

FLAT & SKULL Timber Sale CE Comments

<i>ID No.</i>	<i>Comment Category</i>	<i>Group Name</i>	<i>Signatory</i>	<i>Address</i>	<i>Zip Code</i>	<i>Date Rec'd.</i>	<i>Comments</i>	<i>Response</i>
1	1	Sierra Club and LOWD-BMBP	Asante Riverwind	PO Box 5334, Bend, OR	97708	22-May-06	NEPA analysis must address active raptor nests and or habitat potential	The wildlife biological evaluation (BE) for each project has considered these issues and the restriction on early winter logging on the Flat TS was added to address this issue. No raptor nests have been located in or near either of the sites by any of the staff working on these projects.
2	1	Sierra Club and LOWD-BMBP	Asante Riverwind	PO Box 5334, Bend, OR	97708	22-May-06	Retention of trees between 14 and 21" dbh to protect wildlife habitat for diverse species of concern.	The prescription does retain many trees within this diameter range as well as all trees over 21" dbh. Thinning from below concentrates on removing trees of poor health and poor form leaving a fully stocked stand and retaining a multi-story stand for future management activities.
3	1	Sierra Club and LOWD-BMBP	Asante Riverwind	PO Box 5334, Bend, OR	97708	22-May-06	Retention of variable dbh (10-16" dbh) and stand density basal area targets to reduce potential impacts on wildlife.	These issues have been considered in the writing and review of individual unit prescriptions and in light of the recommendations made in the Integrated Scientific Assessment for Ecosystem Management in the Interior Columbia Basin report (Quigley, 1996). Site conditions remaining after the sales will include retention of variable diameters and variable density stands (10 to 60 sq ft/ ac) including multi story structure and sufficient hiding cover.
4	1	Sierra Club and LOWD-BMBP	Asante Riverwind	PO Box 5334, Bend, OR	97708	22-May-06	Retain sufficient cover and connectivity for dispersing and migrating wildlife	While the prescription concentrates on thinning from below there are many areas with the two sale areas that will retain thickets of advanced regeneration to provide this type of habitat.
5	4	Sierra Club and LOWD-BMBP	Asante Riverwind	PO Box 5334, Bend, OR	97708	22-May-06	Potential for increase of OHV incursions into sale areas	Forest policy does not permit operation of OHVs on non-designated trails anywhere in the District.
6	1	Sierra Club and LOWD-BMBP	Asante Riverwind	PO Box 5334, Bend, OR	97708	22-May-06	Restriction of activities during spring nesting and fledging periods and protection of suitable habitat.	Spring is a critical area for wildlife in both of these units and harvesting activities are not scheduled in either sale until after July 1 . Any other spring operations will require close coordination with wildlife mangers to address these concerns.
7	4	Sierra Club and LOWD-BMBP	Asante Riverwind	PO Box 5334, Bend, OR	97708	22-May-06	Project impacts must not result in adverse harms to salmonid habitat or populations	The biological evaluations from fisheries and hydrology both indicate that these projects are "NOT LIKELY" to have an impact on either the populations or the habitat for salmonids or other aquatic species of concern.
8	6	Sierra Club and LOWD-BMBP	Asante Riverwind	PO Box 5334, Bend, OR	97708	22-May-06	These small sales do not meet CE criteria and require an EA.	These sales do fall under Forest Service Handbook 1909.15 section 31.2 Category 12 - harvest of up to 70 acres. All biological evaluations required by NEPA have been completed for fish, wildlife, silviculture, and hydrology to ensure adequate analysis has been performed.
9	7	Sierra Club and LOWD-BMBP	Asante Riverwind	PO Box 5334, Bend, OR	97708	22-May-06	Undisclosed timber targets are driving these sales.	While these sales will contribute to the timber harvesting target to the Region, the targets are not what is driving these two sales. These sales are based on the need to treat stands to improve forest health in the long term and have been adequately evaluated to fully meet wildlife and ecological scientific recommendations.
10	2	Sierra Club and LOWD-BMBP	Asante Riverwind	PO Box 5334, Bend, OR	97708	22-May-06	Thinning of forests should be prioritized to Wildland Urban Interface areas.	Forest management for multiple use is part of the mission of the US Forest service. Thinning to improve forest health and restore ecological integrity is the goal of these projects. WUI is not applicable to this site and is not the sole reason for thinning of stands even if the primary goal of thinning is for hazard fuel reduction.
11	2	Sierra Club and LOWD-BMBP	Asante Riverwind	PO Box 5334, Bend, OR	97708	22-May-06	Excessive thinning can result in increasing the risk of severe fires in the project area.	These sites have been designed by evaluating the existing site conditions and utilizing the recommendations developed for east side forests in the Integrated Scientific Assessment for Ecosystem Management in the Interior Columbia Basin report (Quigley, 1996). The issues of drying effects, increased insect activities, weather events, increased brush and human caused fires have been considered in developing our prescriptions.
12	2	Sierra Club and LOWD-BMBP	Asante Riverwind	PO Box 5334, Bend, OR	97708	22-May-06	Little validity to cutting trees over 9 to 12" to reduce fire risk.	Fire risk was not the only reason to chose these sites for thinning activities. Forest health and future growth were just some of the other considerations in developing these projects. Size alone is not a measure of forest health and retention of all large trees is not necessarily a desirable condition. The treatments prescribed are designed to provide a healthy multi-story forest that will provide for future wildlife and harvesting opportunities.
13	1	Sierra Club and LOWD-BMBP	Asante Riverwind	PO Box 5334, Bend, OR	97708	22-May-06	Employ a mosaic that leaves 10 to 30% of area untreated.	These are very small areas in a much larger area and the mosaic created by thinning these units helps create variability in forest sand structure.
14	1	Sierra Club and LOWD-BMBP	Asante Riverwind	PO Box 5334, Bend, OR	97708	22-May-06	Improve and protect wildlife habitat natural resource features.	Very little activity is planned along the unit boundaries where the edge is near existing openings. The prescriptions will retain the large diameter trees and thickets that make up the bulk of these areas.

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15	1	Sierra Club and LOWD-BMBP	Asante Riverwind	PO Box 5334, Bend, OR	97708	22-May-06	Remove or control burn the debris but not during spring and not in big piles.	Efforts will be made to sell the biomass created if markets are available at the time of the sale. Utilizing low ground pressure logging methods may create larger slash piles or less compacted slash. Spring burning would only be considered after input from the wildlife staff to ensure compatibility with the species present at the time the burn window is available.
16	1	Sierra Club and LOWD-BMBP	Asante Riverwind	PO Box 5334, Bend, OR	97708	22-May-06	Buffer nest trees and adjust operating season during nesting and fledging period.	No nest trees have been identified within either unit for any species of local or national concern. Season of operation is already restricted in accordance with wildlife evaluations.
17	3	Sierra Club and LOWD-BMBP	Asante Riverwind	PO Box 5334, Bend, OR	97708	22-May-06	Construct no new or temporary roads.	Both units are fully roaded and some roads will be used only for bringing material to the landing thereby reducing the length of haul road utilized.
18	4	Sierra Club and LOWD-BMBP	Asante Riverwind	PO Box 5334, Bend, OR	97708	22-May-06	Minimize or eliminate sources of ecological degradation.	OHV use, firewood cutting, and watershed contamination are regulated activities covered by other forest rules. Harms to wildlife and their habitat have been addressed in the BE.
19	4	Sierra Club and LOWD-BMBP	Asante Riverwind	PO Box 5334, Bend, OR	97708	22-May-06	Utilize light on the land machinery.	The machinery associated with this type of operation is typically lighter on the land than elk. (Elk of North America, and industry literature on machinery)
20	4	Sierra Club and LOWD-BMBP	Asante Riverwind	PO Box 5334, Bend, OR	97708	22-May-06	Take proactive measures to ensure protection of salmonids and their habitat.	These sales provide buffers as required along the riparian areas which will provide adequate protection. Operations during dry weather will also be utilized to reduce potential impacts.
21	8	Oregon Wild	Chandra LeGue	P.O. Box 11648 Eugene, OR	97440	22-May-06	Describe the forest stands proposed for thinning. How old are they? How big are the trees that will be harvested? What condition are they in?	Both stands are predominately ponderosa pine with an understory of ponderosa pine, lodgepole pine, western larch, Douglas fir and grand fir seedlings and saplings and grass/forb ground cover and very limited shrub component. Both the overstory and understory are clumpy in distribution but generally more density overall than is desired for a healthy stand. These are mixed aged stands with some evidence of declining health across all stratum.
24	8	Oregon Wild	Chandra LeGue	P.O. Box 11648 Eugene, OR	97440	22-May-06	What is the desired condition and how will thinning help reach this condition	The desired condition is a healthy stand of ponderosa pine that ranges from 10 to 50 ft ² of basal area per acre that will continue to provide a mixed stratum while being more resistant to catastrophic fire.
25	8	Oregon Wild	Chandra LeGue	P.O. Box 11648 Eugene, OR	97440	22-May-06	Was our recommendation to use variable density thinning methods used?	The variable density of the existing stand will result in a variable density stand after the thinning takes place. There are pockets of higher density regeneration which will remain after treatment to provide cover for game as well as open areas to provide forage opportunities.
26	8	Oregon Wild	Chandra LeGue	P.O. Box 11648 Eugene, OR	97440	22-May-06	What are the harvest prescriptions?	The prescription is to thin the stand to an average of 50 ft ² of basal area per acre by removing smaller diameter trees and those with poor form or high defect to promote a healthy stand condition.
27	8	Oregon Wild	Chandra LeGue	P.O. Box 11648 Eugene, OR	97440	22-May-06	Is there a size limit? You should set a smaller diameter limit in this project, and set a limit for dead trees as well.	No trees alive or dead over 21 inches will be removed. Many trees from 8 to 21 inches will remain after treatment to ensure a fully stocked healthy stand remains.
29	2	Oregon Wild	Chandra LeGue	P.O. Box 11648 Eugene, OR	97440	22-May-06	Removing trees larger than about 12" DBH simply does not make sense in reducing fire risk.	Fire risk was not the only reason to chose these sites for thinning activities. Forest health and future growth were just some of the other considerations in developing these projects. Size alone is not a measure of forest health and retention of all large trees is not necessarily a desirable condition. The treatments prescribed are designed to provide a healthy multi-story forest that will provide for future wildlife and harvesting opportunities.
30	8	Oregon Wild	Chandra LeGue	P.O. Box 11648 Eugene, OR	97440	22-May-06	Plan to protect small diameter old-growth.	Where small diameter trees exhibiting old growth characteristics were healthy and well spaced they were usually left to provide stand diversity.
31	6	Oregon Wild	Chandra LeGue	P.O. Box 11648 Eugene, OR	97440	22-May-06	Consider and disclose cumulative impacts even when using Categorical Exclusions	Cumulative impacts were considered in assessing these two projects. There are no other projects in the past several years or projected fro future years in the vicinity of these projects that would indicate the existence of cumulative impacts.
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