RECORD OF DECISION

and

Finding of Non-Significant Forest Plan Amendment

for

COBBLER II TIMBER SALE AND FUELS REDUCTION PROJECT

USDA Forest Service
Umatilla National Forest
Walla Walla Ranger District
Wallowa and Union Counties, Oregon

Legal Location: Portions of T. 4N., R. 40E., sections 1, 2, 3, 4, 10, 11, 12, 14, and 15; T.5 N., R.40 E., sections 1, 12, 13, 14, 23, 24, 25, 26, 34, 27, 33, 34, 35, and 36; T. 4N., R. 41E., sections 5, 6, 7, and 18; T. 5N., R. 41E., sections 1 to 34; T. 5N., R. 42E., sections 4, 5, 6, and 7; T. 6N., R. 41E., sections 25, 26, 27, 33, 34, 35, and 36; and T. 6N., R. 42E., sections 29, 30, 31, 32, 33, and 34, W. M. surveyed.

DECISION AND REASONS FOR THE DECISION

This record of decision documents my decision and rationale for selecting a course of action to be implemented for the Cobbler II Timber Sale and Fuels Reduction Project. I have considered the analysis that is documented in the final environmental impact statement (FEIS) for the Cobbler II Timber Sale and Fuels Reduction Project, information in the project file, and input received from the public during the course of the National Environmental Policy Act (NEPA) analysis of this project. Cobbler II project planning area is located on Walla Walla Ranger District, within the Grande Ronde River-Grossman and Wenaha River watersheds. The town of Elgin, Oregon is about 20 miles to the southwest of the project area.

Background

Stands in the project planning area have been altered from historical conditions by fire suppression, insects and disease, and past forest management practices. A majority of current forest stands originated as a result of fire disturbances occurring over one hundred years ago, and they have not experienced fire since then. There have been repeated insect defoliation episodes followed by salvage harvest. Lodgepole pine stands have been harvested, and the remaining mature stands in the project planning area are at the age to be highly susceptible to mountain pine beetle, which is currently experiencing an increasing population. Late seral tree species have become dominant after long periods without disturbance and generally are more susceptible to disturbance-caused mortality than early seral species. Forest stands have become overstocked and are above recommended stocking levels that will maintain stand growth and vigor. Timber stands of seral tree species such as western larch and ponderosa pine are infilling with grand fir.

Fire regime condition classes, which describe deviation from natural fire regimes in terms of fire return intervals and vegetative change from historical composition and density, have been modified in the project planning area mainly by past harvest history and fire suppression. Approximately 40 percent of the project planning area has changed from a historical fire regime (Class 1) to a moderately altered fire regime (Class 2) and 10 percent of the area has changed to a significantly altered fire regime (Class 3). Fuels that would have historically been consumed during periodic wildfires have increased, and in many areas surface and aerial (within the canopy) fuel loadings are above historical levels. Today, fires in the dry and moist forests would have moderate to severe effects characterized by high fire severity and intensity on landscapes that historically displayed low to moderate severity. Fire ignitions today would not function as a natural disturbance process within their historical range of variability with regards to fire size, frequency, intensity, severity, or landscape patterns.

Fuel loads in the Grande Ronde canyon have been increasing primarily due to the lack of fire in that area. Fire behavior fuel models that describe how a fire would burn (flame length and rate of spread) through a particular wildland fuel type show that historically fire in this area would have been a fast moving but low intensity surface fire, but with existing fuel loads would be a fast moving, high intensity crown-replacement fire.

In the project planning area there are 23 sites (approximately 115 acres) of hardwood stands (aspen, mountain mahogany, and black cottonwood) that need management in order to be protected and restored. One of the sites needing protection is located in the Elk Flats Meadow area (approximately 70 acres) which is currently allocated in Umatilla Land and Resource Management Plan (Forest Plan) as management area D2 – Research Natural Area (RNA). Elk Flats Meadow was a proposed candidate for RNA status to represent an aspen forest. Evaluations by the Blue Mountain's Forest Ecologist, after completion of the Forest Plan (1990), indicated that formal RNA designation is not appropriate for Elk Flats Meadow because of the small size of the parcel, and because the aspen clones are ecotonal (i.e. transitional between forest and meadow) rather than true aspen forest.

Another area of concern within the project planning area is a series of dry meadows surrounded by dense forest dominated by grand fir. Photo history and field visits indicate there used to be a transition zone made up of low density ponderosa pine, western larch, and Douglas-fir between the meadows and interior stands. Past fire suppression has resulted in young, small diameter trees encroaching on these meadows where there used to be only grass.

The purpose for action in Cobbler II Timber Sale and Fuels Reduction Project is to improve health, vigor, and resilience to fire, insects, and disease in upland forests that are outside their historical pre-fire suppression conditions for species composition (including hardwood species), structural diversity, stocking densities, and fuel loads, and additionally to provide sawlogs and wood fiber products for utilization by regional and local industry.

Based upon current fuel and vegetative trends that are outside of their historical range of variability in Cobbler II project planning area, and contrasting the existing condition with the desired future condition identified in the Forest Plan (FEIS, Chapter 1, pp. 1-4 to 1-5) there is a need to:

- Reduce stand densities in upland forest to recommended stocking levels to increase resiliency of stands to disturbance from insects, disease, or uncharacteristic wildland fire intensity.
- Reduce competition from late seral ingrowth in stands currently dominated by early seral species and/or large trees in order to retain these more resilient trees.
- Move forest stand structural conditions toward the historical range of variability
- Modify the intensity and resulting fire behavior along the rim of the Grande Ronde and along Forest Road (FR) 62 for safe and effective fire suppression actions.

- Return fire to Grande Ronde River canyon to maintain the character of a frequent fire regime, particularly in grasslands and shrubs.
- Reduce ladder fuels to lower the risk of fire spread into the upper canopy.
- Reduce ground fuel that would contribute to uncharacteristic wildfire intensity and resource damage.
- Reduce risk of personal injury by removing danger trees along trailheads and haul routes used for project activities.
- Protect and enhance vegetative conditions of hardwoods by maintaining and or increasing vigor of existing stands.
- Influence stocking levels, growth, health, and vigor of plantations by implementing non-commercial thinning.
- Amend the Forest Plan to reallocate Elk Flats Meadow from management area D2-Research Natural Area to management area A9-Special Interest Area in order to allow for vegetation management, including cutting and leaving of trees, to maintain or enhance existing aspen, which have declined precipitously, and encourage aspen and other hardwood regeneration in the project planning area. Also in the same area as Elk Flats Meadow, a reallocation of small quantity of acres of management area E2-Timber and Big Game would be changed to A9, and a few acres of D2 would be changed to E2 to effectively maintain aspen stands in these areas.

The final environmental impact statement (FEIS) documents the analysis of two (2) action alternatives to address these needs.

Decision

After careful review and consideration of public comments received, and analyses disclosed in the Cobbler II Timber Sale and Fuels Reduction Project FEIS, I have decided to select Alternative B with modifications (Alternative B-Modified).

Following are the selected modifications to Alternative B:

- Commercial harvest will not occur in unit #89 (approximately 20 acres).
- Harvest unit #88 was changed from skyline logging to harvester/forwarder logging, and will be reduced in size by approximately 10 acres.
- The approximately 0.2 miles of temporary road construction will not occur because of the change in logging systems for harvest unit #88 and the elimination of unit #89.
- Silvicultural prescription of harvest unit #77 (approximately 87 acres) was changed from commercial thinning with non-commercial thinning (HITH/NCT) to group selection with commercial thinning (HSEG/HITH).
- Variable density thinning will be implemented in some non-commercial thinning stands.

Implementing Alternative B-Modified will result in the following activities:

Table 1 - Summary of Activities - Selected Alternative (Alternative B-Modified)

Activity	Alternative B-Modified
Commercial Harvest Prescriptions:	
Commercial thinning (HITH)	1,860 acres
Commercial thinning with seed-tree cut (HITH/HSST)	100 acres
Commercial thinning with non-commercial thinning (HITH/NCT)	145 acres
Shelterwood seed cut with commercial thinning (HSSW/HITH)	30 acres
Shelterwood or seed-tree cut (HSSW/HSST)	250 acres
Group Selection with commercial thinning (HSEG/HITH)	90 acres
Total	**2,500 acres***
Reforestation	
Planting	175 acres
Natural Regeneration	165 acres
Total	**340 acres***
Logging Systems	
Conventional ground based (tractor)	380 acres
Harvester/forwarder	1,860 acres
Skyline	200 acres
No Yarding	60 acres
Total	**2,500 acres***
Fuels Treatments	
Material removal** and mastication - 3-9 inch DBH material	400 acres
Material removal** and prescribed fire - 3-9 inch DBH material	100 acres
Mastication or grapple pile	1,320 acres
Mastication or grapple pile and/or prescribed fire	410 acres
Burn piles at landings	230 acres
Hand pile burning in units	40 acres
** If economically feasible	
Total	**2,500 acres***
Associated Road Use/Activity	
Open system roads used	50 miles
Gated closed system roads used and then reclosed	40 miles
Seasonally open roads used	1.5 miles
New road construction (will become a closed system road)	0.25 miles
Total	**92 miles***
Landscape prescribed fire	**8,000 acres***
Hardwood restoration	**115 acres***
Meadow restoration	**275 acres***
Non-commercial thinning	**1,900 acres***
Danger tree removal along haul routes and around trailheads	**Yes**
Non-significant Forest Plan amendment	**Yes**
*acres and miles are approximate	

As part of my decision, I will implement project-specific design features and management requirements (FEIS, Chapter 2, pp. 2-24 to 2-31, Table 2-6) and best management practices (BMPs) listed in Appendix D of the FEIS. Project design elements that were developed reflect existing direction found in the Umatilla Forest Plan and program direction established on the Forest. These design elements include all practical means of avoiding or minimizing environmental harm from management activities, and implementation of these design elements is considered highly effective.

I will also implement monitoring measures (FEIS, Chapter 2, pp. 2-31 and 2-32) to assure that aspects of my decision are carefully tracked during implementation. My decision amends the Forest Plan to reallocate acres in management areas D2-Research Natural Areas, A9-Special Interest Area, and E2-Timber and Big Game (FEIS, Chapter 2, pp. 2-23 to 2-24) in order to allow for restoration and preservation of aspen stands located in and around Elk Flats Meadow.

Reasons For The Decision

I have reviewed the Cobbler II Timber Sale and Fuels Reduction Project FEIS, the information in the project file that shows a thorough review of relevant scientific information, a consideration of responsible opposing views, the acknowledgement of incomplete or unavailable information, scientific uncertainty and risk; the Forest Plan; applicable laws (FEIS, Chapter 3, pp. 3-163 to 3-167); regulations (40 CFR parts 1500 to 1508 and 36 CFR part 220); and Forest Service policies.

In making my decision I considered how each alternative addresses the stated purpose and need (FEIS, Chapter 2, pp. 2-41 to 2-42, Table 2-11), how each alternative responds to the identified issues (FEIS, Chapter 2, pp. 2-43 to 2-47, Table 2-12) and I have considered comments submitted during the 45-day comment period and our responses to those comments (FEIS, Appendix I).

Response To Purpose And Need

Implementing Alternative B-Modified will make considerable progress in moving more acres in the area toward historical vegetative and fuel conditions. I find that both action alternatives (B and C) address the project objectives but to different extents with different effects and trade-offs. I considered the potential outcome to this area if I had selected no action. I concluded that by acting now to reduce stand densities and alter structure and species composition, future stand and habitat conditions within Cobbler II project planning area will improve. Activities including fuels reduction, reintroduction of fire to the landscape, danger tree removal, and hardwood and meadow restoration projects, as well as a Forest Plan amendment to restore and preserve existing aspen stands in and around Elk Flats Meadow will also benefit the Cobbler II project planning area. I believe I have chosen the best course of action to meet the needs we have identified for land management. Implementing Alternative B-Modified will make important progress in moving more acres in the area toward desired historical conditions. I find that Alternative A, the no action alternative, fell short of addressing the purpose and need for action and it would be an irresponsible course of action to do nothing.

Based on the following purpose and need statements and considerations listed below, I believe my decision to select Alternative B-Modified for implementation affirmatively addresses and fulfills the purpose and need for action and is responsive to and consistent with Forest Plan goals identified in the FEIS, Chapter 1, pp. 1-4 to 1-5, and p. 1-15. A quantitative summary comparison of how each alternative considered in detail responded to the purpose and need is located in the FEIS, Chapter 2, pp. 2-41 to 2-42, Table 2-11.

- **Reduce stand densities in upland forest to recommended stocking levels in order to increase resiliency of stands to disturbance from insects, disease, or uncharacteristic wildland fire intensity.**

  In Alternative B-Modified, stand density will be reduced on a total of about 4,040 acres of forest stands through commercial and non-commercial thinning. Alternative C would reduce stand density on about 2,900 acres. Alternative B- Modified will reduce stand densities on more acres of upland forest to recommended stocking levels, based on plant association. Stand vigor and resilience will be increased by lowering stand densities. Thinning stands and reducing competition between individual trees will improve the probability of survival of trees when the stands are affected by insects and disease (FEIS, Chapter 3, p. 3-58).

- **Reduce late seral ingrowth in stands currently dominated by early seral species and/or large trees in order to retain these more resilient trees.**

  My decision increases the representation of early seral species in stands that are departing from historical conditions. Compared to historical conditions, dry upland forest currently supports too much of the grand fir and interior Douglas-fir forest cover types and too little of the ponderosa pine forest cover type; moist upland forest supports too much of the grand fir forest cover type and too little of the western larch and Douglas-fir cover types (FEIS, Chapter 3, p. 3-48, and p. 3-49, Table 3-22). In Alternative B-Modified more acres will be thinned with early seral species being the preferred leave species. In stands that are currently dominated by early seral species, competition from late seral ingrowth will be reduced by commercial and non-commercial thinning on approximately 1,460 acres in Alternative B-Modified, as compared to 1,300 acres in Alternative C. Having more of the early seral species in stands and across the landscape is valuable as they are more resistant to insects, disease, and fire (FEIS, Chapter 3, p. 3-55). Treatments in Alternative C would not bring species composition as close to the historical range of variability (HRV) for dry upland forests as will Alternative B-Modified. In moist upland forest Alternative C would increase the proportion of early seral species on fewer acres than in Alternative B-Modified (FEIS, Chapter 3, p. 3-55). I find this to be important to move the project planning area closer to a sustainable species composition.

  My decision also decreases competition to large trees in old forest stands where trees of late seral species are seeding in. In Alternative B-Modified the late seral understory will be removed from more acres of old forest. In stands that are currently dominated by large trees, competition from late seral ingrowth will be reduced by commercial and non-commercial thinning on approximately 485 acres in Alternative B-Modified. I find this to be important to maintain old forest stand structure within HRV on moist upland forest stands, and to bring old forest stand structure in dry upland forest stands closer to HRV. There would be no removal of late seral ingrowth from old forest stands in Alternative C (FEIS, Chapter 3, p. 3-56, Table 3-28).

- **Move forest stand structural conditions toward the historical range of variability (HRV)**

  As mentioned above, approximately 485 acres of old forest multi strata (OFMS) that are proposed for thinning in Alternative B-Modified will change stand structure from old forest multi strata to old forest single stratum (OFSS) structure. The trees removed will be the smaller trees in the stands, and approximately two-thirds of the basal area will remain in each stand after thinning. This will move the percentage of old forest single stratum closer toward HRV. Stands that are classified as stem exclusion closed canopy will change to stem exclusion open canopy after thinning (FEIS, Chapter 3, pp. 3-56 to 3-57, Tables 3-28, and 3-29).

This shift in structure will contribute to meeting the need to move forest stand structural conditions toward HRV. Implementation of Alternative B-Modified will move Cobbler II project planning area and the landscape closer to the HRV for the various forest stand structures. By implementing Alternative B-Modified, there will be a net change of approximately 530 acres from outside structural class HRV to within HRV, as compared to approximately 255 acres in Alternative C (FEIS, Chapter 3, p. 3-57). No thinning (0 acres) in old forest is proposed in Alternative C, and there is no trend to move old forest single stratum closer to HRV (FEIS, Chapter 3, p. 3-59 and 3-91).

- **Modify the intensity and resulting fire behavior along the rim of the Grande Ronde and along Forest Road (FR) 62 for safe and effective fire suppression actions and reducing ladder fuels to lower the risk of fire spread into the upper canopy.**

  Since Alternative B-Modified proposes the largest amount of treatment acres to accomplish fuel reduction objectives, it provides the best choice for creating safer conditions to take fire suppression action in this area. Treatment units with the objective of fuel reduction were selected because there was a significant ladder fuel component present and they were in a strategic location for fire suppression (i.e. along the rim of the Grand Ronde, Forest Road 62). Harvest of 3 to 9 inch diameter at breast height (DBH) material will remove trees that occupy low to intermediate canopy positions in stands dominated by commercial sized timber. Following removal of these ladder fuels, crown base height (average height from the ground to the base of tree crowns) will increase. By also rearranging and reducing surface fuels through mechanical treatments to levels characterized by a fuel model 8, surface fires will not burn with enough intensity to ignite tree crowns in the stand. This combination of surface and crown fuel treatments effectively reduces the risk of initiation and propagation of crown fires. Therefore, the strategically located treatments will provide firefighters with areas of reduced fire behavior where they can safely and effectively fight fire (FEIS, Chapter 3, p. 3-74).

- **Reduce ground fuel that would contribute to uncharacteristic wildfire intensity and resource damage.**

  My decision to implement fuel treatments in Alternative B-Modified (10,250 acres) as compared to Alternative C (9, 150 acres) will reduce future ground fuel loading to levels which will more closely resemble fuel loadings that existed under a natural fire regime (FEIS, Chapter 3, p. 3-72). These treatments will also serve to make future stands less susceptible to crown-fire, and help reduce the potential for uncharacteristic wildfire, and help reduce the level and extent of destruction caused by this type of wildfire. Treatments have the potential to help prevent widespread changes to large tracts of forest and wildlife habitat, minimize damage to the forest floor and underlying soils, and shorten the time for the landscape to heal (FEIS, Chapter 3, p. 3-75).

- **Provide sawlogs and wood fiber products for utilization by regional and local industry.**

  Alternative B-Modified has the least cost per acre, and the highest value per hundred cubic feet (CCF) above base rates of the two action alternatives (FEIS, Chapter 3, pp. 3-154 to 3-155). Since more acres will be commercially harvested, it maximizes the economic benefits (jobs and dollars) to the regional and local economy. Since more acres will be harvested by implementing Alternative B-Modified there will be more trust funds (Knutson-Vandenberg) available for sale area improvements to resources in the area following the completion of timber harvest (FEIS, Chapter 2, pp. 2-35 to 2-36). Estimated volume of timber to be harvested by implementing Alternative B-Modified is approximately 29,000 hundred cubic feet (CCF) (FEIS, Chapter 2, p. 2-40).

- **Return fire to Grande Ronde River canyon to maintain the character of a frequent fire regime, particularly in grasslands and brush.**

  The Alder and Bear Creek drainages of the Grande Ronde River canyon have missed at least two fire return intervals, and due to the area's inaccessibility has never had any harvest activity (FEIS, Chapter 3, p. 3-69). My decision will allow fire managers to reintroduce landscape fire on approximately 8,000 acres in the Grande Ronde canyon. This will begin the process of returning stands to Condition Class 1 (historical range), and maintain the character of a frequent fire regime by decreasing surface and ladder fuels, decreasing fire intolerant species, and promoting those tolerant of fire (FEIS, Chapter 3, pp. 3-73 to 3-74).

- **Reduce risk of personal injury by removing danger trees along trailheads and haul routes used for project activities.**

  The safety of forest users will be improved by removal of danger trees along trailheads and haul routes (approximately 92 miles) used for project activities. Trees with an imminent failure potential and those deemed likely to fail within a 5-10 year period will be felled along open system roads. Only danger trees with an imminent failure potential will be felled on closed system roads. Danger trees within Riparian Habitat Conservation Areas (RHCAs) will be felled and left to provide additional coarse woody debris (FEIS, Chapter 2, p. 2-20).

- **Protect and enhance vegetative conditions of hardwoods by maintaining and or increasing vigor of existing stands.**

  With my decision to implement Alternative B-Modified, much needed restoration on 23 hardwood sites (aspen, black cottonwood, and mountain mahogany) encompassing approximately 115 acres will occur. This restoration includes one site that contains several aspen stands at Elk Flats Meadow, ten additional aspen stands, eleven cottonwood stands, and one mountain mahogany stand, scattered within the Cobbler II project planning area. Most of these stands have only mature or over-mature hardwood trees with little or no regeneration, or regeneration that is being severely browsed (FEIS, Chapter 2, p. 2-22). Restoration treatments will allow regeneration to grow by reducing browsing and by releasing the stands from encroachment by conifers and benefit a variety of wildlife species (FEIS, Chapter 3, p. 3-90).

- **Influence stocking levels, growth, health, and vigor of plantations by implementing non-commercial thinning.**

  This decision will allow non-commercial thinning on about 1,900 acres within Cobbler II project planning area. This activity will reduce stocking in young stands which will increase resiliency to disturbance from insects, disease, and fire (FEIS, Chapter 3, p. 3-58).

- **Amend the Forest Plan to allocate Elk Flats Meadow (70 acres) from management area D2-Research Natural Area (RNA) to management area A9-Special Interest Area in order to allow for vegetation management, including cutting and leaving of trees, to maintain or enhance existing aspen, which have declined precipitously, and encourage aspen and other hardwood regeneration in the project planning area. In the same vicinity, an adjacent portion of management area E2 (30 acres) which is primarily comprised of meadows would be changed to A9, and a small area of D2 (10 acres) that does not contain hardwood stands or have any special interest features would be changed to management area E2.**

Elk Flats Meadow, which is currently a candidate RNA and has not been established as a RNA, is not compatible with the Forest Plan management area designation of D2-Research Natural Area. Evaluations by the Blue Mountain's Forest Ecologist, after completion of the Forest Plan, indicated that formal RNA designation is not appropriate for Elk Flats Meadow because of the small size of the parcel and because the aspen clones are ecotonal (i.e. transitional between forest and meadow) rather than true aspen forest (FEIS, Chapter 3, pp. 3-51 to 3-52).

Amending the Forest Plan with this decision will reallocate Elk Flats Meadow (70 acres) to Forest Plan management area A9- Special Interest Area, which allows for restoration treatments of existing aspen stands that are in a state of degradation due to increased competition from conifers. This amendment will also allow an adjacent portion of management area E2-Timber and Big Game (30 acres) to be reallocated as A9, and a very small area (10 acres) in D2 that does not contain any hardwood stands will be reallocated to management area E2.

The goals of management areas D2 and A9 affecting Elk Flats Meadow are similar, as listed below:

- The goal for management area D2 –Research Natural Area is to preserve naturally occurring physical and biological units where natural conditions and processes are maintained, insofar as possible, for the purposes of: 1) comparison with those lands influenced by man; 2) provision of educational and research areas for ecological and environmental studies; and 3) preservation of gene pools for typical and rare and endangered plants and animals.

- The goal for management area A9-Special Interest Area is to manage, preserve, and interpret areas of significant cultural, historical, geological, botanical, or other special characteristics for educational, scientific, and public enjoyment purposes.

Aspen stands will continue to be preserved and protected in Elk Flats Meadow with this amendment. These reallocations of management areas were selected to best allow site-specific management and preservation of aspen stands (FEIS, Chapter 2, pp. 2-20 and 2-21 and map entitled Other Activities Common in both Alternatives located in Appendix A). I feel it is important to treat these stands now to increase the vigor of the existing aspen.

Response To Issues

Issues and concerns were raised by various groups, timber industry representatives, and individuals during the development of this project. I reviewed and considered their comments and concerns in making my decision. Two significant or key issues (old forest and elk habitat) were used to develop alternatives to the proposed actions. More detailed information concerning issues can be found in the FEIS, Chapter 2, pp. 2-2 to 2-9 and Chapter 3. For a summary of comparison of effects by indicators selected for key issues and other resource issues see FEIS, Chapter 2, pp. 2-43 to 2-47, Table 2-12).

In Chapter 3 of the FEIS, I observed that environmental effects for many resource topics did not vary by alternative, or only varied in minor ways and the intensity of the predicted effects may be limited in time or extent or minimal altogether. Because of this, those resource issues influenced my decision in minor ways and are not discussed in detail in this decision document.

I recognized that the public was passionate about what they felt was best for the land, and that there is no single management strategy that could totally satisfy all concerns expressed about the Cobbler II project. I have selected an alternative that addresses concerns expressed, but is not likely to resolve conflicting points of view. The resource issues most relevant to me in making my decision are discussed below.

Old Forest (Key Issue) - Early in the development of the project concerns about the reduction and amount of connectedness of old forest habitat stands were expressed during public involvement. This concern was used to develop an alternative to the proposed action (Alternative C).

If I selected Alternative A and no proposed activities were implemented, some timber stands over time will develop habitat characteristics that will result in additional old forest and connective corridors. Other stands will trend towards overstocked, unproductive stands with limited value as wildlife habitat. Dry upland forest will likely continue to develop into multi-storied, overstocked stands with encroaching fir (FEIS, Chapter 3, p. 3-89).

In choosing Alternative B-Modified, I was aware the amount of old forest is within the historical range of variability in moist upland forest and in dry upland forest except for the dry single story stands (FEIS, Chapter 3, p. 3-88). Approximately 485 acres will be thinned in old forest multi-story, and some dry, old forest multi-story will be converted to old forest single stratum. This represents a positive effect for some wildlife species and a negative effect for others. I was also aware from my review of the environmental effects analysis that connectivity is not a limiting factor for old forest species in this project planning area (FEIS, Chapter 3, p. 3-89).

Although no timber harvest will occur in old forest stands in Alternative C, I accepted the trade-off in Alternative B-Modified that proposed harvest treatments will cause a short-term loss of existing old forest structural complexity, but a long-term gain will result due to increased resiliency to potentially large scale disturbances such as insect outbreaks, disease, and wildfire and that the overall amount of stands classified as old forest will not change (FEIS, Chapter 3, p. 3-90).

Elk Habitat (Key Issue) - Restoring big game habitat and not decreasing any existing habitat was another concern expressed early in the development of the project. The concern expressed was that proposed harvest could decrease the density of canopy cover converting satisfactory[1] cover to marginal[2] cover and it could reduce the effectiveness of security areas when screening vegetation is removed. Alternative C was developed in response to this issue to retain more cover for big game.

The majority of commercial thinning will occur in Forest Plan management area allocations C4-Wildlife Habitat and E2-Timber Big Game. By implementing Alternative B-Modified, total cover (marginal plus satisfactory) in management area C4 will be reduced by 2 percent, and total 59 percent, which is above the Forest Plan standard of 30 percent. Total cover in management area E2 will be reduced by 1 percent, and total 51 percent, which is above the Forest Plan standard of 30 percent (FEIS, Chapter 3, p. 3-95). In Alternative C, existing satisfactory cover will not be harvested in management areas C4 and E2. Although the net reduction in satisfactory and marginal canopy cover in Alternative B-Modified will be about 360 acres, it will continue to be consistent with Forest Plan standards and guidelines for total cover.

In making my decision I considered information in the wildlife biologist's environmental effects report that reduction of hiding cover is somewhat dependent upon topography and distance to open roads. Since most of the roads are closed, hiding cover is less critical to elk in this area (FEIS, Chapter 3, p. 3-93).

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[1] **Satisfactory cover** – A stand of coniferous trees 40 or more feet tall with an average canopy closure equal to or more than 70 percent. Umatilla Forest Plan defines it as cover used by animals to ameliorate the effect of weather.

[2] **Marginal cover** – A stand of coniferous trees 10 or more feet tall with an average canopy closure equal to or more than 40 percent but less than 70 percent and generally capable of obscuring at least 90 percent of a standing elk from the view of humans at a distance of 200 feet.

Closed roads used for project activities will not be open to the public during implementation and will remain closed after the project is completed.

Another factor I considered was the habitat effectiveness index (HEI) for elk. HEI will not change with implementation of any action alternative and will remain within Forest Plan standards for management areas C4 and E2 (FEIS, Chapter 3, p. 3-95 to 3-96 and Table 3-52). Based on all of this information, I accept the trade-off of harvesting more acres to better meet the project's purpose and need, knowing that my decision complies with Forest Plan standards and guidelines for elk habitat which was selected as a key issue in the FEIS.

Soils - One responder, to our request for comments on the project, remarked "that as the major purpose and need premise for this project is recovering forest resilience, protection and restoration of ecologically foundational forest soils should have been a paramount priority for this project." I share that concern, and have decided to fully implement the design features and management requirements (FEIS, Chapter 2, Table 2-6) that were recommend by the Forest Soil Scientist and other interdisciplinary (ID) team members. These features include tailored fuel treatments and applicable best management practices (FEIS, Appendix D). I am confident that these site-specific design features will address and lessen impacts to soil productivity.

Past monitoring of harvest activities on our forest indicate these design features will effectively limit ground disturbing activities on sensitive soils (FEIS, Chapter 3, pp. 3-7 to 3-10). Post-activity analysis of effects indicated that no activity units will exceed detrimental soil condition (DSC) standards as identified in the Forest Plan (FEIS, Appendix E). The cumulative effects to DSC are fully consistent with Forest Service policy (FEIS, Chapter 3, p. 3-10). Based on this information, I accept the trade-off of harvesting more acres to better meet the purpose and need, knowing that adequate soil protection measures are in place to meet Forest Plan standards.

Hydrology/Water Quality – During the comment period **s**ome groups wrote that they were concerned that commercial harvest, temporary road construction, road use, and prescribed burning would degrade water quality. Hydrologic processes and effects to water quality were considered and disclosed in the FEIS (Chapter 3, pp. 3-10 to 3-23). As with soils, both action alternatives were developed with design features (FEIS, Chapter 2, Table 2-6) and site-specific best management practices (FEIS, Appendix D) to lessen impacts to water quality. Past monitoring demonstrates the forest has been successful implementing best management practices, PACFISH standards, and skidding guidelines for disturbed soils. These measures effectively limit unwanted effects to water quality. Cumulative effects disclosed in the FEIS indicate activities to be implemented in Alternative B-Modified are fully consistent with all applicable State and Federal water quality standards (FEIS, Chapter 3, pp. 3-22 to 3-23), and the Clean Water Act.

No project streams in the Cobbler II project planning area are 303(d) listed streams (FEIS, Chapter 3, p. 3-15). Projects have been designed and mitigated to prevent or minimize damage to ground cover, erosion, and sedimentation. Road drainage improvement, especially on forest road (FR) 6222 could cause some short-term (less than one week) sedimentation. The potential for sedimentation from other actions is negligible. The North Zone Hydrologist found that project activities proposed in Alternative B-Modified offer no opportunity for measurable cumulative effects with ongoing actions (FEIS, Chapter 3, p. 3-20).

Fisheries - Potential to affect fish habitat for Threatened, Endangered and Sensitive (TES) and Management Indicator Species (MIS) from commercial harvest and associated activities was raised as a concern during the comment period. Fish occupancy has been confirmed in the Grande Ronde River, Meadow Creek, Elbow Creek, Squaw Creek, Alder Creek, Bear Creek, Wenaha River, and Cross Canyon

Creek. Fish occupancy has not been confirmed for Big Hole Canyon Creek, Swamp Creek, Elk Creek or Burnt Canyon Creek, but it is likely that fish use at least the lower portions of these streams as well.

A specific question was asked from a group regarding sediment, and Oregon State listed 303 (d) waterways. They were concerned about how the project prevents sediment from ground disturbing activities from reaching tributaries, streams, and the area's Grande Ronde salmonid waterways. All timber harvest would be outside of PACFISH RHCAs (FEIS, Chapter 2, Table 2-6). Harvest would occur 120 feet or farther from intermittent streams and 150 feet or farther from perennial non-fish bearing streams and 300 feet or farther from fish bearing streams. Rashin et al. (2006) found buffer widths of 10 meters (approximately 33 feet) were effective in preventing 95 percent of harvest related sediment from reaching stream channels. The buffers (PACFISH, RHCA) for the Cobbler II project would be from about five times to nearly ten times that width, and would be proportionally much more effective in preventing timber harvest related sediment from reaching stream channels. Also, proposed harvest methods would produce less soil surface disturbance than older, traditional harvest methods, and there would be less erosion to begin with. Detectable quantities would not be expected to reach stream channels (FEIS Chapter 3, pp. 3-38 to 3-39).

To reduce potential effects on TES and MIS fish habitat, design features and management requirements were developed (FEIS, Chapter 2, Table 2-6) and are included in both action alternatives. A summary of biological evaluation findings for listed species, essential fish habitat under Magnuson-Stevens Act, and findings for sensitive species can be found in the FEIS, Chapter 3, pp. 3-40 to 3-41. Letters of concurrence without terms and conditions by United States Department of the Interior (USDI) Fish and Wildlife Service (March 31, 2009) and National Marine Fisheries Service (May 7, 2009) and a letter of informal conference from USDI on proposed critical habitat for bull trout (September 24, 2010) were received and are in the project file. My decision is in compliance with the Endangered Species Act and the Magnuson-Stevens Fishery Conservation and Management Act. Based on this information, I accept the trade-off of commercially harvesting more acres to better meet the purpose and need knowing that fish and their habitat are protected.

Vegetation - I am aware that there are differing opinions about managing forests in the western United States, especially management of fire-prone forests. Inconsistent terminology for forest vegetation and fire regime types makes it easy for people to disagree about what is the best science that applies to the forest types in the Cobbler II planning area. I believe that the forest condition brought to light by the vegetation analysis corresponds to changes that are common in landscapes whose development has been changed by fire suppression: that is, they are outside of HRV in predictable ways for stand attributes including species composition, stand structures, and tree densities. Treatments are proposed to make the forest more resilient to disturbances including wildfire, drought, and insects and diseases (FEIS, Chapter 3, pp. 3-54 to 3-60).

As discussed above under the heading Purpose and Need, Alternative B-Modified best manages vegetation in Cobbler II project planning area to historical and sustainable conditions. Based on this information, I recognized that more stands will show a greater trend toward improvements in species composition, forest stand structure, and forest stand density by implementing Alternative B-Modified than Alternative C (FEIS, Chapter 2, p. 2-41, Table 2-11).

Diseased Large Tree Removal - One commenter raised a concern that the project as planned would further harm the ecological integrity of the area by its planned removal of far too many of the area's old and mature trees. It is estimated, that with implementing Alternative B-Modified, the number of diseased trees greater than 21 inches DBH that will be harvested in regeneration units is between 10 and 50 trees (FEIS, Chapter 2, p. 2-13). Diseased trees (infected with specified levels of dwarf mistletoe) greater than 21 inches DBH will be removed only in the moist forest biophysical group, which is within the historical

range of variability, and only in regeneration units (shelterwood and seed tree cut) where the disease would be passed from residual trees to the young regenerated stand. None of the large diseased trees that will be removed are in stands classified as old forest structure. Regeneration harvest will occur on approximately 350 acres, which is less than one (1) percent of the total planning area (34,000 acres) and less than two (2) percent of the acres in the planning area where timber harvest is scheduled. Based on this information, I accept the trade-off that a small number of diseased trees greater than 21 inches DBH will be harvested to avoid infecting newly regenerated stands with high levels of dwarf mistletoe, and this action is consistent with the Eastside Screens amendment (FEIS, Appendix F).

Fuels – Historical wildland fire data shows that very small acreages have burned during the last 30 years in the Cobbler II project planning area. Historical large fire information dating back to pre-1900s includes only two large fires, both in the southern-most portion of the project planning area. One of these fires occurred prior to 1900 and the other in 1910 at 3,700 and 380 acres, respectively, for a total of 12 percent of the project planning area. Wildland fire trends from the 1970s to 2006 show that approximately 90 fires occurred, burning about 40 acres in total. With regard to fire return frequency, this means that at least two fire return intervals have been missed in fire regime I and one in fire regime III. This absence of fire has resulted in increased surface fuel loads with high connectivity, and increased tree density and canopy layering. Increased canopy cover has led to regeneration of shade tolerant, fire intolerant species, with low crown bases and heat-trapping foliage (FEIS, Chapter 3, p. 3-67).

I am aware of the concerns expressed in public comments that thinning increases fire risk. Alternative B-Modified will allow for safer and more effective fire suppression, and will reduce ladder and ground fuels on more acres in Alternative B-Modified than Alternative C. Fuel treatments will be implemented in areas where successful suppression efforts can occur and provide or maintain a network of stands that can be used to control the size and spread of wildfire (FEIS, Chapter 3, pp. 3-71 to 3-75). The objective of understory thinning is to raise the canopy base height so that a fire burning through surface fuel does not transition into overstory tree crowns. I believe that fuel treatments designed for this project will use fire disturbance to shape forest cover that will be more reflective of the structure and fire intensity associated with historical forest types. Ground fuels will also be reduced to levels that more closely resemble fuel loadings which existed under a natural fire regime.

Dead wood and snags - The amount of dead wood and snags being left in the area was questioned by some publics. In selecting Alternative B-Modified, I carefully reviewed analysis and information discussed relative to dead wood and snags, and the landscape analysis completed by our wildlife biologist for snags. I considered the design features for snag retention listed in the FEIS and was aware that project design criteria listed in Chapter 2, Table 2-6 of the FEIS to maintain large snags goes beyond Forest Plan standards and guidelines for snags**.** The environmental analysis for snag information was accomplished using a tool called the Decayed Wood Advisor (DecAID, Mellen et al. 2006), which I believe incorporates the best science available for dead wood habitat. My decision to implement Alternative B-Modified is consistent with Forest Plan standards and guidelines for management indicator species (MIS) associated with snags and dead wood (FEIS, Chapter 3, pp. 3-102 to 3-104).

Wildlife – Several wildlife issues were presented during public involvement periods. Concerns regarding elk and old forest are addressed above and are not included in this section.

Comments received showed a concern that there would be negative effects to threatened, endangered, and sensitive species (TES) and management indicator species (MIS). Concerns were related to gray wolf, lynx, goshawks, and landbirds.

The gray wolf was listed as a Regional Forester's Sensitive Species (RFSS) when Cobbler II draft EIS was prepared. A biological determination of "no impact" to the gray wolf was made in the Cobbler II Wildlife Report of April 2, 2009 as amended on August 20, 2009.

On August 5, 2010 the United States District Court for the District of Montana ruled to return the gray wolf as endangered under the Endangered Species Act for the Northern Rocky Mountain distinct population segment. Prior to this ruling, the Northern Rocky Mountains DPS of the gray wolf had been removed from threatened or endangered status (effective May 4, 2009, 74 FR 15123-15188.).

On August 17, 2010 a meeting was held with the U.S. Fish and Wildlife Service and the U.S. Forest Service to discuss the re-listing of wolves and possible impacts from ongoing and proposed projects in northeast Oregon. A variety of land management activities such as grazing and timber harvest were reviewed, what activities could trigger an effect to the gray wolf, and when to initiate consultation was discussed. Project design features to protect seasonal den sites and rendezvous sites are being reviewed, and will be revised if necessary. Through the Level 1 consultation streamlining process (Implementing Streamlined Consultation Procedures for Section 7 of the Endangered Species Act – ICS Memo #2 May 27, 2003 (http://www.blm.gov/or/esa/procedure.htm), informal consultation will continue, including discussion of re-initiation triggers.

Wolves have been documented over the past two years in the Cobbler II project planning area and reproduction has been verified. Monitoring of these wolves is in the early stages, and no den or rendezvous sites have been identified (Russ Morgan, Oregon Department of Fish and Wildlife (ODFW), personal communication).

At this time, consultation for gray wolf in reference to the Cobbler II project is not required because despite monitoring by several agencies, no den or rendezvous sites have been identified in the project area. Ongoing monitoring and informal consultation will provide information to determine if Section 7 consultation should be initiated, or if design features will be required, prior to and during project activities.

The environmental effects analysis for wildlife contains a biological evaluation (BE) for all TES wildlife species. The North Zone Wildlife Biologist made a determination the none of the proposed project activities will adversely affect, contribute to a trend toward Federal listing, nor cause a loss of viability to the listed animal populations (FEIS, Chapter 3, p.3-111). The Wildlife report also contains information that consultation for Canada lynx is not necessary because no other past, ongoing, or future foreseeable projects would cause cumulative effects to lynx. Overall, there would be no effect to Canada lynx, because the Blue Mountains are considered 'unoccupied' by resident lynx (USFS 2006) and a small reduction of suitable habitat on the fringe of lynx range is not expected to have any impact on the lynx population (FEIS, Chapter 3, pp. 3-105 to 3-106).

No goshawk nest sites are known in the Cobbler II project planning area. Design features listed in the FEIS, Chapter 2, Table 2-6 lists the following requirement: if any nests are found at any time they will be protected in accordance with the Forest Plan as amended by the Eastside Screens.

My review of the wildlife analysis also shows that all action alternatives are consistent with the 1918 Migratory Bird Treaty Act (MBTA) and the Migratory Bird Executive Order 13186. The Conservation Strategy for Landbirds (Altman 2000) was reviewed for effects disclosures (FEIS, Chapter 3, p. 3-117). Timber harvest and fuels reduction treatments will reduce canopy closure and structural complexity on approximately 2,500 acres, but the amount of old forest in the area will remain within the historical range of variability. Old forest multi-structure (OFMS) will be converted to old forest single-stratum (OFSS).

This will represent a positive effect for some bird species and a negative effect for others (FEIS, Chapter 3, p. 3-116).

Design features such as retention of adequate snags and down logs, retention of live trees, and avoidance of riparian areas proposed in this project will minimize take of migratory birds and meet the intent of current management direction (FEIS, Chapter 2, Table 2-6).

Based on information in the FEIS, Chapter 3, design features in Chapter 2, Table 2-6, and the Wildlife Biologist report (project file), my decision to implement Alternative B-Modified is consistent with applicable laws, regulations, and policy for wildlife species.

Wilderness, Potential Wilderness Areas (PWAs) and Undeveloped Lands - Several comments received were focused on concerns regarding implementation of logging and burning and their associated activities in areas identified by respondents as roadless/unroaded/undeveloped areas and they were concerned with what they consider the critically important role that unroaded areas provide.

During public involvement for this project, and in past similar projects, a wide range of terms have been used by respondents, the courts, and Forest Service when referring to these topics such as roadless, unroaded, uninventoried roadless, undeveloped areas, and roadless expanse. To best address these concerns and terminologies used by respondents, the terminology used for the four resource topics (1) congressionally designated Wenaha-Tucannon Wilderness; (2)Grande Ronde inventoried roadless area (IRA); (3) potential wilderness areas (PWAs); and (4) remaining other undeveloped lands for this site-specific analysis are defined in the FEIS, Chapter 3, pp. 3-131to 3-133. The four resource topics are based on current law, regulation, agency policy, and the Umatilla Land and Resource Management Plan (Forest Plan), as amended.

A thorough site-specific potential wilderness area (PWA) inventory was completed for this project. This site-specific inventory for potential wilderness areas followed Forest Service procedures (Forest Service Handbook (FSH) 1909.12, Chapter 71). A comprehensive description of the methodology used, detailed information resulting from the inventory, and maps showing sequential steps of the process are located in Appendix H of the FEIS.

Since no project activities will occur within the adjacent Wenaha-Tucannon Wilderness there will be no effects to wilderness qualities of untrammeled, undeveloped, and natural features (FEIS, Chapter 3, p. 3-135). There will be short-term effects to opportunities of solitude and remoteness because of noise, dust, and smoke from project activities located in areas near the wilderness boundary. No project activities will occur in the 130 acres inventoried as PWAs that are contiguous to Wenaha-Tucannon Wilderness and there will be no effects to soils, water quality, or water yield. There will be no direct effect to the apparent naturalness, scenery, and sense of solitude and remoteness within these potential wilderness areas from timber harvest, mechanical fuel activities, and road construction because those actions are not proposed in these areas. The sights and sounds of timber harvest and machinery adjacent to PWAs contiguous to Wenaha-Tucannon Wilderness will reduce a sense of naturalness several miles into a PWA during project operations, but will not persist in the long-term. Plant and animal communities will not be impacted by project activities and habitat for TE&S species and MIS species will not be adversely impacted (FEIS, Chapter 3, pp. 3-135 to 3-136). Short-term effects to opportunities of solitude and remoteness because of noise, dust, and smoke from projects activities located near these PWAs will be the same as for Wenaha-Tucannon Wilderness. Implementation of the selected alternative will not result in any change in the 177,469 acres of designated Wenaha-Tucannon Wilderness or approximately 130 acres of inventoried potential wilderness areas (FEIS, Chapter 3, p. 3-136).

Roadless area characteristics identified in the 2001 Roadless Area Conservation Rule (36 CFR, 294) and any reduction in acres due to implementation of proposed project activities were used to analyze effects to the Grande Ronde IRA/PWA. The analysis in the FEIS, Chapter 3 pp. 3-139 to 3-146 revealed that there will be no long-term effects to roadless characteristics and no reduction in IRA/PWA acres. After implementation of Alternative B-Modified, all acres (7,690) identified in the PWA inventory will remain available for evaluation of potential wilderness and for preliminary administrative recommendations for wilderness designation during forest plan revision (FEIS, Chapter 3, p. 3-146).

An outcome of the PWA inventory process was the identification of isolated polygons of other undeveloped lands (5,660 acres). These undeveloped acres have no history of harvest, do not have any forest roads, and do not meet inventory criteria as PWAs. Most of these undeveloped lands are small in size. Of the 105 polygons identified as other undeveloped lands, 92 polygons are in the range of 1 to 99 acres in size (FEIS, Chapter 3, p. 3-148, Table 3-59). Activities in Alternative B-Modified will occur on approximately 635 acres of undeveloped lands. These 635 acres were analyzed for effects by all resource specialists for intrinsic physical, biological, and social values (FEIS, Chapter 3, pp. 3-149 to 3-152). No special or unique features were identified in specialist reports for any of these undeveloped acres. Of the 34,000 acres in the project planning area, these 635 acres represent only 2 percent of the area (FEIS, Chapter 3, p. 3-151, Table 3-51).

In consideration that there will be no long-term effects to the designated Wenaha-Tucannon Wilderness, PWAs contiguous to the wilderness, the Grande Ronde PWA/IRA, and no change in acres or in availability for future evaluation of these areas as potential wilderness, I have concluded that Alternative B-Modified provides an environmentally acceptable approach to management in the project planning area.

Another factor I considered was that there are no special or unique values associated with the 635 acres of other undeveloped areas, and that these acres are not PWAs now, nor will they be in the future, and that all actions implemented on these acres are consistent with Forest Plan standards and guidelines and management area allocations (FEIS, Chapter 3, p. 3-147).

Economics – Some groups felt that the economic analysis in the EIS was not meaningfully addressed. The economic analysis (FEIS, Chapter 3, pp. 3-152 to 3-155) is in accordance with Forest Service manual and handbook guidance to complete a financial analysis for timber sales (FSH 2409.18). It documents the financial monetary measures for timber and the financial costs of removing the timber. Several economic indicators were used to compare alternatives such as, alternative efficiency which disclosed present net value, benefits to the local economy (jobs), and the sale viability showing value above base rates.

Alternative B-Modified has the least cost per acre of the two action alternatives. Since this alternative has the highest amount of commercial harvest it maximizes the benefits to the regional economy and jobs and total potential income. Trust funds can be expected to fund more vegetative treatment under this alternative. The anticipated value above base rates is positive, so the sale of commercial products is assumed to be viable (FEIS, Chapter 3, Table 3-62).

Climate Change and Carbon Sequestration - I recognize the agency's responsibility to consider climate change in making a decision to implement a project. I am also aware of climate science that suggests it is difficult to establish a cause-and-effect relationship between proposed actions and climate change at a project scale. Therefore climate change was not made an issue and no indicators were established for comparison of alternatives. The climate change and carbon section in the FEIS, Chapter 3 pp. 3-155 to 3-163 discloses how vegetation activities for this project relate to climate change adaptation strategies. Silvicultural actions in the Cobbler II project are designed to alleviate the chronic stress associated with high tree density levels, helping forest vegetation to deal with the direct effects of

warming temperatures and reduced precipitation, as well as indirect effects caused by climate-influenced disturbance processes.

The Intergovernmental Panel on Climate Change (IPCC) has summarized the contributions of global human activity sectors on climate change in their Fourth Assessment Report (IPCC 2007). The top three anthropogenic (human-caused) contributors to greenhouse gas emissions (from 1970-2004) are, respectively; fossil fuel combustion (56.6% of global total), deforestation (17.3%) and agriculture/waste/energy (14.3%). Their analysis of "deforestation" clearly focuses on land use conversions and large scale deforestation (removal of all trees) as the primary forestry-related issues (e.g. conversion of rainforest into agricultural land, conversion of forest into developed land). Cobbler II project activities do not fall within these main contributors of greenhouse gas emissions; project activities do not convert forested land into a developed condition and they do not deforest the land. Given the IPCC findings and the small scale and limited impacts of this project on vegetation cover, the incremental contribution to greenhouse gas (GHG) and climate change is so small it's not measurable and not significant (FEIS, Chapter 3, p. 3-155).

Another area of concern brought forward was consideration of potential carbon consequences of forest management activities. The forest carbon section in Chapter 3 of the FEIS pp. 3-159 to 3-163 reveals issues associated with carbon sequestration, carbon stocks and fluxes, and possible interactions between activities that will be expected to cause short-term reductions in carbon stocks (thinning and prescribed fire) in order to avoid potentially large carbon emissions from wildfire and other stand replacing disturbance processes in the future. An expected outcome of the Cobbler II project is provision of timber that could be then converted into durable wood products for house construction, or utilized as an energy source.

Based on the information regarding climate change and carbon storage and sequestration I believe that scale of effects from implementing Alternative B-Modified will immeasurable when considered at a global scale.

PUBLIC INVOLVEMENT

The public involvement process has gone through several stages. The Cobbler project was first presented to the public in the January 2008 edition of the Schedule of Proposed Actions for Umatilla National Forest. The Cobbler II Timber Sale and Fuels Reduction Project is basically a modification of the original Cobbler project that was prepared as an environmental assessment (EA) and issued to the public in May 2009. A decision notice and finding of no significant impact for the May 2009 EA was signed by the responsible official, Kevin D. Martin, Forest Supervisor, on May 18, 2009. This decision was appealed, and on July 29, 2009 Kevin D. Martin sent a memo to the Regional Forester to withdraw his May 18th decision.

On July 30, 2009, the Forest Service decided to revise the Cobbler EA and initiated the Cobbler II Timber Sale and Fuels Reduction Project EA and a scoping letter was sent out on November 20, 2009. Comments were received from the public on this revised EA.

In response to comments and concerns from the public that timber harvest and road building may change the character of undeveloped lands adjacent to the Wenaha-Tucannon Wilderness and the Grande Ronde inventoried roadless area (IRA), the Forest Service decided to prepare an environmental impact statement (EIS) for the Cobbler II project.

A notice of intent (NOI) to prepare an EIS by the Forest Service for the Cobbler II Timber Sale and Fuels Reduction Project was published in the Federal Register on February 5, 2010. A scoping letter for the EIS was sent to the mailing list of interested parties. The list included Federal, State, and local government agencies, Confederated Tribes of the Umatilla Indian Reservation, Nez Perce Indian Tribe, various organizations, and interested individuals (see project file for mailing list). Five responses were received, reviewed, and incorporated in the project file. On April 30, 2010 the Environmental Protection Agency (EPA) published a notice of availability (NOA) for the draft environmental impact statement (DEIS) in the Federal Register beginning the 45-day comment period. The legal notice requesting comments on the DEIS was published in the East Oregonian (newspaper of record) on May 2, 2010.

Eight responses were received during the 45-day comment period on the DEIS. Public comments and Forest Service responses from the original EA are located in Appendix G of the FEIS and comments and Forest Service responses on the DEIS are located in Appendix I of the FEIS. Based on comments received additional information has been incorporated in FEIS. I have also taken the comments received into consideration as I made my decision for the Cobbler II project.

ALTERNATIVES CONSIDERED

The FEIS considered ten alternatives, three were analyzed in detail and seven were considered but eliminated from detailed study for reasons stated in the FEIS, Chapter 2, pp. 2-36 to 2-39. A detailed description of the three alternatives analyzed in detail can be found in the FEIS, Chapter 2, pp. 2-10 to 2-35. A comparison of these alternatives by activity, issues, and purpose and need can be found in the FEIS, Chapter 2, pp. 2-40 to 2-47 in Tables 2-10, 2-11, and 2-12. I have determined that there is adequate information to make a reasoned choice among alternatives.

Below is a summary of the alternatives considered in detail, see FEIS, Chapter 2 for additional information.

Alternative A (No Action)
The theme of the No Action alternative was to allow current biological and ecosystem processed to continue with the associated risks and benefits, and to provide a baseline for comparison with other alternatives. With implementation of this alternative, all activities identified in the proposed action would not be approved to occur in Cobbler II project planning area. Previously approved ongoing activities such as domestic cattle grazing, fire protection, firewood cutting, recreation, and road maintenance would continue.

Reasons For Not Selecting Alternative A (No Action)
I considered, but did not select Alternative A, the no action alternative. No action at this time will allow forest stands to continue to increase in density of late seral species and become more susceptible to insect, disease, and fire damage. Multi-layered stands will continue to increase while single-layered stands will decrease. Old forest stands will be at risk of becoming more multi-layered (FEIS, Chapter 3, p. 3-54). I find that the no action alternative fell short of addressing the stated purpose and need for this project, and that it would be an irresponsible course of action to do nothing at this time.

Alternative B – Proposed Action and Preferred Alternative

- Commercially harvest approximately 2,500 acres using logging systems that include the following: conventional ground based tractor (380 acres), harvester/forwarder (1,888 acres) and skyline (172 acres) ,
- Activity and natural fuel treatments in harvest units on 2,500 acres using a variety of treatments,
- Reforestation of 340 acres,
- Roads used for project activities include 50 miles of open system roads 40 miles of gated closed system road used and then reclosed, about 1.5 miles of seasonally open roads, and approximately 0.25 miles of new road construction which will become a closed road after project activities and approximately 0.20 miles of temporary road construction decommissioned subsequent to use,
- Danger trees will be removed along all haul routes and trailheads. Danger trees located within defined riparian habitat conservation areas (RHCAs) will be cut and left to provide additional coarse woody debris. All other danger trees will be removed and sold as part of a timber sale, if economically feasible,
- Landscape prescribed burning on about 8,000 acres,
- Hardwood restoration of aspen, black cottonwood, and mountain mahogany on approximately 23 sites (115 acres). Restoration will include release from conifers and construction of protective fencing,
- Meadow restoration on an estimated 275 acres. Restoration work includes cutting small conifers and burning the meadows to rejuvenate vegetation and reduce conifer encroachment,
- Non- commercial thinning on about 1,900 acres outside of commercial harvest units, and
- Forest Plan amendment to change acres in management area allocations in D2-Research Natural Area, E2-Timber and big Game, and A9-Special Interest Area to allow for restoration of existing aspen stands.

Alternative C

- Commercially harvest approximately 1,300 acres using logging systems that include the following: conventional ground based tractor (330 acres), harvester/forwarder (870 acres) and skyline (100 acres),
- Activity and natural fuel treatments in harvest units on 1,300 acres using a variety of treatments,
- Reforestation of 295 acres,
- Roads used for project activities include 50 miles of open system roads 30 miles of gated closed system road used and then reclosed, 1.5 miles of seasonally open roads, approximately 0.25 miles of new road construction which will become a closed road after project activities, and no temporary road construction,
- Danger trees would be removed along all haul routes and trailheads. Danger trees located within defined riparian habitat conservation areas (RHCAs) would be cut and left to provide additional coarse woody debris. All other danger trees would be removed and sold as part of a timber sale, if economically feasible,
- Landscape prescribed burning on about 8,000 acres,
- Harwood restoration of aspen, black cottonwood, and mountain mahogany on approximately 23 sites (115 acres). Restoration would include release from conifers and construction of protective fencing.
- Meadow restoration on an estimated 275 acres. Restoration work includes burning the meadows to rejuvenate vegetation and reduce conifer encroachment,
- Non- commercial thinning on about 1,900 acres outside of commercial harvest units, and
- Forest Plan amendment to change acres in management area allocations in D2-Research Natural Area, E2-Timber and big Game, and A9-Special Interest Area to allow for restoration of existing aspen stands.

Reasons For Not Selecting Alternative C

I considered, but did not select Alternative C because it is not as responsive to the need to improve health, vigor, and resiliency of stands in the area, nor reduce fuel loads as compared to my decision of selecting Alternative B-Modified. Alternative C would not reduce any late seral ingrowth in stands currently dominated by trees 21 inches diameter at breast height (DBH) or greater in the project area (FEIS, Chapter 3, pp. 3-54 to 3-55). Both alternatives (B-Modified and C) considered and applied current science in developing design features with the intent to lessen negative effects to the environment. Current science (FEIS, Literature Citations) was also used to help predict the effects to the environment, and the FEIS clearly discloses the positive and negative effects of all alternatives in Chapter 3. Considering these details, I believe Alternatives B-Modified and C would provide sufficient safeguards to protect the environment from unnecessary degradation. I recognize Alternative C does address the purpose and need but on fewer acres than Alternative B-Modified (FEIS, Chapter 2, Table 2-11). I believe that Alternative B-Modified best balances the purpose and need and protects the environment.

Reasons For Not Selecting Other Alternatives

I considered seven additional alternatives for this project. Some of the alternatives were requested for consideration in response to scoping, and after the comment period. See the FEIS, Chapter 2, pp. 2-36 to 2-39 for reasons why these alternatives were considered but eliminated from detailed study.

FINDINGS REQUIRED BY OTHER LAWS AND REGULATIONS

Forest Service Interim Direction on Activities in Inventoried Roadless Areas - Cobbler II project activities in the Grande Ronde IRA are consistent with Forest Service interim direction.

On May 28, 2009, the U.S. Department of Agriculture, Office of the Secretary, issued a Memorandum (1042-154) reserving to the Secretary, Thomas Vilsack, final decision authority over the construction and reconstruction of roads and the cutting, sale, or removal of timber in inventoried roadless areas on certain lands administered by the Forest Service.

On August 3, 2009, a memo from Joel D. Holtrop, Deputy Chief, National Forest System informed Regional Foresters et al. that the Forest Service had received re-delegation of authority from the Secretary to authorize:

a) Approval of any necessary timber cutting or removal or any road construction/reconstruction in emergency situations involving wildfire suppression, search and rescue operation, or other imminent threats to public health and safety in inventoried roadless areas. The local line officer is delegated authority to make these decisions.

b) Approval of any timber cutting, sale, or removal in inventoried roadless areas incidental to implementation of an existing special use authorization. Road construction/reconstruction is not authorized.

On October 16, 2009 a memo from Joel D. Holtrop, Deputy Chief, National Forest System to Regional Foresters et al. that on October 2, 2009 the Secretary re-delegated authority to the Forest Service for the cutting, sale, or removal of generally small diameter timber when needed for one of the following purposes:

c) To improve threatened, endangered, proposed, or sensitive species, habitat, or

d) To maintain or restore the characteristics of ecosystem composition and structure, such as to reduce risk of uncharacteristic wildfire effects within the range of variability that will be expected to occur under natural disturbance regimes of the current climate period; or
e) For administrative and personal use, as provided for in Title 36, CFR 223.

Landscape prescribed burning within the Grande Ronde IRA will require the construction of handline which will include the cutting of some small diameter trees, snags that pose a hazard to workers, and the limbing-up (pruning) of other trees incidental to prescribed burning activities. Trees cut during handline construction will not be removed from the site. This activity will be consistent with purpose (d) as listed in the October 16th memo. The activity of danger tree removal along haul routes will be consistent with purpose (a) in the August 3rd memo, by responding to imminent threats to public safety.

National Historic Preservation Act –Heritage surveys have been completed. State Historic Preservation Office consultation will be conducted under the Programmatic Agreement among the United States Department of Agriculture, Forest Service, Pacific Northwest Region (Region 6), the Advisory Council on Historic Preservation, and Washington State Historic Preservation Officer regarding Cultural Resource Management on National Forests dated April 1997. Identified sites and any newly recorded sites will be protected from all project activities associated with Cobbler II Timber Sale and Fuels Reduction Project (FEIS, Chapter 2, Table 2-6). Because heritage resources will not be affected by proposed activities under the selected alternative, there will be no effect to any historic property listed in or eligible to the National Register of Historic Places.

Endangered Species Act (ESA) and Regional Forester's Sensitive Species – Environmental effects of implementing the selected alternative are in compliance with the ESA and Regional Forester's Sensitive Species list. The Endangered Species Act requires protection of all species listed as "Threatened" or "Endangered" by Federal regulating agencies (Fish and Wildlife Service and National Marine Fisheries Service).

Biological Evaluations and Assessments have been completed for all Threatened, Endangered and Sensitive (TES) plant, aquatic, and terrestrial wildlife species. Determinations were made that none of the proposed actions will adversely affect, contribute to a trend toward Federal listing, nor cause a loss of viability to listed plant, fish, and animal populations or species. Details are found in the FEIS, Chapter 3 in the Fisheries (p. 3-43), TES Plants (p. 3-86), and Wildlife (p. 3-111) sections.

Consultation has been completed prior to signing a decision. Agreement of findings includes Chinook Salmon Essential Fish Habitat (EFH), which satisfies requirements under the Mangnuson-Stevens Fishery Conservation and Management Act. Letters of concurrence from United States Department of Interior(USDI) Fish and Wildlife Service (March 31, 2009) and National Marine Fisheries Service (May 7, 2009) and a letter of informal conference from USDI Fish and Wildlife Service on proposed critical habitat for Bull Trout (September 24, 2010) are located in the project file. USDI Fish and Wildlife Service is the Federal regulating agency for Federally listed Bull Trout and proposed critical habitat for Bull Trout. National Marine Fisheries service is the Federal regulating agency for Federally listed Snake River Basin steelhead, Snake River fall-run Chinook salmon, and Snake River spring/summer run Chinook salmon, or their designated critical habitats, and for essential fish habitat (EFH) assessment under the Magnuson-Stevens Fishery Conservation and Management Act (MSA).

Clean Air Act - All proposed prescribed burning will be conducted in compliance with National Ambient Air Quality Standards and Oregon Department of Environmental Quality (ODEQ) regulations and restrictions contained in the Oregon Smoke Management Plan (ODEQ Directive 1-4-1-601). Fuel treatments can be timed to minimize the impacts of smoke on forest users and local communities. An operator's burn plan is developed prior to ignition. On site weather conditions are monitored before,

during, and after an ignition. Ocular smoke observations are made throughout the ignition phase. Residual smoke is monitored for dispersion and direction. No ignitions will occur if there is an air stagnation advisory in place within the northeast Oregon geographic area. No ignitions will occur if existing or forecast conditions will transport measurable smoke into downwind communities. The removal and direct treatment of biomass will reduce emissions should a wildfire occur. The effect of smoke under any action alternative will be short term and restricted to dispersed campgrounds. Particulate matter is not expected to exceed standards in the communities of concern (Elgin, Troy and Eden Bench area). See Air Quality analysis and impacts within the Grande Ronde Wild and Scenic River Corridor (FEIS, Chapter 3, pp. 3-76 to 3-79).

Clean Water Act – Cobbler II Timber Sale and Fuels Reduction project is in compliance with the Clean Water Act with implementation of any action alternative (FEIS, Chapter 3, pp. 3-22 to 3-23). The Clean Water Act requires that water quality standards be developed to protect beneficial uses and a list be developed of water quality impaired streams (303d list). The most recent water quality assessment and 303d list of impaired waters in the Grande Ronde Basin is found in Oregon's 2004/2006 Integrated Report. None of the streams in the Cobbler II project planning area are found on this list (FEIS, Chapter 3, pp. 3-14 to 3-15).

Design features (FEIS, Chapter 2, Table 2-6) and site-specific best management practices (BMPs) (FEIS, Appendix D) will control disturbance that could lead to erosion and sedimentation. Effects of proposed actions will not adversely or measurably affect water temperature or dissolved oxygen (DO) (FEIS, Chapter 3, p. 3-23).

Wilderness Act, 1964- All acres (177,469) within the Wenaha-Tucannon Wilderness will remain as wilderness with implementation of any alternative. Proposed activities occurring adjacent to Wenaha-Tucannon Wilderness will not impact any of the qualities needed to be consistent with those listed in the definition of wilderness as stated in the 1964 Wilderness Act from Section 2(c). Environmental effects will be fully consistent with Forest Plan management area allocation (B1-Wilderness) standards and guidelines, and will not impair the values for which the wilderness was created (FEIS, Chapter 3, pp. 3-133 to 3-136).

Prime Farmland, Range Land and Forest Land - No adverse effects on any prime farmland, range land and forest land not already identified in the Final FEIS for the Forest Plan will be expected to result from implementation of the selected alternative (FEIS, Chapter 3, p. 3-164).

Civil Rights, Women and Minorities - No adverse effects on civil rights, women, and minorities not already identified in the FEIS for the Forest Plan will be expected to result from implementation of any alternative. Alternatives B-Modified will be governed by Forest Service contracts, which are awarded to qualified contractors and/or purchasers regardless of race, color, sex, religion, etc. Such contracts also contain nondiscrimination requirements (FEIS Chapter 3, p. 3-164).

Treaty Trust Responsibilities - In this analysis, the primary focus of the Federal government trust responsibility is the protection of the treaty rights and interests that tribes reserve on land included in this project. Both the Nez Perce Tribe and the Confederated Tribes of the Umatilla Indian Reservation have treaty rights and interests in the Cobbler II project planning area. General concerns expressed on past projects are the potential effects on fish habitat and populations and water quality, which are key components of aquatic habitat, and the protection of archaeological sites and traditional cultural properties (FEIS, Chapter 3, p. 3-164).

Floodplains and Wetlands - Executive Orders 11988 and 11990 - Executive Order (EO) 11988 requires the Forest Service to avoid “to the extent possible the long and short term adverse impacts associated with

the occupation or modification of floodplains…" Alternative B-Modified will avoid all floodplains and affects to floodplains, and are consistent with this EO (FEIS, Chapter 3, p. 3-165).

Executive Order (EO) 11990 requires the Forest Service to "avoid to the extent possible the long and short term adverse impacts associated with the destruction or modification of wetlands." Alternative B-Modified will avoid all wetlands and affects to wetlands, and are consistent with this EO.

Municipal Watersheds - There is no de-facto or designated municipal watershed in Cobbler II project planning area (FEIS, Chapter 3, p. 3-165).

Energy Requirements - No adverse effects on energy requirements will be expected to result from implementation of the selected alternative (FEIS, Chapter 3, p. 3-165).

Public Health and Safety - Public health and safety will be improved with Alternative B- Modified removing danger trees along haul routes and trailheads within Cobbler II project planning area (FEIS, Chapter 3, p. 3-165).

Environmental Justice - Executive Order 12898 requires that Federal agencies adopt strategies to address environmental justice concerns within the context of agency operations. With implementation Alternative B-Modified, there will be no disproportionately high and adverse human health or environmental effects on minority or low-income populations. The actions will occur in a remote area and nearby communities will mainly be affected by economic impacts related to contractors implementing harvest, non-commercial thinning, planting, fuels treatment, and burning activities. Racial and cultural minority groups could be prevalent in the work forces that implement these activities. Contracts contain provision clauses which address worker safety (FEIS, Chapter 3, p. 3-165).

NATIONAL FOREST MANAGEMENT ACT (NFMA) AND FOREST PLAN CONSISTENCY

National Forest Management Act - As disclosed in the FEIS, Chapter 3, p. 3-61 under the heading Findings of Consistency, both action alternatives (Alternatives B and C) will provide timber to help meet the demand for wood products and provide socioeconomic benefits to the American people. The selected alternative (Alternative B-Modified) will harvest more wood products than Alternative C, and the economic value from those products, thereby, contributing to a portion of the Forest Plan's allowable sale quantity (FP, Chapter 4).

Timber harvest silvicultural activities in Cobbler II Timber Sale and Fuels Reduction Project are consistent with the National Forest Management Act (NFMA), 16, U.S.C. Section 1604 (g) (3) (E) (i) through (iv) and F(i) and (iii) (FEIS, Chapter 3, pp. 3-61 to 3-62). As required by NFMA Section 1604 (i), I find this project to be consistent with the Forest Plan (Chapter 2 of the FEIS discloses information on the activities proposed in each alternative along with design features, and Chapter 3 discloses information on the environmental effects of implementing these activities and the findings of consistency with the Forest Plan and applicable laws, regulations, and policies).

Umatilla Land and Resource Management Plan (Forest Plan) - This decision to implement timber harvest to improve species composition, structural diversity, stocking densities and reduce fuels, and other proposed activities such as hardwood and meadow restoration, landscape prescribed burning, non-commercial thinning, and danger tree removal is consistent with the intent of the Forest Plan's long term goals and objectives (Forest Plan (FP), pp. 4-1 to 4-3 and 4-15 to 4-46). This project was designed in

conformance with Forest Plan standards and incorporates appropriate guidelines for soils, wildlife habitat, riparian and fisheries habitat, vegetation, water quality, fuels, air quality, pest management, threatened, endangered, and sensitive species, visual resources, wild and scenic rivers and management area guidelines (FP pp. 4-47 to 4-195).

The effects of implementing project activities in the selected alternative, including the non-significant amendment discussed below, is consistent with the Umatilla National Forest Land and Resource Management Plan Final Environmental Impact Statement, Record of Decision, the accompanying Land and Resource Management Plan, (USDA Forest Service 1990), dated June 11, 1990, as amended (FEIS, Chapter 3, pp.3-10, 3-23, 3-43, 3-61, 3-79, 3-84, 3-86, 3-117, 3-120, 3-122, 3-124, 3-126, 3-129, 3-136, 3-146, 3-152, and 3-155).

My decision on this project is based on a review of the record that shows consideration of relevant scientific information, best available science, including responsible opposing views, and as appropriate, the acknowledgement of incomplete or unavailable information, scientific uncertainty, and risk. As required by NFMA (see section above), I find this project to be consistent with the Forest Plan (including the following non-significant amendment discussed below).

FINDING OF NON-SIGNIFICANT AMENDMENT

Implementation of Alternative B-Modified requires an amendment to the Forest Plan by the Forest Supervisor. The Umatilla Land and Resource Management Plan (Forest Plan) will be amended to reallocate acres in management area allocations D2- Research Natural Area, E2- Timber and Big Game, and A9-Special Interest Area to allow for restoration and preservation of existing aspen stands. In management area A9, tree cutting and vegetation management may be permitted in order to maintain or enhance the special features of the interest area, to provide for public safety, to construct or maintain improvements, or in a catastrophic situation (Forest Plan (FP) p. 4-133). Management area allocation D2 does not allow any cutting or removal of vegetation, except as part of an approved scientific investigation (FP p. 4-176). In management area E2 timber will be managed on a scheduled basis (FP p. 4-184). Changes to the Forest Plan are detailed in the FEIS, Chapter 2, p. 2-23.

Elk Flats Meadow (70 acres) which is currently designated as management area D2 as a proposed research natural area (RNA) candidate will be reallocated to management area A9- Special Interest Area, in order to allow vegetation management, such as fencing and removal of competing conifers to maintain, preserve, and or enhance existing aspen stands and encourage aspen regeneration. Elk Flats Meadow is the largest aspen site on Walla Walla Ranger District and is one of the largest sites in the Blue Mountains. Aspen clones on this site are severely declining (Powell 2007b, Spiegel 2003, Schmitt 1999, Crowe 1998, Schmitt 1992) (FEIS, Chapter 3, p. 3-51). In the same vicinity, an adjacent portion of management area E2-Timber-Big Game (30 acres) which is primarily comprised of meadows will be reallocated to A9, and a small area of D2 (10 acres) that does not contain hardwood stands or have any special interest features will be reallocated to management area E2.

Changes to the Forest Plan would be made on page 4-175 under the "Description" heading which now reads "*Eight areas have been identified and are managed as research natural areas. Three (Pataha, Rainbow Creek, and Wenaha Breaks*[3]*) have been established by the Chief's order. The other five candidate areas are Elk Flats Meadow, Kelly Creek Butte, Mill Creek Watershed, Vinegar Hill, and Birch*

[3] A decision to amend the Forest Plan and a Designation Order to establish Wenaha Breaks as a designated RNA were signed July 29, 2008.

Creek Cove." The Forest Plan would be amended to read "*Seven areas have been identified and are managed as research natural areas. Three (Pataha, Rainbow Creek, and Wenaha Breaks) have been established by the Chief's order. The other four candidate areas are Kelly Creek Butte, Mill Creek Watershed, Vinegar Hill, and Birch Creek Cove.*" It would also amend the Forest Plan on page 4-131, under A9-Special Interest Area, to include the addition of Elk Flats Meadow (Walla Walla) under the description of Botanical Areas. This amendment would last beyond project duration and would remain in effect until the Forest Plan is revised.

This decision will include the amendment and document the significance of the amendment.

This plan amendment is being prepared under the 2000 Planning Rule as amended with transition wording at 36 CFR 219.35 that allows the use of the 1982 rule procedures. [See 65 FR 67568, Nov. 9, 2000, as amended at 66 FR 1865, Jan. 10, 2001; 66 FR 27554, May 17, 2001; 67 FR 35434, May 20, 2002; 68 FR 53297, Sept. 10, 2003; 69 FR 58057, Sept. 29, 2004]. The 1982 rule and the 2000 rule as amended are available online at http://www.fs.fed.us/emc/nfma/2000_planning_rule.html

Direction on amending Forest Plans is found in Forest Service Manual 1920, Subsection 1926.5. Forest Service Manual 1926.51 lists four changes to the Forest Plan that may not be significant when those changes result from:

(1) Actions that do not significantly alter the multiple-use goals and objectives for long-term land and resource management.

This criterion concerns analysis of the overall Forest Plan and the various multiple-use resources that may be affected. This Forest Plan amendment changes management area allocations as listed in the FEIS, Chapter 2, Table 2-5 below, also see the map in Appendix A of the FEIS entitled Other Activities Common to both Alternatives.

Table 2-5 Management Area Changes with Forest Plan Amendment

Present Management Area Allocation	Forest Plan Amendment Reallocated to	Acres Reallocated
D2 - Research Natural Area (Elk Flats Meadow)	A9 - Special Interest Area	70
E2 - Timber and Big Game (aspen stands)	A9 - Special Interest Area	30
D2 - Research Natural Area	E2 - Timber and Big Game	10
Total		**110**

In the project planning area management area D2 will decrease by about 80 acres, management area A9 will increase by 100 acres and management area E 2 will decrease by 20 acres.

This amendment increases the acres of land not scheduled for timber harvest by 20 acres, both management areas D2 and A9 do not allow timber harvest. Management area E2 which does allow timber to be managed on a scheduled basis will be reduced by 20 acres. This reduction of 20 acres is minor (well less than one percent) as compared to the approximately 618,000 acres that were considered suitable for timber production in the Forest Plan (FP p. 4-16). It will not result in a measurable decrease in the amount of wood products offered to communities across the forest in the foreseeable future. In addition, the changes in land allocations (management emphasis) will not change or require future changes to livestock grazing permits, mining plans of operations, and the access and travel management plan for the Walla Walla Ranger District (FEIS, Chapter 3, p. 3-59). As such, the anticipated changes brought about by this amendment in the levels of resource activities and outputs (FP, p. 4-16) projected for this planning period are not expected to be measurable.

There is no risk to water quality from the Forest Plan amendment to change management allocations of Elk Flats Meadow RNA to a Special Interest Area (FEIS, Chapter 3, p. 3-19) and will have no effect to old forest stands (FEIS, Chapter 3, p. 3-90). This amendment will allow a few dead trees to be cut where they are intermixed with aspen, but the effect will be minor because of the high density of snags in that area (FEIS, Chapter 3, p. 3-103). Hardwood protection will benefit species such as Williamson's sapsuckers. This amendment will be beneficial to lynx because it will maintain or create habitat for key lynx prey species such as snowshoe hare and grouse (FEIS, Chapter 3, p.3-105).

(2) Adjustments of management area boundaries or management prescriptions resulting from further on-site analysis when the adjustments do not cause significant changes in the multiple-use goals and objectives for long-term land and resource management.

Elk Flats Meadow is currently identified as Forest Plan management area D2- Research Natural Area. Elk Flats Meadow was site-specifically evaluated by Forest Service ecologists who determined that this site should not be recommended for official designation as an established RNA, but that designating the site as a "special interest area" might provide more options to sustain aspen (Johnson 2000) (FEIS, Chapter 1, p. 1-3 and Chapter 3, p. 3-52).

Elk Flats Meadow (70 acres) which is currently designated as management area D2 as a proposed research natural area candidate will be reallocated to management area A9- Special Interest Area, to allow vegetation management, including cutting and leaving of trees, in order to maintain, preserve and or enhance existing aspen and encourage aspen regeneration (FEIS, Chapter 3, p. 3-59 and 3-60). In the same vicinity, an adjacent portion of management area E2 (30 acres) which is primarily comprised of meadows will be changed to A9, and a small area of D2 (10 acres) that does not contain hardwood stands or have any special interest features will be changed to management area E2 (see FEIS, Chapter 2, pp. 2-23 and map entitled Other Activities Common to Both Alternatives in Appendix A).

The planning area of Umatilla National Forest is 1.4 million acres. The reallocation of 110 acres is insignificant in the context of the entire planning area. This amendment will last beyond project duration and will remain in effect until the Forest Plan is revised.

(3) Minor changes in standards and guidelines.

There will be no changes to any Forest Plan standards and guidelines. This amendment will reallocate acres of Forest Plan management areas to be representative of existing conditions and allow for the management of aspen stands in Elk Flats Meadow. Forest Plan management area A9 – Special Interest Area allows for the management of existing aspen stands. Timber harvest will not be scheduled in this management area (A9), but tree cutting and vegetation management may be permitted in order to maintain or enhance the special features of the interest area (FEIS, Chapter 3, p. 3-60).

(4) Opportunities for additional projects or activities that will contribute to achievement of the management prescription.

No additional management practices are included in this Forest Plan Amendment. This amendment does not apply to any other areas outside the Cobbler II project planning area. The Forest Plan amendment will only affect approximately 110 acres across the 34,000 acre project planning area. Also see response to (2) above.

FINDING: On the basis of the information and analysis contained in the FEIS and all other information available as summarized above, it is my determination that adoption of the management direction reflected in my decision does not result in a significant amendment to the Forest Plan.

ENVIRONMENTALLY PREFERRED ALTERNATIVE

In this Record of Decision I have described the selected alternative (Alternative B-Modified) and given rationale for its selection. Based upon the description of alternatives and associated analysis detailed in the FEIS. I believe Alternative B-Modified is the environmentally preferred alternative. My rationale is as follows:

- It allows for treatment on more acres to meet and fulfill the purpose and need for the project with regard to stand densities, species composition, and forest stand structural class,
- it reduces ground and ladder fuels and allows fire to return to the Grande Ronde canyon,
- it consistent with Forest Plan goals and objectives, Forest Service policy, and applicable laws, rules, and regulations,
- it allows for commercial harvest of forest products for community economic well-being while protecting biological, physical, and social resources in the area, and
- the decision made reflects consideration of the viewpoints expressed by the public and professional land managers.

ADMINISTRATIVE REVIEW AND APPEAL PROCESS AND RIGHTS

This decision is subject to administrative review (appeal) pursuant to 36 CFR 215. The appeal must be filed (regular mail, fax, email, hand-delivery, or express delivery) with the Appeal Deciding Officer: Mary Wagner, Regional Forester, USDA Forest Service, ATTN: Appeals Office, P.O. Box 3623, Portland, Oregon 97208-3623. The location for hand-delivery or express delivery is: 333 SW 1st Ave, Portland, Oregon 97204-3440. Send faxes to: 503-808-2339. The office business hours for those submitting hand-delivered appeals are: 7:45 a.m. to 4:30 p.m. Monday through Friday, excluding holidays. Electronic appeals must be submitted in a format such as an email message, plain text (.txt), rich text format (.rtf), or Word (.doc) to:

appeals-pacificnorthwest-regional-office@fs.fed.us.

It is the responsibility of persons providing comments by electronic means to ensure that their comments have been received. In cases where no identifiable name is attached to an electronic message, a verification of identity will be required. A scanned signature is one way to provide verification.

Appeals, including attachments, must be filed within 45 days from the publication date of the legal notice of decision in the *East Oregonian*, our newspaper of record. Appeals and/or attachments received after the 45 day appeal period will not be considered. The publication date in the *East Oregonian* is the exclusive means for calculating the time to file an appeal (36 CFR 215.15 (a)). Those wishing to appeal this decision should not rely upon dates or timeframe information provided by any other source.

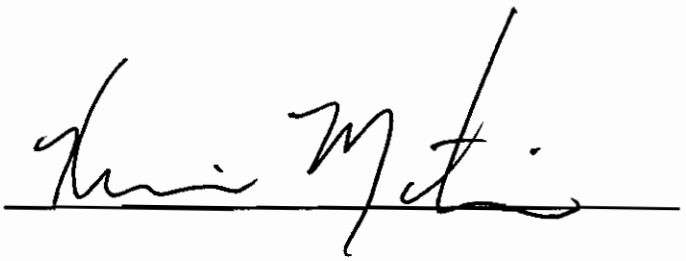
Individuals or organizations who provided comments or otherwise expressed interest in this project by the close of the comment period specified at 36 CFR 215.6 may appeal this decision. The notice of appeal must meet the appeal content requirements at 36 CFR 215.14.

IMPLEMENTATION DATE

If no appeals are received within the 45-day appeal filing time period (see Appeal Process and Rights, (above), implementation of the decision may occur on, but not before, 5 business days from the close of the appeal filing period. If appeals are filed, implementation may occur on, but not before, the 15th business day following the date of the last appeal disposition.

CONTACT

For additional information concerning this decision or the Forest Service appeal process, contact Betsy Kaiser, Project Team Leader, Umatilla National Forest, Walla Walla Ranger District, 1415 West Rose, Walla Walla, WA 99362 or call (509) 522-6290.



10/8/10

KEVIN D. MARTIN
Forest Supervisor
Umatilla National Forest

Date