparian Reserve land allocation comply with Riparian Reserve Standards and Guidelines as discussed on EA pages 123-124. All nine Aquatic Conservation Strategy objectives have been discussed throughout the EA (pages 5-11, 63, 64,106-108,123,124, 127,129,131,132, 139-142, 147-149, 153 and 156).</p>
2	Marking	<p>Train marking crews and cutting crews to look up and identify and retain habitat trees such as those with nests of any kind, those with forked or broken tops, etc.</p>	<p>Thank you for your comment, we will consider and pass this request on where appropriate.</p>

Letter Number	Subject of Concern	Comment	Forest Service Response
3	Support Thinning	<p>We believe the leadership of the Cottage Grove Ranger District remains on the right track when managing public forestlands. By targeting dense young plantations with restoration thinning, the Doris Thin Project is one that will garner support and will not be mired in controversy and gridlock. We appreciate the genuine outreach during all stages of the NEPA process for this project and others in the recent past. Early involvement of the public during the planning process continues to pay dividends in the form of uncontested projects, employment opportunities created in the woods, relationships and trust built, and most importantly, restoration performed on the ground.</p>	<p>Thank you for your comment.</p>
3,2	Temporary Roads	<p>We recognize and appreciate the project proposes no new permanent system road. This is a prudent course of action as many square miles in the Layng Creek watershed have over 4 miles of road in them. With limited funding to maintain roads and a major backlog of road maintenance needs, it does not make sense to build more. Even though the temp roads proposed in the project will be obliterated after use, we'd like to see the district's restoration thinning projects build NO new temp road.</p>	<p>In phone conversations with both Cascadia Wildlands and Oregon Wild the issue of temporary roads was discussed with the district engineering staff. The conversations were paraphrased as follows:</p> <ul style="list-style-type: none"> • The organizations believe that there is a cost/benefit ratio that must be looked at with the length of temp roads and the associated impacts to the ground. The Forest Service said that construction of these temp roads is the most economical way to harvest the units. The roads are inexpensive to build and are low impact. It was discussed the need to do a monitoring trip to the Crawdog and Dinner sales to review temporary road construction and the results after post sale activities have been completed. They thought that would be a great opportunity and the trip would help clear up some of their concerns that they have with temp roads. • Cascadia Wildlands supports the use of existing temporary roads and the restorative benefits that post sale operations have when the road is obliterated. Those same measures are used on new temporary roads as well and it will be beneficial for all of us to review that work on the ground with

Letter Number	Subject of Concern	Comment	Forest Service Response
			<p>the above field trip.</p> <ul style="list-style-type: none"> • We discussed the temporary road stream crossing in unit 28. It was explained that the location of the crossing is very gentle sloped (almost flat) and the stream is barely classified as a class IV drainage. I shared with Cascadia that our biologist reviewed the road location on the ground and felt that the associated disturbance from the temp road construction was not measurable. I said that we would review the ACS analysis and make sure that this was adequately addressed. • Road inactivation and road decommissioning for the Doris planning area was discussed. It was asked why we did not propose road decommissioning for the planning area. I shared with them that we reviewed the entire road system in the planning area and that decommissioning was not an option at this time because of the need to manage stands that will provide access for future management. I did share with them that we identified over 18 miles of roads that would be inactivated. This will reduce the need for road maintenance by removing culverts, water-barring and blocking the entrances.
3	Harvey Creek Culvert Replacement and Pump Chance Removal	We actively support this component of the project due to its benefits to native trout and overall stream health. We need more of these kinds of connected actions.	Thank you for your comment.

Doris Alternative 2 Temporary Roads and Logging Systems

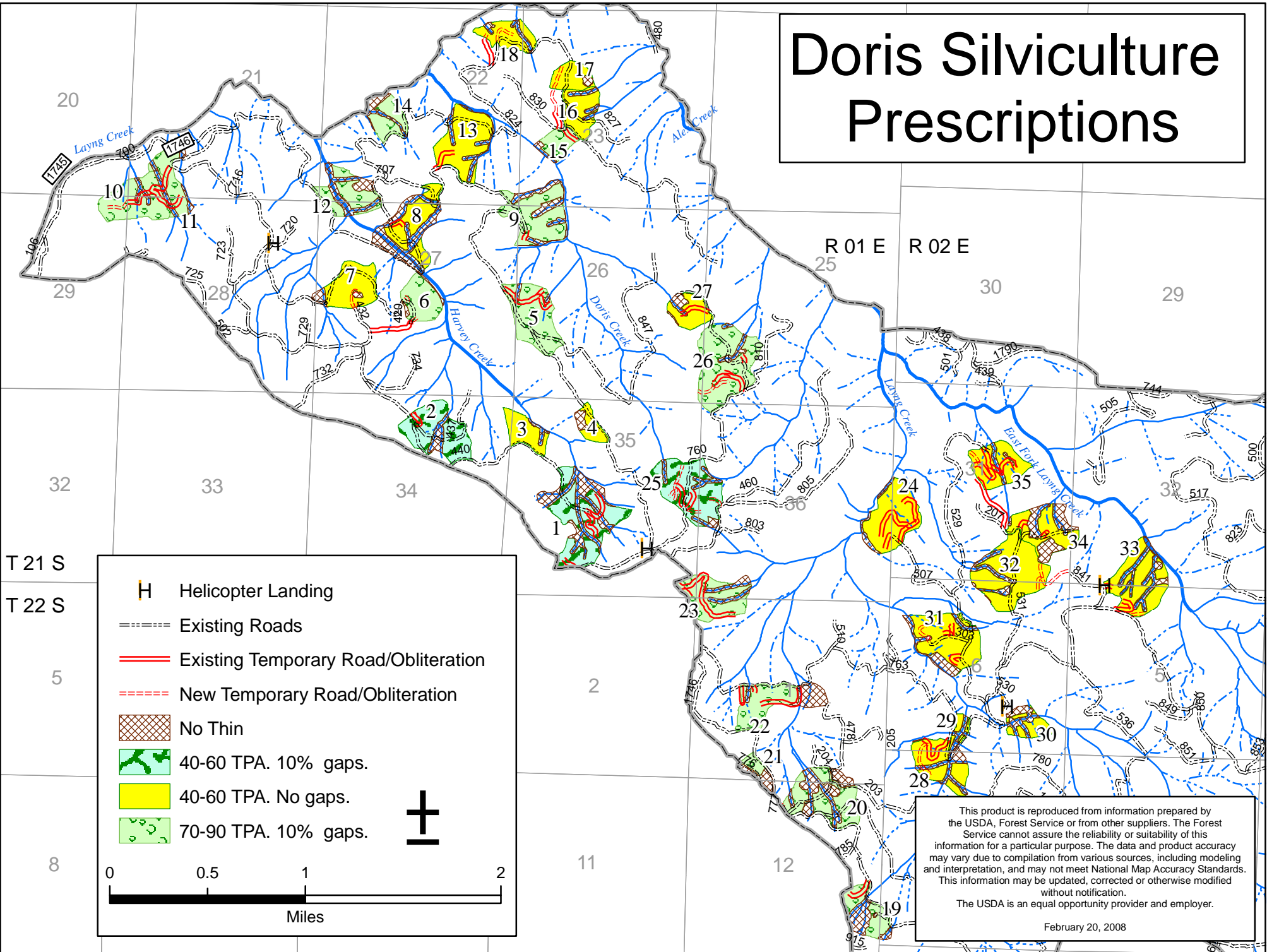


——— Existing Temporary Road/Obliteration (6.6 miles)
——— New Temporary Road/Obliteration (2.2 miles)
 Existing Roads
Logging System
 Helicopter (48 acres)
 Ground (347 acres)
 Skyline (604 acres)
 No Thin (282 acres)
H Helicopter Landing

0 0.5 1 2
 Miles

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 January 11, 2008

Doris Silviculture Prescriptions



	Helicopter Landing
	Existing Roads
	Existing Temporary Road/Obliteration
	New Temporary Road/Obliteration
	No Thin
	40-60 TPA. 10% gaps.
	40-60 TPA. No gaps.
	70-90 TPA. 10% gaps.

0 0.5 1 2
Miles

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February 20, 2008