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**DECISION NOTICE
and
FINDING OF NO SIGNIFICANT IMPACT and
FINDING OF NON-SIGNIFICANT FOREST
PLAN AMENDMENTS**

Fire Amendment

Rogue River-Siskiyou National Forest

***Douglas, Klamath, Jackson, Curry, Coos, and Josephine Counties in Oregon
Del Norte and Siskiyou Counties in California***

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DECISION NOTICE

FINDING OF NO SIGNIFICANT IMPACT and FINDING OF NON-SIGNIFICANT AMENDMENT

Fire Amendment

I. INTRODUCTION

This Decision Notice (DN), Finding of No Significant Impact (FONSI) and Finding of Non-significant Amendment describe my decision, the reasons behind my decision and findings regarding Forest Plan Amendments for Use of Wildland Fire on the Rogue River–Siskiyou National Forest. My decision and findings are based on the Environmental Assessment (EA) – Fire Amendment dated October 2010, which documents the results of an environmental analysis of a proposal to amend the existing Land and Resource Management Plans. This EA was prepared by an interdisciplinary team and is available on the Rogue River-Siskiyou National Forest website: www.fs.fed.us/r6/rogue-siskiyou/projects/planning/index.shtml.

Background

Fire suppression continues to become more complex and expensive with each passing year. Over the last 20 to 30 years large, unwanted wildland fires have occurred more frequently, grown to record setting sizes, and burned with higher severities than in the past (Westerling et al. 2006). This has caused undesirable changes in the composition and structure (age and size) of forest and rangeland vegetation. Wildfires have consumed increasingly large areas of western U.S. forests in recent years, and fire-fighting expenditures by federal land-management agencies now regularly exceed \$1 billion/year (Whitlock 2004). Hundreds of homes are burned annually by wildfires, and damages to natural resources are sometimes extreme and irreversible. Media reports of recent, very large wildfires (>100,000 ha or 250,000 acres) burning in western forests have garnered widespread public attention, and a recurrent perception of crisis has galvanized legislative and administrative action (Westerling et al. 2006).

A few of the primary factors responsible for the increased size, intensity and severity of wildland fires are: 1) fire exclusion in forested ecosystems, which has led to uncharacteristically high fuel loadings, 2) highly successful suppression that has resulted in most large fires burning under extreme conditions, and 3) a general warming and drying trend in climate since the mid-1970s that has extended the length of the fire season. In addition, past silvicultural practices that emphasized even-aged management and favored faster-growing species resulted in a shift toward tree species that are more sensitive to fire and landscape patterns that have tended to promote fire spread (Westerling et al. 2006).

These changes have resulted in a greater threat to forest resources, infrastructure, private property and human life, including firefighters. More people are recreating on national forests and building homes in wildland interface areas, increasing their exposure to the risks of wildland fires that require aggressive and complex suppression efforts. In addition, large amounts of suppression funds are being spent to control fires in areas with low resource value and with little risk to human life and private property. In some of these cases, fires are being suppressed that actually would benefit resources and/or enhance the ability to protect private property and resources.

Forest Plan Background

A Land and Resource Management Plan (or Forest Plan) is a dynamic management scheme that provides integrated direction reflecting decisions, plans, and assessments made at various scales and times. It describes desired conditions, goals, objectives, standards, and guidelines--collectively referred to as "management direction" for a National Forest. The changes in fire management direction in these proposed amendments to the two Forest Plans that provide guidance for the Rogue River-Siskiyou National Forest (RRSNF) would add, delete, and modify fire related items of this programmatic direction. Appropriately reintroducing fire (as one of many land management tools) into ecosystems is expected to help land managers achieve the desired conditions described in the existing Forest Plans, as amended.

At this time, the RRSNF is operating under guidance from two Land and Resource Management Plans (LRMP); one for the Rogue River National Forest (1990) and the other for the Siskiyou National Forest (1989). When these LRMPs were developed, language regarding fire management was fairly vague and the overall emphasis was on providing wood products to meet high demand. The plans recognize the potential for resource benefits from naturally-ignited fires within designated Wilderness Areas, but not for the remainder of the Forest.

Since the Forest Plans were approved, there have been several changes in Forest Service land management emphasis and fire management policy that allow for increased flexibility in managing naturally ignited wildland fires. These proposed plan amendments would allow the Rogue River-Siskiyou National Forest to take full advantage of these policy and management direction changes.

In addition, since these plans were formulated, new information has provided managers with a greater understanding of fire's natural or historical role on the RRSNF landscape. Watershed Analyses have been conducted on nearly every fifth field watershed on the Forest (1995-1999); many of these have been updated or revised since their development. Late-Successional Reserve Assessments which include Southwest Oregon (1995), Mt. Ashland (1996), South Cascades (1998), and a Forest-wide Klamath NF Assessment (1998) (which includes part of the RRSNF) have been developed, and in some cases, updated. These landscape-level analyses identify fire-adapted ecosystems on the Forest that are in a condition that threatens their long-term resiliency, integrity, and sustainability. These assessments, along with additional studies referenced in EA Appendix D, document the importance of wildland fire as an ecological process.

The resulting Forest Plan amendments from this decision have been designed to clarify management direction related to fire management and have both plans utilize the same language and direction, until the Forest Plans are revised. Currently the Forest's LRMP is anticipated to be revised in 3-5 years; however revision could be pushed back longer than this due to funding issues and other delays.

What These Amendments Are and What They Do

This Forest Plan Amendment EA is a programmatic document that will modify and clarify some wording within the Plans. It amends the plan to expand the decision space of fire managers to allow consideration of the use of wildland fire to meet Forest Plan goals, objectives, and desired conditions.

The term "use of wildland fire" is a new term meaning the management of wildfire or prescribed fire to meet objectives in land and resource management plans. Because prescribed fire is

already authorized for the Rogue River-Siskiyou National Forest, these amendments only add the authority to manage wildfires to meet resource objectives to the LRRMPs. Current LRRMP direction regarding prescribed fire remains unchanged.

The Amendments remove direction that constrains decision space, has no clear tie to desired condition, and conflicts between the two Plans. The amendments will help make it possible for the Forest-wide Fire Management Plan to lay out criteria for a set of circumstances and sideboards that are evaluated through WFDSS, the Wildland Fire Decision Support System. WFDSS is an integrated, web-based system used by fire managers during fire incidents, that helps to aid in and document the decision making process. Forest Plan desired conditions, goals, and objectives do not change with these amendments, and thus, environmental consequences predicted by the Plans do not change.

During the objection review process, I was asked to clarify how and when fire managers might make the decision to allow the use of wildland fire. While these decisions are highly variable, the following factors are considered by fire managers prior to and during use of wildland fire operations:

- Firefighter and Public Safety – the ability to keep people safe at all times is of key importance to managers;
- Time of Year – when (month and day) the unplanned fire is ignited, how much time is left in fire season, and weather predictions help fire managers determine if an unplanned fire can meet resource objectives;
- Location – the unplanned fire’s proximity to the forest boundary, to private lands, to archaeology sites, to ongoing operations (like timber sales) and overall proximity to other capital investments on the forest;
- Availability of firefighting resources – are there resources available should conditions change or are all resources across the region committed;
- Predicted fuel conditions – local knowledge of fuel moistures and fuel profiles in the area where the fire ignites;
- Air quality – smoke management concerns for public Airsheds; and,
- Socio-political climate – ongoing analysis of local, state, regional, and national concerns.

All of these factors go in to management’s confidence and risk assessment regarding the ability to meet resource objectives.

What these plan amendments are not and what they do not do:

These Forest Plan Amendments do not authorize any specific project-level activities or additional types of response actions. The types of response actions that can take place on a wildland fire, such as fireline construction, burning out, monitoring, and so forth, remain unchanged from the response actions already allowed. As such, the effects of those activities remain unchanged with respect to those discussed under the original Forest Plan FEIS, as amended by the Northwest Forest Plan.

As stated in the Environmental Assessment, these amendments do not imply a ‘let it burn’ or no response strategy to unplanned fire. All fires, whether planned or unplanned, will be responded to in an appropriate manner. These amendments allow fire managers to consider an additional tool in managing a fire, should that fire have the potential to benefit resources and meet desired conditions.

Under my decision, all fires would continue to receive a management response based on a variety of factors: location of the fire, time of year, predicted weather conditions, values at risk,

safety risks to firefighters and the public, proximity to private/non National Forest System lands, resource management objectives, etc. Aggressive suppression of all human-caused wildfires will continue. Aggressive action would be taken to protect adjoining lands from fires threatening to cross the National Forest boundaries. Aggressive action would be taken to protect areas under contract (timber sales, thinning contracts, stewardship contracts, etc.). Emergency consultation on the actions taken to manage any wildland fire would continue pursuant to the requirements of the Endangered Species Act. Management requirements of other amendments to the Forest Plans (e.g., the Port-Orford-cedar root disease Record of Decision and Invasive Plants Management Record of Decision) will be followed.

Fires in the dry portions of the forest, near structures and/or private property, or in ecologically sensitive areas that are more prone to damage from fire, will continue to receive more aggressive responses, even when the fire is managed for resource benefits. Actions will continue to be taken to protect, to the best of the agency's ability, other lands from fires moving off National Forest System lands. Conversely, fires occurring in areas where resource benefits can be attained without undue risk to life, property, and resources may receive less aggressive responses.

Purpose and Need

The needs to amend the Forest Plans are threefold (EA pages I-4). **First**, the current fire management direction in the two Forest Plans, by emphasizing aggressive suppression, is actually driving forest conditions in a direction that is contrary to the desired conditions and management objectives in several land management allocations.

Second, the current and expected rate of fuels treatments and other vegetation management, such as thinning and prescribed burning, cannot keep pace with the changes taking place in vegetation and fuel conditions, leading to the continuing movement away from desired conditions and management objectives, as well as continuing increases in the risks to public and firefighter safety, private lands and resources, and public resources, such as wildlife habitat and water quality.

Third, the current direction in both Forest Plans does not allow the Forest to take full advantage of the fire management options available under the Federal wildland fire policy, leading to ever-escalating wildfire costs and the continued decline in forest conditions and thus, a divergence from the Forest Plan goals and objectives.

This effort also provides an opportunity to change out-dated fire terminology in these two Plans. This out-dated language is a source of confusion between the Forest fire managers and other Forest resource managers, between the Forest Service and other fire management agencies and cooperators, and between the Forest Service and the general public. Updating the fire terminology to reflect current terms and usages would reduce the confusion.

The proposed amendment(s) would expand opportunities to use a wider range of potential responses to wildland fires, including managing such fires to accomplish Forest Plan goals and objectives and move towards desired ecological conditions. Implementing the proposed amendments would provide Forest managers with a wider range of fire management tools to meet ecological, social and economic goals, including protecting human health and safety and private property. Increased flexibility would provide more opportunities to move at-risk ecosystems toward properly functioning conditions.

With this decision, suppression of unwanted wildland fires will continue, however, the Forest Plans would provide land managers additional options by which to achieve the desired

conditions described in each Forest Plan. Responsible use of wildland fire across a landscape-scale is needed to help reduce hazardous fuels and sustain wildland ecosystems into the future. Existing fire management direction would be modified or deleted and new management direction would be added to the Forest's Fire Management Plan to address these concerns and provide more options for managing wildfires.

II. THE DECISION

As the Responsible Official, **it is my decision to adopt the Forest Plan Amendments described in the EA as the Proposed Action (EA pages II-1 to II-33)**. This proposal and my decision is an administrative action involving the modification and changing of the wording for management direction and Standards and Guidelines regarding management response to meet current federal and Forest Service fire terminology and policy. My decision includes refinement of more generally worded Standards and Guidelines, the removal of wording that suggests limitations on the full range of appropriate response to fire, clarification of out-dated or inconsistent language, and the addition of text to allow for the use of wildland fire.

Under my decision, Forest Plan amendments will revise certain Forest Plan Standards and Guidelines and certain language contained within LRMP Appendices to allow for the use of wildland fire as a management responses to wildfires. This includes the consideration of resource benefits **for all land management allocations throughout the entire Rogue River-Siskiyou National Forest.**

Based on these amendments, the Southwest Oregon Fire Management Plan will be changed for incorporation of relevant management direction for all resources; the modification of the Fire Management Plan will also identify any mitigation or procedures relative to those resources, in order to achieve Forest Plan goals and desired conditions. The measures in the Fire Management Plan will then be available to the line officer, fire management officer, and incident commander prior to future wildland fire activities so that the appropriate site-specific resource and social concerns can be addressed.

Under my decision, the new fire management direction (Standards and Guidelines), *together with existing forest plan management direction not changed through this action*, will provide reasonable assurance that adequate environmental safeguards are incorporated in future management of wildland fires.

Based on the review that occurred during the objection process, I am also including a monitoring component to document the use of wildland fire:

- The total number of fires and acres burned through the use of wildland fire will be reported by land allocation each year in the Forest's annual monitoring report. The Forest will follow regional/national direction in reporting acres burned through the use of wildland fire.

Summary of Changes Made With My Decision

- Outdated fire definitions will be replaced with current accepted fire terminology.
- Use of wildland fire to meet Forest Plan objectives will be authorized Forest-wide consistent with Forest-wide desired future conditions emphasis and Management Area direction.

- For the Siskiyou LRMP: references to suppression strategy, fire size objectives, attack emphasis and Table IV-11 will be removed.
- Certain language contained within LRMP Appendices pertaining to Wilderness will be changed to allow for the consideration of the use of wildland fire.

Actual and specific changes made under this decision are documented in the EA, Chapter 2 on pages II-1 to II-33.

III. RATIONALE FOR THE DECISION

The goal of my decision is to allow more acres to be positively affected by naturally ignited wildland fire, move those acres towards desired ecological conditions, and to reduce long-term fire suppression costs. The plan amendments will provide opportunities to reduce overall costs and provide a choice for the use of wildland where naturally ignited wildland fires can maintain or enhance forest health, reduce the risks of large-scale damage or loss of ecosystem function such as wildlife habitat and water quality over the long-term, and reduce the risks to private property and resources.

There is a growing need to address the accumulation of fuels. The acres in need of fire re-introduction are accumulating faster than any possible application of prescribed fire. When there is an opportunity to accomplish ecological objectives during a wildfire and conditions are appropriate, these amendments provide an additional tool that will allow the flexibility for the use of wildland fire.

The Fire Management Plan guides implementation, supports attainment of the LRMP goals and objectives, and provides direction on which allocations can be treated and how. Therefore, fire managers may consider the use of wildland fire where appropriate to achieve ecological benefit. The Forest Service is required to use the Wildland Fire Decision Support System (WFDSS) on every wildfire decision. Each fire would be evaluated on a case-by-case basis and the decision on how to manage each fire documented in WFDSS. In addition, emergency consultation procedures will continue to be implemented regardless of the methods of managing the fire.

My decision is a broad-scale strategic programmatic decision that will guide the selection and implementation of future fire management activities regarding wildland fires on the Forest (via the Fire Management Plan). Programmatic decisions do not directly result in on-the-ground changes to environmental conditions. Plan components (e.g. Standards and Guidelines) have no direct or short-term environmental effects; however, they guide subsequent activities that indirectly effect soil and water conditions, vegetation conditions, wildlife habitat, recreational opportunities, etc., over the life of the plan(s); these long term consequences (indirect effects) were documented in Chapter III and Appendix D of the EA.

My decision addresses the Purpose and Need and provides clear direction for use of wildland fire to attain Forest Plan goals and objectives, maximizing the range of fire management tools available. Initially, overall costs may not change or may even increase. Higher costs can result from more conservative approaches to managing fires less aggressively, from lack of experience in managing such fires, and from the need to manage a given fire for a longer period of time than if the historical management approach did not change. Eventually, costs are expected to decline as the Forest crosses a threshold in the number of acres treated through the combination of hazardous fuels and wildfires managed for resource benefits. In the long-term, overall fire management program costs are expected to decrease as more acres receive a less intensive response.

Expanding the array of strategies, including the deliberate choice to manage a fire to meet Forest Plan goals and objectives, was found to be either neutral or beneficial to the Forest Plan intent. For example, less aggressive strategies where expected losses from a fire are less than expected losses from suppression actions are at least neutral to attainment of Forest Plan goals and objectives.

It is estimated that it would take at least ten years for any ecological differences arising from this change to become noticeable. Less than ten years is not a sufficient time for a change in management approach to manifest itself on the landscape, particularly since initially, decisions are likely to be quite conservative until all Forest personnel and line officers gain experience in using a wider array of wildfire response strategies.

IV. PUBLIC INVOLVEMENT

I, the Forest Supervisor (responsible official) signed the project initiation letter for the Rogue River-Siskiyou National Forest Fire Amendment proposal in early February 2008. I also developed a draft Purpose and Need and Proposed Action, and issued it for public comments and suggestions (Scoping) on February 26, 2008.

Scoping

The public scoping period began on March 5 and ended on April 4, 2008. Scoping Letters were mailed to about 300 people, organizations, tribes (7 personalized letters), and agencies throughout Southern Oregon. A press release requesting public input was sent to local newspapers (Curry Coastal Pilot, Medford Mail Tribune, The World – Coos Bay, Myrtle Point Herald, Curry County Reporter, Grants Pass Daily Courier), and to local TV and radio stations.

The project was listed on each Forest's quarterly schedule of proposed actions, and the scoping notice was also posted on the Rogue River-Siskiyou National Forest website. Lastly, an internal request for comments from RRSNF employees was sent to the Forest on March 5, 2008.

The Forest received 35 responses to the scoping letter. Additional comments were also accepted after the closing date. The State of Oregon, local governments, environmental groups, industry groups, and individuals provided comments on the Proposed Action. A scoping report (including the persons, organizations, and agencies that responded) was prepared and is contained in the project record. The comments received during scoping were generally divided in support for the use wildland fire, versus a perception that a "let it burn" policy was being proposed, to which many individuals and groups were opposed. Many Scoping comments identified the need for increased and active hazardous fuels reduction, including thinning, brushing and prescribed fire. Many commenters believed that this proposal involved no initial attack response and/or "monitoring" a wildland fire start without suppression action, which could then quickly turn into a large conflagration. Comments of concern (issues) identified the potential for:

- Degradation of air quality (including health effects and visibility)
- Risks for human safety and property (private lands)
- Destruction of timber resources (public and private lands)

Based on the review that occurred during the objection process, I was asked to clarify that these concerns raised were issues, and to identify how these issues were resolved. These comments of concern are now referred to as issues. These issues were resolved through disclosure in the EA (Chapter III) and in Appendix D.

Other resource topics frequently raised included possible adverse effects on water quality, soils, fisheries, and wildlife habitat. These resource concerns were also disclosed in the EA (Chapter III and in Appendix D). Comments concerning the planning process were also received, typically asking for more detail on the proposal. Requests for more information were generally addressed as they were received, either by follow-up phone calls or email.

Those in support of the proposal identified the need to restore fire as a natural ecological process, the resource benefits it could provide, and the potential for less impact from aggressive fire suppression actions (firelines, bulldozers, etc.).

Other Alternatives Considered

All of the issues raised were identified as disclosure issues. No issues were raised that would have suggested an alternative course of action (alternative to the proposed action) to consider in detail. The EA documented four alternatives that were considered, but eliminated from detailed study (EA pages II-33 to II-35).

A stand alone no action alternative was not considered in the EA. Because these are programmatic amendments, no action means continuing with the current condition and current fire suppression strategies outlined in both Forest Plans. As such, the EA documents the long term consequences and changes from the current condition (taking no action) and the changes that might occur over the long term from the proposed action.

Objection Process

On October 27, 2009, the Fire Use Amendment EA was transmitted and made available for objection pursuant to the provisions of the optional appeal procedures available during the planning rule transition period as described at Title 36 Code of Federal Regulations (CFR), Part 219, Section 219.35(b) (published in the Federal Register at 65 FR 67514 (November 9, 2000)).

In accordance with 36 CFR 219.32(a), the objection process was made available to Scoping participants and any interested person (via legal notice published in the Forest's newspaper of record (*Medford's Mail Tribune*) for objection to the proposed Forest Plan amendments. The 30-day objection period began on October 30, 2009, and ended on November 30, 2009. Objections were required to be in writing and filed with the Reviewing Officer (Regional Forester, USDA Forest Service, Pacific Northwest Region Six).

During the 30-day objection period, input was received from five individuals or groups. Not all of the input received met the definition of an objection and were not considered or processed as objections.

As part of the objection process, on February 10, 2010, Forest Service personnel from the Supervisor's Office convened an objection resolution meeting to "narrow the issues, agree on facts, and explore opportunities for resolution (36 CFR 219.32)." In attendance at the Medford Interagency Office (MIO) and on behalf of the Forest Service were: Forest Supervisor Scott Conroy; Aviation and Fire Staff Officer M.J. Harvie (facilitating); Deputy Fire Staff - Fuels Rob Budge (and Fire Amendment EA project lead), Forest Ecologist Tom Sensenig and Forest Planner Pam Olson. Charles Phenix, an objector, was also present at MIO. Representing the Forest Service via a conference call was Regional Fire Ecologist Louisa Evers and Regional NEPA/Appeals Specialist Brad Paul.

Two other objectors were in attendance at the meeting via conference call: Joseph Vaile,

Campaign Director of Klamath-Siskiyou Wildlands Center and Michael Dubrasich, Executive Director of the Western Institute for the Study of the Environment (WISE), and Greg Brenner, also from WISE. Also on the conference call were interested persons (36 CFR 219.32 (b)) Jay Lininger, Ecologist, Center of Biological Diversity, and Doug Heiken from Oregon Wild.

No resolution was reached as a result of this meeting. In total, four objections were reviewed by an independent review team; the Forest and objectors were provided written input and instructions from that review.

As a result of the objection review, I was instructed to make the following clarifications prior to signing my decision:

1. Clarify the concerns (issues raised) and the dismissal of alternatives considered;
2. Clarify the indirect effects of the amendments;
3. Add a monitoring component that documents the acres of unplanned natural ignitions that meet resource objective each year, by land allocation;
4. Detail the criteria used by fire managers in deciding whether or not an unplanned wildfire ignition might be managed for resource benefit; and
5. Document the consultation process.

As instructed, I have clarified that the concerns raised during scoping are considered issues (see above); clarified that these were disclosure issues that did not drive an alternative course of action (see above); clarified that the long-term consequences described in Chapter 3 and Appendix D are indirect effects (see above and below); added a monitoring component to the proposed action (see above); detailed the criteria used by fire managers in making decisions regarding unplanned fire (see above); and documented the consultation process (see below – emergency consultation procedures will be followed).

By complying with these written instructions, the objection review has now been completed and this decision notice can be signed.

V. FINDINGS

This action has been analyzed and designed under other laws, regulations and agreements applicable to the management of National Forest System lands and resources, including: 16 USC 1604 (g)(3), 36 CFR 219.14, 36 CFR 219.27 (b). I find this decision to be consistent with the National Environmental Policy Act of 1969 (NEPA), the Council on Environmental Quality regulations for implementing NEPA, 40 CFR 1500-1508, July 1, 1986, the Multiple-use Sustained Yield Act of 1960, and the National Forest Management Act of 1976. I also find this action is in compliance with the provisions of the Endangered Species Act 1973 as amended, and the National Historic Preservation Act.

Finding of No Significant Impact (FONSI)

40 CFR 1508.27 defines the criteria in determining whether or not a proposed action is significant. "Significantly" as used in NEPA requires considerations of both context and intensity:

- (a) Context. This means that the significance of an action must be analyzed in several contexts such as society as a whole (human, national), the affected region, the affected interests, and the locality. Significance varies with the setting of the proposed action. For instance, in the case of a site-specific action, significance would usually depend upon

the effects in the locale rather than in the world as a whole. Both short- and long-term effects are relevant.

For these amendments, the proposed action applies to all land management allocations throughout the approximately 1.72 million-acre Rogue River-Siskiyou National Forest, located mostly in southwestern Oregon, with some lands in northern California. Not every acre of the Forest will be affected by fire; the option for the use of wildland fire is being provided to fire managers with these amendments. No effects were identified that would be important on a regional or national scale.

Based on the discussion and rationale of the long-term consequences of proposed Forest Plan Amendments to allow use of wildland fire(Chapter III and Appendix D of the EA), there would be no changes that will affect land and resources throughout a large portion of the Forest, that are not already occurring with wildland fires that escape containment efforts. There would likely be limited use of wildland fire during the first few years, with a potential for long-term benefits. The programmatic management direction adopted through this decision would not change the physical environment; therefore, there are no direct (operational or on-the-ground) effects. Considering context, I find that these amendments are not significant.

(b) Intensity. This refers to the severity of impact. The following are considered in evaluating intensity:

1. **Impacts that may be both beneficial and adverse. A significant effect may exist even if the Federal agency believes that on balance the effect will be beneficial.** My decision is a broad-scale strategic programmatic decision that will guide the selection and implementation of future fire management activities resulting from wildland fires on the Forest (via the Fire Management Plan). Programmatic decisions do not directly result in on-the-ground effects that would be beneficial or adverse.

By clarifying Forest Plan components such as Standards and Guidelines for fire management during implementation of fire management actions, these Forest Plan amendments focus future selection, design and timing of actions to achieve specific desired outcomes. Although these plan components have no direct or short-term environmental effects, they can guide subsequent activities that may indirectly affect soil and water conditions, vegetation conditions, wildlife habitat, recreational opportunities, etc., over the life of the plan(s). The EA Chapter III did not find any of these long-term consequences (indirect effects) significant.

2. **The degree to which the proposed action affects public health or safety.** The amended management direction does not, on its own, authorize any ground-disturbing activities or direct changes to the environment. This decision does not have direct effects on human health and safety beyond those already documented in existing forest plan Environmental Impact Statements and the site-specific analyses of on-going projects and activities. Indirect effects to human health and safety are documented in Chapter III and in Appendix D of the EA. Over time, safety of firefighters is expected to be enhanced as fire managers use wildland fire to decrease fuel loads and fire intensities over time. Risks to human health from smoke were also detailed in Chapter III and in Appendix D of the EA, which concluded that these amendments are not likely to result in any additional risks to public health.

3. **Unique characteristics of the geographic area such as proximity to historic or cultural resources, park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas.** The proposed amendments do not alter the environmental protection afforded such unique lands as is already provided for in the Forest Plans and may provide improved long-term opportunities for protection or enhancement of these resources (EA, Chapter III, section E).
4. **The degree to which the effects on the quality of the human environment are likely to be highly controversial.** There are differing opinions on the importance or role fire disturbance plays in the ecosystem, balanced against the protection of people and property. The level of social controversy or interest in what course of action to take regarding fire management is not the focus of this criterion; rather it is the degree of scientific controversy over the effects disclosed in the analysis. No scientifically significant disagreements have been identified with the disclosure of effects in Chapter III of the EA; the best available scientific information provided the foundation for development of the amended management direction. While some comments differed with the conclusion that the proposed changes in fire management direction would help move the Forest toward desired future conditions listed in each Forest Plan, the reasons for this difference are based on opinions, not with the disclosure of effects.
5. **The degree to which the possible effects on the human environment are highly uncertain or involve unique or unknown risks.** The best available scientific information provided the foundation for development of the amended management direction. These changes are consistent with recently issued interagency policy regarding implementation of Federal wildland fire policy. These changes are also consistent with the management direction adopted for fire management activities on other National Forest System lands as well as other Federal land management agencies (BLM, Fish and Wildlife Service, and National Park Service). While management of all fires, planned or unplanned, carries risk, those risks are generally known and have been documented in analyses of previous wildland fires. The WFDSS is a tool used by fire managers that helps assess the level of risk involved in a fire incident and will be used for both planned and unplanned fire ignitions.
6. **The degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration.** Similar actions of similar context (e.g., forests in California, Colorado, Utah, Wyoming, Arizona, and New Mexico), have documented this type of action under an EA, and consequently determined a finding of no significant impact.

Other federal agencies within or adjacent to the area of the Rogue River-Siskiyou National Forest, include the Klamath, Fremont-Winema, Six Rivers, and Umpqua National Forests, Crater Lake National Park, Oregon Caves National Monument, and the Medford and Coos Bay Districts of the Bureau of Land Management. The Klamath National Forest and Crater Lake National Park have land use plan and implementation direction that allows for the use of wildland fire. The Fremont-Winema NF has land use plan direction that allows for the use of wildland fire and is developing implementation direction. The Umpqua National Forest is planning to review their land use plan direction to determine what changes may be needed to allow for the use of wildland fire. At the present time, the Medford and Coos Bay Districts of the Bureau of Land Management, Oregon Caves National Monument and the Six Rivers National Forest do not allow for the use of wildfires.

This programmatic proposed action does not change or restrict any future action or decision. Allowing for the use of wildland fire does not preclude suppression of any fire, nor does it imply that all fires will be allowed to burn. It allows fire managers to consider whether or not an unplanned ignition may be 'managed' to meet resource benefits.

7. **Whether the action is related to other actions with individually insignificant but cumulatively significant impacts. Significance exists if it is reasonable to anticipate a cumulatively significant impact on the environment. Significance cannot be avoided by terming an action temporary or by breaking it down into small component parts.** The programmatic management direction adopted through this project would not change the physical environment; therefore, there are no direct or short-term effects. Because there are no direct effects, there are no cumulative effects (EA Chapter III-3 and III-4).
8. **The degree to which the action may adversely affect districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historical resources.** These programmatic amendments would not have any direct or cumulative effect on any eligible or listed historic property. Standard Forest practices include notifying the Forest Archaeologist of fires that have the potential to impact archaeological resources. During WFDSS, resource specialists are involved in determining whether or not there may be a prehistoric or historic resource at risk. This practice will not change with these amendments. Cultural resource specialists will be consulted during the decision making process to determine if an unplanned fire can meet resource benefits (EA Chapter III-7 and Appendix D).
9. **The degree to which the action may adversely affect an endangered or threatened species or its habitat that has been determined to be critical under the Endangered Species Act of 1973.** These amendments do not alter the environmental protection afforded threatened and endangered species as is already provided for in the Forest Plans. Lightning strikes and the resulting fires are a natural process. Consultation is not required for what may be described as "acts of God" such as fire, flood, land movement, weather impacts, and insect and disease outbreaks. Consultation may be necessary if the agency response to these events causes additional effects on listed species. Where there is potential for effects on listed species resulting from human actions (i.e., fire suppression), emergency consultation with the US Fish and Wildlife Service and/or National Marine Fisheries Service is required. The procedures that currently occur for emergency consultation would be followed for use of wildland fire (Chapter III-7 and Appendix D). Thus, there would be no direct impacts to Threatened or Endangered species or their habitats as a result of these proposed amendments.
10. **Whether the action threatens a violation of Federal, State, or local law or requirements imposed for the protection of the environment.** This decision will not affect the following elements of the human environment, which are specified in statute, regulation, or executive order: Cultural Resources, Farm Lands (prime or unique), Floodplains, Native American Religious Concerns, Environmental Justice, Hazardous or Solid Wastes, Water Quality, Wild and Scenic Rivers, and Wilderness (EA Chapter III). The programmatic management direction adopted through these amendments will not change the physical environment; therefore, there would not be an irretrievable or irreversible commitment of resources. Indirect effects to air quality (Clean Air Act) and water quality (Clean Water Act) are disclosed in Chapter III and Appendix D of the EA.

In consideration of the analysis documented in the EA and in light of the reasons set forth below, I find that this decision will not significantly impact the human environment.

Finding

On the basis of the information and analysis contained in the EA and all other information available as summarized above, it is my determination that adoption of the amended fire management direction (as reflected in this decision), **does not constitute a major Federal action significantly affecting the quality of the human environment.** Therefore, an Environmental Impact Statement will not be prepared.

Finding of Non-Significant Amendment

In accordance with the requirements of Forest Service policy, Forest Service Handbook sections 1926.51 and 1926.52, the EA considered and disclosed the consistency with Forest Plan goals and objectives. Forest goals are statements that describe a desired condition to be achieved. They are expressed in broad general terms and are timeless in that they have no specific date by which they are to be completed during the planning period. Goal statements form the principal basis from which objectives are developed.

Applicable goals from the Rogue River and Siskiyou NF Forest Plans were evaluated in the EA (EA pages III-17 through III-25). Basis for these long-term implications are contained in EA Appendix D, incorporated by reference. Pursuant to 36 CFR 219.10(f) (1982 Version), significance of these proposed Forest Plan amendments is evaluated. Note that “significant” in the context of amending Forest Plans does not have the same meaning as “significantly” as related to environmental consequences as discussed in CEQ Regulation 40 CFR 1508.27.

The following examples indicate circumstances that may cause a significant change to a land management plan (FSH 1926.52):

a. Changes that would significantly alter the long-term relationship between levels of multiple-use goods and services originally projected (see section 219.10(e) of the planning regulations in effect before November 9, 2000 (see 36 CFR parts 200 to 299, revised as of July 1, 2000)).

Evaluation

Based on evidence, discussion and rationale of the long-term consequences (indirect effects) of proposed Forest Plan Amendments to the use of wildland fire, and the consistency with Forest Plan goals as documented in the EA (Chapter III), there would be no changes that would significantly alter the long-term relationship between levels of multiple-use goods and services originally projected by the Rogue River (1990) and Siskiyou (1989) National Forest Land and Resource Management Plans, as amended by the Northwest Forest Plan.

b. Changes that may have an important effect on the entire land management plan or affect land and resources throughout a large portion of the planning area during the planning period.

Evaluation

Based on the discussion and rationale of the long-term consequences (indirect effects) of proposed Forest Plan Amendments to allow use of wildland fire, and the consistency with Forest Plan goals as documented in the EA (Chapter III), there would be no changes that would have an important effect on the entire land management plan or affect land and resources throughout

a large portion of the planning area (the Forests) during the planning period. While the amendments apply to all land allocations, use of wildland fire will not occur on each and every acre of the forest; thus, an important effect on the entire planning area cannot occur. As documented herein, under my decision there would likely be limited changes during the first few years, with a potential for long-term benefits. The programmatic management direction adopted through this project would not change the physical environment; therefore, there are no direct (operational or on-the-ground) effects. These administrative word changes would allow decision makers more options to obtain the beneficial effects of fire.

Changes to the land management plan that are not significant can result from (FSH 1926.51):

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

b. 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.

c. Minor changes in standards and guidelines.

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

Evaluation

As noted above, and based on the discussion and rationale of the long-term consequences (indirect effects) of proposed Forest Plan Amendments to allow for the use of wildland fire, and the consistency with Forest Plan goals as documented in the EA (Chapter III-26 and III-27), there would be no changes that that would significantly alter the multiple-use goals and objectives for long-term resource management. My decision does not include adjustments to management area boundaries and does not preclude other projects or activities that may contribute toward achievement of management prescriptions.

The decision is an administrative action and proposed changes are wording changes to existing Standards and Guidelines, wording changes to goals and objectives, and clarification to promote consistency between the two Forest Plans. Terminology in the Standards and Guidelines throughout the two Forest Plans would be updated to meet current federal and Forest Service fire terminology and policy. Redundant information would be removed and replaced with language consistent with current Forest Service policy. Adoption of the amendments would provide opportunities for additional fire management activities that would contribute to achievement of the overall management prescriptions and goals of the respective Forest Plans.

Finding

Overall, this evaluation provides a basis for a determination that these Forest Plan Amendments would be non-significant under Forest Service Policy. Appropriate public involvement has been conducted under NEPA. On the basis of the information and analysis contained in the EA and all other information available as summarized above, it is my determination that adoption of the management direction reflected by **my decision does not result in significant amendments to the existing Forest Plans.**

VI. IMPLEMENTATION

Authorization of my decision is based on this Decision Notice and Finding of No Significant Impact, its attachments and the October 2010 Environmental Assessment as clarified following the objection period. Implementation of this decision may take place immediately after signature of this document.

Based on these amendments, the Southwest Oregon Fire Management Plan will be changed for the Rogue River-Siskiyou National Forest to incorporate relevant management direction for other resource topics and identify any mitigation or procedures relative to them, in response to meeting Forest Plan goals, and desired conditions. The measures in the Fire Management Plan will then be available to the line officer, fire management officer, and incident commander prior to future wildland fire activities so that they may appropriately address site-specific resource and social concerns. As directed during the objection review process, the Fire Management Plan will also be made available to the public via the Rogue River-Siskiyou National Forest world wide website, when it is updated.

VII. ADMINISTRATIVE REVIEW OPPORTUNITIES

This action was subject to a pre-decisional administrative review process (Objection Process) under 36 CFR 219. Objections and comments to the project were received and are discussed under the Public Involvement portion of this Decision Notice.

The signing of this decision indicates that the reviewing officer has responded, in writing, to unresolved objections (36 CFR 219.32 (d)) within a reasonable period of time and has responded to all objections in one response. The reviewing officer's response regarding an objection is the final decision of the Department of Agriculture (36 CFR 219.32 (c)). This also indicates that my decision is consistent with the reviewing officer's response to objections (36 CFR 219.32 (d)).

For further information concerning the action authorized by my decision, or for more information contact:

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VIII. AUTHORIZATION and SIGNATURE

Scott D. Conroy
Forest Supervisor

Date