DECISION NOTICE

CAMAS RESTORATION

Forest Plan Amendment 14

UMATILLA COUNTY, OREGON
USDA FOREST SERVICE
UMATILLA NATIONAL FOREST
NORTH FORK JOHN DAY RANGER DISTRICT

This Decision Notice documents the Forest Service decision to implement Salvage Timber Sales as part of the management activities described in the Camas Restoration Environmental Assessment (EA) and as displayed on the attached map.

The information in this document is described in more detail in the EA and analysis file. It documents the analysis of the area and is available for public review in the Forest Supervisor's Office in Pendleton, Oregon, and at the North Fork John Day Ranger District in Ukiah, Oregon. This EA documents the site-specific analysis conducted by an interdisciplinary team to determine the potential environmental effects connected to a proposal of salvage harvest, reforestation, temporary road construction, road reconstruction, prescribed burning, and wildlife and fisheries habitat improvement. The EA is tiered to the "Umatilla National Forest Land and Resource Management Plan Final Environmental Impact Statement (FEIS)" and Record of Decision (ROD), dated June 11, 1990.

The Camas planning area is located approximately 12 air miles east and northeast of Ukiah, Oregon, in Umatilla and Union counties. It covers approximately 62,130 acres and includes all or portions of Owens, Upper Camas, and Hidaway watersheds. The legal description includes all or portions of: T.3S., R.32E.; T.3S., R.33E.; T.4S., R.32E.; T.4S., R.33E.; T.4S., R.33-1/2E.; T.4S., R.34E.; T.5S., R.33E.; T.5S., R.33-1/2E.; and T.5S., R.34E.; Willamette Meridian.

KEY ISSUES

Through discussions involving Forest Service resource specialists, state agencies, and members of the public, the following key issues were identified within the project area:

1. **Water Quality and Riparian Health.** Some overland flow and soil erosion may occur on forested sites following ground disturbing activities such as logging and road construction. Soil compaction may also occur as a result of land management activities. There is concern that activities proposed in the Camas analysis may accelerate these processes which would reduce site potential and further degrade water quality.

The Oregon State 1988 Assessment of Non-point Sources of Water Pollution Assessment and Forest Service monitoring has shown that many of the streams in the Camas area do not meet bank stability. Management activities that occur in riparian areas can degrade bank stability.

Low stream flows and high water temperatures within the Camas Watershed are also problematic and are directly effecting the quality of the fisheries habitat. Proposed management activities should be designed to improve fisheries habitat. Suggested management activities to improve fisheries habitat include riparian planting and erosion control measures on bare road cut banks, fill slopes, and closed roads. Long-term road system planning will focus on moving the road system away from streams.

2. **Forest Health/Recovery.** There are a number of dead and dying forest stands in this project area. Impact from high spruce budworm populations, several years of drought conditions, and past forest management practices have resulted in a decline of vigor, resiliency and sustainability of forest stands. Past management practices of selective harvest and fire exclusion have encouraged forest stands, previously dominated by ponderosa pine and western larch, to become dominated by shade tolerant species (grand fir and Douglas-fir). This altered pattern of succession has resulted in stand conditions which may not be sustainable in vigor, resiliency and productivity. The current trend is moving much of the area away from the Desired Future Condition described in the Umatilla National Forest Land and Resource Management Plan (the Forest Plan). Actions are needed to prevent further degradation of forest health and sustainability.

Many of the grand fir/Douglas-fir stands have experienced catastrophic mortality due to insects and diseases. About one-third of the area or approximately 45.3 million board feet could potentially be salvaged. Due to the rapid deterioration of dead fir, opportunities to utilize the existing wood fiber will decrease with time.

3. **Wildlife Habitat.** The combination of environmental components within the Camas project area support a diverse community of terrestrial animal species. The Forest Plan has selected several animal species to represent the habitat requirements of all the species in the forest. Rocky Mountain Elk are the indicator species for general forest and winter range habitat. Factors other than habitat condition currently influence elk numbers and herd composition. High densities of open roads, fast moving vehicular traffic, and harassment during the hunting season contribute to non-hunt mortality and stress among both bulls and cows. This has contributed to cow/calf ratios outside the objectives established by Oregon Department of Fish and Wildlife.

Survey results have shown that many habitats have declined in size and quality in the Camas area since the 1930's. These include old growth ponderosa pine forests, riparian hardwood shrub corridors, and aspen stands. Habitat quantity has been reduced by past timber activity and continues to decline due to the heavy insect caused mortality and damage. These areas play an important role in providing the variety of habitats needed to support the diverse numbers of wildlife species historically present in the Camas area. If these habitats are not restored, continued decline in certain species can be expected.

DECISION

Based on the results of the analysis documented in the EA, it is my decision to implement a modification of Alternative 4.

Alternative 4 was developed to implement the management opportunities and recommendations presented in the Camas Ecosystem Analysis dated May 18, 1995, (refer to Need for the Project). The objectives are to (1) implement as many projects from the Camas Ecosystem Analysis as practicable, (2) focus on the entire area, (3) establish the old growth and riparian network as recommended by the Camas Ecosystem Analysis, (4) analyze entire project area in the

document so we can look at cumulative effects, and (5) include scheduling as part of proposal. This alternative incorporates the following ecosystem restoration projects: salvage timber sales, tree species conversion timber sales, pre-commercial thinning, underburning, tree planting, and related restoration projects.

Salvage timber harvest units were selected on a priority basis. The first priority stands are pine sites with fir growing on them; on these sites the fir is experiencing heavy spruce budworm mortality. The second priority are pine sites with fir growing on them; but on these sites there is less fir mortality. The third priority are sites requiring pre-commercial or commercial thinning. These treatments will reduce competition between individual trees and improve stand health and vigor while accelerating movement of these stands towards late old structure. Although the focus of timber harvest in all priority treatments will be on dead trees; more harvest of green fir and to a lesser extent pine and larch, will occur in priority two and three stands.

This alternative would harvest approximately 45.3 MMBF of timber from 15,086 acres through the use of tractor, skyline, and helicopter logging systems. There would be approximately 12.7 miles of specified road reconstruction, and approximately 30 miles of temporary road construction. No specified road construction would be required.

Approximately 11,500 harvested acres would be planted with conifers specific to the site conditions. Approximately 7,036 acres would be pre-commercially thinned. In Riparian Habitat Conservation Areas (RHCAs), approximately 2,786 acres would be planted. Approximately 59 miles of specified road would be closed using gates, signs, or barricades. Approximately 25 miles of long-term closed specified road would be obliterated. Post-harvest open road density would be 1.4 miles per square mile. Prescribed underburning would re-introduce low intensity fire into fire-tolerant timber stands (ponderosa pine and mixed conifer) in a manner that replicates natural fire patterns. Approximately 10,000 acres would be treated over a 10-year period. The restoration activities listed on page 24 of the EA are also planned.

Modifications to Alternative 4 that I have decided to implement are:

I have decided to utilize an adaptive management approach to the implementation of Alternative 4. My decision is to implement the proposed restoration activities in Upper Owens Creek (32B), Lane Creek (97A), Bear Wallow Creek (97B), and Bowman Creek (97C) subwatersheds in this Decision Notice.

1. Salvage harvest of dead and dying, insect damaged Douglas-fir and grand fir over 2,790 acres through the use of ground-based and skyline logging systems. This will consist of shelterwood and salvage harvest with leave tree reserves. The estimated volume to be produced under this alternative is 10.5 million board feet (MMBF).

2. Fuel reduction will include 3,000 acres of underburning (harvest and non-harvest areas), and 950 acres (harvest units) of jackpot or concentration burning for hazard reduction and site preparation.

3. Salvaged areas will be planted with conifers specific to site conditions after harvest on 1,500 acres. Natural regeneration will be relied upon in the remaining harvested areas, and supplemental planting will be used as needed.

4. Temporary road construction of approximately 8 miles of road and specified road reconstruction of approximately 6 miles of existing system road would be required. No specified road construction will be required.

5. Hardwoods and conifers will be planted in riparian areas deficient in stream shading which have high tree mortality and where potential for natural regeneration is low.

By implementing this alternative in stages and monitoring the results of this first project, I can determine if any adjustments are needed to improve the success of our restoration efforts. While implementation of this first phase of Alternative 4 is underway, additional portions of this alternative will be implemented with new Decision Notices. Public scoping for implementation of the next phase of Alternative 4 will begin this summer.

Additional mitigation that I have decided to implement follows:

1. Mechanical harvester system trails may be spaced no closer than 40 feet apart.

2. Skid trails, landings, and temporary roads would be treated to reduce soil erosion and spread of noxious weed upon completion of timber harvest activities.

3. Ground based yarding would normally occur during an operating season from June 1 to November 1. Operations would be permitted outside the normal operating season as specified in the contract only when they can be conducted without damage to soil (no compaction and/or displacement of soil), water (no sedimentation in creeks), transportation (no loss of the surface material for rocked roads and no displacement of surface for native surface roads), and wildlife (no disturbance or displacement during wintering and selected wildlife breeding seasons) resources. When weather conditions render these resource susceptible to damage, operations will be curtailed.

4. Waterbars shall be required on subsoiled roads, temporary roads, skid trails, cable trails, and fireline when the slope is greater than 4 percent. Spacing of waterbars shall conform to requirements stated in the Sale Administration Handbook. As an alternative to waterbars, slash and soil material may be left in skid trails and machine constructed firelines to divert water, or subsoiling can be done so as to provide lead-off drainage from the trails.

RATIONALE FOR THE DECISION

The criteria I used in arriving at my decision were:

Move elements and processes currently outside their natural range of variability back to a condition that is more sustainable.

Salvage dead and dying timber resources to recover some of the wood fiber and economic benefits.

Incorporate riparian management objectives for fish habitat using the Environmental Assessment for the Interim Strategies for Managing Anadromous Fish-producing Watersheds in Eastern Oregon and Washington, Idaho, and Portions of California (PACFISH) direction.

Conserve and enhance old growth and riparian areas that contribute both now and in the future to the long-term viability of old growth and riparian habitats, and the local populations of species that use those habitats.

Restore damaged and degraded forest resources and conditions within the shortest period of time practical.

The selected alternative, as modified, meets all my decision criteria well. It begins the immediate restoration of 2,790 acres within the 62,130 acre Camas Restoration project area. This would allow the removal of 10.5 million board feet (MMBF) of timber which will help meet commodity outputs as described in the Forest Plan. Salvage of these dead, down and dying trees and down woody material will make an important contribution to the Umatilla Forest's Timber Sale Program.

In the Camas Ecosystem Analysis, stands were prioritized for treatment based in part on the need to bring plant association groups back into their ranges of natural variability. This will create more sustainable conditions across the landscape. The selected alternative uses the ecosystem analysis information to develop treatment prescriptions and assign treatment priorities. These treatments will change stand compositions, structures, and stocking levels to align them more closely with the historic landscape. Treatments will also facilitate the ability to withstand natural disturbances and cause the landscape as a whole to be more resilient.

Based on information provided in the Camas Ecosystem Analysis, as well as from other survey data, we realize that, due to inappropriate species mixes or severe insect damage, many of the forest stands are a high priority for harvest or other restoration treatments. It is also clear that attempting to correct all these problems in a 10-year period would cause unacceptable impacts to many different resources. I believe that Alternative 4 provides the best balance between scheduling treatments on a reasonable timetable and the protection of the area's valuable resources.

All alternatives will meet PACFISH direction; and none of the alternatives proposes harvesting timber in Riparian Habitat Conservation Areas. However, I believe that harvest treatments and other restoration activities scheduled in Alternative 4 will provide for substantial long-term improvements in the health and revitalization of riparian areas.

Alternative 4 implements the Old Growth and Riparian Network developed in the Camas Ecosystem Analysis. This network will maximize forest health restoration efforts while retaining some late/old structures for immediate wildlife needs. While improving the long-term health of individual stands of trees, it also creates a resiliency within the forest to withstand future natural disturbances. I believe that this system will have positive benefits for future wildlife populations within the project area.

HOW ISSUES ARE RESOLVED IN THE DECISION

1. **Water Quality and Riparian Health.** In Alternative 4, logging systems and methods were chosen to minimize the amount of detrimental soil impacts. I have added additional mitigation in this decision notice to further reduce effects. Rehabilitation treatments are prescribed to treat high impact areas and many of the existing compacted areas. With these prescribed treatments and mitigations, accelerated runoff and soil erosion is not expected to be a problem.

In Alternative 4, no timber harvest is planned in Riparian Habitat Conservation Areas. However, because of problems identified in these areas (including streambank instability and high water temperatures), additional restoration activities are planned. These may include planting in riparian areas, placement of instream large woody material, and modification of stand composition where it is expected to benefit water quality (EA page 23).

2. **Forest Sustainability.** Treatments recommended in Alternative 4 have been designed to bring the Camas area plant association groups back into their ranges of natural variability. Treatments will align stand composition, structures, and stocking levels to more closely match historical levels. Their ability to withstand natural disturbances will be enhanced, and the landscape as a whole will be more resilient.

During its period of implementation, it is estimated that Alternative 4 will produce over 45,000 MBF of harvest volume.

3. **Wildlife Habitat.** A short-term natural loss of cover will lower overall elk habitat effectiveness as well as increase elk vulnerability. Although there will be an overall short-term reduction in quality of elk habitat in Alternative 4, the long-term benefits are expected to offset this temporary reduction. Temporary road closures will be used to reduce elk vulnerability. Once Alternative 4 has been implemented, an accelerated increase in elk habitat effectiveness will occur; faster than in any other alternative.

Treatments scheduled in Alternative 4 are designed to move treated stands to within their range of natural variability. This will provide a wider variety of habitats than is currently present. Adoption of the old growth network will provide habitat for old growth associated species. Riparian Habitat Conservation areas will provide additional habitat diversity within the area. Implementation of the District snag and down woody guide (including green tree replacement) will assure adequate habitat for snag dependent species.

OTHER ALTERNATIVES CONSIDERED

Alternative 1. (No Action) No management activities implemented at this time. The area would be allowed to recover by natural means.

Alternative 2. This alternative was developed to create no further reduction to Forest Plan standards and guidelines.

Alternative 3. This alternative was developed to follow Forest Management Direction for maximum salvage treatment of all fir stands.

PUBLIC INVOLVEMENT

Newspaper notices, a news release, and letters to interested groups and individuals provided information on the project and requested issues for analysis. Two District open houses presenting the Camas and Bughunter Planning areas were held in the Spring and Fall of 1991. Before separate analyses of these two areas were complete, a decision was made to combine the areas into the Camas Salvage Planning Area to better evaluate the cumulative effects of the proposed projects on a watershed basis. In the Fall of 1992, a third District Open House presenting the Camas Salvage Planning area was held. Camas Salvage Planning Area was also included in all fiscal year '93 quarterly Schedule of Proposed Actions reports which were sent to all interested parties.

Several letters of response from the public were received. Generally, most of the concerns expressed were water quality, forest health, or wildlife related. Water quality concerns included increased sedimentation, increased stream temperatures, impacts to fish habitat, and closed roads causing sediment. Forest health concerns included utilizing logging to restore health, not harvesting in riparian areas, maximizing harvest, and utilizing fire to restore ecosystems. Wildlife related concerns included closing roads for big game habitat, create Big Game Security Area, reduction of dead and down tree habitat, and Threatened, Endangered, and Sensitive species. Letters received from project scoping are contained in the Camas Analysis File.

The Camas Ecosystem Analysis team kept public involvement at an informal level, focused on those people who had previously shown interest in the analysis of the area during earlier public involvement efforts on the Camas Salvage and Restoration DEIS. During the Camas Ecosystem Analysis development, four meetings were held with a staff member of the natural resources department of the Confederated Tribes of the Umatilla Indian Reservation (CTUIR).

Information sharing and informal consultations are on-going with USDI Fish and Wildlife Service, National Marine Fisheries Service, Oregon Department of Fish and Wildlife, and the Confederated Tribes of the Warm Spring and Umatilla Indian Reservations.

Scoping process records are available in the Camas Analysis File located at the North Fork John Day Ranger District office.

The proposed timber sale lies within lands ceded to the United States by treaties with American Indian tribes. These treaties established trust responsibilities for the United States that were intended to protect reserved rights and interests of the tribes. The paramount concern of the Confederated Tribes of the Umatilla Indian Reservation is the need for cold, clear water. Salvage and restoration activities were designed with our trust responsibilities in mind.

MONITORING

Activities and their effects, including effectiveness of mitigation measures, would be monitored. In addition to Forest-level monitoring, the specific monitoring activities that would be performed in the Camas project area are listed on pages 31-33 of the EA.

SITE-SPECIFIC FOREST PLAN AMENDMENT

It is my decision to implement the following adjustments under the authority of 36 CFR 219.10. The changes have been determined not to be significant for purpose of the planning process and represent a non-significant amendment to the Umatilla National Forest Land and Resource Management Plan. This amendment was analyzed and documented within the EA for this project, completing the necessary NEPA procedures and the associated public notification required under CFR 219.10.

Alternative 4 is not consistent with the Forest Plan standards and guidelines in Management Areas C3, C4, and E2 due to the large scale insect infestation and past harvest activities. The Forest Plan is based on healthy forest conditions. My decision to issue this site specific, non-significant Forest Plan amendment will not alter the desired future condition in these management areas. This amendment is as follows:

Habitat Effectiveness Index (HEI)

In management area C3, big game winter range, Forest Plan standards and guidelines require a Habitat Effectiveness Index (HEI) no less than 70. This planning area does not meet this requirement currently, and under this alternative will not meet this requirement for 50 years. The Forest Plan is amended by allowing an exemption from this standard (Forest Plan 4-152) for the Camas project area (Upper Owens Creek subwatershed only).

In management area C4 wildlife habitat, Forest Plan standards and guidelines require an HEI of no less than 60. This project area does not meet this requirement currently, and under this alternative will not meet this requirement for 40 years. The Forest Plan is amended by allowing an exemption from this standard (Forest Plan 4-159) for the Camas project area (Lane Creek and Bear Wallow Creek subwatersheds only).

In management area E2 timber and big game, Forest Plan standards and guidelines require an HEI of no less than 45. This project area does not meet this requirement currently, and under this alternative will not meet this requirement for 30 years. The Forest Plan is amended by allowing an exemption from this standard (Forest Plan 4-159) for the Camas project area (Upper Owens Creek, Bear Wallow Creek, and Bowman Creek subwatersheds only).

Big Game Hiding Cover

In management area C3, big game winter range, Forest Plan standards and guidelines require a minimum of 10 percent of the winter range in satisfactory cover, with a minimum of 30 percent of the winter range in total cover (marginal and satisfactory). Satisfactory cover does not currently meet this requirement, and under this alternative will not meet this requirement for 40 years. Total cover does not currently meet the minimum requirement, but under this alternative is expected to meet it in 20 years. The Forest Plan is amended by allowing an exemption from this standard (Forest Plan 4-152) for the Camas project area (Upper Owens Creek subwatershed only).

In management area C4, wildlife habitat, Forest Plan standards and guidelines require a minimum of 15 percent of the area provide satisfactory cover, when possible, 30 percent of the area provide total cover (marginal and satisfactory). Satisfactory cover does not currently meet this requirement, and under this alternative will not meet this requirement for 50 years. Total cover does not currently meet the minimum requirement, but under this alternative is expected to meet it in 30 years. The Forest Plan is amended by allowing an exemption from this standard (Forest Plan 4-157) for the Camas project area (Lane Creek and Bear Wallow Creek subwatersheds only).

In management area E2, timber and big game, Forest Plan standards and guidelines require a minimum of 10 percent of the area provide satisfactory cover, with a minimum of 30 percent of the area providing total cover (marginal and satisfactory). Satisfactory cover does not currently meet this requirement, and under this alternative will not meet this requirement for 50 years. Total cover does not currently meet the minimum requirement, but under this alternative is expected to meet it in 30 years. The Forest Plan is amended by allowing an exemption from this standard (Forest Plan 4-183) for the Camas project area (Upper Owens Creek, Bear Wallow Creek, and Bowman Creek subwatersheds only).

Successional Stages

In management area C4, wildlife habitat, Forest Plan standards and guidelines require that a minimum level of 15 percent in each of the following seral stages be provided for: grass/forb, shrub/seedling, pole/sapling, young sawtimber, and mature/overmature sawtimber. This alternative will not meet the standard for the pole/sapling seral stage. In the next 20 years, the shrub/seedling stage will be grouped into the pole/sapling stage and Forest Plan standards and guidelines will be met. The Forest Plan is amended by allowing an exemption from this standard (Forest Plant 4-160) for the Camas Restoration project area (Upper Owens Creek, Lane Creek, Bear Wallow Creek, and Bowman Creek subwatersheds).

Dispersion

Following salvage harvest, the subwatersheds within the Camas Restoration project area will not meet Forest Plan standards of no more than 30 percent of general forested lands in the 0 to 10 age class. The Forest Plan is amended by allowing an exemption from this standard (Forest Plan 4-77) for the Camas Restoration project area (Upper Owens Creek, Lane Creek, Bear Wallow Creek, and Bowman Creek subwatersheds).

OTHER FOREST PLAN CONCERNS

Created Openings

This alternative will "create" openings from 10 to 100 acres. While a majority of the "created" openings will be greater than 40 acres, this is permitted through exemption language in the Forest Plan for catastrophic situations such as the present insect epidemic (Forest Plan 4-73).

Visual Quality

Harvest in the visual corridor (A4 area only) will "create" openings larger than 5 acres. This is permitted through exemption language in the Forest Plan for catastrophic situations such as the present insect damage (Forest Plan 4-109).

NFMA CONSISTENCY

Any project proposed for implementation has to meet the requirements of the National Forest Management Act (NFMA). In accordance with these requirements, I conclude from the results of site-specific analysis documented in the Environmental Assessment and Analysis File that:

> The modified alternative documented in this Decision Notice is consistent with the Umatilla National Forest Land Resource Management Plan and Record of Decision dated June 11, 1990, including Forest Plan amendment 8 and 11 (PACFISH AND the REVISED SCREENS), and is in compliance with the requirements of 36 CFR 219.27.

DATES AND INFORMATION

This decision will be implemented immediately to facilitate Forest rehabilitation and recovery in the Blue Mountains and to capture the economic benefit from dead timber.

This decision for the Camas Restoration qualified as a salvage sale as described in the provisions of subsection 2001(e) of Public Law 104-19. Under that legislation, salvage sales are not subject to the provision of the appeal regulations of 36 CFR 215.

The documents and procedures required for the preparation, advertisement, offering, awarding, and operation of these salvage sales shall be deemed to satisfy the requirements of the applicable environmental laws as listed in subsection 2001(i) of Public Law 104-19.

This decision is subject to judicial review only in the United States district court for the district in which the affected Federal lands are located. As required under section 2001(f)(1) of Public Law 104-19, any challenge to this salvage sale project must be filed in the district court within 15 days after the advertisement of the sale.

For further information, contact Craig Smith-Dixon, District Ranger, North Fork John Day Ranger District, P.O. Box 158, Ukiah, Oregon 97880 or at (541) 427-3231.

Thomas K. Reilly

THOMAS K. REILLY
Acting Forest Supervisor

5/8/96
Date

Enclosures (2)
Project Area Map
Response to Substantive Public Comments

RESPONSE TO SUBSTANTIVE PUBLIC COMMENT

As part of the comment review and analysis process, the Interdisciplinary Team identified substantive comments on the Environmental Assessment (EA). Comments were grouped by subject matter and summarized. Comments were extracted from the letters and may or may not be paraphrased; attempts were made to accurately capture and display each substantive comment. The Forest Service response follows each comment.

FOREST HEALTH

Comment 1: The EA doesn't adequately take into account that the drought conditions and spruce budworm and Douglas-fir tussock moth epidemics have ended.

Response: The level of budworm activity has dropped but what we are left with are trees in a weakened state (very poor crowns) and many of trees that are dead. Some trees have re-foliated to varying degrees. Bark beetles are still active and are still killing trees, even, in some cases, trees with full green crowns. The EA took into account the mortality and the weakened trees (susceptible to other insects and disease) from the aftermath of the budworm epidemic. The proposal is trying to adjust the stocking levels and species mixes so that these types of epidemics (any insect) will not have as great of an impact in the future.

Comment 2: Why is the harvest of green trees included in this proposal?
Comment 3: Why is proposed logging targeting larger, older (merchantable) trees?

Response: Research of silvicultural treatments reducing the susceptibility of stands to budworm are presented in Carlson et. al. (1989), Rudinsky (1979), and the Blue Mountain Forest Health Report. Large scale conversion of host to non-host trees by harvest, fire, etc., would create stands resistant to defoliation, and stocking control should reduce their susceptibility to bark beetle epidemics. An endemic population of many insect types is expected.

The process of removing dead and defoliated trees (but not all trees in these classes) has several benefits: (1) it reduces competition and provides growing space for healthier trees; (2) it increases sunlight to lower canopy levels and to the ground, to enable desirable shade-intolerant tree and plant species to become established and grow; (3) it increases the amount and diversity of forage vegetation for both wildlife and domestic animals; (4) it helps reduce dangerously high fuel loads which would affect fire intensity and rate of spread in residual stands; and (5) it allows the recovery of merchantable wood fiber before it loses value through fungal- and insect-caused deterioration.

We are not targeting removal of older/large diameter trees. We are not removing any green trees over 21 inches in DBH. The size of the green component of a salvage sale under Public Law 104-19 is not defined in terms of acres or percentages. Under definitions in the text of Section 2001 of Public Law 104-19, salvage timber sale is defined as "...a timber sale for which an important reason for entry includes the removal of disease- or insect-infested trees, dead, damaged, or down trees, or trees affected by fire or imminently susceptible to fire or insect attack. Such term also includes the removal of associated trees or trees lacking the characteristics of a healthy and viable ecosystem for the purpose of ecosystem improvement or rehabilitation, except that any such sale must include an identifiable salvage component of trees described in the first

sentence." Note that "imminently susceptible" trees do not need to be dying at this time. Stands where stocking levels, substantially reduced stand vigor, location, tree species, mortality, and other indicators present a high likelihood of imminent fire or insect attack might be thinned or otherwise harvested, even if few or none of the actual cut trees are "dead or dying."

GENERAL

Comment 4: To approve 10 years of logging in an EA is an abuse of P.L. 104-19.
Comment 5: Sending out decision notices on future individual actions within this proposed salvage does [not] follow the spirit of NEPA of (sic) allowing full environmental analysis and comment on various proposed individual activities.

Response: In his letter accompanying the review copy of the Camas Restoration Environmental Assessment, Acting Forest Supervisor Tom Reilly explained why he decided to only implement the proposed restoration activities in Upper Owens Creek, Lane Creek, Bowman Creek, and Bear Wallow Creek drainages at this time.

By implementing the alternative in stages and monitoring the results of the first project, we can determine if adjustments are needed to improve the success of future restoration efforts. After assessing the implementation of the first portion of the selected alternative, additional portions of the alternative will be implemented with new decision notices. Depending on when these future decisions are made, they may or may not fall under the rules of P.L. 104-19. They will, however, be made available for public review and if a new information or changed circumstances relating to the environmental impacts of the proposed action are discovered, additional analysis will be completed.

Comment 6: What new information led to the determination that the proposed action would not cause significant environmental effect? The EA has not adequately demonstrated that this proposal would not cause significant impacts.

Response: The responsible official used many different factors in making a determination of non-significance. Two Forest Plan Amendments, (PACFISH and the Revised SCREENS), adding more protective interim standards and guidelines, have been adopted. The information provided in the Camas Ecosystem Analysis was also utilized. This analysis provided a great deal of information previously unavailable to the I.D. Team. This information played a key role in determining environmental effects. It provided a comparison of historic, natural and existing conditions in the area. It also provided many integration and management recommendations that were implemented, including an old growth/riparian management emphasis network.

Comment 7: We disagree with your decision to include a Forest Plan Amendment as part of this decision. The action should be required to meet the requirements of the Forest Plan [without amendments].

Response: The Forest Supervisor has the authority to sign non-significant Forest Plan amendments, 36 CFR 219.10(f). The need for this amendment was established in Chapter I of the Camas EA and the determination that the proposed amendment would not result in a significant change in the Forest Plan was documented in Chapter IV of the EA. Many of the Forest Plan standards are not currently met by existing conditions and will not be met in the near future by any alternative. The selected alternative restores conditions more quickly then no action.

Comment 8: Any cultural resource sites must be identified and protected.

Response: As stated in the EA (page 109), "...there will be no effect on any known cultural resource properties in the project area. If cultural resource items are located during project implementation, activities will be halted in the vicinity of the discovery until the site could be evaluated. Appropriate mitigation measures, such as project unit size and shape modification, or relocation or road could be applied..." The timber sale contract has a mandatory clause CT6.24# Protection Of Cultural Resources which provides for the designation of an Area To be Protected (ATP) on the sale area map.

Comment 9: The no action alternative is minimal and clearly biased.

Response: CFR 40, Section 1502.14(d) requires the alternatives analysis in the EIS to "include the alternative of no action". There are two distinct interpretations of "no action" that must be considered, depending on the nature of the proposal being evaluated. One of these interpretations of "no action" is illustrated in instances involving federal decisions on proposals for projects. "No action" in such cases would mean the proposed activity would not take place, and the resulting environmental effects from taking no action would be compared with the effects of permitting the proposed activity or an alternative to go forward. The Camas No Action alternative falls under this category and meets the requirements for the no action alternative.

Comment 10: In reference to comment under Table 2-4, is the Screens Amendment being applied to this proposal?

Response: Yes

SOILS

Comment 11: Why is allowance for 20% of the harvested area being left less than acceptable productivity potential (non-compacted and non-puddling) consistent with a restoration project.

Response: The maintaining a minimum of 80 percent of the harvested area in a condition of acceptable productivity potential is a Forest Plan standard. This project is designed to achieve greater than 80 percent productivity when implemented.

VEGETATION MANAGEMENT

Comment 12: What form of noxious weed control is planned and for which plants?

Response: This EA incorporated the Forest Environmental Assessment for the Management of Noxious Weeds (April 1995) which lists by site the species and proposed treatment. By incorporating the above EA into this document by reference, we have incorporated the mitigation as well as the prevention strategy. Treatment will only take place on those sites identified and analyzed in the EA for the Management of Noxious Weeds. If new sites are found we will have to complete additional analysis before treating them.

WATER QUALITY AND FISH HABITAT

Comment 13: Given that every watershed in this planning area is not meeting water quality standards under current management, new activities are prohibited from further degrading impaired waters pursuant to both Oregon and Federal antidegradation laws and policies"
Comment 14: Is this proposal in compliance with the Clean Water Act and PACFISH standards?

Response: The proposed 1994/1995 Oregon State 303(d) list listed high stream water temperatures during the summer months as the parameter impairing water quality. Stream surface shade, which protects the water from solar heating, would not be removed with the proposed project. No harvest units would be located within PACFISH Riparian Habitat Conservation Areas. Also, native hardwood shrubs and coniferous trees would be planted along perennially flowing streams which are deficient in stream surface shade. This project would not cause further increases in stream water temperatures and could cause a slight decrease in water temperatures. The proposed project would not cause further degradation in water quality and would meet State water quality standards.

Comment 15: We are also concerned about the extent to which ground-based logging will be used, particularly on highly-erodible soils.
Comment 16: The risk of increasing inputs of fine sediments to streams from upland logging also appears quite high in light of the widespread degradation of riparian areas and the high road densities within the planning areas.

Response: We share your concerns regarding potential resource values at risk from soil compaction and in-stream degradation from accelerated runoff and soil erosion. However, we feel that in the stands identified for harvest, the reduction in canopy due to defoliation and tree mortality has removed much of the properties which protect against erosion and runoff, yet the dying and dead trees provide enough shade and debris to prevent regeneration of a new canopy. The erosion and regeneration potential stated in the EA was obtained from the Umatilla National Forest's Soil Resource Inventory (SRI). The SRI contains several limitations and used by itself, only indicates potential concerns.

Logging systems and methods are chosen to minimize the amount of detrimental soil impacts. Operations are conducted when conditions are least likely to produce undesirable effects. The decision notice added additional mitigation measures to help prevent soil compaction. Rehabilitation treatments are designated where practical to treat high impact areas and as much of existing compacted areas as physically possible. Site preparation activities are limited to the amount of bare, mineral soil exposure needed for natural seeding requirements and only in areas planned for natural regeneration.

Contemporary logging methods designated for this area limit exposed soil subject to erosion. Best management practices are incorporated as standard practice to further limit potential sedimentation from areas that are exposed and prone to erosion such as road cuts and high-traffic skidding corridors. PACFISH Riparian Habitat Conservation Areas also provide a buffer where deposition of sediment could occur, reducing the amount of sediment which enters the drainage network.

Comment 17: Will the grazing combined with the accelerated logging protect the health of the fishery and comply with PACFISH direction?

Response: With regard to grazing, only restoration projects such as riparian planting were considered in the Camas Restoration EA. Grazing allotments are being reviewed in separate analyses for updating allotment management plans on the North Fork John Day Ranger District. Revision of these plans is being conducted between 1995 and 2001, under separate analyses for each allotment.

Comment 18: Restoration and mitigation may not be used to substitute for prevention of habitat degradation. PACFISH was specifically amended during consultation to make it clear that land managers may not propose mitigation and planned restoration as a substitute for prevention of habitat degradation. It is not clear from our reading of this proposal that this is the case.

Response: We agree that it would be inappropriate to use restoration and mitigation as a substitute for prevention of habitat degradation. This has not been done in the Camas analysis. No timber harvest units would be located within PACFISH Riparian Habitat Conservation Areas, so degradation of riparian habitat would not occur. Restoration and mitigation activities have been prescribed where it is believed they will speed up riparian recovery.

WILDLIFE AND WILDLIFE HABITAT

Comment 19: Impacts of the proposed animal damage control is not fully disclosed.

Response: As we don't know what, if any, animal damage control will be needed to insure reforestation, we do a separate analysis. Through our reforestation monitoring we determine if animal damage is occurring. Then treatment options are analyzed in a separate analysis and a new NEPA decision will be issued.

Comment 20: Three hundred feet no-cut buffers are inadequate to protect active raptor nests and raptor reproduction.
Comment 21: The 400 acre "Post Fledgling Areas" are inadequate to protect goshawk fledglings and goshawk reproduction.

Response: We are following Forest Plan standards and guides in our buffer strip designation. In recent years, we have completed goshawk surveys and found none present. To meet Interim Regional Guidelines for goshawk, surveys to determine the presence of nesting pairs will be conducted in the Camas project area prior to harvest treatment. If birds are found during restoration activities, Regional protocol will be followed. As stated in the EA, the wildlife biologist will assign the appropriate buffer. The 300 feet no-cut buffer is just a general guideline. The 400-acre area is a requirement of the Screens Amendment and the wildlife biologist will assign the appropriate boundary.

Comment 22: How is there no "Old Growth/LOS connectivity" in the forest before cutting but more after logging? (reference Table 2-5)

Response: The phrase "Old Growth/LOS connectivity" refers to the establishment of connectivity corridors in the screening process. In the No Action alternative we do not establish connecting corridors.

Comment 23: We are concerned about the potentially disastrous impacts of the proposed action to the following species in the area:.... [a list including numerous aquatic and terrestrial species found in the Blue Mountains followed].

Response: Discussion of the wildlife indigenous to the area is found in the Camas Ecosystem analysis and appendices, in the E.A. at pages 48-58 and in the specialist reports prepared by the District fisheries and wildlife biologists for this project. The effects of the proposed activities are disclosed in the specialist reports, Biological Evaluations prepared for Proposed, Endangered, Threatened and Sensitive (PETS) species, and pages 82-94 in the EA. This analysis concluded there would be no negative effect on any PETS species. These analyses also concluded that restoration activities would provide overall beneficial effects for other wildlife and aquatic species.

Comment 24: All of the action alternatives, if implemented, would cause further degradation of fish and wildlife habitat and water quality..... Suspending land disturbing activities could do much toward halting continuing degradation and initiating a phase of recovery. Necessary measures to begin recovery include: [a list including numerous suggestions followed].

Response: We believe that achieving ecosystem restoration will not come without adjustments in tree species composition, stand structures, and levels of tree stocking in portions of the Camas analysis area. Changing tree species composition and reducing stand densities are a necessary and important part of the process of growing healthy trees and assuring healthy stands and forests and restoring the historic plant association groups native fauna have evolved with. Salvage logging, along with the proposed reintroduction of fire, is a means to this end.

The specific effects of our proposed actions are disclosed in Chapter IV. Our analysis determined that long-term forest health would be improved by implementation of the selected alternative. Our proposal meets Forest Plan standards and guidelines (as amended) and is consistent with the other direction in the Forest Plan.