

United States  
Department of  
Agriculture

Forest Service

Pacific  
Northwest  
Region

1990

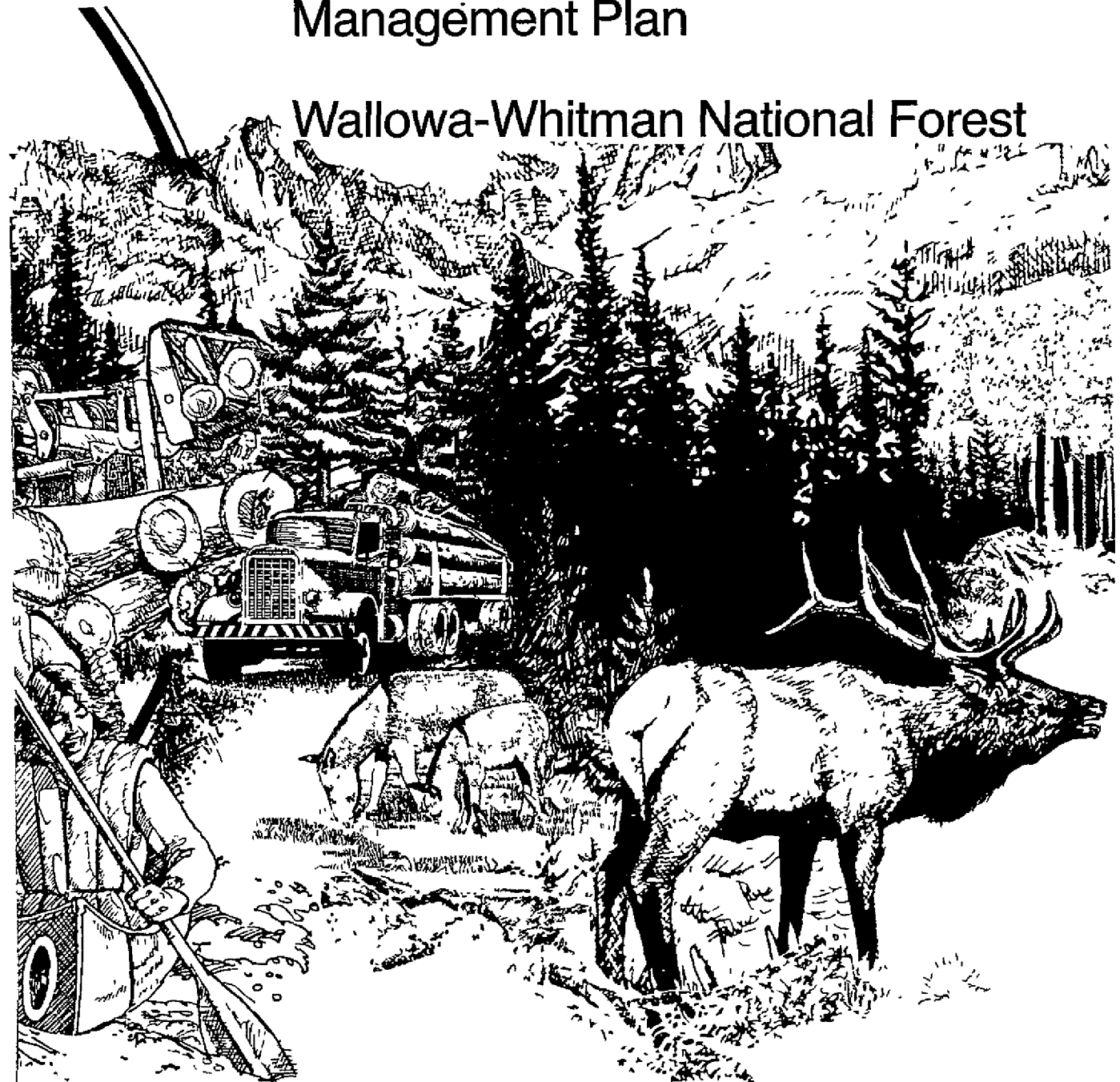


# Appendices – Volume III

## Final Environmental Impact Statement

Land and Resource  
Management Plan

Wallowa-Whitman National Forest



# ACRONYMS AND ABBREVIATIONS USED IN THIS DOCUMENT

Those listed with an asterisk are further explained in the Glossary

AC - Acres	MR - Management Requirement
AMP - Allotment Management Plan *	MRVD - Thousand Recreation Visitor Days
AMS - Analysis of the Management Situation *	MS - Management Strategy(ies)
ASQ - Allowable Sale Quantity *	MWFUD - Thousand Wildlife/Fish User Day
ATV - All Terrain Vehicle *	NA - No Action
AU - Animal Unit *	NAS - National Activity Structure
AUM - Animal Unit Month *	NC - No Change
BAP - Benzo (A) Pyrene	NDF - Nondeclining Flow *
BCR - Benefit Cost Ratio	NEPA - National Environmental Policy Act
BF - Board Foot *	NFMA - National Forest Management Act
BIA - Bureau of Indian Affairs	NFMAS - National Fire Management Analysis System
BLM - Bureau of Land Management *	NPB - Net Public Benefits
BMP - Best Management Practice *	NRA - National Recreation Area (HCNRA)
BTU - British Thermal Unit *	NRT - National Recreation Trail *
CCC - Civilian Conservation Corps	O&M - Operation and Maintenance
CEQ - Council on Environmental Quality *	OBERS - Office of Business Economics - Economic Research Service
CFL - Commercial Forest Land *	ODFW - Oregon Department of Fish and Wildlife
CFR - Code of Federal Regulations *	ONRC - Oregon Natural Resources Council
CI - Capital Investment	ORV - Off Road Vehicle
CMAI - Culmination of Mean Annual Increment *	PAOT - Persons At One Time
CMP - Comprehensive Management Plan (HCNRA)	P&M - Protection and Management Funds
CRITFC - Columbia River Inter-tribal Fish Commission	PILOT - Payment in Lieu of Taxes
DBH - Diameter at Breast Height *	PL - Public Law
DEIS - Draft EIS *	PNV - Present Net Value
DEP - Departure *	PNW - Pacific Northwest
EA - Environmental Assessment *	POM - Polycyclic Organic Matter
EHF - Earned Harvest Factor	PVB - Present Value of Benefits
EIS - Environmental Impact Statement *	PVC - Present Value of Costs
EO - Executive Order	R-6 - Region 6
EPA - Environmental Protection Agency *	RARE II - Roadless Area Review and Evaluation *
FEIS - Final EIS *	RIM - Recreation Information Management *
FERC - Federal Energy Regulatory Commission	RNA - Research Natural Area *
FIL - Fire Intensity Level *	ROD - Record of Decision
FORPLAN *	ROS - Recreation Opportunity Spectrum *
FPFO - Forestry Program for Oregon	RPA - Forest and Rangeland Renewable Resources Planning Act of 1974 *
FRES - Forest Range Environmental Study *	RVD - Recreation Visitor Day *
FS - Forest Service	SAF - Society of American Foresters
FSH - Forest Service Handbook	S&G - Standards and Guidelines
FSM - Forest Service Manual	SCORP - Statewide Comprehensive Outdoor Recreation Plan
FVB - Future Value of Benefits	SHCI - Smolt Habitat Capability Index
FVC - Future Value of Costs	SHPO - State Historical Preservation Officer (Office)
FY - Fiscal Year	SIC - Standard Industrial Classification
GIS - Geographic Information System	SMA - Special Management Area
GNP - Gross National Product	SMU - Streamside Management Unit *
HCNRA - Hells Canyon National Recreation Area	SPM - Semiprimitive, Motorized
HCRS - Heritage Conservation and Recreation Service	SPNM - Semiprimitive, Nonmotorized
HEI - Habitat Effectiveness Index	T&E - Threatened and Endangered *
ICO's - Issues, concerns, and Opportunities	TRI - Total Resource Inventory *
I&DC - Insect and Disease Control	TSI - Timber Stand Improvement *
ID - Interdisciplinary	TSPIRS - Timber Sale Program Information Reporting System
IPM - Integrated Pest Management *	TSPQ - Timber Sale Program Quantity *
IMPLAN *	TSP - Total Suspended Particulates *
INTEGER *	USGS - United States Geological Survey
K-V Act - Knutson-Vandenberg Act *	U S - United States
KV - Kilovolt	USDA - United States Department of Agriculture
LRMP - Land and Resource Management Plan	USDI - United States Department of Interior
LTSY - Long Term Sustained Yield *	VAC - Visual Absorption Capacity *
MA - Management Area	VMS - Visual Management System
MAUM - Thousand Animal Unit Month	VQO - Visual Quality Objective *
MBF - Thousand Board Feet	WFUD - Wildlife and Fish User Day *
MCF - Thousand Cubic Feet	WRC - Water Resources Council
MIH - Management Information Handbook	WRS - Wilderness Recreation Spectrum *
MIS - Management Indicator Species	
MM\$ - Million Dollars	
MMBF - Million Board Feet	
MMCF - Million Cubic Feet	
MOU - Memorandum of Understanding	

# *APPENDIX N*

*Public Comments And  
Forest Service Responses*

*Continued From Appendix Volume II*

**REFORESTATION  
Code 702**

**COMMENT NO. 1:** I AM CONCERNED ABOUT THE PLANNED REGENERATION LAG TIMES OF 10-20 YEARS THIS COULD LEAD TO CONSIDERABLE ACREAGE OUT OF PRODUCTION OVER A 20 YEAR PERIOD. IN ADDITION IT WILL RESULT IN CONSIDERABLE ACREAGE OF "BACK LOG REGEN NEEDS" WHICH BY LAW (NFMA) ARE NOT ACCEPTABLE (MY INTERP.) ... AFTER TREATING ALL BACKLOG THE F S IS TO REGEN AS MANY AC AS IT CUTS EVERY YEAR

I ALSO THINK A 1-YEAR REGEN LAG ON LPP IS OPTIMISTIC. STOCKING SURVEY DATA ON NON BUG KILL REGEN CUTS WOULD GIVE A MORE REALISTIC ESTIMATE.

**FOREST SERVICE RESPONSE:**

Our current and ongoing program identifies our artificial and natural regeneration needs so we can meet the NFMA requirement of treating cut over lands and maintaining planned timber production on all other forested lands so as to prevent a backlog of needed work. Our proposed Forest Plan identifies the use of a mix of reforestation methods designed to be an efficient program and meet these NFMA requirements. Our assumed regeneration lag times were based on a study conducted in 1979 and 80 on cutover and other deforested lands on this Forest and therefore reflects our most current on-the-ground experience. The assumed natural regeneration lag for lodgepole pine is five years.

**COMMENT NO. 2:** I HAVE ADJOINING PROPERTIES THAT HAVE BEEN LOGGED IN THE NOT-SO-RECENT PAST. THERE HAVE BEEN VIRTUALLY NO AREAS THAT HAVE REGENERATED NEW GROWTH OF ANY SORT ALTHOUGH REPLANTING HAS BEEN ATTEMPTED.

**FOREST SERVICE RESPONSE.**

All cutover or otherwise deforested land on this Forest has a stand activity record initiated that records, along with other information, the monitoring of the tree stocking and growth in the plantation. Our basic reforestation objective is to maintain all forest lands in appropriate forest cover and we are currently meeting or exceeding Regional standards in this area. We do have a small amount of deforested lands that have been difficult to reforest, but we keep track of these areas through our monitoring program and are working to get and keep them in a stocked condition.

**COMMENT NO. 3:** I USED TO SHOW FILMS IN MY CLASSROOM ON FOREST SERVICE CLEARCUTTING AND SELECTIVE CUTTING TECHNIQUES. THE CUTTING TECHNIQUES WORK BUT THE REFORESTATION DOESN'T. A BIG MONEYMAKER IN THIS AREA IS THE PONDEROSA PINE. IT TAKES 200-300 YEARS TO GROW A DECENT ONE. THE HUMAN ANIMAL IS KNOWN TO BE QUITE IMPATIENT. THE FOREST SERVICE HAS HAD HORRIBLE SUCCESS IN TRYING TO GROW NEW TREES.

**FOREST SERVICE RESPONSE:**

This Forest has a significant number of reforested plantations well stocked with a variety of species and growing at rates meeting or exceeding the predictions of our managed yield.



tables. We have and will continue to meet or exceed our Regional reforestation standards. We consider our Forest program a success.

**COMMENT NO. 4: TIMBER REMOVAL SHOULD BE ALLOWED ONLY WHERE GUARANTEED RESEEDING SUCCESS IS KNOWN IN ADVANCE BY PRIOR EXPERIMENTATION OR EXPERIENCE.**

**FOREST SERVICE RESPONSE:**

We are bound by the rule of "reasonable assurance" that lands can be restocked (36 CFR 219.14)

**COMMENT NO. 5 EFFORTS IN REFORESTATION AND SILVICULTURE SHOULD BE DIRECTED TOWARD INCREASING THE PROPORTION OF PONDEROSA PINE AVAILABLE FOR HARVEST FROM THE W.W. TO HISTORIC LEVELS. THIS MEANS DE-EMPHASIZING REGENERATION TECHNIQUES THAT FAVOR SHADE TOLERANT SPECIES; TECHNIQUES HEAVILY EMPLOYED IN THE 1950'S, 60'S, AND 70'S.**

**FOREST SERVICE RESPONSE:**

Percent of growing stock in ponderosa pine has not changed from the 1969 inventory to the 1979 inventory, therefore, it is being maintained at recent historic levels. Regeneration cut in reforestation prescriptions also speak to the best species or species mix applicable to the site. We emphasize reforestation of ponderosa pine on pine climax sites and in mixed conifer associations where pine might be better suited to reduce problems with other species such as Douglas-fir and grand fir on western spruce budworm susceptible areas. Ponderosa pine is presently one of the major species in our planting program and will continue to play a major role in our reforestation efforts.

**COMMENT NO. 6 I BELIEVE THAT ALTERNATIVE C IS IN THE BEST INTEREST OF THE PEOPLE. THERE ARE A FEW ADDITIONS I WOULD LIKE TO SEE MADE. A) MORE REFORESTATION NOT ENOUGH IS INCLUDED TO REPLACE TIMBER LOST TO CUTTING, DISEASE, AND FIRE.**

**FOREST SERVICE RESPONSE:**

Our calculations indicate that the prescribed reforestation levels will be adequate.

**COMMENT NO. 7 BE CAUTIOUS IN REFORESTATION EFFORTS TO MAINTAIN A WIDE GENETIC DIVERSITY, IN THE FOREST SPECIES.**

**FOREST SERVICE RESPONSE**

We agree.

**COMMENT NO. 8 THE CONFEDERATED TRIBES ALSO SUPPORT ACCELERATED ESTABLISHMENT OF TIMBER STANDS IN RIPARIAN ZONES WITH A PARTICULAR EMPHASIS TO ENCOURAGE WHITE FIR IN THESE AREAS.**

**FOREST SERVICE RESPONSE**

Silvicultural prescriptions specify, among other things, the species or species mix to be managed on a specific site. All sites, including riparian zones, proposed for treatment will emphasize the species best suited to that site.

**COMMENT NO. 9:** IF LTSY IS PREDICATED ON SUCCESS IN REVEGETATION AND WHEN 75 TREES PER ACRE IS AN ACCEPTABLE REGENERATION DENSITY, AND IF NATURAL REGENERATION CAN BE A FALLBACK POSITION, AND LODGEPOLE IS ACCEPTABLE ON ANY SITE AS A SITE CONVERSION SPECIES, IT CAN BE QUESTIONED WHETHER COMPUTER MODELING IS POWERFUL OR MEANINGFUL. WHAT PERCENTAGE REVEGETATION SUCCESS AFTER FIVE AND 20 YEARS IS UTILIZED IN THE MODEL?

**FOREST SERVICE RESPONSE:**

The model assumes 100 percent success, but this includes the assumption that 25 percent of plantations will require supplemental planting to achieve minimum stocking levels.

**COMMENT NO. 10:** IS IT TRUE THAT THE FOREST IS ONLY OBLIGATED TO "TRY" TO REVEGETATE? THAT IS, IF SEEDLINGS DIE IS THERE NO SECOND ATTEMPT? WHAT IS THE BACKLOG OF UNVEGETATED SITES AND WILL FUNDS BE AVAILABLE TO CATCH UP WITH REVEGETATION ON THESE ACRES? IS THE FOREST EVEN "TRYING" TO REVEGETATE AT THE SAME PACE AS HARVESTING? HOW ARE REVEGETATION BUDGETS LINKED TO HARVEST ON A SITE?

**FOREST SERVICE RESPONSE:**

NFMA, Sec. 4(d)(1) states "It is the policy of the Congress that all forested lands in the National Forest system shall be maintained in appropriate forest cover with species of trees, etc in accordance with land management plans." Secretary of Agriculture Regulations 36 CFR part 219.27(c)(3) states "when trees are cut to achieve timber production objectives, the cuttings shall be made in such a way as to assure that technology and knowledge exists to adequately restock the lands within five years after harvest." Regeneration lag times assumed in our proposed land management plan reflects a coordination between regeneration and final harvest times to meet NFMA requirements. All backlog reforestation areas have been certified complete or are in an active reforestation status. Every acre that is prescribed for a regeneration harvest also has an associated reforestation prescription. All cutover acres are based on a silvicultural prescription and monitored until the work is certified complete. Every reforestation site activity record, whether harvest generated or naturally caused, has a funding category designated and this record forms the basis for budget requests.

**COMMENT NO. 11:** CAN PONDEROSA PINE BE REPLANTED ON ALL SITES PREVIOUSLY CONTAINING THIS SPECIES? IS RESTOCKING CONSIDERED SUCCESSFUL IF PONDEROSA SITES ARE REPLACED BY LODGEPOLE?

**FOREST SERVICE RESPONSE**

Yes, on suitable forestland. Reforestation is considered successful if the area is adequately stocked with any species that is suitable to that site.

**COMMENT NO. 12** CAPABLE LAND IS LAND ABLE TO BE 10% STOCKED WITH COMMERCIAL SPECIES (DEIS III-18) WILL THE WWNF ACCEPT 10% OF 75 TREES/ACRE OR DOES 10% REFER TO FOREST COVER? IS LODGEPOLE CONSIDERED COMMERCIAL?

**FOREST SERVICE RESPONSE**

The 10 percent more accurately refers to forest cover. Yes, lodgepole pine is considered a commercial species

**COMMENT NO. 13:** YOU NEED TO DO THE PLANTING AND THINNING THAT IS NECESSARY TO KEEP THE FOREST GROWING AS MUCH AS IT CAN

**FOREST SERVICE RESPONSE:**

Planting and thinning are an integral part of implementing any alternative. However, the economic efficiency of these practices are also considered For example, on some sites it is more efficient to plan for natural tree seeding due to the high cost, and sometimes low success rate, of planting

**COMMENT NO. 14:** I FEEL THE LUMBER MANUFACTURERS HAVE MORE RESPECT, CONSIDERATION, AND BY FAR A BETTER REFORESTATION, AND FOREST MANAGEMENT PROGRAM THAN THE FOREST SERVICE

**FOREST SERVICE RESPONSE:**

From the standpoint of meeting their particular goals, this may be true.

**COMMENT NO. 15:** THE FOREST SERVICE HAS FAILED TO PROPERLY REFOREST TIMBERED (LOGGED) AREAS WITH THE MONEY PAID FOR SUCH BY THE LOGGING COMPANY

**FOREST SERVICE RESPONSE.**

Purchasers of National Forest timber sales pay for the timber removed Timber sale receipts are then deposited in the national treasury and part of these deposits constitute a special fund called the Knutson-Vandenberg (K-V) Act fund which is appropriated to cover the cost of reforestation and other sale area improvement work. We have an ongoing program of planting, seeding, site preparation, and tree protection using these K-V funds to meet our annual reforestation goals See response to Comment No. 2 on reforestation success

**COMMENT NO. 16:** FOREST IS A RENEWABLE RESOURCE AND WHEN PROPERLY HARVESTED, REPLANTED, AND MAINTAINED MUCH THE SAME AS A FARMER WOULD WITH HIS CROPS - EVERYONE BENEFITS

**FOREST SERVICE RESPONSE.**

We appreciate your point of view However, many people do not believe that "tree farming" is appropriate on the National Forests

**COMMENT NO. 17:** I BELIEVE THE FOREST SERVICE COULD BETTER SERVE NATIONAL INTERESTS BY IMPLEMENTING A FAR MORE AGGRESSIVE TREE PLANTING CAMPAIGN.

**FOREST SERVICE RESPONSE:**

More planting would result in a higher harvest level, but costs of planting are often more expensive than the eventual value of the wood fiber produced. We have attempted to rely on natural regeneration where it is clearly economically advantageous

**COMMENT NO. 18:** REGENERATION LAG TIME - (APPENDIX, PAGE B-37) THE WALLOWA-WHITMAN'S USE OF A 20 YEAR NATURAL REGENERATION LAG TIME FOR THE MID TO HIGHER ELEVATION MIXED CONIFER TYPES IS INCONSISTENT WITH THE 10 YEAR LAG TIME USED BY THE UMATILLA NATIONAL FOREST. ADDITIONAL DOCUMENTATION IS NEEDED TO JUSTIFY THESE DIFFERENCES.

**FOREST SERVICE RESPONSE.**

The assumed regeneration lag times are based on Forest-wide on-the-ground experience See response to Comment No. 1

**COMMENT NO. 19:** I DON'T NEED TO SAY THAT TREES GROW SLOWER HERE IN EASTERN OREGON THAN THEY DO IN THE WESTERN PART OF THE STATE, BUT HAVE YOU THOUGHT-- THERE MAY BE NO STRONG BASE FOR A SUSTAINABLE TIMBER ECONOMY IN THIS AREA WHERE IT TAKES A HUNDRED YEARS OR MORE TO GROW A GOOD TREE.

**FOREST SERVICE RESPONSE.**

We believe timber can continue to be an important and sustained part of the local economic base.

**COMMENT NO. 20:** I HAVE DONE STOCKING SURVEYS FOR THE WALLOWA-WHITMAN AND THE NRA ON THE NORTH SIDE OF THE WALLOWAS THE PLANTED TREES WHICH HAD LIVED WOULD BE TALLIED IN THE STOCKING SURVEY, BUT THE GROWTH WAS SMALL AND EVEN AFTER SEVERAL YEARS THE TREES WERE OFTEN STRUGGLING JUST TO LIVE WORKING IN THE DESCHUTES NATIONAL FOREST, I COULD SEE THE DRAMATIC DIFFERENCE WHERE THE SEEDLING PONDEROSA PINES WERE GROWING SEVERAL INCHES A YEAR. I HOPE THIS DIFFERENCE CAN BE ADEQUATELY EXPRESSED IN THE FOREST PLAN, BECAUSE IT IS MUCH MORE DIFFICULT AND SLOWER TO REGENERATE TREES IN THIS AREA

**FOREST SERVICE RESPONSE:**

We agree that regeneration can often be challenging. Growth rates are accounted for in the planning process

**SUSTAINED TIMBER YIELD  
Code 703**

**COMMENT NO. 1:** THE BUDWORM HAS HAD A FAIRLY LARGE IMPACT ON PRESENT TREE GROWTH AND EVEN FUTURE MERCH. GROWTH OF TOP KILLED TREES OR TREES THAT ARE AFFECTED WITH SECONDARY DISEASE AGENTS HAS THIS BEEN INCLUDED IN YOUR CALCULATIONS FOR SUSTAINED YIELD OUTPUTS? IF NOT, I AM CONCERNED THAT THE OUTPUTS ARE NOT AT A SUSTAINED YIELD LEVEL IF YOU PLAN TO CORRECT AT THE NEXT INVENTORY, I AM ALSO CONCERNED BECAUSE THE CURRENT INVENTORY WAS NOT INCORPORATED INTO THE CURRENT UNIT PLANS AND THE CUT CONTINUES (EVEN AFTER FORPLAN RUNS HAVE SHOWN) AT A DEPARTURE RATE UNDER THESE UNIT PLANS. (REFERENCE - CURRENT CUT LEVELS V S. PRESENT DIRECTION CUT LEVELS).

**FOREST SERVICE RESPONSE**

The next timber inventory, scheduled for 1990, will be influenced by the spruce budworm and other events, such as fires, that have occurred since the last inventory. It is correct that the current allowable harvest level is not based on the Unit Plans, but on the timber management plan. When the information from the last inventory was available (1980) the intent was to prepare an EIS for the Forest Plan rather than prepare a new timber management plan for the Unit Plan. Obviously, the preparation of the Forest Plan has taken longer than expected.

**COMMENT NO. 2** I WISH TO EXPRESS MY STRONG SUPPORT FOR THE CONCEPT AND IMPLEMENTATION OF SUSTAINED YIELD IN FOREST MANAGEMENT. I BELIEVE IT IS RESPONSIBLE STEWARDSHIP OF OUR NATIONAL RESOURCES TO MANAGE THEM SO THAT FUTURE GENERATIONS CAN ENJOY THEIR BENEFITS. TIMBER IS A RENEWABLE RESOURCE, BUT ONLY IF WE TAKE THE EFFORT TO ENSURE THE OPPORTUNITY EXISTS FOR THAT RENEWAL. IN GENERAL, REGULATED TIMBER HARVEST SCHEDULING BASED UPON A DEPARTURE FROM NONDECLINING YIELD IS IRRESPONSIBLE MISMANAGEMENT OF OUR FORESTS WHILE THE DECISION TO KEEP TIMBER HARVEST TO A SUSTAINABLE LEVEL DOES HAVE A DETRIMENTAL EFFECT ON EMPLOYMENT, I FEEL WE SHOULD BE WILLING TO ACCEPT THIS COST TO PROVIDE THE BENEFIT OF A WALLOWA-WHITMAN FOREST TO FUTURE GENERATIONS.

**FOREST SERVICE RESPONSE:**

Many respondents agreed. We have not chosen to implement a departure alternative.

**COMMENT NO. 3:** THE SUSTAINED YIELD OF TIMBER IS TOO HIGH IN THE EIS. RECENT RESEARCH ON MANAGED FORESTS IN OREGON, GEORGIA, GERMANY, AND CHINA HAS SHOWN THAT FOREST PRODUCTIVITY DECREASES DRAMATICALLY AFTER THE THIRD OR FOURTH ROTATION. GRRC RECOMMENDS A TRUE SUSTAINED-YIELD BY SEVERELY REDUCING EXISTING HARVEST LEVELS.

**FOREST SERVICE RESPONSE:**

Through current research we are learning a great deal about long-term productivity of the Forests. Some management policies have already changed in response to this new knowledge, for instance, subsoiling and tilling of disturbed forest soils and retention of dead and down woody debris for future nutrient cycling. As we learn more, we only need to retain the

flexibility to make necessary adjustments. The Forest planning process is designed to provide that flexibility.

**COMMENT NO. 4:** WE NEED TO MAINTAIN OUR HISTORICAL SUSTAINED YIELD RATE OF TIMBER HARVEST, WITH REGARDS TO ALL SPECIES, INCLUDING PONDEROSA PINE IT HAS BEEN PROVEN TIME AFTER TIME THAT THIS CAN BE DONE WITH PROPER FOREST MANAGEMENT, AND OUR NEW TECHNOLOGY.

**FOREST SERVICE RESPONSE:**

Economic stability can certainly be enhanced by maintaining historic yields. Historic yields have been the result of many factors, including the Forest land base available for timber harvest. It may not be possible to maintain historic yields on a reduced land base even if technology can increase yields from a given area.

**COMMENT NO. 5:** YOU PEOPLE ARE OFFICIALLY CHARGED WITH MANAGING THE FOREST, SO MANAGE IT. DECIDE ON THE BEST PRACTICAL APPROACH AND TAKE IT. IF IT IS YOUR OPINION THAT THE FOREST CAN NOT, IN THE LONG RUN, SUPPORT THE CURRENT LEVEL OF HARVEST, THEN SO BE IT. IF, IN THE LONG RUN, OUR LOCAL ECONOMY HAS TO HAVE A BROADER ECONOMIC BASE THAN THE CURRENT DEPENDANCE ON WOOD PRODUCTS, LETS GET STARTED. IF, HOWEVER, THE PRESENT LEVEL OF HARVEST AND INDUSTRY CAN BE MAINTAINED, LETS DO THAT.

**FOREST SERVICE RESPONSE:**

We are charged with managing the Forest to provide the level and variety of goods and services that the public desires. The economic base is one of the considerations. We have confidence in our technical ability to manage the resources. By law, answering the political questions of how much of each resource to provide requires public involvement.

**COMMENT NO. 6:** I SUPPORT ALTERNATIVE C BECAUSE I THINK THAT IT IS THE MAXIMUM SUSTAINABLE HARVEST LEVEL WITHOUT PLACING SERIOUS STRAIN ON THE OTHER FOREST RESOURCES.

**FOREST SERVICE RESPONSE:**

Thank you for your view.

**COMMENT NO. 7:** I BELIEVE THAT TIMBER SHOULD BE HARVESTED AT A RATE THAT CAN BE MAINTAINED INFINITELY. CUTTING MORE TREES THAN CAN RE-GROW THREATENS THE FUTURE STABILITY OF OUR COMMUNITY AND MAY PERMANENTLY DAMAGE THE ENVIRONMENT.

**FOREST SERVICE RESPONSE:**

Many people share your view.

**COMMENT NO. 8:** THE ALLOWABLE HARVEST IS TOO HIGH. IT IS A TRAGEDY THAT YOUR FOREST WOULD EVEN PROPOSE SUCH A HIGH HARVEST. I THOUGHT YOU WERE ONE FOREST

THAT WOULD WITHSTAND THE PRESSURES TO INCREASE THE HARVEST BEYOND SUSTAINABLE RATES. DO YOU REALLY THINK SUCH HIGH HARVEST RATES ARE IN THE BEST INTEREST OF THE STATE?

**FOREST SERVICE RESPONSE:**

We believe the rate we propose will be sustainable, but subject to adjustment from the results of future timber inventories and future Forest Plans. We believe the harvest levels proposed are in the best interest of the state at this point in time.

**COMMENT NO. 9:** THE ISSUE OF OVER-CUTTING ON THE WALLOWA-WHITMAN NATIONAL FOREST IS FALLACIOUS. FROM MY EXPERIENCE AS A FOREST LANDOWNER, I KNOW THAT PROPERLY MANAGED TIMBER LAND CAN PRODUCE AT OR ABOVE THE LEVELS YOU HAVE ESTABLISHED. IF YOU ARE NOT GETTING THIS KIND OF PRODUCTION, THEN YOU ARE NOT MANAGING IT PROPERLY. I SUGGEST YOU REVIEW BOTH YOUR INVENTORY DATA AND MANAGEMENT POLICIES BEFORE SETTING LONG RANGE PRODUCTION LEVELS WHICH ARE TOO LOW TO MEET THE NEEDS OF SOCIETY.

**FOREST SERVICE RESPONSE.**

Inventory data and management policies have been carefully reviewed. We believe the timber production levels are correct, considering the other resource considerations -- considerations which may not affect management of private lands.

**COMMENT NO. 10:** BETWEEN THE TWO BIG MONEY SPECIAL INTERESTS (LUMBER AND CATTLE), WE THE REAL PEOPLE DO NOT WANT THE LANDS OVER CUT OR OVER GRAZED BEYOND ITS OWN LIMITS!!

**FOREST SERVICE RESPONSE:**

Most people share your concern.

**COMMENT NO. 11:** ONRC HAS ALWAYS BELIEVED THE WW WAS OVERCUTTING AND APPARENTLY THIS IS TRUE. PLEASE EXPLAIN IN DETAIL HOW THE 232,000 ACRE ERROR (OVER-ESTIMATION) WAS MADE IN THE TIMBER INVENTORY? OVERCUTTING AT 10-20 MMBF/YR FOR A DECADE OR MORE HAS COST THE FOREST ENVIRONMENT IN THE FORM OF DAMAGE TO OTHER RESOURCES AND CURRENT PRESSURE TO KEEP CUTS ARTIFICIALLY HIGH WITH POOR REGARD FOR TRUE MULTIPLE USE.

**FOREST SERVICE RESPONSE.**

The 232,173 acre figure is the difference in commercial forest land between the Forest Plan and the 1962 Timber Management Plan. This is documented in Chapter 2 of the Forest Plan. It results primarily from a difference between the results of the inventory plot expansion technique in the timber management plan, and mapped-in-place acres from the 1969 inventory.

**COMMENT NO. 12.** FOR MANY YEARS THE FOREST SERVICE HAS OVER-ROADED AND OVER-CUT IN OUR NATIONAL FORESTS AND IT APPEARS IT INTENDS TO CONTINUE SUCH FAULTY MANAGEMENT. THE NFMA ACT OF 1976 MANDATES MULTIPLE USE WITH EQUAL

CONSIDERATION TO RECREATION, WILDLIFE, FISHERIES, GRAZING, ETC. THE RECENT DEIS SHOWS A GLARING FAILURE TO ADDRESS MULTIPLE USE AND YOUR ADMITTED OVERCUTTING IN THE WWNF MUST BE STOPPED IMMEDIATELY

**FOREST SERVICE RESPONSE:**

We believe all resources were given equal consideration in the planning process. We have been harvesting timber at a rate established by the 1962 timber management plan as amended. This was not based solely on the land allocation determined through unit planning, nor did it consider more recent (NFMA) criteria for determining land suitability for timber production. But we were not overcutting in the sense that the established level (established by the Timber Management Plan) for the Forest was being overharvested. See response to Comment No. 1, this section.

**COMMENT NO. 13: TIMBER OVERCUTTING: TIMBER HARVEST SHOULD BE SIGNIFICANTLY REDUCED, TO COMPENSATE FOR THE MORE THAN A DECADE OF EXCEEDING SUSTAINED-YIELD LEVELS BY MORE THAN 15%**

**FOREST SERVICE RESPONSE:**

With the implementation of the Forest Plan, the timber harvest level will be in accord with the land management direction and will be on a sustained yield level based on that direction.

**COMMENT NO. 14 WHAT IS THE EXPECTED LTSY FOR PONDEROSA?**

**FOREST SERVICE RESPONSE:**

Although long-term sustained yield is not normally calculated separately by species, we estimate that the maximum sustainable level of ponderosa pine under Alternative C is about 35 million board feet per year.

**COMMENT NO. 15: IF PRECOMMERCIAL THINNING DOES NOT YIELD THE DESIRED BENEFIT, THE ALLOWABLE SALE QUANTITY (ASQ) CAN BE ADJUSTED. THIS CONSTITUTES THE "EARNED HARVEST" QUANTITY (PLAN-E-17). THIS "ESCAPE CLAUSE" APPEARS TO MEAN THAT IF SUFFICIENT FUNDS ARE NOT AVAILABLE TO FINANCE PRECOMMERCIAL THINNING THAT ADDITIONAL ACRES ARE CUT TO MEET THE ASQ. HOW WOULD THE ASQ ITSELF NEED TO BE ADJUSTED? WOULD THIS BE UPWARD OR DOWNWARD? IF 33% MORE ACRES WILL NEED TO BE CUT TO MEET THE ASQ, HOW DOES THIS AFFECT LONG-RANGE PLANNING? WERE THE FORPLAN RUNS MADE ASSUMING THE MOST OPTIMISTIC RESULTS OF THINNING? WOULDN'T THE LTSY POTENTIAL BE MUCH LESS THAN EXPECTED IF THIS ASSUMPTION IS NOT MET? WOULDN'T HARVESTING ON THE BASIS OF A DESIRED ASQ WHICH CANNOT BE TAKEN FROM THE ASSUMED LAND BASE CONSTITUTE A DEPARTURE EVEN IN THE FIRST DECADE?**

**FOREST SERVICE RESPONSE**

If funding for precommercial thinning is insufficient to complete all of the needed work, future growth of the stands will be reduced. A reduction in future growth will negatively affect the current allowable sale quantity. Plan Appendix E describes the process for calculating the reduction in ASQ to be used if precommercial thinning is not fully funded.



**COMMENT NO. 16.** IS LTSY CALCULATED ON THE BASIS OF MMCF UNITS ALONE AND DOES FORPLAN ACCOUNT FOR THE FUTURE LOSSES IN BOARD FEET THAT CAN BE PRODUCED FROM A GIVEN VOLUME OF SAWLOGS IN DETERMINING THE REQUIRED NUMBER OF ACRES TO BE HARVESTED? UNLESS THESE KINDS OF CONCERNS ARE FULLY ADDRESSED IN THE PLANNING PROCESS, MANY MORE ACRES MIGHT BE CLEARCUT THAN STATED, GIVEN THE "EARNED HARVEST" PROVISION

**FOREST SERVICE RESPONSE.**

Long-term sustained yield capacity is calculated on the basis of MMCF (millions of cubic feet) We recognize that board foot/cubic foot ratios will decline in future decades This is reflected in the EIS wherever board foot projections are made

**COMMENT NO. 17:** THE COMMUNITY STABILITY PLAN (RATHER THAN BEING A PLAN TO "CUT AND RUN" AS SOME HAVE CLAIMED) CAN PROVIDE A SUSTAINED YIELD AT THIS LEVEL IF MORE INTENSIVE MANAGEMENT IS PRACTICED BY THE FOREST SERVICE. THIS PLAN (BY INCREASING THE HARVEST) WILL PROVIDE THE FUNDS TO DO JUST THAT.

**FOREST SERVICE RESPONSE**

We agree that the "community stability" alternative can provide a sustainable level. There is no guarantee that funds will be provided, just as there is no guarantee funds will be provided for other alternatives

**COMMENT NO. 18:** IF BAKER'S STABILITY IS DEPENDABLE ON CUTTING PONDEROSA PINE WE ARE HEADED FOR TROUBLE THE FOREST SERVICE'S OWN DATA CLEARLY INDICATES THAT THE CUT OF PONDEROSA HAS BEEN FAR BEYOND ANY SUSTAINED YIELD BASIS. YOU MUST NOT BE PRESSURED INTO ALLOWING THE SAME RATE OF CUT OR IT WON'T BE LONG UNTIL ITS ALL GONE AND THE MILLS SHUT DOWN.

**FOREST SERVICE RESPONSE**

Thank you for your view We agree that the rate of harvest of ponderosa pine must be reduced

**COMMENT NO. 19:** IF THIS COMMUNITY STABILITY ALTERNATIVE IS ADOPTED WE WILL HAVE A FLURRY OF LOGGING ACTIVITY -- THEN IT WILL STOP SIMPLY BECAUSE THE RESOURCE IS GONE. I URGE YOU TO ADOPT THE LONG-TERM VIEW AND PROVIDE FOR STABILITY BY GETTING ON A STRICT SUSTAINED YIELD BASIS AND STAY THERE GO WITH THE FACTS, THE DATA AND DON'T LET POLITICAL PRESSURE INTIMIDATE YOU INTO RAPING THE WALLOWA-WHITMAN.

**FOREST SERVICE RESPONSE:**

Thank you for your views

**COMMENT NO. 20:** IN 1979, WE PUBLISHED A RESEARCH PAPER ENTITLED TIMBER PRODUCTIVITY IN THE WALLOWA AND WHITMAN NATIONAL FORESTS THE THESIS OF THE PAPER WAS THAT FOREST SERVICE TIMBER YIELD TABLES FAILED TO ACCOUNT FOR THE LOW STOCKING CAPACITY OF MANY OF THE SITES IN THE WALLOWA-WHITMAN. ALTHOUGH WE SENT YOUR OFFICE A COPY OF THE REPORT, YOU MAY NOT HAVE SEEN IT.

AS NOTED IN MACLEAN AND BOLSINGER'S 1973 RESEARCH PAPER, ESTIMATING PRODUCTIVITY ON SITES WITH A LOW STOCKING CAPACITY (USDA FS RP PHW-153), "DATA COLLECTED BY HALL IN THE BLUE MOUNTAINS OF EASTERN OREGON SUGGEST THAT SUBSTANTIAL AREAS OF PONDEROSA PINE TYPE WILL NOT SUPPORT\* THE NUMBER OF TREES ASSUMED IN MEYER'S YIELD TABLES (USDA TECHNICAL BULLETIN 630) MEYER EXCLUDED ALL PLOTS WITH A STAND DENSITY INDEX (THE NUMBER OF TREES PER ACRE WHEN THE AVERAGE STAND DIAMETER IS 10 INCHES) LESS THAN 250. HIS AVERAGE STAND DENSITY INDEX WAS 370 THE "NORMAL" STAND DENSITY INDEX FOR MIXED CONIFER STANDS IS USUALLY HIGHER - SOME YIELD TABLES PLACE IT AS HIGH AS 500

CHEC'S REPORT WAS BASED ON FOREST SERVICE DATA FROM 159 INVENTORY PLOTS THESE PLOTS WERE LISTED AS UNDISTURBED BY INVENTORY CREWS AND SHOULD PRESUMABLY HAVE REACHED THEIR FULL POTENTIAL STOCKING LEVELS CHEC FIELD CHECKED 25 DIFFERENT PLOTS AND CONCLUDED THAT THEY WERE AT LEAST 96 PERCENT FULLY STOCKED BASED ON THEIR CAPABILITIES

STAND DENSITY INDEX CAN BE EASILY CALCULATED FROM THE FOREST SERVICE INVENTORY DATA. BASED ON 28 PONDEROSA PINE PLOTS, CHEC ESTIMATED THE AVERAGE STAND DENSITY INDEX TO BE 184, OR ABOUT HALF THE "NORMAL" INDEX OF MEYER'S TABLES. BASED ON 131 MIXED CONIFER PLOTS, CHEC ESTIMATED THE AVERAGE STAND DENSITY INDEX TO BE 302, OR ABOUT 60 PERCENT OF "NORMAL"

ALTHOUGH FOREST SERVICE YIELD TABLES USED IN PLANNING AT THE TIME OF CHEC'S REPORT WERE DEVELOPED AFTER MACLEAN AND BOLSINGER'S PAPER WAS PUBLISHED, PLANNERS MADE LITTLE ATTEMPT TO CORRECT FOR LOW STOCKING CAPACITY. THE YIELD TABLES ASSUMED A STAND DENSITY INDEX OF 300 FOR PINE AND 360 FOR MIXED CONIFER, SIGNIFICANTLY GREATER THAN CHEC'S ESTIMATES CHEC URGED THE FOREST SERVICE TO CORRECT THE YIELD TABLES, BUT WAS TOLD SUCH CORRECTIONS WOULD HAVE TO WAIT UNTIL A NEW INVENTORY AND THE NEXT ROUND OF PLANNING

HOWEVER, I UNDERSTAND FROM MEETINGS WITH REGIONAL PLANNERS THAT THE MOST RECENT INVENTORY MADE NO ATTEMPT TO MEASURE STOCKING CAPACITY. I UNDERSTAND THAT THE NEW WALLOWA-WHITMAN YIELD TABLES ARE BASED ON THE INLAND EMPIRE VERSION OF THE PROGNOSIS MODEL, ALTHOUGH FORESTS IN THE INLAND EMPIRE ARE CAPABLE OF CONSIDERABLY GREATER STOCKING LEVELS THAN THE WALLOWA-WHITMAN. FURTHERMORE, I UNDERSTAND THAT WALLOWA-WHITMAN PLANNERS FOUND THAT THEIR MANAGED YIELD TABLES (PRECOMMERCIAL THINNING ONLY) WERE "ONLY" 20 PERCENT GREATER THAN MEYER'S, WHICH THEY CONSIDERED REASONABLE BECAUSE MEYER'S ASSUMES UNMANAGED STANDS

BUT IF WALLOWA-WHITMAN STANDS ARE ONLY CAPABLE OF HALF THE STOCKING LEVELS OF MEYER'S TABLES, THEN THE WALLOWA-WHITMAN TABLES ARE ACTUALLY 140 PERCENT GREATER THAN UNMANAGED STANDS SHOULD BE EXPECTED TO PRODUCE. IT IS COMPLETELY UNREALISTIC TO EXPECT THAT PRECOMMERCIAL THINNING WOULD PRODUCE A 140 PERCENT INCREASE IN YIELDS.

IT IS EXTREMELY DISAPPOINTING THAT THE FOREST SERVICE DID NOT ADDRESS THIS PROBLEM IN ITS RECENT INVENTORY I SUGGEST THAT A REVISED INVENTORY BE MADE BETWEEN THE DRAFT AND FINAL PLANS TO ESTIMATE THE TRUE STOCKING CAPACITY OF THE WALLOWA-WHITMAN AND CORRECT THE TIMBER YIELD TABLES

IF SUCH AN INVENTORY IS NOT POSSIBLE, HALL'S ECOLOGICAL CLASSIFICATION SYSTEM, WHICH INCLUDES PRODUCTIVITY ESTIMATES, COULD BE COMPARED WITH THE PROGNOSIS YIELD TABLES. FAILURE TO CORRECT THE TIMBER YIELD TABLES WILL LEAVE THE FOREST

SERVICE OPEN TO CHARGES THAT IT IS VIOLATING THE SUSTAINED YIELD REQUIREMENTS OF THE MULTIPLE-USE SUSTAINED-YIELD ACT AND THE NATIONAL FOREST MANAGEMENT ACT

**FOREST SERVICE RESPONSE**

Both empirical and managed yield tables are based on Forest inventory and stand examination data, therefore, reflecting our local area conditions. Calculated stand density indices, by working group, from both empirical and management yield data do reflect lower than normal stocking.

**COMMENT NO. 21:** OVERCUTTING ON THE WW ALSO SKEWS THE COMPARISON OF ALTS. RECENT CUTTING LEVELS OF 159 MMBF (20 MMBF OVER THE CURRENT DIRECTION SUSTAINED YIELD OUT OF 139 MMBF) SHOULD HAVE BEEN CORRECTED IN 1979 WHEN THE PROBLEM WAS DISCOVERED. UNFORTUNATELY, THE INFLATED OVERCUTTING FIGURES ARE USED BY THE PUBLIC TO COMPARE ALTS AND GIVES THE IMPRESSION THAT THE DP IS LESS TIMBER ORIENTED WHEN IN FACT IT IS MORE TIMBER ORIENTED THAN THE CURRENT DIRECTION

**FOREST SERVICE RESPONSE**

In hindsight, we agree that the timber management plan should have been revised. You are correct that the preferred alternative of the draft plan is more commodity oriented than the sum of the unit plans.

Recent harvest levels were based on the timber management plan that was in effect. By definition, therefore, this was not overcutting.

**COMMENT NO. 22:** THE RESOURCES PLANNING ACT REQUIRES THE FOREST SERVICE TO CALCULATE NONDECLINING TIMBER SALE LEVELS ON THE WALLOWA AND WHITMAN FORESTS SEPARATELY. THE FOREST SERVICE DID NOT DO THIS, AND EACH FOREST WILL EXPERIENCE DECLINING TIMBER SALE LEVELS AT SOME POINT IN THE FUTURE.

**FOREST SERVICE RESPONSE:**

This analysis is displayed in Appendix B, Benchmark Analysis

**COMMENT NO. 23:** THE LAW SPECIFIES THAT THE FOREST SERVICE MUST INSURE THAT SALES OF TIMBER ARE NONDECLINING OVER TIME. ALTHOUGH THE FOREST SERVICE SELLS TIMBER IN BOARD FEET, IT CALCULATED NONDECLINING SALE LEVELS IN CUBIC FEET. THIS IS CERTAIN TO RESULT IN DECLINES IN BOARD FOOT TIMBER SALES TO AS LOW AS 115 MILLION BOARD FEET, A FACT THAT IS NOT FULLY DISCLOSED IN THE EIS.

**FOREST SERVICE RESPONSE:**

Both allowable sale quantity and nondeclining flow are calculated on a cubic foot basis. Board feet are shown in the FEIS for the first decade because this is the traditional unit of measure. It is expected that cubic feet will become the basis for selling wood as trees are increasingly used in products manufactured from fiber rather than being used as sawn boards.

**DEPARTURE FROM NON DECLINING FLOW  
Code 704**

**COMMENT NO. 1:** IN CONSIDERING THE HISTORY OF MAN, TO EXPAND THE DISCUSSION, PLANS ARE SELDOM CARRIED OUT AS PLANNED IT SEEMS TO ME AS GIVEN THAT PLANS WILL CHANGE TO CUT MORE THAN THE ALLOWABLE CUT IN THE EXPECTATION OF LATER CUTTING LESS SEEMS TO ME TO BE PUTTING THE CART BEFORE THE HORSE. THIS IS A TACTIC THAT IS NOT COMPATIBLE WITH FUTURE CHANGES THAT WOULD BE LIKELY TO OCCUR.

**FOREST SERVICE RESPONSE:**

According to our mail, many people agree with your point of view

**COMMENT NO. 2.** THE WALLOWA-WHITMAN HAS 2.2 BILLION BOARD FEET OF PONDEROSA PINE IN INVENTORY AND I WOULD SUGGEST THAT A DEPARTURE FROM NON-DECLINING EVEN FLOW BE IMPLEMENTED ON THE PONDEROSA PINE COMPONENT OF YOUR STANDING TIMBER INVENTORY. I THINK A 48 MILLION FOOT ANNUAL CUT MAKES GOOD SENSE. YOUR SHORT ROTATIONS WILL NEVER GROW OLD-GROWTH PINE AND THEREFORE IT SHOULD BE CUT OVER A SHORT PERIOD OF TIME (SAY FORTY YEARS) TO FULLY UTILIZE ITS ECONOMIC VALUE.

**FOREST SERVICE RESPONSE:**

This line of thought was expressed by many respondents. A complicating factor is that ponderosa pine largely grows in conjunction with other species and it is usually not practical, or silviculturally sound to single the ponderosa pine out for harvest. However, we agree that it would be possible to place greater emphasis on harvesting stands that have a greater proportion of ponderosa pine. We have done this in the Preferred Alternative as shown in the Final EIS

**COMMENT NO. 3:** EACH YEAR YOU DELAY CUTTING THE OLD GROWTH YOU INCREASE THE LOSS DUE TO NATURAL MORTALITY TO RATION THE VOLUME OVER A LONGER PERIOD OF TIME WILL INCREASE YOUR MORTALITY LOSSES AND REDUCE YOUR OVERALL TIMBER GROWTH

**FOREST SERVICE RESPONSE**

We agree. If reducing mortality losses were the primary concern, departing from nondeclining flow and harvesting the older timber as quickly as possible would be a logical action

**COMMENT NO. 4.** BY INCREASING THE PONDEROSA PINE CUT NOW YOU WILL INCREASE REVENUES TO THE FEDERAL TREASURY AS WELL AS LOCAL COMMUNITIES WHO RECEIVE STUMPAGE RECEIPTS IN LIEU OF PROPERTY TAXES.

**FOREST SERVICE RESPONSE:**

This is correct in the short term

**COMMENT NO. 5** MANAGEMENT SHOULD BE DIRECTED TOWARD LONG TERM MAINTENANCE OF FOREST VALUES IN A BROAD SENSE, NOT LIMITED TO SHORT TERM EXPEDIENTS. MANAGEMENT ALTERNATIVES SUCH AS THE LISTED DEPARTURE ALTERNATIVES WHICH WOULD INCREASE REGULATED CUT VOLUMES IN THE SHORT TERM WILL NOT ALLOW THE FOREST TO MAINTAIN SUSTAINED YIELDS AND COMPLY WITH FEDERAL REGULATIONS. MARKET DEMAND AT THE END OF THE LIFE OF THE PLAN OR AT THE YEAR 2000 IS EXPECTED TO BE GREATER THAN PRESENTLY EXISTS DUE TO A DECREASE IN AVAILABILITY OF TIMBER ON PRIVATE FOREST LANDS THAT WILL BE AVAILABLE. EVEN GREATER EMPHASIS THAN NOW EXISTS WOULD THEN BE THE CASE, AS A SUBSEQUENT PLAN IS FORMULATED, TO INCREASE THE VOLUME OF CUT FROM WALLOWA-WHITMAN NATIONAL FOREST. BOTH SHORT-TERM AND LONG-TERM FISHERIES AND BIG GAME VALUES WOULD BE SACRIFICED FROM HARVEST IN EXCESS OF SUSTAINED YIELDS. THE CONFEDERATED TRIBES, THEREFORE, RECOMMEND EXCLUSION OF DEPARTURE ORIENTED VOLUMES FROM REALISTICALLY VIABLE ALTERNATIVES

**FOREST SERVICE RESPONSE:**

Departures, by definition, harvest timber at levels which cannot be sustained indefinitely. They are, however, legal in some instances (36 CFR 219.16(g)(3)). The feeling expressed in this letter -- that departures are detrimental in many ways -- was shared by many. Tradeoffs have been portrayed in the document so they can be considered by all.

**COMMENT NO. 6** THE WW HAS A RESPONSIBILITY TO INFORM THE PUBLIC THAT THEY ARE NOW OPERATING UNDER A DEPARTURE PLAN AND THEN LET PEOPLE DECIDE IF THEY ARE WILLING TO DEPART TO EVEN HIGHER TIMBER HARVEST LEVELS.

**FOREST SERVICE RESPONSE:**

As of this writing, the Forest's timber harvest levels are still based on the 1962 Timber Management Plan, as amended. Our best information indicates that we could not continue to harvest green sawtimber (FORPLAN volume) at those levels indefinitely with the current land allocation.

**COMMENT NO. 7** NO DEPARTURES SHOULD BE CONSIDERED IN THE FOREST PLAN. THE LONG-TERM ECONOMIC IMPACT ON COMMUNITIES SURROUNDING THE W-W WILL BE CATASTROPHIC IF THERE IS NO TIMBER OF VALUE TO MILLS AND NO PRISTINE LANDS TO DRAW VISITORS, HUNTERS, AND FISHERMEN. DEPARTURES TO HIGHER TIMBER HARVEST LEVELS WILL DEVASTATE THIS FOREST'S ALREADY OVERSTRESSED RESOURCES.

**FOREST SERVICE RESPONSE:**

We have not selected a departure alternative, but we did consider some in the planning process. They provide a legitimate means of achieving some objectives.

**COMMENT NO. 8** ANY DEPARTURES FROM A SUSTAINED YIELD POLICY SIMPLY WON'T DO WHY ROB FROM FUTURE GENERATIONS SO THAT WE TODAY CAN BE IN A HIGHER INCOME BRACKET?

**FOREST SERVICE RESPONSE.**

Many expressed this view

**COMMENT NO. 9:** IN ACCORDANCE WITH NFMA (36 CFR 219.16), WHEN THE NONDECLINING EVENFLOW SALE SCHEDULE WOULD "CAUSE A SUBSTANTIAL ADVERSE IMPACT UPON A COMMUNITY IN THE ECONOMIC AREA IN WHICH THE FOREST IS LOCATED," THE WALLOWA-WHITMAN SHOULD DEVELOP DEPARTURE ALTERNATIVES. GIVEN THE LOCAL COMMUNITY'S RELIANCE ON THE FOREST FOR JOBS AND INCOME AND IN PARTICULAR THE AMOUNT OF PONDEROSA PINE SAWLOG MATERIAL A DEPARTURE ALTERNATIVE WHICH SPECIFICALLY ADDRESSES THIS ISSUE IS NECESSARY.

IT IS POSSIBLE FOR THE WALLOWA-WHITMAN TO INCREASE THE AMOUNT OF PONDEROSA PINE AVAILABLE TO LOCAL MILLS FROM THE AMOUNTS DISPLAYED IN ANY ALTERNATIVE THIS WOULD REQUIRE SELECTIVE TIMBER MANAGEMENT OVER A CERTAIN PERIOD FOR CERTAIN STANDS OF MATURE AND OVER-MATURE PINE

**FOREST SERVICE RESPONSE:**

Departure alternatives were developed and considered during the planning process. The preferred alternative was modified between draft and final to increase its amount of ponderosa pine and its overall harvest level

**COMMENT NO. 10:** DEPARTURES - (DEIS, PAGE II-8) THE DEPARTMENT OF FORESTRY SUPPORTS THE USE OF TIMBER HARVEST SCHEDULES WHICH UTILIZE A DEPARTURE FROM NON-DECLINING EVEN-FLOW. REGION 6 DIRECTION TO THE FOREST REQUIRES CONSIDERATION OF DEPARTURE ALTERNATIVES IN THE FOLLOWING SITUATIONS

- WHEN LOSSES FROM INSECT ATTACKS CAN BE REDUCED.
- WHEN FIRE RISKS CAN BE REDUCED.
- WHEN TIMBER HARVESTS FROM OTHER OWNERSHIPS ARE EXPECTED TO DECLINE TO BETTER MEET RANGE AND WILDLIFE GOALS
- WHEN THE SPECIES MIX OF TIMBER HARVESTS ON ALL OWNERSHIPS IS CHANGING IN A WAY THAT COULD ADVERSELY AFFECT THE ECONOMICS OF LOCAL COMMUNITIES.
- TO MEET FPFO TIMBER HARVEST TARGETS.

CLEARLY, ALL OF THESE CONDITIONS EXIST ON THE WALLOWA-WHITMAN. COLLECTIVELY, THEY POINT OUT THE NECESSITY FOR THE PREFERRED ALTERNATIVE TO INCLUDE A DEPARTURE IN ORDER TO MEET MULTIPLE-USE GOALS AND MAXIMIZE PUBLIC NET BENEFITS.

**FOREST SERVICE RESPONSE:**

While the State Department of Forestry and Governor Atiyeh recommended departure, Governor Goldschmidt did not

**COMMENT NO. 11:** I ALSO WANT TO EMPHASIZE THAT WE DO NOT FAVOR EITHER OF THE DEPARTURE ALTERNATIVES UNDER OPTION C OR B THAT WOULD ACCELERATE HARVESTS IN

THE FIRST DECADE. RATHER, WE STRONGLY RECOMMEND THAT WHATEVER PLAN IS ADOPTED BE FLEXIBLE ENOUGH TO ALLOW FOR ADJUSTING THE TIMBER (ESPECIALLY PONDEROSA PINE) SALE VOLUME DEPENDING ON THE RESULTS OF THE NEXT COMPLETE TIMBER INVENTORY BY SPECIES (1990?).

**FOREST SERVICE RESPONSE:**

The Forest Plan will be subject to amendment or revision. Unexpectedly large shifts in the next timber inventory may result in the development of a new Forest Plan.

**COMMENT NO. 12:** BOTH DEPARTURES ARE BASED ON THE ASSUMPTION THAT THE INDUSTRY NEEDS TIME TO ADAPT TO THE SMALLER DIAMETER LOG AND WILL TAKE THE OPPORTUNITY PROVIDED BY THE DEPARTURE HARVEST SCHEDULES TO PREPARE FOR A SHORTFALL. BOTH ASSUMPTIONS ARE VERY WEAK. THE INDUSTRY HAS KNOWN SINCE AT LEAST 1960, THAT LARGE DIAMETER LOGS WERE BEING CUT AT A RATE ABOVE NATURAL REGENERATION. THEIR FAILURE TO RESPOND IS NOT LIKELY TO BE ALTERED BY ANOTHER DECADE OR SO. IN FACT, ANOTHER DECADE OF CONTINUED ACCELERATED HARVESTING WILL SIMPLY PROLONG EXISTING ACTIVITY AND NOT ACT AS AN ECONOMIC STIMULUS FOR CHANGE. IN BOTH INSTANCES, THE DECLINE IN THE OUT-DECADES EXCEEDS THE DECLINE BETWEEN ANNUAL CURRENT SALES AND THE ESTIMATED SALES FOR THE PREFERRED ALTERNATIVE OR ALTERNATIVE B OR D. THE TRADE-OFF FOR THE COMMUNITIES WITH THE DEPARTURE ALTERNATIVES IS SIMPLY STATED AS: A FEW CURRENT JOBS LOST OR MANY MORE FUTURE JOBS LOST. THE COMMUNITY OPTION IS TO HAVE THE PARENT UNEMPLOYED TODAY OR TWO OF HIS/HER CHILDREN UNEMPLOYED TOMORROW.

**FOREST SERVICE RESPONSE:**

Many voiced like sentiments. Historically, the labor component of a thousand board feet of manufactured product was greater than it is today and that trend does not seem to be reversing. Many would argue that, other things remaining constant, a thousand board feet logged today will provide more employment than if it were to be logged in the distant future.

**COMMENT NO. 13:** THE SECOND PROBLEM WITH THE ALTERED HARVEST SCHEDULES IS THAT THEY ARE PREDICATED ON PRIVATE LANDS BEING ABLE TO COMPENSATE FOR DECREASES IN PUBLIC YIELDS IN THE OUT-GENERATIONS. THIS IS EXTREMELY TROUBLESOME SINCE NO GUARANTEES EXIST TO INSURE THAT THIS WILL IN FACT OCCUR. ON THE OTHER HAND, MOST ECONOMIC MAXIMIZING BEHAVIOR WOULD INSURE THAT THE PRIVATE SHORTFALL PROBLEM WOULD NOT BE SOLVED BY INCREASED PUBLIC OFFERINGS NOW.

**FOREST SERVICE RESPONSE:**

We agree. There are no assurances that non-Forest Service timber supplies would increase to compensate for Forest Service harvest reductions occurring after a departure.

**COMMENT NO. 14:** THE "NC" ALTERNATIVE ALSO IS BASED ON OVERESTIMATED YIELD TABLES AND USES CUBIC FEET TO CALCULATE TIMBER CUTTING LEVELS THUS OBSCURING DEPARTURES FROM NON-DECLINING FLOW.

**FOREST SERVICE RESPONSE:**

The "NC" Alternative is based on the 1962 Timber Management Plan for the Wallowa-Whitman National Forest. The yield tables for that plan represented the state-of-the-art at that time, and were designed to provide nondeclining flow. Better data, new methodology for yield estimation, and new laws and regulations concerning National Forest management, have made the 1962 plan largely obsolete.



**BELOW COST TIMBER SALES  
Code 705**

**COMMENT NO. 1:** WE SUPPORT THE CONCEPT EMBODIED IN ALTERNATIVE G THAT ONLY TIMBER THAT PRODUCES A POSITIVE RATE OF RETURN SHOULD BE CUT, THE FOREST SERVICE SHOULD NOT COUNT ON CONTINUING SUBSIDIES FROM A GOVERNMENT DROWNING IN DEBT OR TAXPAYERS ALREADY OVERBURDENED. BELOW-COST TIMBER SALES SHOULD BE CAREFULLY JUSTIFIED (I.E. A RANGE OF OTHER RESOURCE VALUES ARE THUS PROTECTED OR ENHANCED) BEFORE BEING PLANNED.

**FOREST SERVICE RESPONSE:**

Many expressed a similar view.

**COMMENT NO. 2:** IN 1976, CONGRESS INSTRUCTED EACH NATIONAL FOREST TO DEVELOP A COMPREHENSIVE MANAGEMENT PLAN GIVING BALANCED CONSIDERATION TO ALL USES OF THE FOREST (NATIONAL FOREST MANAGEMENT ACT).

NONE OF YOUR 10 ALTERNATIVES PROVIDES THIS BALANCE - FOR EXAMPLE YOUR PROPOSED ALTERNATIVE WILL ALLOW 58% OF THE REMAINING ROADLESS AREAS TO BE ROADED AND LOGGED. THE COST OF BUILDING THESE ROADS WILL NOT BE RECOVERED FROM THESE LOGGING SALES AND THEREFORE WILL COST THE TAXPAYERS. WHERE IS THIS IN YOUR DEIS?

**FOREST SERVICE RESPONSE.**

We feel that we have presented a balanced consideration of all uses in each of the alternatives but recognize that many do not share this view. We felt that it was important to refrain from presenting "straw man" alternatives. Information on logging individual sales or subregions of the Forest was not presented in the document because that detailed information is generated during project analyses. Summary discussions are provided in FEIS Chapter III.

**COMMENT NO. 3:** THE IDEA OF HARVESTING PUBLIC TIMBERLANDS FOR PROFIT IS A JOKE. THE ONLY PEOPLE PROFITING FROM PUBLIC TIMBER SALES ARE THE PEOPLE WHO BUY THEM AND THEIR EMPLOYEES. THERE ARE PLENTY OF JOBS IN THE WOODS OUTSIDE OF PUBLIC TIMBERLANDS - JUST CONSIDER THE UNION-BREAKING ACTIVITIES AND DISSOLUTION OF LOGGING OPERATIONS BY THE LARGE PRIVATE TIMBERLAND COMPANIES. THE BIG OUTFITS KNOW THEY CAN GET A GYPPO TO LOG THEIR TIMBER CHEAPER THAN THEY CAN DO IT THEMSELVES. IN THE MEANTIME, THEY WILL EMPLOY LOBBYISTS TO SCREAM FOR MORE SALES OF TIMBER ON PUBLIC LANDS.

**FOREST SERVICE RESPONSE.**

Thank you for your point of view.

**COMMENT NO. 4:** WOULD YOU GET OFF THE KICK ON BELOW COST SALES. IT SHOULDN'T EVEN BE AN ITEM IN FOREST PLANNING. BELOW COST SALES ARE LARGELY A FUNCTION OF USING TIMBER HARVESTING TO ACCOMPLISH OTHER MANAGEMENT GOALS AND POOR COST ACCOUNTING ACCOMPANYING THIS.

**FOREST SERVICE RESPONSE**

The below-cost timber sales question came to prominence during the planning process. Our treatment of it is in response to concerns voiced by the public. There are those that agree with your summary of the issues, but many that disagree. Much of the difference of opinion is due to differing opinions on the value of roads.

**COMMENT NO. 5: WE ARE CUTTING TOO MUCH TIMBER AS IT IS AND WHEN THE COST OF HARVESTING THE TIMBER EXCEEDS THE VALUE OF THAT TIMBER, THEN THE PUBLIC IS DONE A DISSERVICE BY LOSING IRREPLACEABLE BACK COUNTRY AND WILDLIFE RESOURCES.**

**FOREST SERVICE RESPONSE:**

Many expressed similar views

**COMMENT NO. 6 THE PRINCIPLES OF "NO BELOW COST" SALES WOULD FIT IN WELL WITH ALTERNATIVE C**

**FOREST SERVICE RESPONSE:**

A valid point of view. However, it would not be possible to achieve the predicted level of timber harvest if we were to disallow below cost sales.

**COMMENT NO. 7: I THINK THE FOREST SHOULD BE MANAGED SO AS TO PUT ONLY INVESTMENTS INTO TIMBER THAT WILL RETURN A PROFIT TO THE GOVERNMENT. THAT'S THE REAL WAY TO KEEP OUR TAXES DOWN.**

**FOREST SERVICE RESPONSE**

A commonly expressed statement. Such a policy would have a significant effect on wood product supplies and local economies.

**COMMENT NO. 8: WHY SPEND TAXPAYERS MONEY TO SUBSIDIZE LOGGING WHEN THERE IS A DECREASED DEMAND FOR CONSTRUCTION MATERIALS?**

**FOREST SERVICE RESPONSE:**

Whether or not there is a decreased demand, there may be several reasons for selling timber below cost. These include helping to meet Regional targets for timber as expressed by Congress, maintaining local economic stability, and in some instances, achieving other resource objectives.

**COMMENT NO. 9: BELOW-COST TIMBER SALES WERE INCOMPLETELY ADDRESSED IN THE DRAFT EIS. THE ISSUE SHOULD BE DISCUSSED IN GREATER DETAIL THAN THAT WHICH THE FOREST SERVICE PRESENTED IN THE ALTERNATIVE G. TO SIMPLY SAY THERE WILL BE NO BELOW-COST TIMBER SALES IN ONE ALTERNATIVE IS INSUFFICIENT. PRESENTING AN ALTERNATIVE WHICH DELETES ALL BELOW-COST TIMBER SALES WITHIN CERTAIN AREAS, SUCH AS ROADLESS AREAS, WOULD WIDEN THE STUDY OF BELOW-COST SALES AND ALLOW PEOPLE TO MAKE A MORE INFORMED DECISION**

**FOREST SERVICE RESPONSE**

There are, of course, an infinite number of alternatives that could be developed including many variations of the one you suggest. We believe we displayed a reasonable range.

**COMMENT NO. 10.** I SUPPORT THE CONCEPT OF LIMITING BELOW-COST TIMBER SALES IN A TIME OF SO MANY RESOURCE CONFLICTS - SURELY WHERE A SALE IS NOT ECONOMICAL LETS MANAGE THE AREA FOR OTHER RESOURCE VALUES SUCH AS WILDLIFE HABITAT - OLD GROWTH, PRIMITIVE RECREATION - BACKCOUNTRY. IF MARKET CONDITIONS CHANGE THE PLAN CAN BE REVISED IN THE NEXT GO AROUND LETS NOT THROW AWAY OUR OPTIONS

**FOREST SERVICE RESPONSE:**

Similar views were expressed by many respondents.

**COMMENT NO. 11.** THE DEIS (PAGES III-20 AND III-22) SHOWS DATA WHICH INDICATES THAT BETWEEN 1979 AND 1984, IN TWO YEARS TIMBER SALES PRODUCED MORE REVENUE THAN TOTAL COSTS, IN TWO YEARS SALES BROKE EVEN, AND IN TWO YEARS SALES WERE BELOW-COST. IN THESE TIMES OF TIGHT BUDGET DOLLARS AND A HUGE GOVERNMENT DEFICIT, THE USFS SHOULD ONLY DEVELOP TIMBER SALES WHICH AT THE MINIMUM, BREAK EVEN.

**FOREST SERVICE RESPONSE.**

This view was commonly expressed

**COMMENT NO. 12:** THE DEIS MUST PROVIDE A MAP WHICH ILLUSTRATES WHAT AREAS OF THE FOREST ARE ANTICIPATED TO PRODUCE BELOW-COST SALES.

**FOREST SERVICE RESPONSE**

Such a map would display many steep lands which can only be harvested with sophisticated equipment as well as lands which are difficult to reforest or which have timber of low value. However, it would only be an estimate since it is impossible to tell in advance how the sales will be bid. Sales we think will be below cost are sometimes bid up to where they are profitable.

**COMMENT NO. 13:** BEFORE THE "BELOW-COST" LANDS ARE WITHDRAWN FROM THE TIMBER BASE, THESE TIMBER SALES SHOULD BE REVIEWED TO DETERMINE WHAT FACTORS RESULTED IN THEIR BELOW COST STATUS. INSTITUTIONAL RESTRAINTS AND THE OVERHEAD COSTS ASSOCIATED WITH OTHER FOREST SERVICE PROGRAMS (NON-TIMBER PRODUCTION RELATED PROGRAMS) SHOULD BE REVIEWED TO DETERMINE IF THESE SALES CAN BE ABOVE COST IF THESE UNRELATED COSTS ARE REMOVED.

**FOREST SERVICE RESPONSE:**

Alternative G was the only alternative designed to respond specifically to the question of below-cost timber sales. It is the only alternative in which all such lands were dropped from timber harvest considerations. Anything that tends to increase costs also tends to increase the amount of land with below-cost timber sales. The basic question of cost allocation--what costs should be "charged" timber--is not settled. The costs which we "charged" timber were those

costs which the respective program managers associated with their support of the timber program.

**COMMENT NO. 14: WALLOWA-WHITMAN EIS EXAGGERATES AND MISSTATES REASONS FOR SALES BELOW COST PROBLEM**

THE WALLOWA-WHITMAN EIS USES ALTERNATIVE G AS THE FOCAL POINT TO ILLUSTRATE THE SALES BELOW COST PROBLEM ON THE WALLOWA-WHITMAN THE EIS MISLEADS THE PUBLIC INTO BELIEVING THAT ONLY 127 MMBF/YR SHOULD BE HARVESTED IF WE WANT TO ELIMINATE SALES BELOW COST. THE EIS PORTRAYS TIMBER MANAGEMENT AS THE SOURCE OF THE PROBLEM AND ELIMINATION OF TIMBER MANAGEMENT AS THE SOLUTION. HOWEVER, IT IS THE TIMBER MANAGER NOT TIMBER MANAGEMENT THAT IS AT FAULT ON THE WALLOWA-WHITMAN THE MANAGER'S DECISION TO CONSTRAIN TIMBER PRODUCTION FOR WILDLIFE, EVENFLOW, AND OTHER MULTIPLE USES CREATES UNECONOMIC SALES FOR EXAMPLE, THE WALLOWA-WHITMAN MADE TWO BENCHMARKS RUNS THAT MAXIMIZED TIMBER PRODUCTION, ONE WITH AND THE OTHER WITHOUT THE MINIMUM MANAGEMENT REQUIREMENTS WITHOUT THE MMR'S, THE MAXIMUM TIMBER BENCHMARK HAD A PRESENT NET VALUE OF \$200 MILLION AND PRODUCED 239 MMBF/YR. ADDING THE MMR'S REDUCED PRESENT NET VALUE TO ONLY \$86 MILLION AND CUT TIMBER OUTPUT TO 193 MMBF/YR. TIMBER OUTPUT WAS REDUCED AND ECONOMIC VALUES DROPPED BECAUSE OF MMR'S NOT BECAUSE OF TIMBER MANAGEMENT. NONDECLINE YIELD AND ROTATION CONSTRAINTS ALSO CAUSE SALES BELOW COST ON THE WALLOWA-WHITMAN FOR EXAMPLE ALTERNATIVE G, SUPPOSEDLY THE MOST EFFICIENT ALTERNATIVE, SELLS 127 MMBF/YR WITH A PRESENT NET VALUE (PNV) OF \$651 MILLION. BUT BENCHMARK 4 HAS AN ALMOST IDENTICAL PNV AND SELLS 151 MMBF/YR THUS, MORE TIMBER IS PRODUCED FOR THE SAME ECONOMIC RETURN AS ALTERNATIVE G WHY? BECAUSE BENCHMARK #4 DOES NOT CONTAIN NONDECLINING YIELD OR ROTATION CONSTRAINTS.

IN SUMMARY, THE WALLOWA-WHITMAN'S ANALYSIS OF SALES BELOW COST IS INADEQUATE, INCOMPLETE, AND MISLEADING. ALTERNATIVE G WAS STRUCTURED TO SHED THE WORST ECONOMIC LIGHT ON TIMBER PRODUCTION THE EIS SAYS, "[T]HE NONDECLINING EVENFLOW CONSTRAINTS WAS APPLIED TO THIS ALTERNATIVE TO RETAIN COMPARABILITY WITH THE MAJORITY OF OTHER FOREST PLAN ALTERNATIVE." THE EIS DOES NOT SAY HOW MUCH THIS CONSTRAINT REDUCED PNV NOR DOES THE EIS EMPHASIZE THAT OTHER MULTIPLE USE CONSTRAINTS ARE THE MAJOR CAUSE OF SALES BELOW COST

\* RECOMMENDATION: THE ANALYSIS OF THE SALES BELOW COST ISSUE IN THE FINAL EIS SHOULD BE LESS ONE-SIDED. THE WALLOWA-WHITMAN MUST CLEARLY EMPHASIZE THAT THE COST OF TIMBER SALES DEPENDS AS MUCH ON MULTIPLE USE AND TIMBER POLICY CONSTRAINTS AS IT DOES ON THE EXPENSE OF ROAD BUILDING AND REFORESTATION SENSITIVITY ANALYSIS SHOULD BE PERFORMED ON ALTERNATIVE G TO MODIFY SOME OF THE CONSTRAINTS TO SHOW THAT MORE TIMBER CAN BE PRODUCED EFFICIENTLY. FINALLY, THE DIRECT TIMBER MANAGEMENT COST ASSUMPTION SHOULD BE REVISED AND CORRECTED AS DISCUSSED IN SECTION A 3 (PROBLEMS WITH FUNDAMENTAL PLANNING ASSUMPTIONS)

**FOREST SERVICE RESPONSE**

There is no "final solution" as to what constitutes a below-cost timber sale, what costs are properly charged as timber sale, or how an entire alternative should be constructed in response to the question. Alternative G is one approach

It is true that the multiple-use objectives of National Forest management do contribute to increased costs--in Alternative G as well as in the other alternatives That has been spelled out in considerable detail in the constraint analysis described in Appendix B

**COMMENT NO. 15:** THE DEIS FAILS TO IDENTIFY WHICH PROPOSED SALES IN THE TEN YEAR SALE PLAN ARE "BELOW-COST" "ALTERNATIVES OTHER THAN ALTERNATIVE G ARE ANTICIPATED TO HAVE BELOW-COST SALES BECAUSE THEY HAVE BEEN CONSTRAINED TO PROVIDE TIMBER HARVESTS AT LEVELS IN EXCESS OF THOSE WHICH EFFICIENCY ALONE WOULD INDICATE," THE READER IS UNABLE TO DISCERN WHICH SALES WILL BE BELOW-COST

**FOREST SERVICE RESPONSE:**

The detailing of site-specific costs and benefits necessary for such a conclusion is done at the project level—not at the Forest Plan level.

**COMMENT NO. 16:** THE COMMISSION IS CONCERNED THAT THE FOREST SERVICE WILL RESPOND TO THE "SALES BELOW COST" CONTROVERSY BY ARTIFICIALLY "IMPROVING" ITS TIMBER SALE BALANCE SHEET BY SHORTCHANGING MITIGATION NEEDS THE DEIS SHOULD DISCLOSE THE MANNER IN WHICH MITIGATION MEASURES AND LEVELS OF MITIGATION FUNDING ARE CHOSEN AND APPLIED. THIS INFORMATION MAY DEMONSTRATE THAT THE TIMBER PRODUCTION ENVISIONED BY THE PROPOSED ALTERNATIVE FAILS TO INCLUDE ALL MITIGATION COSTS AND IS THEREFORE EVEN MORE COST INEFFECTIVE THAN IT PRESENTLY APPEARS. BLAND ASSURANCE THAT THE FOREST SERVICE WILL IMPLEMENT MITIGATION MEASURES WHICH IT ALONE DETERMINES ARE NECESSARY FRUSTRATES THE POLICIES BEHIND BOTH NEPA AND NFMA. BOTH OF THESE STATUTES DEMAND DISCLOSURE, PUBLIC SCRUTINY, AND PUBLIC INPUT.

**FOREST SERVICE RESPONSE:**

Selection of mitigation measures for a particular project is done on a site-specific basis. The actual mitigation measures needed determine to considerable extent what funding would be needed. *Project level analysis includes the opportunity for public involvement.*

**COMMENT NO. 17:** IN ATTEMPTING TO JUSTIFY "SALES BELOW COST," THE FOREST SERVICE SHOULD EXPLAIN WHERE IT INTENDS TO FIND THE FUNDS TO PAY FOR MITIGATING THE EFFECTS OF TIMBER MANAGEMENT ON FISH AND WILDLIFE. IT IS OUR UNDERSTANDING THAT KNUTSON-VANDENBERG FUNDS FOR FISH AND WILDLIFE ARE NOT GENERATED BY "SALES BELOW COST," WHEREAS A SALE THAT COVERS ITS COSTS ALSO YIELDS MITIGATION MONEY IN OTHER WORDS, FISH AND WILDLIFE ARE MUCH MORE ADVERSELY AFFECTED BY A BELOW COST SALE THAN BY A SALE THAT IS FINANCIALLY SOUND

**FOREST SERVICE RESPONSE:**

Sales below-cost have no direct association with the level of K-V funding. Funding for improvements may not be forthcoming if the timber sells for minimally acceptable bid values. Mitigation measures specified in the environmental document will be done even if they must be funded from other sources.

**COMMENT NO. 18** I CAN CERTAINLY UNDERSTAND THE PUBLIC CONCERN OVER BELOW-COST SALES GIVEN THESE LOW STUMPAGE PRICES. AS FAR AS I CAN TELL, WITH AN ANNUAL APPROPRIATED BUDGET OF ABOUT \$10,000,000 AND AN ALLOCATED BUDGET (IT IS MOSTLY K-V OR PURCHASER CREDIT) OF \$14,000,000, THE PUBLIC ONLY RECEIVES BACK, BASED ON 1985 PRICES, \$6,300,000. OF THIS AMOUNT, FULLY \$5,400,000 COMES FROM CUTTING ABOUT 40 MMBF OF PONDEROSA PINE, OUT OF THE TOTAL CUT OF 139 MMBF. THE OTHER 99 MMBF ONLY PROVIDES \$900,000 TO THE FOREST REVENUE STREAM

## FOREST SERVICE RESPONSE

This compares the total Forest budget to total Forest receipts. Many of the Forest outputs are provided without charge to the public. That does not diminish their worth

Alternative G was formulated to schedule only above-cost sales.

**COMMENT NO. 19:** I BELIEVE FURTHER ANALYSIS OF ALTERNATIVE G SHOULD BE UNDERTAKEN SO AS TO RELIEVE THE ALTERNATIVE FROM THE INEFFICIENCIES OF CONSTRAINING HARVEST BY THE NECESSITY TO SCHEDULE ONLY ABOVE COST SALES. IN ADDITION I WOULD SUGGEST FURTHER EXPLANATION OF THIS ALTERNATIVE SINCE IT IS HARD TO DETERMINE WHETHER "ABOVE COST SALES" WERE ABOVE THE FOREST-WIDE BUDGET, THE TIMBER ONLY COST OF LAYING OUT THE SALES ETC.

## FOREST SERVICE RESPONSE.

Alternative G eliminates timber harvest on those lands whose timber receipts are expected to be surpassed by the cost of selling them. The cost of selling them includes road costs, sale preparation costs, contract administration costs, and other costs associated with offering timber as outlined in Appendix B to the EIS.

**COMMENT NO. 20** BELOW COST TIMBER SALES - (APPENDIX, PAGE B-47) THE OCCURRENCE OF BELOW COST TIMBER SALES IN MOST OF THE WALLOWA-WHITMAN ALTERNATIVES IS DISCUSSED IN THE TEXT ALONG WITH THE NEED TO SACRIFICE SOME ECONOMIC EFFICIENCY IN ORDER TO MAINTAIN AN ACCEPTABLE LEVEL OF ECONOMIC STABILITY IN THE LOCAL COMMUNITIES AND TO ENHANCE OTHER RESOURCES. AS ASSISTANT SECRETARY MYERS HAS STATED, THE REAL MEASURE OF THE WORTH OF THE TIMBER PROGRAM IS NOT COSTS VERSUS REVENUES, BUT COSTS VERSUS PUBLIC BENEFITS. THE CORRECTION TO THE DEIS ALSO POINTS OUT THAT BLENDING IN SOME NEGATIVE-VALUE SALES CAN ACTUALLY LEAD TO IMPROVED ECONOMIC PERFORMANCE ON A FOREST-WIDE BASIS. WHILE THE DEPARTMENT AGREES WITH THIS LOGIC, WE DISAGREE WITH THE INFERENCE MADE BY THE FOREST THAT THE REASONS FOR THESE NEGATIVE-VALUE SALES ARE PURELY RESOURCE AND MARKET BASED. AN ADDITIONAL REASON MAY BE THE USE OF QUESTIONABLE ASSUMPTIONS AND UNREALISTICALLY HIGH MANAGEMENT COSTS BY THE FOREST. FOR EXAMPLE, IT IS NOT APPROPRIATE THAT CERTAIN FIXED COSTS BE CHARGED TO THE TIMBER PROGRAM. EIGHTY PERCENT OF THE WATER RESOURCE COSTS, 90 PERCENT OF THE CULTURAL RESOURCE INVENTORY COSTS, AND 20 PERCENT OF THE MINING LAW COMPLIANCE AND ADMINISTRATIVE COSTS ARE CHARGED TO TIMBER. THIS ACTION IS NOT JUSTIFIED IN THE PLANNING DOCUMENTS. FEWER NEGATIVE VALUE SALES MAY RESULT IF MORE REASONABLE ASSUMPTIONS AND COSTS ARE USED.

## FOREST SERVICE RESPONSE.

Fixed costs (as identified in Appendix B of the EIS) have not been charged to the timber program. Other costs were charged entirely or partially to the timber program (also displayed in Appendix B). We have added clarifying language to explain that the cost allocation (including what costs should be charged the timber program) was developed and reviewed by the Forest Economist and appropriate staff. In each and every instance, the cost allocation reflected a consensus view of the Forest Economist and appropriate staff or substaff.

**COMMENT NO. 21:** THE ECONOMIC IMPACT OF BELOW COST TIMBER SALES SHOULD BE CONSIDERED. BELOW COST SALES CAUSE THE LOSS OF BADLY NEEDED REVENUE TO LOCAL TOWNS AND COUNTIES WHICH MORE THAN OFFSETS THE BENEFITS OF PUTTING A FEW LOGGERS TO WORK. IT ALSO COSTS THE FEDERAL TAXPAYER MONEY. TREES THAT ARE NOT CUT NOW (FOR BOTH ECONOMIC AND OTHER REASONS) ARE LIKELY TO BE MORE VALUABLE IN THE FUTURE. IT MAKES NO SENSE TO CUT THEM NOW WHEN THEY COULD BE SOLD AT A PROFIT LATER.

**FOREST SERVICE RESPONSE:**

As acknowledged in the EIS, all alternatives but one expect a certain level of sales below cost. Below cost sales do not necessarily cause a loss of revenue to local towns, however, they do cost the federal taxpayer money. It is up to the taxpayers, speaking in this forum and through their elected officials to say whether the support of local economics is worth it.

The assumption in the analysis was that trees would be more valuable in the future.

**COMMENT NO. 22:** THE FORPLAN COMPUTER MODEL USED TO PREPARE THE WALLOWA-WHITMAN PLAN FAILED TO IDENTIFY MANY MONEY-LOSING TIMBER AREAS BECAUSE PLANNERS OVERESTIMATED TIMBER PRICES BY AT LEAST 30 PERCENT. FORPLAN PRICES WERE ABOUT 30 PERCENT GREATER THAN AVERAGE 1987 AND 1988 BID PRICES FOR GREEN SALES AND WERE NEARLY 70 PERCENT GREATER THAN THE ACTUAL PRICE PAID FOR TIMBER IN 1987.

**FOREST SERVICE RESPONSE:**

Chapter III in the EIS has been expanded to show the shifts in prices that have occurred in the past and which could occur in the future. The values used in FORPLAN reflected dollar amounts actually paid for Forest stumpage over the 1977-1983 time period. As such, they were designed to be more reflective of average conditions than any single year.

**COMMENT NO. 23:** THE FORPLAN MODEL IMPLICITLY INCORPORATED ALLOWABLE CUT EFFECTS THAT LEAD THE COMPUTER TO INCLUDE MONEY-LOSING LAND IN THE TIMBER BASE EVEN WHEN IT IS ASKED TO MAXIMIZE PRESENT NET VALUE. FORPLAN RUNS THAT MAXIMIZED PRESENT NET VALUE EXCLUDED ABOUT 30 PERCENT OF AVAILABLE LANDS FROM TIMBER MANAGEMENT. IT IS THUS LIKELY THAT MORE THAN 30 PERCENT OF THE LAND BASE LOSES MONEY ON TIMBER SALES.

**FOREST SERVICE RESPONSE:**

The EIS acknowledges that the dollar-quantified benefits of some sales will be less than their dollar-quantified costs.

**COMMENT NO. 24:** I KNOW THAT THERE WILL BE A CRY ABOUT THE LOW COST TIMBER SALES. IT IS MY BELIEF THAT A GREAT DEAL OF THAT CAN BE PUT TO REST BY THE EXAMINATION OF THE METHOD IN WHICH THE FOREST SERVICE PREPARES THE SALE AND THE COSTS THAT ARE USED TO DO THE SAME. I AM SURE THERE ARE WAYS TO BE CREATIVE AND MAKE THOSE BELOW COST SALES HAVE A MORE POSITIVE ECONOMIC VALUE BY LOOKING AT THE ROADS, THE AMOUNT OF MATERIAL, AND TYPE OF MATERIAL HARVESTED, AND A HOST OF OTHER THINGS WHICH WILL FORCE A POSITIVE ECONOMIC BENEFIT.

**FOREST SERVICE RESPONSE:**

Under existing regulations timber sales are required to be as efficient as possible. We recognize though, that we need to continue to emphasize these efforts.



**SPECIES MIX  
Code 706**

**COMMENT NO. 1:** THE PLAN SHOULD INCLUDE AN ECONOMIC ANALYSIS ON THE UTILIZATION OF THE SPECIES COMPOSITION CONTAINED IN THE PROPOSED CUT INCLUDING IMPACTS ON THE LOCAL MILLS AND FEDERAL RECEIPTS

**FOREST SERVICE RESPONSE.**

The analysis did consider the anticipated species mix of the harvest insofar as it could be reflected in the difference between sawtimber and roundwood and in the difference in stumpage values (see Appendix B) This enabled us to reflect these considerations in our estimates of jobs, personal income, and payments to local governments

**COMMENT NO. 2:** ALTERNATIVES B, B-DEPARTURE, C-DEPARTURE, AND D ARE THE ONLY ALTERNATIVES ANALYZED WHICH OFFER MORE NON-LOGEPOLE SAWTIMBER FOR SALE THAN THE PREFERRED ALTERNATIVE IN THE FIRST DECADE (DEIS TABLE IV-9). ALTERNATIVE B-DEPARTURE WOULD CLEARLY BE THE BEST CHOICE FROM INDUSTRY'S STANDPOINT

**FOREST SERVICE RESPONSE.**

We agree that this could be a logical choice from an industry point of view.

**COMMENT NO. 3:** I THINK INDUSTRY SHOULD CHANGE THEIR OPERATIONS TO BE MORE PRODUCTIVE ON THE SMALLER TIMBER.

**FOREST SERVICE RESPONSE:**

Several local mills have been revamped to better utilize smaller material

**COMMENT NO. 4:** MUCH OF THE LODGEPOLE OFFERED COULD BE HELD BACK FOR FIREWOOD AND REPLACED WITH ROUND, SOUND, GREEN SAW TIMBER OF OTHER SPECIES.

**FOREST SERVICE RESPONSE.**

This could be accomplished, but not without reducing the sustained yield harvest level

**COMMENT NO. 5:** THE SAWMILLS AROUND HERE HAVE NO USE FOR THE \$6.00/THOUSAND LODGEPOLE. THE RECEIPTS TO THE COUNTY GOVERNMENT WILL FALL OFF DRASTICALLY IF YOU RETURN 25% OF TIMBER SALES TO THE COUNTY, IF LODGEPOLE SELLS FOR EVEN \$10.00/THOUSAND AS COMPARED TO \$120.00/THOUSAND FOR HIGH GRADE PONDEROSA. WHEN YOU TALK OF SUBSTITUTING 37 MILLION FEET OF \$6.00 - \$10.00 WOOD FOR \$120.00 WOOD, IT IS A REDUCTION THE CITIZENS OF THIS COUNTY CANNOT AFFORD. YET AMAZINGLY YOUR PLAN SAYS THAT RECEIPTS TO FOREST USERS WILL RISE. PROVE THIS TO US, IF YOU CAN.

**FOREST SERVICE RESPONSE**

We have tried to address these points by expanding our treatment of Uncertainty in the Analyses in Appendix B of the EIS. Area mills do process low-value lodgepole pine. Lower-valued timber species do return less in payments to local governments than highly-valued species. The Forest has, over the decades, been harvesting disproportionately large amounts of ponderosa pine, our highest value species. Cutting disproportionately large amounts of ponderosa pine has depleted the supply of the large diameter, premium-priced ponderosa pine. The species mixes of the various alternatives are largely all reflections of the remaining timber inventory.

We have attempted to realign the species mix in the Preferred Alternative to harvest more ponderosa pine in the near future. This means that the Forest will continue to harvest ponderosa pine at a disproportionately high level, but not at as high a percent as in the past.

Some changes in Forest practices are called for in the Forest Plan which will tend to increase the efficiency of the timber sale program compared to the historical base period of 1979 to 1983. These changes are expected to result in increases in stumpage values in and of themselves. One such change is the projected increase in volume harvested per acre. This reflects a decreasing reliance on partial harvesting and a greater emphasis on regeneration harvests than in the historical base period. In the past, "commercial thins" were frequently, if not commonly, noncommercial thins -- they sold only because they were blended in with higher dollar-valued stands. The overall sale was still merchantable even though its overall dollar value was actually reduced by including the "commercial thin." This practice is to be greatly reduced under the Forest Plan and estimates of volumes harvested per acre show substantial increases.

In the same context, past Forest practices included the harvesting of difficult-to-log lands even though more readily accessible lands were available. There was a sense of "proving" that the lands could be logged. Under the current emphasis to increase efficiency, there is no need to "prove" the possibility of logging such lands. The Plan calls for the harvest of the more lucrative lands as rapidly as is possible subject to plan objectives.

During the historical base period, we did not emphasize cost-benefit analysis in the development of timber sales. Under current regulations (FSM 2430) we are charged to complete an economic analysis on all sizable or unusual-requirement sales, to analyze timber sale alternatives for cost efficiency and activities within alternatives for least-cost objectives; and to ensure that the sale area design meets the intent of economic direction. This same sense of concern for economics was contained in the Forest planning model and this results in increased Forest receipts and payments to local governments.

About 5 percent of the estimated payments to local governments accrues from the assumption of 1 percent per year real price increase in timber (stumpage) values. (Payments to local governments are projected for the midpoint of the first decade.) This assumption is common to all Forests in the Pacific Northwest Region.

**COMMENT NO. 6 YOUR REDISTRIBUTION OF TIMBER SPECIES WILL ALSO BE VERY HARMFUL TO THE SURVIVAL OF THESE MILLS YOU HAVE CUT THE AMOUNT AND QUALITY OF THE TIMBER AND TRIED TO MAKE UP FOR IT WITH LESSER GRADES THIS WILL NOT WORK MILLS CANNOT AFFORD TO PROCESS THESE LESSER GRADES WITHOUT MORE OF THE BETTER QUALITY TIMBER TO TO HELP AVERAGE OUT COSTS**

**FOREST SERVICE RESPONSE:**

The reduction in the quality of timber is the result of trying to meet demand for high quality timber in the past. If quantities are to be maintained, it will be necessary to utilize the lower quality timber to a greater degree.

**COMMENT NO. 7:** HISTORIC LEVELS OF GREEN SAW TIMBER, PONDEROSA, AND OTHER SPECIES SHOULD BE GRADUALLY CUT DOWN, OR REDUCED, OVER A CONSIDERABLE PERIOD OF TIME. NO INCREASES SHOULD BE ALLOWED FOR AT LEAST 20 YEARS.

**FOREST SERVICE RESPONSE.**

This is generally what will occur with the Preferred Alternative

**COMMENT NO. 8:** THE AMOUNT OF ALLOWABLE CUT PROPOSED UNDER THE PLAN IS A DECEPTIVE FIGURE. WHILE THE SAW TIMBER CUT IS SET AT 137 MMBF, THE ACTUAL SPECIES COMPOSITION PLACES AN EMPHASIS ON LESS DESIRABLE SPECIES

**FOREST SERVICE RESPONSE.**

We disagree that there is deception involved. We believe we have clearly shown in FEIS Chapter IV and elsewhere that the species composition will change.

**COMMENT NO. 9.** EXPECT THAT DIVERSITY WILL DECREASE MORE AND MORE AS THE U S F.S. CONTINUES ITS CURRENT PRACTICES AS YOU APPROACH A TOTAL MONOCULTURE WITH NO SUPPORTING PLANT OR ANIMAL SPECIES, I THINK YOU WILL FIND THE TREES WILL CEASE TO GROW. THEY FOUND THIS OUT IN CHINA AND JAPAN THE HARD WAY. THAT IS WHY THEY ARE BUYING OUR LUMBER.

**FOREST SERVICE RESPONSE.**

We do not plan, nor do we envision, that our practices will result in monocultures.

**COMMENT NO. 10:** LODGE POLE TIMBER DOESN'T MAKE GOOD WOOD PRODUCTS EXCEPT FOR FIRE WOOD

**FOREST SERVICE RESPONSE.**

Whereas this may once have been true, we have been able to market lodgepole pine in recent years. It has good qualities for paper production, posts, poles, and good quality lumber can be cut from larger lodgepole logs.

**COMMENT NO. 11.** YOUR PROPOSED TEN-YEAR PLAN ALSO PLACES A MUCH HIGHER VALUE ON SMALL LODGEPOLE PINE THAN IS REASONABLE THE MARKET FOR WHOLE LOG CHIPS FROM THIS LODGEPOLE PINE WAS SHARPLY CURTAILED WHEN BOISE CASCADE DISCONTINUED PURCHASE OF WHOLE LOG CHIPS FOR THEIR PARTICLEBOARD PLANT AND PAPER OPERATIONS IN 1986. YOUR PLAN PRESENTLY CLASSES THIS LARGE VOLUME OF SUBSTANDARD SIZE LODGEPOLE PINE AS SAWTIMBER THIS WAS A DECISION THAT SEEMS TO BE TYPICAL OF

THE PRESENT MENTALITY OF YOUR PLANNERS HOW CAN YOU GET ANY LUMBER PRODUCT FROM 5" DBH LODGEPOLE?

**FOREST SERVICE RESPONSE:**

The Forest Plan projects an annual allowable sale quantity of approximately 16.5 MMBF of green merchantable sawtimber, 5" diameter and larger. Of this 16.5 MMBF, approximately 30 percent or 4 to 5 MMBF of lodgepole pine is in the 5" to 6.9" DBH class. We agree this lodgepole pine below 7" DBH is not suitable for board production nor was this our intention. Until recently, this smaller, green lodgepole was being chipped, as you indicate. We are currently participating in a market study which will attempt to attract new market opportunities for small diameter logs and other submerchantable timber products. If, during the plan decade, there are no markets for this small diameter green material, it will be dropped and the green allowable sale quantity reduced accordingly.

**COMMENT NO. 12.** COMPARING THE SPECIES MIX WITHIN THE SAWTIMBER COMPONENT, THERE IS A FALL DOWN OF 23 MMBF OF PONDEROSA PINE VOLUME OR 45% FROM THE EXISTING FOREST PLAN OF 51 MMBF PONDEROSA PINE VOLUME TO THE PROPOSED PLAN OF 28 MMBF OF PONDEROSA PINE VOLUMES. THERE IS A FALL DOWN OF 45 MMBF OF PONDEROSA PINE VOLUME OR 62% FROM THE ACTUAL AVERAGE ANNUAL SALES LEVEL OF 73 MMBF PONDEROSA PINE VOLUME TO THE PROPOSED PLAN OF 28 MMBF PONDEROSA PINE VOLUME.

SOLUTION. THE COMMUNITY STABILITY ALTERNATIVE SUPPORTS 183 MMBF OF CHARGEABLE VOLUME WITH A SELL LEVEL OF 158 MMBF OF CHARGEABLE SAWTIMBER (SEE SPECIES MIX BELOW) AND 25 MMBF OF OTHER CHARGEABLE VOLUME. MOREOVER, THIS ALTERNATIVE WILL MAINTAIN HISTORIC LEVELS OF PONDEROSA PINE, DOUG FIR & LARCH, WHITE FIR & SPRUCE AND LODGEPOLE PINE SAWTIMBER SALES

PONDEROSA PINE	48 MMBF
DOUG FIR & LARCH	52 MMBF
WHITE FIR & SPRUCE	50 MMBF
LODGEPOLE PINE	8 MMBF
CHARGEABLE SAWTIMBER	158 MMBF
OTHER CHARGEABLE	25 MMBF
TOTAL CHARGEABLE	183 MMBF

**FOREST SERVICE RESPONSE:**

We do not agree that the historical levels of ponderosa pine can be maintained with this alternative. It would be possible for the first ten years.

**COMMENT NO. 13** REDUCE PONDEROSA PINE HARVEST (@ \$141/M) OR SWITCH IT TO LODGEPOLE PINE (@ \$9/M) AND YOU CHEAT YOURSELVES AND US OUT OF \$132/M GROSS RECEIPTS, SIMPLY BY SWITCHING PONDEROSA TO LODGEPOLE PINE FOR EVERY THOUSAND BOARD FEET OF TIMBER THIS IS A REDUCTION OF \$99/M TO THE FOREST SERVICE AND \$33/M TO WALLOWA COUNTY SCHOOLS AND ROADS.

**FOREST SERVICE RESPONSE.**

The sale of lower-valued trees will generate less return to the federal and the local treasuries. The Forest has in the past harvested disproportionately large amounts of higher-valued trees.

and plans, to a degree, to continue to do so in the future. But some blending in of lower-valued species is needed if the Allowable Sale Quantity is not to be reduced further.

**COMMENT NO. 14:** ANYONE WHO HAS SPENT MUCH TIME IN THE WW NATIONAL FOREST SHOULD REALIZE THAT THERE JUST IS NOT ENOUGH P. PINE AVAILABLE TO MEET THE DEMANDS OF THE INDUSTRY BACKED "COMMUNITY STABILITY PLAN"

**FOREST SERVICE RESPONSE:**

Others share your observation

**COMMENT NO. 15.** THE PLAN INADEQUATELY ADDRESSED THE PONDEROSA PINE SALES ISSUE. CURRENT SALES OF PONDEROSA PINE TIMBER AVERAGE OVER 70 MMBF/YR AND THE PREFERRED ALTERNATIVE PLANS TO REDUCE THIS TO ABOUT 28 MMBF/YR THE COMMUNITY STABILITY ALTERNATIVE PROPOSES 48 MMBF/YR. THE FOREST SERVICE HAS STATED THAT 28 MMBF/YR IS ALL THAT CAN BE OFFERED IF THE PONDEROSA PINE SALE PROGRAM IS TO BE SUSTAINED. BUT WHAT GOOD IS AN ATTEMPT TO SUSTAIN THE SALE PROGRAM IF THE SHORT TERM CONSEQUENCES ELIMINATE THE MILLS THAT USE THIS MATERIAL.

TO SELL AT "SUSTAINED YIELD" IS TOO SIMPLIFIED AN ANSWER TO THE QUESTION OF THE APPROPRIATE AMOUNT OF PONDEROSA PINE SALES. IN A RECENT LETTER THE FOREST SERVICE ESTIMATED THE TOTAL STANDING INVENTORY OF PONDEROSA PINE ON SUITABLE LANDS IS 2,160 MMBF INVENTORY TURNOVER RATES IN FOREST PLANS VARY FROM 1% TO 3%. ASSUMING AN INVENTORY TURNOVER RATE OF 2%, THE WALLOWA-WHITMAN COULD HARVEST 43 MMBF/YR OF PONDEROSA PINE. ALTERNATIVELY, GIVEN THE PROPOSED WALLOWA-WHITMAN PROGRAM OF 28 MMBF/YR, IT WOULD TAKE 77 YEARS TO CONVERT THE OLD GROWTH. AT THE SALE RATE OF 48 MMBF/YR, THE CONVERSION WOULD TAKE 45 YEARS. BOTH PROGRAMS EVENTUALLY ELIMINATE THE OLD GROWTH.

THE QUESTION IS HOW TO MAKE THIS TRANSITION TO MINIMIZE THE DISRUPTION ON LOCAL ECONOMIES. WFIA BELIEVES SLASHING THE PONDEROSA PINE PROGRAM IN HALF IS TOO DRASTIC A STEP ESPECIALLY WHEN THE MILLS AND THE MARKETS ARE GEARED FOR USING HIGH QUALITY PONDEROSA PINE. THE FOREST SERVICE BELIEVES THE FACT THAT PONDEROSA SALES IN THE LAST 3 YEARS HAVE BEEN CLOSER TO 50 MMBF/YR MEANS THE IMPACT OF A REDUCTION WILL NOT BE SEVERE. HOWEVER, THESE LOWER SALES LEVELS HAVE NOT YET BEEN FELT BY THE MARKETS

WE BELIEVE BOTH EVEN AND UNEVENAGED MANAGEMENT SHOULD BE CONSIDERED FOR MANAGING PONDEROSA PINE STANDS WHICH EVER METHOD PROVIDES THE MOST EFFICIENT PRODUCTION OF 48 MMBF DURING THE NEXT 10-15 YEARS SHOULD BE USED. IF THIS REQUIRES A COMBINATION OF THE TWO MANAGEMENT SCHEMES OR THE USE OF ONE EARLIER IN THE PLANNING HORIZON AND ANOTHER LATER, THEN SO BE IT

**FOREST SERVICE RESPONSE:**

*We agree that the discussion of the ponderosa pine issue in the DEIS could have been clearer. A number of changes have been made in the FEIS to reflect this concern. A better description of the reasons for the predicted reduction in ponderosa pine harvest levels has been added. We have also added a comparison of the ponderosa pine harvest levels for the different Forest Plan alternatives. In addition, the selected alternative has been modified to increase the ponderosa pine harvest level in the first decade, gradually reducing harvest in succeeding decades.*

The respondent is correct that the standing inventory of ponderosa pine is approximately 2,160 million board feet. However, not all of this is available for scheduled timber harvest. Substantial standing volumes of ponderosa pine exist within the Hells Canyon National Recreation Area in management areas where scheduled harvest is not permitted. Also containing ponderosa pine are the old-growth and mature stands necessary to maintain visible populations of some wildlife species, and the Starkey Experimental Forest and Range. These also do not include scheduled timber harvest.

On some lands, the rate at which timber can be harvested is limited. These include riparian areas, where a reduced rate of harvest is needed to maintain water quality and stream channel stability, and the Dispersed Recreation/Timber Management land allocation in the National Recreation Area where law dictates the use of selective harvest systems.

Timber sales have been concentrated in the lower elevations since 1971 because of restrictions on harvest in roadless areas being considered under RAREI, RAREII, and the Oregon Wilderness Act. Harvest dispersion constraints require that sales in the first decade be concentrated in the higher elevations where ponderosa pine is a minority species. This situation would have been inevitable with or without the Forest Plan.

Ponderosa pine under 20 inches in diameter is of lower value than larger diameter trees. Second growth ponderosa pine stands will make up much of the future allowable sale quantity, but will be of smaller trees.

**COMMENT NO. 16.** IN THE WALLOWA-WHITMAN'S CASE, IT IS NOT SUFFICIENT TO CONSIDER ONLY THE DECLINE IN TOTAL SAWTIMBER VOLUME PROJECTED FOR SALE. THE ANALYSIS MUST ALSO CONSIDER THE DECLINE IN THE VOLUME OF THOSE SPECIES OF SPECIAL IMPORTANCE TO THE LOCAL TIMBER INDUSTRY. THE DEIS RECOGNIZES THAT MANY OF THE FOREST'S LOCAL TIMBER MILLS ARE "BEST SUITED FOR THE PROCESSING OF LARGER LOGS" AND THAT THE SUPPLY/DEMAND IMBALANCE IS "MOST APPARENT FOR LARGE DIAMETER PONDEROSA PINE" (DEIS III-23). NEVERTHELESS, TABLE IV-9 IN THE DEIS SHOWS THAT, RELATIVE TO RECENT VOLUMES SOLD, THE PREFERRED ALTERNATIVE WILL OFFER NEARLY 17 PERCENT LESS PONDEROSA PINE, SPRUCE, FIR, AND LARCH (IN TERMS OF MMBF) AND 3.5 TIMES AS MUCH LODGEPOLE PINE. THE VOLUME OF NON-LODGEPOLE SPECIES IS PROJECTED TO DROP FROM THE CURRENT 155 MMBF PER YEAR TO 129 MMBF PER YEAR OVER THE NEXT TEN YEARS. SALE OF PONDEROSA PINE -- THE MOST CRITICAL SPECIES -- WILL DROP FROM THE CURRENT AVERAGE OF ROUGHLY 70 MMBF PER YEAR TO 28 MMBF PER YEAR -- A 60 PERCENT REDUCTION.

GIVEN SUFFICIENT TIME AND INCENTIVE, INDUSTRY WILL BE ABLE TO ADAPT TO THE CHANGING SPECIES MIX AND SIZES PRODUCED ON THE FOREST. NEVERTHELESS, A SUDDEN REDUCTION OF LARGE SAWTIMBER VOLUME OF THE MAGNITUDE DESCRIBED IN THE DRAFT PLAN COULD HAVE SEVERE SHORT-TERM IMPACTS ON BOTH INDUSTRY PRODUCTION AND CURRENT EMPLOYMENT LEVELS. ALTHOUGH THE DEIS RECOGNIZES THAT CHANGES IN SPECIES MIX AND SIZES WILL OCCUR UNDER THE PREFERRED ALTERNATIVE, THE FOREST SEEMS TO ASSUME, WITHOUT EXPLANATION, THAT INDUSTRY WILL ADAPT TO THE NEW REGIME WITH NO PROBLEMS AND WITH MINIMAL ADVERSE IMPACT ON LOCAL ECONOMIES. THIS MAY NOT BE A VALID ASSUMPTION. THE FINAL EIS SHOULD ANALYZE AND DISCUSS THIS ISSUE IN MORE DETAIL.

#### **FOREST SERVICE RESPONSE**

The Final EIS and Preferred Alternative have been revised, partially in recognition of the problem you point out. Much of our mail expressed similar concerns.

**COMMENT NO. 17:** THE TOTAL EXTENT OF THE PINE VOLUME REDUCTION HAS NOT BEEN SHOWN TO THE PUBLIC FOR EXAMPLE, NOWHERE DOES THE DEIS SHOW THAT THE SAWLOG SALES ACCOUNT FOR 98% OF THE PAYMENTS-TO-COUNTIES AND THAT PONDEROSA PINE ACCOUNTS FOR 60% OF THOSE PAYMENTS A REDUCTION IN PONDEROSA PINE WILL HAVE A VERY LARGE NEGATIVE SOCIAL, ECONOMIC AND POLITICAL IMPACT ON NORTHEAST OREGON.

**FOREST SERVICE RESPONSE**

Additional information on this subject has been put in the FEIS.

**COMMENT NO. 18: C. THE SPECIES MIX IS CRITICAL TO MAINTAINING THE OPERATION OF INSTALLED MILLING FACILITIES. WE HAVE INVESTED MANY MILLIONS OF DOLLARS IN OUR FACILITIES TO PROCESS THE SAWLOG MATERIAL. MAJOR SPECIES OR SIZE CHANGES CANNOT BE ACCOMMODATED FOR IN A SHORT PERIOD OF TIME. A GRADUAL SUBSTITUTION PROCESS IS NECESSARY TO ALLOW FOR EQUIPMENT INVESTMENT, INSTALLATION AND DEPRECIATION THE SPECIES CHANGES SHOWN IN ANY OF YOUR ALTERNATIVES, INCLUDING YOUR PREFERRED ALTERNATIVE IS TOO SEVERE, SURELY RESULTING IN MILL CLOSURES OR SHIFT LAYOFFS.**

WE RECOMMEND THAT THE WALLOWA-WHITMAN MODIFY THEIR PLAN TO MEET THE FOLLOWING ALLOWABLE SALES QUANTITY OBJECTIVES:

	MMBF/YR
SAWTIMBER(LARGER THAN 9" DBH)	
PONDEROSA PINE	48
DOUGLAS-FIR & WESTERN LARCH	52
WHITE FIR & SPRUCE	50
LODGEPOLE PINE	9
SAWTIMBER(SMALLER THAN 9" DBH)	25
TOTAL A S.Q.	183

THESE LOGS ARE THE MATERIAL NECESSARY TO OPERATE THE EXISTING SAWMILLS AND PLYWOOD PLANTS. THE RESIDUES AID IN MAINTAINING CHIPS AND FUEL FOR PARTICLEBOARD, PAPER, AND POWER GENERATION.

**FOREST SERVICE RESPONSE:**

This recommendation was carefully considered along with other planning issues. The Final EIS and Preferred Alternative have been adjusted in recognition of this concern.

**COMMENT NO. 19** EMPHASIS SHOULD BE PLACED ON CUTTING THE WHITE FIR THAT HAS ENCROACHED INTO THE OLD PINE SITES AND DOUGLAS-FIR AND PINE SHOULD BE REPLANTED.

**FOREST SERVICE RESPONSE.**

We address this sort of question at the project level, so the silvicultural prescription can be as site-specific as possible.

**COMMENT NO. 20:** BECAUSE OF THE TENDENCY OF WHITE FIR TO BECOME DISEASED WHEN SCARRED BY LOGGING OPERATIONS, CARE SHOULD BE TAKEN TO REMOVE IT DURING THE SALE. PAST PRACTICES HAVE TENDED TOWARD HIGH-GRADING THE PINE AND DOUGLAS-FIR AND LEAVING WHITE FIR BEHIND. YOUR PLAN TO EMPHASIZE CUTTING WHITE FIR IS RIGHT ON THE MONEY.

**FOREST SERVICE RESPONSE:**

This comment points out the importance of clearcutting as a tool when managing white fir. Partial cutting often results in a diseased stand.



**SUITABILITY OF LAND FOR TIMBER PRODUCTION  
Code 708**

**COMMENT NO. 1** INDICATIONS ARE THAT THE NEW FOREST PLAN NOW BEING FORMULATED IS EXCLUDING LARGE AREAS OF COMMERCIAL TIMBERLAND WHICH CAN BE HARVESTED BY HELICOPTER. THESE EXCLUDED LANDS APPEAR TO BE IN PART THE RESULTS OF AN OUTDATED METHOD OF FINANCIAL ASSESSMENT NOW BEING USED BY THE FOREST SERVICE PLANNING STAFF. THESE EXCLUDED LANDS ARE COMMERCIAL TIMBERLANDS AND THE USE OF AN UPDATED SYSTEM OF COSTING WOULD PLACE SOME, IF NOT ALL, OF THESE TIMBERLANDS BACK INTO THE TIMBER BASE. (I CAN NO LONGER STAND BY AND WATCH COMMERCIAL TIMBERLANDS BEING WITHDRAWN OR NOT CONSIDERED IN THE PLANNING, WHICH CAN BE EFFECTIVELY HARVESTED THROUGH THE USE OF HELICOPTERS. THESE TIMBERLANDS ARE A VALUABLE ADDITION TO THE TIMBER SUPPLY, AND IN SOME CASES ARE CRITICAL TO THE WELL BEING OF THE COMMUNITIES TRIBUTARY TO THEIR LOCATION.)

**FOREST SERVICE RESPONSE:**

We are required by National Forest Management Act regulations to stratify timberlands into categories of land with similar management costs and returns. This was done based on historical management cost data and projected returns, given timber species, volumes-per-acre, and access needs. This entire process has received much scrutiny and we feel that it is an accurate representation. You are correct that some lands (those which are the least economically efficient to manage for timber) are not scheduled for harvest in the FORPLAN model. These are typically lands with low volumes per acre, low-valued timber species, or high access costs.

**COMMENT NO. 2:** AREAS UNSUITABLE FOR TIMBER HARVESTING. THE INFORMATION I RECEIVED DID NOT CONTAIN A MAP OF AREAS UNSUITABLE FOR TIMBER HARVESTING, NOR DID THE PACKET DISCUSS THE METHODOLOGY USED FOR CLASSIFYING THESE AREAS. THE FINAL EIS SHOULD CONTAIN SUCH A MAP.

**FOREST SERVICE RESPONSE.**

Maps can be reviewed at the National Forest Headquarters. The process used is described in Appendix E to the EIS.

**COMMENT NO. 3** UNDER FORPLAN, LANDS NOT SCHEDULED FOR TIMBER HARVEST WERE CLASSIFIED AS LANDS "ECONOMICALLY UNSUITED". THIS CLASSIFICATION IS MISLEADING SINCE THESE LANDS ARE UNSUITED ONLY AS A RESULT OF THE RESOURCE OBJECTIVES OF THE PLAN AND NOT BASED UPON THE ABILITY TO PRODUCE TIMBER. THE RELIANCE ON FORPLAN WITHOUT FIELD SAMPLING OF EACH SITE RESULTS IN AN ARBITRARY DECISIONMAKING PROCESS.

**FOREST SERVICE RESPONSE:**

Although the resource objectives may reduce the economic efficiency of managing a parcel of land, essentially all (more than 95%) of the lands which failed to enter the FORPLAN solution due to economic considerations had negative present net values without considering other resource objectives.

**COMMENT NO. 4:** PAGE E-4 OF THE DEIS (APPENDICES) STATES 35,000 ACRES PREVIOUSLY THOUGHT UNSUITABLE ARE NOW CONSIDERED SUITABLE BECAUSE OF TWO FACTORS FIRST, REGIONAL STOCKING STANDARDS HAVE BEEN LOWERED FROM 250-300 TREES PER ACRES TO 75 TREES PER ACRE FOR ALL FOREST COMMUNITY TYPES ON THE WALLOWA-WHITMAN. SECOND, IN THE FOUR YEARS SINCE THE ORIGINAL SUITABILITY DETERMINATION, THE SILVICULTURISTS ON THE FOREST HAVE GAINED SUBSTANTIALLY MORE EXPERIENCE IN REFORESTATION ADDING 35,000 ACRES TO THE SUITABLE LAND BASE IS HIGHLY SUSPECT A STOCKING STANDARD OF 75 TREES PER ACRE IS NOT ADEQUATE FOR SOME FOREST COMMUNITIES ADEQUATE TREE STOCKING VARIES FOR VARIOUS FOREST COMMUNITIES. THE WALLOWA-WHITMAN NATIONAL FOREST STAFF RECOGNIZES THIS AND STOCK THE VARIOUS FOREST COMMUNITY TYPES AT DIFFERENT LEVELS THE SILVICULTURISTS PRACTICES HANDBOOK (FSH 10/85 CHAPTER 9.12, TABLE 1) EVEN LISTS 100 TREES PER ACRE AS A MINIMUM FOR CERTAIN FOREST COMMUNITY TYPES SO, EVEN FOREST SERVICE DATA INDICATES 75 TREES PER ACRE AS INADEQUATE STOCKING FOR CERTAIN WALLOWA-WHITMAN FOREST COMMUNITIES CAREFUL READING OF THE DEIS SHOWS THAT THE SILVICULTURISTS ON THE WALLOWA-WHITMAN HAVE A DIFFERENCE OF OPINION AS TO WHICH TIMBERLANDS ARE SUITABLE IN ANY CASE, THERE IS CERTAINLY A HIGH DEGREE OF UNCERTAINTY AS TO WHETHER OR NOT THE 35,000 ACRES OF LAND ARE SUITABLE FOR TIMBER PRODUCTION AT MINIMUM, THE DEIS SHOULD PROVIDE A THOROUGH DISCUSSION DESCRIBING THESE 35,000 ACRES AND THE PROBLEMS ASSOCIATED WITH REFORESTING EACH COMPONENT FOREST TYPE THE DEIS INDICATES THAT THE 35,000 RECLASSIFIED ACRES ARE MOSTLY HIGH ELEVATION COLD-SOIL AREAS AND AREAS WITH SEVERE BRUSH COMPETITION. THE DEIS, IN NOT ADDRESSING HOW COLD SOIL OR BRUSH COMPETITION IS TO BE OVERCOME, IS UNREALISTIC. BRUSH CONTROL MUST AWAIT ADOPTION OF A NEW VEGETATION MANAGEMENT PLAN, AND THEN IS LIKELY TO BE MORE EXPENSIVE THAN APPROPRIATIONS MAY ALLOW. UNREALISTIC DESIGNATIONS OF SUITABLE ACREAGE IS A RECIPE FOR CONTINUING OVERHARVESTING ON THE FOREST.

#### **FOREST SERVICE RESPONSE**

The Regional minimum stocking level of 75 trees per acre is for use in determining land suitability. In practice, the desired stocking level is likely to be much higher, varying with the productivity of the individual site. Although the determination of land suitability is somewhat subjective, our silviculturists indicate a good probability of reforestation success on the 35,000 acres in question. These are mostly droughty sites at lower elevation or on southerly aspects.

**COMMENT NO. 5:** ISSUE THE WALLOWA-WHITMAN HAS APPROXIMATELY 1,090 MILLION ACRES (47%) TENTATIVELY SUITABLE FOR TIMBER PRODUCTION FROM A TOTAL OF 2.3 MILLION ACRES ON THE NATIONAL FOREST THE FOREST SERVICE'S PREFERRED ALTERNATIVE SETS ASIDE 48% OF 2.3 MILLION ACRES IN WILDERNESS AND NON-WILDERNESS ONLY 14% OF THE SUITABLE LAND BASE IS MANAGED FOR FULL TIMBER YIELD

PROBLEM THE MAJOR PROBLEM IS THAT MOST OF THE LANDS TENTATIVELY SUITABLE FOR TIMBER PRODUCTION ARE NOT BEING MANAGED FOR FULL YIELD. ONLY 14% OF THE 1 MILLION ACRES AVAILABLE FOR TIMBER PRODUCTION WILL BE MANAGED FOR FULL TIMBER YIELD. THE PREFERRED ALTERNATIVE WILL ONLY MANAGE 151,200 ACRES OF SUITABLE FOREST LAND FOR FULL YIELD. WHEN COMPARING THESE FULL YIELD NUMBERS TO THE DESCHUTES NATIONAL FOREST, ANOTHER EASTSIDE FOREST, THE IMPACT ON TIMBER HARVESTING BECOMES APPARENT. THE DESCHUTES MANAGES 94% OF ITS LANDS SUITABLE AND APPROPRIATE FOR REGULATED PROGRAMMED TIMBER HARVEST AT FULL TIMBER YIELD THE DESCHUTES PREFERRED ALTERNATIVE WITH APPROXIMATELY 1 MILLION ACRES AVAILABLE FOR TIMBER HARVESTING WILL MANAGE 952,100 ACRES (OR 94%) AT FULL TIMBER YIELD (PG 95, DESCHUTES DEIS, USDA FS, 1986). THE WALLOWA-WHITMAN, ON THE OTHER HAND, WITH

APPROXIMATELY 1 MILLION ACRES AVAILABLE FOR TIMBER PRODUCTION WILL ONLY MANAGE 151,200 ACRES (OR 14%)

SOLUTION: THE WALLOWA-WHITMAN SHOULD EXAMINE ALTERNATIVES THAT WILL MANAGE A LARGER PERCENTAGE OF SUITABLE TIMBER LANDS IN FULL YIELD. THE COMMUNITY STABILITY ALTERNATIVE SUPPORTS MANAGING 950,000 ACRES AT FULL TIMBER YIELD

**FOREST SERVICE RESPONSE.**

We expect "full yield" to occur only in stands where the management intensity calls for planting, precommercial thinning, commercial thinning, and regeneration cutting. It is often more practical to carry out practices which produce less than full (maximum) yield. For example, it may be desirable to rely on natural reforestation to reduce management costs -- often hundreds of dollars per acre. However, the delay in establishing a new stand causes an output of less than full yield. Commercial thinning contributes to full yield, but produces a relatively small diameter product for which there is little demand. Additional situations which result in less than full yield include, management of riparian zones, visual quality protection, and legal requirements in the Hells Canyon NRA.

**COMMENT NO. 6** THE DP SHOULD INCORPORATE THE IDEA THAT MANY PRODUCTIVE FOREST LANDS ARE ALSO THE MOST PRODUCTIVE FOR WATER, FISH, WILDLIFE, SCENERY AND RECREATION. MULTIPLE USE MANAGEMENT INCLUDES ALL THE VALUES AND NOT JUST OVERWHELMING EMPHASIS ON TIMBER CUTTING IN PRODUCTIVE FOREST LANDS. THE FS SHOULD GIVE MORE EQUITABLE EMPHASIS FOR ALL RESOURCES IN THE MULTIPLE USE SPECTRUM, NOT MERELY LEAVE HIGH ELEVATION AREAS FOR OTHER RESOURCES EMPHASIS

**FOREST SERVICE RESPONSE**

We believe that the proposed plan recognizes these values and provides for their balanced use

**COMMENT NO. 7.** THE CONFEDERATED TRIBES RECOMMEND THAT GRASSLAND-TIMBER MOSAIC AREAS COMMONLY FOUND ON NORTH FACING STRINGERED SLOPES BE DELETED FROM THE REGULATED TIMBER VOLUME BASE THESE AREAS HAVE BEEN SHOWN TO PROVIDE PREFERABLE THERMAL AND HIDING COVER FOR ELK AND OTHER WILDLIFE THESE MOSAIC AREAS ALSO MAINTAIN SOIL INTEGRITY AND SLOPE STABILITY WHICH PROTECTS WATER QUALITY AND ANADROMOUS FISHERIES.

**FOREST SERVICE RESPONSE:**

We recognize the importance of these areas to big game However, we also feel that the wildlife values can be maintained while these areas contribute to timber outputs from the Forest

**COMMENT NO. 8** CERTAIN TIMBER TYPES WITH HEAVY UNDERBRUSH SHOULD NOT BE IN THE TIMBER BASE DUE TO REFORESTATION PROBLEMS TIMBER STRINGERS LESS THAN 40 ACRES AND VALUABLE WILDLIFE MICRO-HABITAT AREAS SHOULD NOT BE IN THE TIMBER BASE.

**FOREST SERVICE RESPONSE:**

Brushfield areas totaling 9,800 ares were removed from the timber base. In many cases, these were also timbered stringers However, most timbered stringers were determined to be suitable

for timber management. We recognize the importance of these areas to wildlife, but we feel that the wildlife values can be maintained while these areas contribute to timber outputs from the Forest.

**COMMENT NO. 9:** OF THE 2,349,215 ACRES IN THE FOREST, ONLY 831,700 ARE SCHEDULED FOR TIMBER HARVEST. HOWEVER WHILE THE PLAN STATES THESE LANDS ARE AVAILABLE, IN FACT, NOT ALL OF THESE LANDS ARE AVAILABLE THE REPORT SHOULD DISCUSS HOW MANY ACRES WILL BE AVAILABLE AFTER THE REDUCTIONS FOR BIG GAME HABITAT; PROPOSED WILD AND SCENIC RIVERS; RARE, THREATENED AND ENDANGERED SPECIES HABITATS; PROPOSED WILDERNESS; AND STREAMSIDE MANAGEMENT UNITS.

**FOREST SERVICE RESPONSE:**

All of the 831,700 acres are available and scheduled for timber harvest.

**COMMENT NO. 10:** THE DEIS IS BEREFT OF ANY DESCRIPTION OF THE PROCESS USED TO IDENTIFY LANDS NOT SUITABLE FOR TIMBER PRODUCTION DUE TO THE LIKELIHOOD OF IRREVERSIBLE RESOURCE DAMAGE TO SOILS PRODUCTIVITY OR WATERSHED CONDITIONS. IT STATES THAT "(A) FOREST SOIL SCIENTIST IDENTIFIED AREAS WHICH WERE UNSUITABLE FOR TIMBER HARVEST BECAUSE SHALLOW, DROUGHTY SOILS PRECLUDED SUCCESSFUL REGENERATION." APPENDIX E AT 4. WHAT IS "IRREVERSIBLE RESOURCE DAMAGE?" OF COURSE, ONE DEFINITION CANNOT BE CREATED THAT WILL COVER ALL SITUATIONS, BUT THE FOREST SERVICE CAN AT LEAST GIVE A GENERAL DESCRIPTION. WHAT IS THE DIFFERENCE BETWEEN "IRREVERSIBLE" AND REVERSIBLE" RESOURCE DAMAGE? "IRREVERSIBLE DAMAGE" NEEDS TO BE DEFINED IN A MANNER THAT PROTECTS THOSE RESOURCES DEPENDENT UPON STABLE PRODUCTIVE SOILS AND HEALTHY WATERSHEDS FOR EXAMPLE, "IRREVERSIBLE HARM" TO WATERSHEDS MUST TAKE INTO ACCOUNT THE LIFECYCLE AND GENETIC BACKGROUND OF ANADROMOUS FISH.

A FOREST SOIL SCIENTIST IDENTIFIES AREAS THAT WERE "UNSUITABLE FOR TIMBER HARVEST BECAUSE OF EXTREME SOIL INSTABILITY" OR BECAUSE SHALLOW, DROUGHTY SOILS PRECLUDED SUCCESSFUL REGENERATION "THESE CLASSIFICATIONS WERE REVIEWED ACCORDING TO REGIONAL CRITERIA AND RESULTED IN RETURNING "BRUSH COMPETITION AND HIGH ELEVATION COLD SOIL AREAS TO THE SUITABLE LAND BASE." IF REGIONAL SUITABILITY CRITERIA REQUIRE "A DEGREE OF SOILS AND CLIMATOLOGICAL DATA NOT AVAILABLE ON THE WALLOWA-WHITMAN" (APPENDIX E-4) HOW CAN THE LANDS IN QUESTION BE ASSUMED TO PROVIDE NO REGENERATION PROBLEMS? IT WOULD SEEM THAT A CONSERVATIVE CLASSIFICATION WOULD BETTER PROTECT THE RESOURCE

IN 1984 FOREST LAND SUITABILITY WAS REVIEWED, RESULTING IN 35,000 FEWER ACRES CLASSIFIED AS SUITABLE FOR TIMBER MANAGEMENT THIS SITUATION WAS REPORTED TO ARISE FROM (1) ACCEPTANCE OF 75 TREES PER ACRE RATHER THAN 250 TO 300 AS ADEQUATE RESTOCKING DENSITY, AND (2) THE GREATER LEVEL OF EXPERIENCE OF SILVICULTURISTS. HOW COULD RELAXATION OF RESTOCKING REQUIREMENTS CAUSE A REDUCTION IN SUITABLE LAND?

1,090,072 ACRES OF TENTATIVELY SUITABLE FOREST LAND WAS IDENTIFIED (DEIS III-19) A TOTAL OF 1,121,292 ACRES ARE SCHEDULED TO BE MANAGED BY AREAS 1 AND 3, THE INTENSIVE TIMBER MANAGEMENT AREAS. IT WOULD APPEAR THAT ALL SUITABLE AND AVAILABLE LAND WOULD BE RELEGATED TO TREE FARM AGRICULTURE ONLY IF A SIGNIFICANT PERCENTAGE OF THESE MANAGEMENT UNITS 1 AND 3 HAD INCLUSIONS OF NON-FOREST COULD WE FIND ANY SUITABLE FOREST OUTSIDE OF MS 1 AND 3

FROM TABLE B-39 (APPENDIX B-167), WE MIGHT ASSUME THAT AT LEAST 726,431 ACRES ARE SUITABLE IN MS 1 AND 3. HOWEVER, MS-3 IN THIS TABLE INDICATES MORE ACREAGE THAN ACTUALLY IS PLANNED (CF PLAN 4-15). THIS OCCURS BECAUSE OF 'THE NEED TO REPRESENT CERTAIN PRESCRIPTIONS AS MANAGEMENT EMPHASIS IN FORPLAN THAT ARE PART OF OTHER MANAGEMENT AREAS IN ALTERNATIVES.' FOR EXAMPLE, RIPARIAN AND VISUAL FOREGROUND AND MIDDLEGROUND HAVE BEEN EXTRACTED FROM MS 1 AND 3. ALL SUCH ACRES ARE 100% FOREST LAND IF THIS IS TRUE, THEN ACRES FROM OTHER PRESCRIPTIONS MUST HAVE BEEN ADDED TO MS 1 AND 3 TOTAL ACREAGE TO MAKE THEM APPROXIMATE ACTUAL ACREAGES LISTED IN THE PLAN (4-15) IT THEREFORE SEEMS THAT TABLE B-39 IS A VERY DECEPTIVE GUIDE TO SUITABLE ACRES IN EACH MANAGEMENT AREA. CAN THE WWNF PROVIDE CLARIFICATION TO THESE ISSUES? HOW MUCH ACREAGE OF SUITABLE TIMBER REALLY IS LOCATED IN EACH MANAGEMENT AREA? WHERE IS SUITABLE TIMBER INTENDED TO BE LEFT UNCUT OUTSIDE MA 1 AND 3? ALSO, IF SUITABLE TIMBER EXISTS OUTSIDE UNITS MA 1 AND 3 WHAT WILL THE ROTATION PERIODS BE FOR THIS TIMBER UNDER DIFFERENT AREAS?

#### FOREST SERVICE RESPONSE:

We think that the description found in Appendix E is reasonably complete. Loss of soil through mass soil movement (land slides, slumps) was the major consideration in identifying areas of irreversible damage. Mass movement is considered irreversible because it is normally impossible or impractical to return the soil to the site. In some instances, harvest-related soil mass movement may also cause instream damage, but this is not a common problem on the Willowa-Whitman.

We recognize that determination of suitable lands is somewhat subjective. Verification of the lands identified as suited or unsuited for timber management has been made a part of the Forest monitoring plan.

Relaxation of minimum restocking requirements reduced the acres of *unsuited* lands.

Following is a summary of suited lands by management area for Alternative C as displayed in the FEIS.

	Tentatively Suited Acres*	Suited Acres
MA 1	500,038	482,429
MA 3, 18	268,516	247,351
MA 5	1,743	1,743
MA 11	57,727	41,979
Riparian	18,843	18,843
Visual Foreground	51,793	44,444
	<hr/>	<hr/>
	898,660	836,789

- Does not include tentatively suitable acres in management areas without scheduled timber harvest.

The remaining tentatively suitable lands are in management areas which do not include scheduled timber harvest or were not scheduled for timber harvest because of economic considerations. Your difficulty in comparing suitable acres in the various management areas with total acreage stems from the inclusion of nonforest lands. Both Management Areas 1 and 3 include significant acreages of grasslands, talus slopes, and rock.

**COMMENT NO. 11: LANDS SUITABLE FOR TIMBER PRODUCTION**

FROM THE TOTAL LAND TENTATIVELY SUITABLE FOR TIMBER PRODUCTION OF 1,090,100 ACRES, THE COMMUNITY STABILITY ALTERNATIVE CLASSIFIES 950,000 ACRES AS SUITABLE TIMBER LANDS. THE COMMUNITY STABILITY ALTERNATIVE WOULD MANAGE 950,000 ACRES OF SUITABLE TIMBER LAND FOR FULL TIMBER YIELD, VERSUS 151,200 ACRES IN THE FOREST SERVICE PREFERRED ALTERNATIVE. THIS WILL ATTAIN THE LONG-TERM SUSTAINED YIELD OF 47.1 MILLION CUBIC FEET PER YEAR. THIS IS CONSISTENT WITH THE MAXIMUM TIMBER W/MMR BENCHMARK RUN.

**FOREST SERVICE RESPONSE:**

The "Community Stability" alternative which is discussed in the FEIS shows, based on FOR-PLAN analysis, 913,600 acres of lands suitable for timber production, of which 255,200 are managed for "full" yield (See response to Comment No. 5)

**COMMENT NO. 12** WE SUGGEST THE FOREST SERVICE MANAGE TIMBER ON 950,000 ACRES AS SHOWN IN THE MAX/TBR WITH MMR'S BENCH MARK. THIS WILL MAINTAIN A LARGER BASE SO THAT THE WALLOWA-WHITMAN NATIONAL FOREST CAN RETAIN FLEXIBILITY TO MAINTAIN A VIABLE TIMBER SALE PROGRAM. THIS IS ESPECIALLY CRITICAL IN TERMS OF ANNUAL APPROPRIATION REDUCTIONS THAT MAY BE IMPOSED ON THE WALLOWA-WHITMAN. MAINTAINING A LARGER LAND BASE WILL ALSO TEND TO LESSEN THE SHORT TERM AMENITY IMPACTS OF TIMBER HARVESTING BY NOT HARVESTING ON AN EXCESSIVE AMOUNT OF ACREAGE IN A SHORT PERIOD.

**FOREST SERVICE RESPONSE**

Maintaining a larger land base would spread out and lessen timber harvesting impacts if the harvest level were not increased and if it were possible to market the timber from the economically marginal lands that would be included.

**COMMENT NO. 13:** THE WALLOWA-WHITMAN HAS MANY FAULTS WITH ITS DETERMINATION OF LAND SUITABLE FOR TIMBER PRODUCTION. FOREMOST IS THE LACK OF FIELD VERIFICATION OF UNPRODUCTIVE FORESTLAND AND LAND WITH REGENERATION DIFFICULTY. THE FOLLOWING POINTS ARE SIGNIFICANT TO THIS ISSUE: FIRST, FIELD VERIFICATION WAS SPOTTY OR NONEXISTENT. FOR EXAMPLE, REGIONAL CRITERIA PERMITTED NATURAL REGENERATION TO BE CONSIDERED AS AN OPTION ON SOILS TOO ROCKY TO PLANT. REGIONAL CRITERIA FOR IDENTIFYING ROCKY SOILS REGENERATION PROBLEMS WERE NOT FOLLOWED BECAUSE THE FOREST NEEDED BETTER SOIL DATA TO MAKE THE EVALUATION. INSTEAD, THE WALLOWA-WHITMAN BASED THIS DECISION EXCLUSIVELY ON EVALUATION OF AERIAL PHOTOS, RATHER THAN COLLECTING THE NECESSARY SOIL DATA TO BASE THEIR DECISION UPON AS REQUIRED BY NFMA.

SECOND, THE 1982 REVISION OF THE NFMA REGULATIONS ELIMINATED THE CATEGORY OF UNPRODUCTIVE FOREST LAND. THE 206,000 ACRES THE WALLOWA-WHITMAN CLASSIFIED IN THIS CATEGORY WERE REASSESSED USING ONLY 10% REVIEW USING AERIAL PHOTOS. MOST OF THE LAND IS SUPPOSEDLY NONFOREST BUT NO FIELD CHECK WAS MADE TO SEE IF SEEDLINGS WERE PRESENT. MORE IMPORTANTLY, ABOUT 9,417 ACRES WERE ESTIMATED TO BE PRODUCTIVE FOREST LAND. THESE LANDS WERE NOT ADDED BACK INTO THE SUITABLE LANDS CLASSIFICATION BECAUSE THE FOREST SERVICE THINKS THEY WILL BE OFFSET BY UNPRODUCTIVE INCLUSIONS WITHIN LAND CLASSIFIED PRODUCTIVE.

THIRD, THE WALLOWA-WHITMAN DID NOT USE SOUND TECHNICAL PROCEDURES FOR THE ANALYSIS. THERE WAS LITTLE TRAINING GIVEN TO THOSE INDIVIDUALS ACTUALLY DOING THE PHOTO INTERPRETATION; THERE WAS VIRTUALLY NO VERIFICATION OF CONSISTENCY AMONG INTERPRETERS, NOR WAS THERE DIRECT PARTICIPATION BY PROFESSIONAL FORESTERS OR AERIAL PHOTO INTERPRETERS. THERE WAS ALSO A MAJOR OMISSION OF ADEQUATE FIELD VERIFICATION OF THE PHOTO INTERPRETATION.

WE FEEL THE ENTIRE WALLOWA-WHITMAN FOREST MUST BE RECLASSIFIED IN TERMS OF LAND SUITABILITY BEFORE THE FINAL EIS IS RELEASED.

#### FOREST SERVICE RESPONSE

We disagree with your opinion of the adequacy of the suitability determination. Although the process required some subjectivity, it was conducted by a team of silviculturists (all professional foresters) and a professional soil scientist. These were all individuals familiar with local timber management activities, proficient in aerial photo interpretation, and knowledgeable concerning the land suitability requirements for Forest planning. The process was overseen by the Forest silviculturist to assure consistency. Following mapping on aerial photographs, a field verification was conducted on selected areas of each Ranger District and adjustments were made where needed. The process and results have received close scrutiny and no significant errors have been found. Periodic review of unsuited lands is required by National Forest Management Act regulations. This review, along with a site-by-site verification of land suitability, is a part of the Forest Plan Monitoring Plan.

**COMMENT NO. 14** IN DECIDING WHICH LANDS ARE SUITABLE FOR TIMBER MANAGEMENT, THE FORESTS' STAFF ARE TO REVIEW DATA FOR ALL LANDS WITHIN THE PLANNING AREA AND, WHERE THERE IS NOT ASSURANCE OF ADEQUATE RESTOCKING WITHIN FIVE YEARS, DECLARE SUCH LANDS UNSUITABLE, 36 CFR 219.14 AND 219.27. IT APPEARS THAT THE DRAFT FOREST PLAN NEITHER PROVIDES ASSURANCE OF RESTOCKING WITHIN FIVE YEARS, NOR USES AVAILABLE DATA TO DETERMINE TIMBERLAND SUITABILITY.

1. AVAILABLE DATA WERE NOT USED TO SUPPORT THE SUITABLE LANDS DECISIONS. THERE IS NO EVIDENCE IN THE PLAN, DEIS, OR PLANNING RECORDS THAT CERTAIN AVAILABLE REFORESTATION DATA WERE USED IN MAKING THE SUITABLE LANDS DECISIONS IN THE FOREST PLAN. THE ONLY LANDS WHERE REFORESTATION CRITERIA APPEAR TO HAVE BEEN CONSIDERED WERE "SHALLOW DROUGHTY SOILS. SEVERE COMPETITION FROM SHRUBS, PRIMARILY NINEBARK (AND) HIGH ELEVATION SITES WITH COLD SOILS." EVEN THESE LANDS WHICH HAVE ADMITTED "REGENERATION DIFFICULTY" WERE NOT ALL DECLARED UNSUITABLE. RATHER, BASED UPON "REGION-WIDE CRITERIA," BRUSH COMPETITION SITES AND HIGH ELEVATION COLD SOIL AREAS WERE RETURNED TO THE SUITABLE LAND BASE. SEE MEMO OF OCTOBER 28, 1981 WITH ATTACHMENTS. NO DATA ARE PRESENTED THAT INDICATE, LET ALONE ASSURE, THE REMAINING GREAT MAJORITY OF LAND IS REFORESTABLE WITHIN FIVE YEARS. THERE IS SIMPLY NO REFORESTATION WITHIN FIVE YEARS. THE NATIONAL FOREST MANAGEMENT ACT IS UNAMBIGUOUS IN THIS REGARD, REQUIRING THAT "TIMBER WILL BE HARVESTED FROM LANDS ONLY WHERE ... (III) THERE IS ASSURANCE THAT SUCH LANDS CAN BE ADEQUATELY RESTOCKED WITHIN FIVE YEARS AFTER HARVEST." NEITHER DATA NOR ANY OTHER EVIDENCE HAS BEEN PROVIDED BY PLAN OR DEIS TO SUPPORT THE SUITABILITY DECISIONS.

2. READILY AVAILABLE REFORESTATION DATA WERE NOT USED TO MAKE THE SUITABILITY DECISIONS. THE WALLOWA AND WHITMAN FORESTS HAVE A CONSIDERABLE AMOUNT OF REFORESTATION DATA IN STAND RECORD CARDS, BUT THERE IS NO EVIDENCE ANY OF IT WAS USED IN MAKING THE SUITABILITY DECISIONS. STAND RECORD CARDS ARE AN INVENTORY OF ALL SILVICULTURAL ACTIVITIES OCCURRING ON AN INDIVIDUAL STAND. THESE DATA PROVIDE THE MOST USEFUL INFORMATION FOR DETERMINING WHETHER OR NOT LANDS ARE ASSURED OF ADEQUATE RESTOCKING WITHIN FIVE YEARS AFTER HARVEST. IN

SPITE OF THE AVAILABILITY OF THESE DATA ON ALL RANGER DISTRICTS OF THE FORESTS, NO ANALYSIS OF THE DATA WAS PERFORMED. ANALYSIS ON OTHER FORESTS, FOR EXAMPLE THE BITTERROOT FOREST, SHOWED THAT, BUT 26 PERCENT OF STANDS HARVESTED BETWEEN 1976 AND 1980 WERE ADEQUATELY RESTOCKED WITHIN FIVE YEARS WILL BE HARVESTED AND NOT REFORESTED FOR UP TO 20 YEARS. THIS SIMPLY FLIES IN THE FACE OF CONGRESSIONAL DIRECTION REQUIRING ASSURANCE OF RESTOCKING WITHIN FIVE YEARS. THE FOREST SERVICE WOULD BE WELL-ADVISED TO RECALL THE GENESIS OF THESE CONCERNS DURING THE CHURCH CLEARCUTTING HEARINGS IN 1972. PLEASE INCORPORATE BY REFERENCE THE ENTIRE HEARINGS RECORD AND COMMITTEE REPORT AS A PART OF OUR COMMENTS IN ADDITION, WE ATTACHED AN ARTICLE WHICH DISCUSSES THE GENERIC PROBLEMS WITH THE FOREST SERVICE'S INTERPRETATION OF THE REFORESTATION REQUIREMENTS.

**FOREST SERVICE RESPONSE:**

The respondents' interpretation of NFMA reforestation is different from the Forest Service interpretation. As discussed in the EIS, NFMA regulations require that timber harvest not occur on land where there is not reasonable assurance that such lands can be adequately restocked. This does not mean that restocking must occur that quickly in all circumstances. In some situations, achieving reforestation within five years could cause planting expenditures of \$200 to \$400 per acre, while natural reforestation could normally be expected in six to ten years with little investment. Direction in the plan permits increased economic efficiency in situations such as this

Although not specifically used in differentiating between suitable and unsuitable sites, information on historical reforestation success was used in estimating reforestation lag periods and reforestation costs.

**COMMENT NO. 15:** SECTION 6(G)3(E)(I) OF THE NATIONAL FOREST MANAGEMENT ACT REQUIRES THAT THE PLAN "INSURE" THAT TIMBER WILL NOT BE HARVESTED OR ROADS BUILT ON THE FOREST WHERE THERE IS A POTENTIAL FOR IRREVERSIBLE RESOURCE DAMAGE. THIS MANDATE SPECIFICALLY REQUIRES PROTECTION OF THE WATERSHED. AS A RESULT OF THE FRAMEWORK ESTABLISHED IN APPENDIX E, THE PLAN DOES NOT ADEQUATELY IDENTIFY SUITABLE AREAS OR INSURE AGAINST IRREVERSIBLE DAMAGE TO THE WATERSHED AND OTHER NATURAL RESOURCES.

A NARROW DEFINITION OF AVAILABILITY AND TECHNICAL SUITABILITY, A LACK OF PREDETERMINED STANDARDS AND ADEQUATE INFORMATION AND A FAILURE TO ALLOW FOR CATASTROPHIC EVENTS MAKE THE PLANNING TEAM'S CLASSIFICATION OF LANDS SUITABLE FOR TIMBER HARVEST AND ROAD BUILDING HIGHLY QUESTIONABLE. IN ADDITION, THE CLASSIFICATION OF SUITABLE LANDS DOES NOT TAKE INTO ACCOUNT THE COST OF MITIGATION MEASURES AND THE POSSIBILITY THAT THE TOTAL COST OF HARVEST AND MITIGATION MAY EXCEED THE VALUE OF THE TIMBER HARVESTED, I.E., UNECONOMIC SALES

THE ONLY LANDS CLASSIFIED AS 'UNAVAILABLE' BECAUSE OF THE POTENTIAL FOR IRREVERSIBLE RESOURCE DAMAGE ARE 231,623 ACRES OF LAND ALREADY DESIGNATED AS RESEARCH NATURAL AREAS, WILD AND SCENIC RIVERS, OR WILDERNESS. ALL FORESTED LANDS OUTSIDE OF THE DESIGNATED AREAS ARE, EVIDENTLY, 'AVAILABLE' FOR TIMBER HARVEST AND THUS SUITABLE SO LONG AS THEY CAN MEET THE 'TECHNICALLY SUITABLE' TEST. UNFORTUNATELY, THIS TEST IS BASED ON SUBJECTIVE EVALUATIONS OF SOIL INSTABILITY AND REGENERATION POTENTIAL. SUITABILITY STANDARDS HAVE APPARENTLY NOT BEEN DEvised



RESTRICTING THE COMPOSITION OF UNAVAILABLE LANDS TO DESIGNATED AREAS AND APPROACHING IRREVERSIBLE IMPACT ON THE WATERSHED IN TERMS OF SUBJECTIVE EVALUATIONS OF SOIL CHARACTERISTICS AND UNCERTAIN POSSIBILITIES FOR REFORESTATION DOES NOT FULFILL THE LEGAL REQUIREMENTS OF THE PLANNING PROCESS. AT A BARE MINIMUM, THE SUITABILITY OF ROUGHLY 476,000 ACRES OF UNDESIGNATED ROADLESS AREAS SHOULD BE CAREFULLY STUDIED IN TERMS OF BOTH ECOLOGICAL AND ECONOMIC FACTORS. AS THE PLANNING TEAM INDICATES IN THE DRAFT ENVIRONMENTAL IMPACT STATEMENT (P.IV-62): (CONT)

**FOREST SERVICE RESPONSE:**

We believe that the intent of Congress to avoid irreversible resource damage is strongly reflected throughout the EIS and plan -- particularly in the standards and guidelines (Forest Plan Chapter 4) We believe these standards and guidelines clearly establish that protection of these resources has priority over all others on the Forest

The definitions of availability and technical suitability are found in the National Forest Management Act implementing regulations. No attempt was made to bias or limit their application. It is important to recognize that economic factors, such as the cost of mitigation, are not a part of the determination of tentatively suitable lands. These factors are considered during the economic stratification of lands required by 36 CFR 219.14b

"Unavailable" lands are lands which have been withdrawn from timber production by an Act of Congress, the Secretary of Agriculture, or the Chief of the Forest Service. On the Wallowa-Whitman, the only lands qualifying as "unavailable" are those within wilderness or established Research Natural Areas

All roadless areas on the Forest were assessed as to their suitability for timber production. This information is found in DEIS Appendix C.

**COMMENT NO. 16: IT BORDERS ON THE IRRATIONAL AND INDICATES A MEASURE OF IRRESPONSIBILITY TO EVEN CONSIDER AN ALTERNATIVE NC THAT, AS NOTED ON PAGE S-3, "SCHEDULES TIMBER HARVEST FROM LANDS UNSUITED FOR TIMBER PRODUCTION "**

**FOREST SERVICE RESPONSE:**

This dilemma has occurred due to the law changing after the NC Alternative was developed

**TIMBER HARVEST EFFECTS  
Code 718**

**COMMENT NO. 1** PAGE IV-33, EFFECTS OF TIMBER MANAGEMENT ON STREAMFLOWS - THIS SECTION SHOULD INCLUDE A BRIEF DISCUSSION ON THE POTENTIAL IMPACTS OF TIMBER HARVEST ON SEASONAL STREAMFLOWS ALTHOUGH ANNUAL STREAMFLOWS MAY REMAIN RELATIVELY UNAFFECTED BY TIMBER HARVEST, SUMMER FLOWS--OFTEN CRITICAL FOR ANADROMOUS FISH--MAY BE SIGNIFICANTLY REDUCED AND SPRING FLOWS SUBSTANTIALLY INCREASED.

**FOREST SERVICE RESPONSE:**

In general, we do not believe timber management will affect summer stream flows to the detriment of fish, but we agree that there is the potential for adverse effects. This will be a consideration in all timber sale project analyses. We have included a brief discussion in Chapter IV as suggested.

**COMMENT NO. 2.** THE PLAN'S OVEREMPHASIS ON COMMODITY PRODUCTION IS CLEARLY DESTROYING BACKCOUNTRY, TRAILS, BIG GAME HABITAT, FISHERIES AND WATER QUALITY, AND THE LEGAL FOUNDATION FOR SUSTAINED YIELD OF FOREST LANDS. THE NEED FOR SOBER MANAGEMENT OF PUBLIC LANDS THAT STABILIZE OUR RESOURCES RATHER THAN LEAD TO THEIR DEGRADATION AND LIQUIDATION IS PARAMOUNT TO MY CONCERNS.

**FOREST SERVICE RESPONSE:**

Thank you for your point of view.

**COMMENT NO. 3:** THE EIS RELIES TOO HEAVILY ON MITIGATION MEASURES TO CORRECT PROBLEMS WITH FISH, WILDLIFE AND WATERSHEDS CAUSED FROM TIMBER HARVEST. ALL TOO FREQUENTLY THE FOREST SERVICE WILL PROPOSE GRANDIOSE TIMBER HARVEST ACTIVITIES WHICH SERIOUSLY DEGRADE OTHER RESOURCES AND CLAIM THE DAMAGE TO THOSE OTHER RESOURCES WILL BE CORRECTED THROUGH MITIGATION MEASURES. THEN WHEN IT COMES TIME TO ACTUALLY MITIGATE THE PROBLEMS, THERE'S NO MONEY OR THE MEASURE DON'T WORK EFFECTIVELY.

**FOREST SERVICE RESPONSE:**

There is always the chance funds will not be available. However, if funds are not available to mitigate certain effects, we are obligated to review the project or find other sources of mitigation funds. We realize our record has not been perfect in mitigation measures, but we don't believe it has been bad. We are continuing to stress the importance of proper and realistic mitigation.

**COMMENT NO. 4:** AVAILABLE SCIENTIFIC EVIDENCE CLEARLY SHOWS THAT A WELL-DESIGNED "HIGH-TIMBER" ALTERNATIVE SHOULD NOT PRODUCE EXCESSIVE ADVERSE IMPACTS ON BIG-GAME WILDLIFE POPULATIONS. MOST BIOLOGISTS AGREE THAT TIMBER HARVEST CAN HAVE BENEFICIAL EFFECTS ON FORAGE PRODUCTION AND, AS A RESULT, IMPROVE ELK HABITAT PRODUCTIVITY WHERE DENSE TIMBER STANDS INHIBIT THE GROWTH OF UNDERSTORY SHRUBS, GRASSES AND FORBS. THE MAJOR SOURCE OF CONFLICT BETWEEN TIMBER

HARVEST AND BIG-GAME MANAGEMENT ACTUALLY INVOLVES THE POTENTIAL ADVERSE EFFECTS ASSOCIATED WITH TIMBER HARVEST ROADS RATHER THAN THE IMPACT OF TIMBER HARVEST ITSELF.

**FOREST SERVICE RESPONSE.**

We agree that timber harvest can improve forage production for big game. But it can also reduce thermal cover and have other adverse effects as discussed in Chapter IV of the EIS.

**COMMENT NO. 5: PUT PROTECTION FOR THE NATURAL FISH LIFE IN THE DRAFT. KEEP LUMBER COMPANIES AWAY FROM STREAMS AND AREAS THAT WASH INTO STREAMS**

**FOREST SERVICE RESPONSE:**

We believe adherence to the standards and guidelines for riparian habitat and wildlife will protect fish habitat.

**COMMENT NO. 6: HEAVY LOGGING MAKES FOR FEWER UNDISTURBED AREAS AND IS CERTAINLY UNATTRACTIVE**

**FOREST SERVICE RESPONSE**

Many people agree that harvested areas, especially recently harvested areas, are unattractive.

**COMMENT NO. 7: THE FOREST NEEDS TO BE HARVESTED TO KEEP THE FOREST HEALTHY AND TO PROVIDE ENOUGH YOUNG GROWTH TO KEEP DEER AND ELK HERDS STRONG**

**FOREST SERVICE RESPONSE:**

Timber harvest usually does result in temporary increases in forage for deer and elk. By removing the older trees, the remaining or new trees are often more vigorous. There are other points of view on whether this makes the entire Forest more "healthy" as a whole.

**COMMENT NO. 8. ALTERNATIVE F HAS 44% LESS TIMBER HARVEST THAN ALTERNATIVE B-DEP AND HAS 56% FEWER MILES OF ROAD BUILT IN ROADLESS AREAS IN THE FIRST DECADE (TABLE C C-9) AND HAS ABOUT 44% FEWER TOTAL ROAD MILES BUILT FOR ALL FOREST AREAS (DEIS II-88). IF ROAD BUILDING IS A MAJOR CAUSE OF SEDIMENTATION, HOW IS IT THAT THERE IS ONLY A SIX PERCENTAGE POINT DIFFERENCE**

**FOREST SERVICE RESPONSE:**

A substantial part of the sediment comes from the existing road system, grasslands, and wilderness areas. These sediment contributions occur regardless of alternative, tending to reduce the differences between alternatives on a percentage basis.

**COMMENT NO. 9: AVERAGES PROJECTED FOR FIVE DECADES SHOW A MAXIMUM PERCENTAGE POINT DIFFERENCE OF 1.5%. IS MAXIMUM LOGGING AND ROAD BUILDING REALLY SO INNOCUOUS? WHERE HAS IT BEEN SHOWN THAT THERE IS NO EFFECT? VIRTUALLY NO EFFECT IS SHOWN ON ANADROMOUS FISH NUMBERS BETWEEN ALTERNATIVES EITHER**

(DEIS-II-88). WHY WAS SEDIMENT NOT ESTIMATED FOR BENCHMARKS WITH MAXIMUM TIMBER OR MAXIMUM LIVESTOCK, BUT IT WAS ESTIMATED FOR MAXIMUM ELK (DEIS-II-80)

**FOREST SERVICE RESPONSE:**

Sediment estimates are best viewed as indices of risk rather than actual projections of output. Forest Service policy is to not degrade water quality significantly, this is reflected in the Standards and Guidelines found in the Forest Plan and in the projected numbers of anadromous fish. Sediment projections for the maximum elk benchmark are displayed because it is identical to Alternative F and the projections were available. The other benchmarks, with the exception of the current direction benchmark, are not implementable alternatives and many of the outputs/activities associated with them were not estimated. Also see response to Comment No. 8.

**COMMENT NO. 10:** I AM DISTRESSED TO LEARN THAT THE WALLOWA-WHITMAN DRAFT PLAN EXCESSIVELY FAVORS THE USE OF THE FORESTS FOR LOGGING AT THE EXPENSE OF RECREATIONAL USE AND WILDLIFE PRESERVATION AS A BACKPACKER, CANOEIST, AND WILDLIFE SUPPORTER, I AM ASKING YOU TO PLEASE REDUCE THE AREAS IN WHICH LOGGING WILL TAKE PLACE SO THAT MY FRIENDS AND I CAN BACKPACK IN THE EAGLE CAP WILDERNESS WITHOUT RUNNING INTO UNSIGHTLY CLEAR-CUTS, COMPETING WITH VEHICLES ON THE LOGGING ROADS, AND FINDING YET FEWER BIRDS, FISH, ELK, AND OTHER ANIMALS IN ONE OF THEIR LAST REMAINING HABITATS.

**FOREST SERVICE RESPONSE:**

You will not find clearcuts and logging roads within the Eagle Cap Wilderness. Timber management activities are not permitted in wilderness.

**COMMENT NO. 11:** OUR ADVICE WOULD BE TO KEEP THE HARVEST LEVEL AT HISTORIC LEVELS AND LET THE ELK TAKE CARE OF THEMSELVES. THE LOGGING IN THE PAST HAS NOT BEEN HARMFUL TO THEIR EXISTENCE AND THERE IS NO REASON TO THINK THAT IT WILL BE IN THE FUTURE.

**FOREST SERVICE RESPONSE:**

Many people share your point of view.

**COMMENT NO. 12:** I OPPOSE ANY PLAN THAT TARGETS THE REMAINING ROADLESS AREAS, EVEN WATERSHEDS, FOR HEAVY LOGGING. I FEEL THIS WILL RESULT IN LOSS OF DEER AND ELK HABITAT AND SUBSEQUENT DECLINE OF THEIR POPULATIONS, DECLINE IN WATER QUALITY AND NATIVE FISH POPULATION, DESTRUCTION OF MANY EXISTING TRAIL HEADS AND TRAILS, AND REDUCTION OF OLD GROWTH.

**FOREST SERVICE RESPONSE:**

Our analysis does not show the effects of the proposed plan to be so detrimental although there will be a reduction in old growth and trails.

**COMMENT NO. 13:** THE PLAN PROPOSES EXCESSIVE TIMBER HARVEST AND FAR TOO MANY MILES OF ROADS WITH AN EMPHASIS ON ENTRY INTO ROADLESS AREAS. THE RESULT IS A

PLAN WHICH IGNORES OR DEGRADES OTHER RESOURCES THAT ARE IN MANY CASES FAR MORE VALUABLE THAN THE TIMBER TO BE HARVESTED.

**FOREST SERVICE RESPONSE:**

We cannot agree with your assessment that the plan ignores or degrades other resources than timber, but we recognize that, depending on one's personal values, it may appear that way.

**COMMENT NO. 14.** ADJACENT TO THE SOUTH AND EAST BOUNDARIES OF THE CITY OF GREENHORN ARE TWO SMALL TRACTS, NO. 15 AND 16, INCLUDED IN THE GREENHORN TIMBER SALE NO. 87097 THESE TRACTS ARE IN THE VIEWSHED OF THE CITY AND BY CLEARCUTTING THIS AREA WOULD SERIOUSLY JEOPARDIZE THE VISUAL RESOURCE OF THE ADJACENT CITY PROPERTY. ON PAGE 4-39 OF THE PROPOSED LAND AND RESOURCE MANAGEMENT PLAN, IT IS STATED: "WHERE CONFLICTS DEVELOP BETWEEN VISUAL QUALITY OBJECTIVES AND TIMBER OR RANGE MANAGEMENT OBJECTIVES, THESE CONFLICTS WILL BE RESOLVED IN FAVOR OF MEETING THE VISUAL OBJECTIVES". WE WOULD PRESUME THAT THE TRACTS NO. 15 AND 16 WOULD BE CONSIDERED BELOW-COST SALES INCORPORATED SALE NO 87097, SO THAT THEIR REMOVAL FROM THE GREENHORN SALE WOULD NOT MATERIALLY AFFECT THE OVERALL SALE PROCEEDS

WE HAVE NO OBJECTIONS TO TRACT NO. 55 CONTINUING IN SALE NO. 87097, DUE TO THE TOPOGRAPHY OF THE LAND INVOLVED, THIS WOULD NOT PRESENT A SERIOUS PROBLEM TO THE CITY'S VISUAL RESOURCES

**FOREST SERVICE RESPONSE:**

The District Ranger has modified the proposed timber sale and these particular conflicts have been resolved

**COMMENT NO. 15.** OF MOST CONCERN TO ME IS THE MATTER OF ADDITIONAL ROADS AND EXCESSIVE TIMBER CUTTING. IT IS COMMON KNOWLEDGE THAT THE SOILS IN THIS AREA ARE TERRIBLY FRAGILE AND THAT ANY DISTURBANCE OF THE EXISTING CONDITIONS CAN RESULT IN PROFOUND CHANGES WITHIN THE IMMEDIATE AREA, INCLUDING HEAVY SOIL LOSS, DESTRUCTION OF VALUABLE GROUND COVER, AND LOSS OF TIMBER LANDS. IN ADDITION, WATERSHED AND AGRICULTURAL CONDITIONS IN THE ADJACENT VALLEYS ARE ALSO SERIOUSLY AFFECTED, THUS DISTURBING THE BASIC ECONOMY OF THE AREA. (WRITER REFERRED TO AREAS WEST OF BAKER AND SOUTHWEST OF LA GRANDE.)

**FOREST SERVICE RESPONSE**

The nature of the soils will be carefully considered in timber sale plans and the public will have the opportunity to participate We do not believe adjacent valley agricultural conditions will be seriously affected

**COMMENT NO. 16** YOU FAIL TO, AND MUST, INCLUDE A COMPREHENSIVE LIST OF OTHER BOTANICAL RESOURCES IN THESE TIMBER HARVEST AREAS WHAT ARE THE EFFECTS OF "MANAGEMENT" ON THESE POTENTIALLY VALUABLE RESOURCES? WHAT WILL THE DOLLAR LOSS BE? I HAVE REFERENCES IF YOU DO NOT

**FOREST SERVICE RESPONSE**

The other botanical resources that are used in this area are generally not adversely affected by timber harvest. The growth of huckleberries and mushrooms, two commonly gathered plants, is stimulated by timber harvest. In addition, the roads which result make areas more accessible for harvesting the various plants.

**COMMENT NO. 17:** (PAGE 1V-36, 37, 38) EFFECTS OF TIMBER MANAGEMENT ON WILDLIFE AGAIN YOU FAIL TO INCLUDE VERY MUCH PERTINENT INFORMATION IN THIS SECTION WHAT OF THE EFFECTS ON COUGAR, BEAR, WOLVERINE, OR WOLF HABITAT? WHERE ARE THESE LOCATED?

**FOREST SERVICE RESPONSE**

Our intent is that the various species will be represented by the selected indicator species. We know of no wolves on the Forest, but cougar, bears, and wolverines are provided for by management of the Rocky Mountain elk, pine marten, and pileated woodpecker, and perhaps the riparian indicator species. With the proposed plan, there will remain relatively abundant habitat for black bear, cougar, and wolverine.

**COMMENT NO. 18:** WHATEVER METHODS ARE CHOSEN FOR TIMBER MANAGEMENT, THE EFFECTS ON BIG GAME WILL BE MINIMAL IN COMPARISON TO THE EFFECTS OF HUNTING AND POLICIES OF THE OREGON DEPARTMENT OF FISH AND WILDLIFE

**FOREST SERVICE RESPONSE:**

We agree that numbers of game animals are more directly affected by hunting regulations. However, in the long term, habitat can determine what the policies will be, and habitat is affected by timber management.

**COMMENT NO. 19:** THE LACK OF TIMBER HARVEST HAS CAUSED SEVERE FIRE HAZARDS AND WILL CONTINUE TO DO SO IF MATURE AND DISEASED TREES AREN'T HARVESTED

**FOREST SERVICE RESPONSE.**

We agree that in forested areas where there has not been harvest or fire for long periods, fuels accumulate and fire hazard levels may be high. This is a consideration, but seldom a justification in itself, for harvest.

**COMMENT NO. 20:** TIMBER HARVESTING DOESN'T AUTOMATICALLY CAUSE POOR WATER QUALITY, JEOPARDIZE WILDLIFE POPULATIONS, OR DESTROY THE RECREATION OPPORTUNITIES AVAILABLE IN THE WALLOWA-WHITMAN NATIONAL FOREST. THE PEOPLE OF EUROPE HAVE LIVED WITH A FINITE NATURAL RESOURCE BASE. THE COMMODITIES OF WATER, WILDLIFE, RECREATION AND WOOD FIBER PRODUCTION HAVE CO-EXISTED

**FOREST SERVICE RESPONSE**

We agree

**COMMENT NO. 21:** I INVITE ANYONE TO TAKE A SHORT RIDE WITH ME TO THE GROSSMAN-NOREGARD AREA NORTH OF WALLOWA THIS IS PROBABLY ONE OF THE MOST LOGGED OVER AREAS IN THE COUNTY. YET ONE SEES MORE WILDLIFE (FROM PILEATED WOODPECKER TO ELK) HERE THAN IN THE EAGLE CAP WILDERNESS.

**FOREST SERVICE RESPONSE:**

Thank you for the invitation. We do not dispute your claim Overall, the Eagle Cap Wilderness is not particularly good elk habitat.

**COMMENT NO. 22:** RESPONSIBLE TIMBER HARVESTING BENEFITS THE FOREST IN MANY WAYS THAT WILDERNESS CANNOT. IT KEEPS THE FOREST FROM BECOMING OVERBURDENED WITH BIG TREES THAT CONSUME ALL OF THE SUN, WATER, AND SOIL AND KEEP SMALLER TREES FROM MATURING THESE SMALLER TREES AND UNDERBRUSH ARE BENEFICIAL TO MANY SPECIES OF WILDLIFE, INCLUDING DEER AND ELK

**FOREST SERVICE RESPONSE:**

We agree that either method of management has its advantages, depending on one's objectives .

**COMMENT NO. 23:** WE MUST CONFRONT THE FULL COSTS THAT THESE COMMODITY INTERESTS "TAKE" FROM OTHER USES IN OUR NATIONAL FORESTS "TAKES" SUCH AS THE LOSS OF HABITAT FOR DEER AND ELK. "TAKES" SUCH AS THE DEGRADATION OF WATER QUALITY NEEDED TO REBUILD EXISTING POPULATIONS OF SALMON AND STEELHEAD IN NORTHEAST OREGON "TAKES" SUCH AS WHAT HAS HAPPENED TO WILD TROUT POPULATIONS. "TAKES" SUCH AS INTOXICATED TIMBER HARVEST LEVELS THAT ARE EXCEEDING SUSTAINED YIELD. "TAKES" SUCH AS EXISTING TRAILS AND TRAILHEADS BEING LOST TO TIMBER HARVESTING ON LANDS OF "QUESTIONABLE" COMMERCIAL PRODUCTIVITY. "TAKES" SUCH AS THE LOSS OF ROADLESS AREAS IN ELKHORN RANGE, BEAR CREEK, AND CATHERINE CREEK WHICH CONTAIN 9,000' MOUNTAINS, PRISTINE ANADROMOUS FISH HABITAT AND RARE OLD-GROWTH STANDS OF TIMBER AT LOW ELEVATIONS.

IN CONFRONTING THESE "TAKES" AS EXCESSES OF A DRUNKEN MANAGEMENT THAT LEAD TO DEGRADATION OF MULTIPLE USE OF RESOURCES, I STRONGLY RECOMMEND THAT THE FOREST ADOPT A PLAN THAT PROTECTS "NO CUT ON ALL ROADLESS AREAS SUCH AS LAKE FORK, THE UPPER GRAND RONDE RIVER, AND GRAND RONDE RIVER CANYON

**FOREST SERVICE RESPONSE:**

We cannot agree that the "takes" you refer to have necessarily occurred, or if they have occurred, have been the result of forest management Your recommendations have been considered

**COMMENT NO. 24:** I CONTEND THAT THE LOSS OF LOW ELEVATION HABITAT FOR DEER AND ELK TO INTENSIVE TIMBER HARVESTING MUST BE STOPPED IT SHOULD ALSO BE EMPHASIZED

THAT PRIORITY SHOULD BE GIVEN TO ALL FISH PRODUCING AREAS FOR SPECIAL MANAGEMENT IN THESE SAME AREAS SUCH AS JOSEPH CANYON, TOPE CREEK AND BEAVER CREEK

**FOREST SERVICE RESPONSE:**

Most low elevation habitat is allocated to Management Area 3 in the Preferred Alternative, which is intended to maintain high quality habitat. Fish producing streams are protected by special management through standards and guidelines.

**COMMENT NO. 25** THE OVERALL TONE OF THE "ENVIRONMENTAL CONSEQUENCES" PORTION OF THE REPORT DISTURBS ME. ON THE WHOLE, THE DIALOG IS NEGATIVE OR REACTION-ORIENTED, RATHER THAN A POSITIVE "PROBLEM-SOLVING" PRESENTATION STATEMENTS SUCH AS "THESE PRACTICES (HARVEST METHODS) VARIOUSLY CHANGE HABITATS FOR PLANTS AND ANIMALS (BOTH FAVORABLY AND UNFAVORABLY); AFFECT VISUAL QUALITY, DEGRADE WATER QUALITY, AND REDUCE SOIL QUALITY THROUGH COMPACTION EROSION, AND FERTILITY REDUCTION," PORTRAY TIMBER MANAGEMENT UNNECESSARILY AS ENVIRONMENTALLY DESTRUCTIVE OPERATIONS. TIMBER HARVESTING METHODS WHEN APPROPRIATELY ADMINISTERED CAN PROVIDE WOOD PRODUCTS OUTPUTS WHILE MAINTAINING QUALITY WATER AND SOIL RESOURCES SOME OF THE POSITIVE ENVIRONMENTAL CONSEQUENCES OF TIMBER MANAGEMENT SHOULD ALSO BE ADDRESSED, SUCH AS REDUCED RISK OF MAJOR CONFLAGRATIONS, OR IMPROVED GROWTH RATE DUE TO REDUCED INSECT INFESTATIONS.

**FOREST SERVICE RESPONSE:**

We are often criticized for failing to display all of the negative effects, and perhaps the intent to avoid such criticism resulted in an overly negative chapter - at least in the eyes of some readers. Many readers felt we still fell short of displaying negative consequences. See following two comments.

**COMMENT NO. 26:** THE FOREST PLAN TAKES IN TEN YEARS OF MANAGEMENT, BUT MUST NECESSARILY PLAN MUCH FURTHER THAN THAT. I WOULD LIKE TO SEE A SERIOUS EVALUATION OF THE IMPACT ON FISHERIES, WATER QUALITY, BIG GAME, WILDLIFE, RECREATION, AND THE ECONOMY BEYOND TEN YEARS UNDER THE PREFERRED ALTERNATIVE. THIS EVALUATION SHOULD UTILIZE RESEARCH DOCUMENTING THE DAMAGE OF TIMBER HARVESTING TO WATERSHEDS (SEDIMENTATION, REDUCTION OF LATE SEASON FLOWS AND TEMPERATURE INCREASES), ROADS AND LOGGING TO BIG GAME (LOSS OF HIDING, THERMAL COVER) AND TO SEMI-PRIMITIVE RECREATION USE.

**FOREST SERVICE RESPONSE:**

The evaluations we made are long term -- usually 50 years. However, the plan will be updated every 10 to 15 years or less and will always rely on current research.

**COMMENT NO. 27:** THE PROPOSED TREE FARMING METHODS MAY ACTUALLY DESTROY THE ABILITY OF THESE FORESTS TO PRODUCE COMMERCIAL TIMBER IN THE FUTURE DUE TO SOIL DEPLETION AND EVENTUAL LOSS OF FOREST PRODUCTIVITY. THE STRONG EMPHASIS ON "COMMODITY PRODUCTION" AND THE NEGLECT OF ALL OTHER RESOURCE VALUES PUTS THE PLAN IN LOGGERS' PARADISE. THE PLAN DESTROYS BACK COUNTRY WITH HEAVY LOGGING AND CALLS FOR 58% OF THE ROADLESS AREAS TO BE LOGGED AND ROADED. THE PLAN MAINTAINS EXCESSIVE CUTTING LEVELS BY ENTRY INTO THE LAST OF OUR ROADLESS LANDS,



THE PROPOSED PLAN INCREASES HARVEST BY 3% ABOVE THE TRUE SUSTAINED YIELD AND DOES NOT EVEN INCLUDE MITIGATION FOR PAST OVERCUTTING! WE URGE YOU TO REDUCE TIMBER HARVEST, CURTAIL ROAD BUILDING AND CLOSE MANY EXISTING ROADS

**FOREST SERVICE RESPONSE:**

We do not agree with several of your judgements, but appreciate your point of view.

**COMMENT NO. 28:** I KNOW, FROM HAVING WALKED THROUGH THEM, MANY OF THE ROADLESS AREAS ON THE W-W FOREST. I ALSO KNOW WHAT ADVERSE EFFECTS EXCLUSIVE TIMBER MANAGEMENT HAS ON MOST OF NON-TIMBER RESOURCES FROM HAVING WATCHED WHAT HAPPENED TO THE NF LANDS SURROUNDING MY FOREBEARS' LAND AFTER CLEARCUTTING, NATIVE PLANTS DISAPPEARED. STREAMS AND WITH THEM MEADOWS DRIED UP, ELIMINATING FISH HABITAT. WHOLE MICROCLIMATES CHANGED, OVER DECADES, PERHAPS PERMANENTLY OFTEN RESEEDING DIDN'T TAKE IN SHORT, MANAGEMENT FOR SINGLE-USE, TIMBER HARVEST.

**FOREST SERVICE RESPONSE:**

We agree that the effects you describe have occurred. We do not anticipate the "exclusive timber management" that you describe will occur on the Forest.

**COMMENT NO. 29:** YOUR ACREAGES BY SITE CLASS INDICATE TO ME THAT YOUR FOREST WOULD BEST BE MANAGED IF 70-75% OF YOUR SALES WERE CUT SELECTIVELY. THESE SELECTIVE CUTS SHOULD BE CUT FROM ABOVE TAKING ONLY 30% OF THE CUBIC VOLUME. THE CUTS SHOULD OCCUR ABOUT 25 - 30 YEARS APART. VERY FEW TREES BELOW 15" DBH SHOULD BE CUT ON THESE SELECTIVE CUTS. THIS TYPE OF CUTTING WILL REVERSE ALL OF THE NEGATIVE THINGS HAPPENING ON YOUR FOREST.

**FOREST SERVICE RESPONSE:**

We agree that such a method of management would be possible and would have some advantages. The primary disadvantage would be in greatly reduced harvest levels.

**COMMENT NO. 30:** I HAVE BEEN A MILL WORKER AND LOGGER MOST OF MY LIFE AND SO WAS MY FATHER. HE AND I BOTH THINK THAT THE FORESTS ARE ALMOST RUINED FROM THE WAY THEY HAVE BEEN LOGGED OFF IN THE PAST. WE ARE PROBABLY AS GUILTY AS ANYBODY.

**FOREST SERVICE RESPONSE:**

Thank you for your point of view.

**COMMENT NO. 31:** I WANT MATURE TREES TO BE CUT SO THERE WILL BE NEW GROWTH TO KEEP OUR DEER AND ELK HERDS STRONG. THEY NEED YOUNG GROWTH FOR FOOD AND THE OLD-GROWTH TIMBER GIVES THEM COVER, BUT NO FORAGE.

**FOREST SERVICE RESPONSE:**

Most of our harvest comes from what are considered to be mature trees -- that is, trees that are relatively large and are no longer growing rapidly. This will continue to be true for the next

few decades, but in order to maintain harvest levels, it will be necessary in the future to harvest more trees at younger ages. We agree that removal of older timber often results in increased forage that deer and elk can use.

**COMMENT NO. 32:** WITH RESPECT TO OTHER AREAS OF CONCERN SUCH AS LOGGING IN RIPARIAN ZONES, WATER QUALITY, FISHERIES, BIG-GAME HABITAT, AND OLD-GROWTH LOGGING, I BELIEVE THAT, AS THE CSA PROPOSES, WITH PROPER PLANNING AND CONSCIENTIOUS TIMBER SALE ADMINISTRATION PROBLEMS IN THESE AREAS CAN BE AVOIDED.

**FOREST SERVICE RESPONSE:**

We generally agree. The degree of risk increases with increased activity, but this in itself would not preclude selecting the community stability alternative.

**COMMENT NO. 33:** W-W MUST CONTINUE TO RECOGNIZE TRADITIONAL LAND USE PATTERNS, SUCH AS TIMBER HARVESTING ON A SUSTAINED YIELD BASIS, THAT PROMOTES A HEALTHY THRIVING ECONOMY FOR NORTHEASTERN OREGON. HARVESTING TIMBER ON THE W-W IS A NECESSARY PRACTICE. I BELIEVE, AS A LAND HOLDING NEIGHBOR, THAT FOREST MANAGEMENT IS GOOD FOR THE FOREST AND GOOD FOR MY LAND AS WELL.

**FOREST SERVICE RESPONSE:**

See following viewpoint from another landholder

**COMMENT NO. 34:** ONE OF THE MAIN REASONS I HAVE ENJOYED MY PROPERTY IS ITS PROXIMITY TO THE LARGELY ROADLESS AREAS ABOVE UPPER PINE CREEK BETWEEN CARSON AND CORNUCOPIA. THEY ARE EXCELLENT WILDLIFE HABITAT AND BEAUTIFUL PLACES TO HIKE AND WALK, DESPITE THEIR PRECIPITOUS NATURE. I HAVE BEEN DISAPPOINTED TO LEARN OF THE INCREASED ATTEMPTS TO SELL TIMBER FROM THESE AREAS. THE HIKING AND WILDLIFE VIEWING EXPERIENCES ARE NIGHTMARISH IN A LOGGED-OVER AREA WHEN COMPARED TO A PRISTINE ONE AS A PROFESSIONAL OUTDOOR PHOTOGRAPHER, I KNOW THAT PRISTINE AREAS ARE OF FAR GREATER AESTHETIC INTEREST IN MY FIELD.

**FOREST SERVICE RESPONSE:**

See previous comment Opinions of private landowners obviously varies with which characteristics of the adjacent National Forest they most value

**COMMENT NO. 35:** I AM CONVINCED THAT CLEARCUTTING AND CLEARING LAND LEAVING ONLY SPARSE OVERSTORY, COUPLED WITH PRESCRIBED BURNING ARE THE MANAGEMENT TOOLS THAT HAVE DRAWN THE MOST PUBLIC ANGER AND IF THIS IS CONTINUED BY THE FOREST SERVICE THE RESULT WILL BE THAT MORE AND MORE PEOPLE TO FIGHT TIMBER HARVESTING AND LINE UP WITH THOSE PRESERVATIONISTS DESIRING TO STOP ALL TIMBER HARVESTING. I FORESEE MORE AND MORE TIMBERLAND BEING TAKEN OUT OF TIMBER ALLOCATION AND LOST TO TIMBER HARVESTING UNNECESSARILY, THIS DONE BY PEOPLE WHO ACTUALLY FAVOR ROAD BUILDING AND TIMBER HARVESTING

**FOREST SERVICE RESPONSE:**

We agree that such a dilemma is possible. If we are to continue to use clearcut harvesting, we must make it more acceptable to more people. We believe it is an important technique that is oftentimes necessary if the forest is to achieve the high level of production that many people desire (See EIS Chapter IV and Appendix B).

**FUELWOOD  
Code 750**

**COMMENT NO. 1:** MORE AREAS COULD BE UTILIZED FOR FIREWOOD WHICH IN MY OPINION HAS GREATLY IMPROVED THE FIRE PROBLEM AND APPEARANCE OF THE FOREST.

**FOREST SERVICE RESPONSE.**

Many people share your opinion

**COMMENT NO. 2.** WITH REGARD TO WOOD-CUTTING, I TAKE ISSUE WITH SOME OF THE RESTRICTIONS IMPOSED, THE FEES ASSESSED, AND THE FACT THAT MANY AREAS OF THE FOREST, WHICH HAVE BEEN ACCESSIBLE FOR YEARS ARE SUDDENLY BLOCKED BY HUGE LOGS, WATER BARS, ETC I HAVE FOUND HISTORICAL WAGON ROADS BLOCKED BY WATER BARS WHERE NO WATER PROBLEM EXISTED. I FEEL SOME OF THE RULES ALMOST MAKE A WOODCUTTER A CRIMINAL

**FOREST SERVICE RESPONSE:**

Fees are charged for fuelwood in an attempt to make the program cost effective. A portion of these fees are set aside for planning and administering the present and future fuelwood program. Restrictions on fuelwood gathering such as road closure, area closures, and species prohibitions, we agree are not always attractive to fuelwood users. However, they are often necessary to protect other resource values such as wildlife, water, and cultural resources.

**COMMENT NO. 3:** ISSUE THE PROPOSED ACTION IN THE DRAFT FOREST PLAN FAILS TO MEET THE DEMAND FOR PERSONAL USE FIREWOOD WHICH SUPPLIES A MAJOR PORTION OF NE OREGONIANS' ENERGY NEEDS

PROBLEM: WHILE THE FOREST SERVICE INDICATES THAT A "CONTINUATION OF RECENT TRENDS INDICATES AN INCREASE IN FUELWOOD CONSUMPTION" (III-26, DEIS, USFS), THE PREFERRED ALTERNATIVE DOES LITTLE TOWARD OFFERING ENOUGH FUELWOOD TO MEET THE DEMAND FOR FIREWOOD DURING THE PERIOD FROM 1975 TO 1984, THE FOREST SERVICE HAS PROVIDED 33.3 MMBF OF PERSONAL USE FIREWOOD ANNUALLY. THE PREFERRED ALTERNATIVE, HOWEVER, WILL ONLY PROVIDE 25 MMBF OF PERSONAL USE FIREWOOD ANNUALLY.

**FOREST SERVICE RESPONSE.**

We have updated the cited DEIS fuelwood text and companion graphs to reflect the most recent consumption and trend figures. For the life of the Forest Plan, we don't foresee a shortage of fuelwood. Over time, however, it will be of lower quality and more difficult to locate in many areas of the Forest. The amount of personal use fuelwood sold annually seems to be stabilizing at 30,000 to 35,000 cords (15 MMBF to 17.5 MMBF). With the apparent strengthening of the wood pellet industry, we foresee a potential drop in fuelwood consumption, particularly if other energy costs remain modest. The cited 25 MMBF projection was not meant to be limiting. If there is a higher demand, we feel the Forest can meet the demand during the plan period.

**COMMENT NO. 4:** YOUR DRAFT PLAN PROJECTS A SHORTAGE OF FIREWOOD AS THE RESULT OF MANAGING THE FOREST AS A TREE FARM SINCE MANY PEOPLE LOOK TO THE WWNF AS A FUTURE SOURCE OF HOME HEATING FUEL, YOUR REVISED PLAN MUST ADDRESS THIS ISSUE AND PROVIDE A MEANS TO ACHIEVE PROJECTED LEVELS OF USE OF FUELWOOD

**FOREST SERVICE RESPONSE:**

We believe that fuelwood will be available for many years, but the quality will decrease and it will become more difficult to find it

**COMMENT NO. 5:** THERE NEEDS TO BE SOME INCLUSION IN A COMPREHENSIVE PLAN OR GLEANING PROGRAM FOR THE POOR TO BE ABLE TO GLEAN FIREWOOD, AND SUCH OTHER PRODUCTS AS CAN BE READILY HARVESTED WITHIN MINIMUM OF INVESTMENT OF DOLLARS AND EQUIPMENT.

**FOREST SERVICE RESPONSE**

There are many opportunities for low investment industry in the Forest Commercial firewood cutting and mushroom gathering are examples Personal use permits are inexpensive and some free use areas are available where excesses of woody debris is scheduled for clean up.

**COMMENT NO. 6** WE ALSO SUGGEST THE FOREST IMPLEMENT A SYSTEM OF DESIGNATED FUELWOOD CUTTING AREAS TO IMPROVE COMPLIANCE WITH REGULATIONS RELATED TO THIS ACTIVITY. A MORE AGGRESSIVE PROGRAM AIMED AT INFORMING THE PUBLIC OF THE VALUE OF SNAGS AND DEAD AND DOWN WOODY MATERIAL TO WILDLIFE AND THE FOREST ECOSYSTEM IS NEEDED

**FOREST SERVICE RESPONSE**

We agree with the need and initiated such a program in 1987.

**COMMENT NO. 7:** THE EMPHASIS ON MAKING HARVEST RESIDUE AVAILABLE FOR PERSONAL FUELWOOD GATHERING (P. 4-43) APPEARS TO BE AT ODDS WITH THE EXPECTATION THAT FUELWOOD GATHERING WILL DIMINISH SIGNIFICANTLY.

**FOREST SERVICE RESPONSE**

We assume that most woodcutters would consider it more difficult to obtain fuelwood from residue than to get it from large standing or down trees as is now possible.

**COMMENT NO. 8** IT IS STRANGE THAT SINCE THE WWNF ONLY CHARGES \$2.50/CORD WHEN THE MARKET VALUE COULD BE 40 TIMES THIS AMOUNT, THAT IT DOES NOT CONSIDER THE VALUE OF LEAVING WOOD TO DECAY TO RETURN NUTRIENTS TO FOREST SOILS AND PROVIDE HABITAT FOR THE WILDLIFE

**FOREST SERVICE RESPONSE**

We anticipate the cost of fuelwood permits will increase over time We agree that dead and down woody material has significant nutrient recycling and other resource values. In 1987 and

1988 we are planning for the recycling of woody materials including ponderosa pine logs and snags

**COMMENT NO. 9:** WHY IN THE DESCRIPTION OF MA-18 (THE ANADROMOUS FISH MANAGEMENT ZONE) IS IT STATED THAT "THE NEED FOR ACCESS FOR REMOVAL OF FUELWOOD BY THE PUBLIC WILL BE RECOGNIZED"? WHAT SHOULD REALLY TAKE PRECEDENCE IN ANY ANADROMOUS FISH ZONE OR ANY FISH ZONE? HERE AS WELL AS IN OTHER WILDLIFE AREAS, LARGE WOOD MUST BE RETAINED TO PROVIDE STRUCTURE TO THE CHANNEL AND TO PROVIDE HABITAT. UNCONTROLLED WOOD REMOVAL WILL WREAK HAVOC WITH THE FISHERIES

**FOREST SERVICE RESPONSE:**

We intend that fuelwood removal will be managed to ensure that sufficient woody material remains for stream structure and other fish habitat needs.

**COMMENT NO. 10:** CONSIDERING THE SMALL PROFITS GENERATED FROM FUELWOOD, HOW GREAT IS THE COST OF FERTILIZER PLANNED TO BE SPREAD OVER THE FOREST TO INCREASE PRODUCTIVITY.

**FOREST SERVICE RESPONSE.**

We have no plans to spread fertilizer. We believe there will be sufficient residue to provide nutrient recycling.

**COMMENT NO. 11:** HOW WILL FUELWOOD REMOVAL IN FOREST LAND BE REGULATED SO AS TO MAINTAIN DESIRED SNAG AND DOWN FUEL LEVELS.

**FOREST SERVICE RESPONSE:**

Fuelwood availability and use is considered as a part of each timber sale environmental analysis. Also, overall fuelwood use and impacts are monitored annually for each Ranger District and the "Forest as a whole." Adjustments to the Forest fuelwood program are discussed and selected as a result of this annual monitoring. Maintenance of snag levels and down woody material are an important part of this monitoring.

**COMMENT NO. 12:** WE NEED THE WOOD TO HEAT HOMES

**FOREST SERVICE RESPONSE:**

We agree that wood is currently a popular local energy choice.

**COMMENT NO. 13:** INCREASED FIREWOOD CUTTING COULD BE USED AS AN IMPORTANT TOOL IN THE MANAGEMENT OF BUG DAMAGED FORESTS.

**FOREST SERVICE RESPONSE:**

We agree.

**COMMENT NO. 14:** I DON'T FEEL I SHOULD HAVE TO PAY FOR FIRE WOOD AND CUT IN A PLACE ALREADY PICKED OVER.

**FOREST SERVICE RESPONSE:**

Many people share your view

**COMMENT NO. 15** I WANT TO CONTINUE TO CUT AS MUCH FIREWOOD AS I HAVE IN THE PAST

**FOREST SERVICE RESPONSE**

We believe the fuelwood supply will be adequate to meet local demands during the plan period.

**COMMENT NO. 16:** ALTHOUGH I SELDOM USE WOOD FOR HEAT ANYMORE - MANY PEOPLE PARTICULARLY (SOME ELDERLY) HAVE ONLY THAT OPTION IN ORDER TO SURVIVE

**FOREST SERVICE RESPONSE.**

Because of the relatively low cost, wood is currently a popular heating fuel for many

**COMMENT NO. 17** WE NEED FIREWOOD & I DON'T THINK I SHOULD PAY FOR DEAD TREES ESPECIALLY WHEN I SEEN FIRST HAND WHAT YOU DO WITH THE TREES WHEN YOUR CREWS ARE THROUGH THINNING.

**FOREST SERVICE RESPONSE:**

When we thin stands that have species and size that would make fuelwood, we try to make it available for that purpose

**COMMENT NO. 18:** THE "PUBLIC" IS MADE UP PRIMARILY OF PEOPLE WHO WOULD LIKE EASIER ACCESSIBILITY TO DOWNED TIMBER IN THE FORESTS FOR FIREWOOD;

**FOREST SERVICE RESPONSE:**

We agree that many members of the public share this view

**COMMENT NO. 19** IT MAKES MORE SENSE TO ALLOW FIRE WOOD TO BE USED RATHER THAN LOST TO ROT

**FOREST SERVICE RESPONSE**

Recent studies illustrate the benefits to wildlife and soil fertility that decaying woody material provides

**COMMENT NO. 20: WE SHOULD BE ALLOWED TO CUT FIREWOOD FOR PERSONAL USE**

**FOREST SERVICE RESPONSE:**

We agree.

**COMMENT NO. 21. THERE IS TO MUCH RESTRICTION ON FIRE WOOD CUTTING**

**FOREST SERVICE RESPONSE:**

As firewood becomes less readily available and of higher value, restrictions become necessary to allocate the resource and protect the other forest resources which are affected by fuelwood harvesting activities

**COMMENT NO. 22. I THINK COMMERCIAL WOODCUTTING SHOULD BE STOPPED**

**FOREST SERVICE RESPONSE:**

We must consider those members of the public that are unable for various reasons to cut their own firewood and choose to purchase it

**COMMENT NO. 23: I HEAT MY HOME WITH WOOD AS DO MOST PEOPLE IN THIS AREA, AND I DON'T THINK THAT WITH PROPER MANAGEMENT THERE WILL BE ANY OVER USE OR DESTRUCTION TO OUR FOREST BY EITHER THE WOOD CUTTERS OR THE INDUSTRY.**

**FOREST SERVICE RESPONSE:**

We agree.

**COMMENT NO. 24: I WOULD LIKE TO SEE MORE WOOD CUTTING AREAS OPENED TO THE PUBLIC FOR FIREWOOD CUTTING**

**FOREST SERVICE RESPONSE.**

We believe there are enough areas available for fuelwood cutting to meet existing demand Future timber sales will make more areas available.

**COMMENT NO. 25. FIRE WOOD SHOULD CONTINUE TO BE MADE AVAILABLE AS LONG AS THE FOREST IS PUBLIC, PAID FOR OR SUPPORTED BY US, THE WORKING PEOPLE.**

**FOREST SERVICE RESPONSE:**

Since fuelwood is public property, we are obligated to sell it at fair market value. As demand increases, and supply dwindles, we will undoubtedly have to charge more for it

**COMMENT NO. 26: PERMIT CUTTING OF PERSONAL USE FIREWOOD AT CURRENT LEVELS CUTS DOWN ON FIRE HAZARDS, CLEANS UP THE FORESTS AND ALSO PROVIDES FUEL FOR HOMES AT AN ECONOMICAL COST.**



**FOREST SERVICE RESPONSE:**

*We agree, but we also recognize the value of snags and woody material for other purposes*

**COMMENT NO. 27:** THE FOREST BELONGS TO ALL OF US. WE SHOULD BE ALLOWED TO CUT THE SAME FIREWOOD FOR PERSONAL USE THAT WE HAVE BEEN ALLOWED TO CUT IN THE PAST

**FOREST SERVICE RESPONSE:**

The harvest of fuelwood from the National Forests is a long established legitimate use. But as supplies decrease, or demand increases, it is likely that many of us will experience difficulty in getting the same amount of fuelwood, and with the same ease, as we have in the past.

**COMMENT NO. 28:** THE SLASH LEFT FROM TIMBER SALES COULD BE UTILIZED FOR FIREWOOD, RATHER THAN LEFT TO BE BURNED BY THE FOREST SERVICE

**FOREST SERVICE RESPONSE:**

We try to make logging slash available for utilization as firewood. In many cases, it is not as desirable as dead logs and the public will not use it. We then find that we must burn it to clear the ground for planting trees.

**COMMENT NO. 29:** AS A WOOD CUTTER I WOULD SUPPORT PERMITS TO BE ASSIGNED IN SPECIFIC AREAS. LET THE PUBLIC UTILIZE THE WOOD AND AT THE SAME TIME CLEAN UP OUR FORESTS

**FOREST SERVICE RESPONSE:**

It is likely that we will need to more carefully regulate where woodcutting is permitted as time goes on -- for the convenience of the woodcutters as well as the Forest Service.

**COMMENT NO. 30:** ALSO A LOT OF YOUNG MEN ARE OUT OF WORK AND NEED TO BE ABLE TO "CLEAN AND CUT DEAD TIMBER FOR FIREWOOD TO SELL AS SOME HAVE ONLY THAT AS A MEANS OF GETTING FOOD FOR THEIR TABLE

**FOREST SERVICE RESPONSE:**

We agree that fuelwood cutting and selling from the National Forest often provides a means of making a living for people who are otherwise unemployed

**COMMENT NO. 31:** TAKE DEAD WOOD FROM TIMBER SALES AND MAKE MORE AVAILABLE TO THE GENERAL PUBLIC INSTEAD OF THE LOGGING COMPANIES.

**FOREST SERVICE RESPONSE**

We frequently exclude the dead trees from timber sales so they will be available to the public for firewood.

**COMMENT NO. 32.** SOME YEARS BACK YOU CHARGED A SMALL FEE FOR PERSONAL WOOD CUTTING USE. NOW THAT FEE HAS BEEN RAISED. PLEASE REMEMBER THE FOREST ARE PUBLIC OWNED. SO WHY SHOULD THE PUBLIC BE CHARGED FOR ITS USE?

**FOREST SERVICE RESPONSE**

That the Forests are publicly owned is the reason a charge is warranted -- because they belong to all of the people. The same rationale holds for commercial timber sales, grazing, etc. For any products which benefit an individual or company, and for which there is a recognized market value, the public owners should receive compensation.

**COMMENT NO. 33:** THE COMMUNITY STABILITY ALTERNATIVE WOULD IMPROVE ACCESS FOR FIREWOOD GATHERING WHICH IS IMPORTANT NOT ONLY FROM A PERSONAL STANDPOINT, BUT IT IS ALSO A GOOD WAY TO MAKE USE OF DEAD TIMBER WHICH WOULD OTHERWISE BE WASTED.

**FOREST SERVICE RESPONSE:**

By having more lands in management areas that emphasize timber management, the "Community Stability" alternative would provide more open roads than any other alternative. As pointed out elsewhere in this section, dead timber which is not used for fuel is not necessarily wasted.

**COMMENT NO. 34:** THE FOREST BELONGS TO ALL OF US. WE SHOULD BE ALLOWED TO CUT THE SAME FIREWOOD FOR PERSONAL USE THAT WE HAVE BEEN ALLOWED TO CUT IN THE PAST.

**FOREST SERVICE RESPONSE**

The amount of fuelwood available will depend on how fast it is removed. We predict it will continue to be available for many years, but the quality will decline and finding it will become more difficult as the supply is reduced by woodcutters.

**COMMENT NO. 35:** I ALSO FEEL THAT ALL WOOD LOGS SHOULD BE SKIDDED OUT FOR PUBLIC USE.

**FOREST SERVICE RESPONSE:**

Each timber sale environmental analysis attempts to analyze this issue. One view is that we should maximize the fuelwood gathering as a part of each sale. An opposing view is the need to reduce sale operation costs and leave more dead and down woody material for environmental recycling. We hope to effectively balance these opposing issues as each project is implemented under the Forest Plan. Many people, however, agree with your point of view.

**COMMENT NO. 36:** OPEN SOME OF THE ROADS TO GET WOOD.

**FOREST SERVICE RESPONSE:**

Road construction, road opening, road closing, road densities, and how long to keep short-term roads open to permit fuelwood gathering are all considered on a "project-by-project"

basis. This will continue under the Forest Plan. There are many differing views concerning the need for roads and how they shall be managed. Most timber sale projects offer an opportunity to enhance fuelwood gathering, at least short term. We intend to continue to look for these opportunities.

**WATER AND SOIL  
Code 800**

**COMMENT NO. 1:** BEAVER CREEK AND MARBLE POINT -- THESE AREAS SHOULD BE IN A NON-TIMBER MANAGEMENT, NO-DOMESTIC ANIMAL GRAZING MUNICIPAL WATERSHED DESIGNATION. THE WATER QUALITY FOR THE CITIES OF LA GRANDE AND BAKER MUST BE PROTECTED FROM SEDIMENTATION AND IMPURITIES FROM ROAD-BUILDING, TIMBER HARVESTING AND LIVESTOCK GRAZING.

**FOREST SERVICE RESPONSE:**

Under Alternative C both the Baker and La Grande Municipal Watersheds are closed to domestic livestock grazing except for recreational livestock. This represents no change from historical grazing use within the watersheds. Timber harvest and roadbuilding are permitted to the extent that water quality and streamflow are not impaired. The Plan requires that all projects within the watersheds be designed to maintain or improve water quality and streamflow. It also requires monitoring of any projects where the potential to affect water quality exists (see Plan, Chapter 4).

**COMMENT NO. 2:** THE FOREST ALTERNATIVES SHOW NO PROVISION FOR PROTECTION OF OUR MUNICIPAL WATERSHED AREAS SUPPLYING UNION, BAKER, WALLOWA, AND LA GRANDE'S WATER SUPPLY. ANY PLAN ADOPTED WOULD OBVIOUSLY BE NEGLIGENT WITHOUT WATERSHED PROTECTION.

**FOREST SERVICE RESPONSE:**

Standards and guidelines for management of the municipal supply watersheds are found in Chapter 4 of the Forest Plan and Appendix D of the EIS. They are incorporated, by reference, into the alternatives in the EIS.

**COMMENT NO. 3.** THE WALLOWA-WHITMAN HAS MERELY PAID LIP SERVICE TO WATERSHED PROTECTION

THE FOREST SERVICE HAS FAILED TO INSURE THAT WATER QUALITY WILL BE PROTECTED DURING TIMBER HARVEST. ROAD BUILDING AND TIMBER HARVEST WOULD DEGRADE THE WATER QUALITY THUS VIOLATING SEVERAL LAWS

**FOREST SERVICE RESPONSE:**

The Forest Service is required to comply with State and Federal water quality laws. Management standards and guidelines, designed to assure compliance with these laws, are found in Chapter 4 of the Plan. The Plan also calls for monitoring to assure that these standards and guidelines are implemented. Standards and guidelines for water quality protection have been substantially strengthened in the Final Plan.

**COMMENT NO. 4:** THERE IS NO MANAGEMENT STRATEGY FOR MUNICIPAL WATERSHEDS IN THE EIS. GRRC [GRANDE RONDE RESOURCES COUNCIL] FEELS THERE SHOULD BE AT LEAST

ONE, AND PREFERABLY SEVERAL, MANAGEMENT STRATEGIES WHICH DEAL SPECIFICALLY WITH MUNICIPAL WATERSHEDS.

**FOREST SERVICE RESPONSE.**

Development of a special management strategy for the watersheds was considered. We believe that protection of municipal water supplies can be assured equally well through the use of special standards and guidelines specific to the watersheds.

**COMMENT NO. 5:** I ALSO THINK TIMBER HARVESTING SHOULD NOT OCCUR IN OUR MUNICIPAL WATERSHEDS AND I'M PLEASED THAT THE WALLOWA-WHITMAN IS CURRENTLY NEGOTIATING A PLAN FOR LA GRANDE'S WATERSHED WITH CONCERNED CITIZENS

**FOREST SERVICE RESPONSE**

Timber management within municipal watersheds is considered an acceptable alternative to nonmanagement, provided that water quality, which is consistent with current levels of purity, will be maintained. Maintaining water quality and quantity are the major criteria used in designing and developing logging and transportation systems. The assurance that existing water quality and quantity will be maintained will be found in site-specific environmental analyses. These analyses identify site-specific "Best Management Practices" (BMP's). BMP's are defined as the protection requirements for implementing any specific land management activity. Included are such things as Forest Service manual direction, contract provisions, Forest Plan standards and guidelines, and management strategies. BMP's are designed to achieve specific water quality goals. Inherent in this process is the requirement for monitoring and evaluation of the appropriate BMP's to upgrade them if necessary. General BMP's are discussed in Appendix O.

It is our goal that all management activities within municipal watersheds will promote the improvement, protection, restoration, and maintenance of water quality in support of beneficial uses.

It is the policy of the Forest Service to provide the opportunity for public involvement in decisions regarding management activities. The Forest Service will continue to work closely with the City of La Grande, its officials and citizens, in regard to proposed management activities within the La Grande municipal watershed.

**COMMENT NO. 6:** DOMESTIC AND MUNICIPAL WATER SUPPLIES DESERVE PROTECTION. YOUR PLAN FOR LOGGING THE LA GRANDE AND BAKER WATERSHEDS ARE JUST ONE EXAMPLE OF A FAILURE TO RECOGNIZE AND PROTECT WATERSHEDS: THIS NEEDS TO BE CORRECTED IN THE FINAL PLAN

**FOREST SERVICE RESPONSE:**

Protection of domestic and municipal watersheds is identified in the goal statement for municipal watershed management and specifically under the section titled "Standards and Guidelines" which state that "water quality will be the major factor in designing and developing logging and transportation systems." Management activities will promote the improvement, protection, restoration, and the maintenance of water quality to support beneficial uses.

Logging proposals within the La Grande and Baker Municipal Watersheds will be based on site-specific environmental analyses. These analyses will address specific water quality/

quantity concerns and issues, and make site-specific recommendations concerning management practices for the maintenance of water quality and quantity. These practices dictate logging and roading system design and location and identify site-specific water quality protection measures

**COMMENT NO. 7: WATERSHED MANAGEMENT - (DEIS, PAGE III-12) THE DEPARTMENT OF FORESTRY SUPPORTS CONTINUATION OF THE CURRENT MANAGEMENT DIRECTION FOR MUNICIPAL WATERSHEDS LOCATED ON THE WALLOWA-WHITMAN. WE BELIEVE THAT CAREFULLY PLANNED TIMBER MANAGEMENT ACTIVITIES ARE COMPATIBLE WITH THE GOAL OF WATER QUALITY PROTECTION IN THESE AREAS. IN THE CASE OF THE LA GRANDE WATERSHED, WE SUPPORT CAREFUL SALVAGE OF DEAD AND DYING LODGEPOLE PINE STANDS TO REDUCE THE EXTREME FIRE HAZARD, TO FACILITATE THE REESTABLISHMENT OF A NEW TIMBER COVER, AND TO PROVIDE RAW MATERIAL TO WOOD PROCESSORS.**

**FOREST SERVICE RESPONSE:**

We agree.

**COMMENT NO. 8 THE DEIS DOES NOT PROTECT MUNICIPAL WATERSHEDS THE FOREST SERVICE HAS ALREADY AGREED TO STAY OUT OF THE LA GRANDE MUNICIPAL WATERSHED, BUT THE DEIS REFLECTS BUSINESS AS USUAL THE WATERSHEDS NEED TO BE PUT IN A NO-ROAD NO-CUT STATUS TO COMPLY WITH RECENT CITY REQUESTS.**

**FOREST SERVICE RESPONSE:**

We have not agreed to stay out of the La Grande watershed, but have agreed to postpone activities within the boundaries (those activities above the water intakes) of the watershed pending further analysis

**COMMENT NO. 9: DOMESTIC WATER SUPPLIES ARE DEALT WITH WELL IN THE DEIS AND PLAN SUMMARIZING THE MANAGEMENT AGREEMENTS WITH THE CITIES OF LA GRANDE AND BAKER IS APPROPRIATE FOR THIS TIER OF DOCUMENTS, AND WILL HELP THE PUBLIC TO UNDERSTAND THE IMPORTANCE THE FOREST SERVICE PLACES ON THE PROTECTION OF DRINKING WATER SUPPLIES.**

**FOREST SERVICE RESPONSE.**

Thank you for you comment.

**COMMENT NO. 10: I STRONGLY OPPOSE YOUR PROPOSAL. MY DRINKING WATER AND THAT OF THE CITY OF WALLOWA COMES FROM BEAR CREEK AND YOUR PLAN WOULD CAUSE WATER TURBIDITY AND RESULTANT HEALTH HAZARDS.**

**FOREST SERVICE RESPONSE**

The Forest Plan includes standards and guidelines for domestic supply watersheds. These are intended to assure that high quality water is provided. In the Bear Creek watershed, this is complicated by the presence of private lands between the National Forest boundary and the domestic supply intake. Roads and other activities on these private lands could significantly affect water quality.

**COMMENT NO. 11** THE PLAN PROVIDES WEAK OR NON-EXISTENT STREAM AND WATERSHED PROTECTION WHICH WOULD RESULT IN DEGRADATION OF WATER QUALITY AND MAKE IT DIFFICULT OR IMPOSSIBLE TO ENHANCE OR RETAIN EXISTING SALMON AND STEELHEAD POPULATIONS IN NORTHEAST OREGON. PROPER MANAGEMENT OF ANADROMOUS FISH REQUIRES COMPLETE PROTECTION

**FOREST SERVICE RESPONSE**

Standards and guidelines for watershed protection and fish habitat have been strengthened in the Final Plan.

**COMMENT NO. 12** I URGE THE FOREST SERVICE TO LISTEN TO WHAT THE MAJORITY OF THE PUBLIC AND NOW THE CITY COUNCILS OF LA GRANDE AND BAKER ARE SAYING ABOUT WATERSHED MANAGEMENT. THERE SHOULD BE NO SURFACE DISTURBING ACTIVITY IN MUNICIPAL WATER SOURCE AREAS.

**FOREST SERVICE RESPONSE.**

Listening to public comment and working closely with the respective cities are important in management of the Baker and La Grande domestic supply watersheds. We are not aware of any consensus against surface disturbing activities within the watersheds.

**COMMENT NO. 13** WATERSHEDS FOR THE LA GRANDE AND BAKER AREAS SHOULD BE SPECIALLY PROTECTED TO PRESERVE DOMESTIC WATER QUALITY FOR CITY RESIDENTS.

**FOREST SERVICE RESPONSE:**

These watersheds receive special protection in the selected alternative.

**COMMENT NO. 14:** MY CONCERN IS THAT STRATEGY 3A ALLOWS FOR AN EXTENSIVE VOLUME OF LOGGING AND ROAD BUILDING. ONLY A MINOR IMPACT TO THE LA GRANDE WATER SUPPLY WILL RENDER THIS RESOURCE USELESS BASED ON EPA TURBIDITY STANDARDS. CAN USFS LAND MANAGERS POSSIBLY BELIEVE THAT A ONE-TIME TIMBER HARVEST (LODGEPOLE PINE AT THAT) HAS A HIGHER VALUE TO UNION COUNTY THAN THE LOSS OF THE DOMESTIC WATER SUPPLY FOR 12,000 PEOPLE FOREVER?

**FOREST SERVICE RESPONSE:**

All road construction and logging activities will be designed to maintain or improve water quality. Regardless, you are correct that these activities do present a degree of risk. However, the large number of dead and dying trees within the watershed also presents a risk--fire. We believe that the least long-term risk to the water supply will result from careful management of the resources within the watershed.

**COMMENT NO. 15:** BECAUSE DETAILED AND SPECIFIC ANALYSIS OF CUMULATIVE IMPACTS ARE EXTREMELY IMPORTANT, THE FINAL PLAN SHOULD DISCUSS IN SOME DETAIL THE PROCESS FOR ASSESSING THEM ON THE W-WNF. FOR EXAMPLE, FOR HOW LARGE AN AREA (AND OTHER DRAINAGES?) WOULD SUCH ANALYSES BE PERFORMED? WHAT PERIOD OF TIME BETWEEN PROJECTS WOULD BE CONSIDERED? WOULD ALL ACTIVITIES PRODUCING SEDIMENT IN THE AREA BE INCLUDED (E.G., TIMBER HARVESTS, PLUS ROADS, MINES, GRAZING,

ETC.)? HOW WILL MULTIPLE OWNERSHIP DRAINAGES FIT INTO THESE ANALYSES? WILL DOCUMENTS BE PREPARED AND AVAILABLE FOR PUBLIC REVIEW AND COMMENT?

**FOREST SERVICE RESPONSE:**

Forest planning represents interactions of the various forest components and is in itself a cumulative effects analysis (CEA). An analysis of the effects of each integrated land management alternative requires an understanding of the interrelationships incumbent with each alternative. To the extent that these interrelationships can be identified and measured, the Forest planning process becomes a cumulative effects analysis at the programmatic level. However, some localized cumulative effects can only be addressed at the project level --potential effects of timber sales on municipal watersheds are one example

The size and boundary of the area for which a CEA would be conducted will most likely be different for each issue being analyzed. Wildlife issues may encompass multiple drainages while water issues may involve single or multiple drainage basins depending on the specific water issue and the potential significance and probability of effects. The period of time between projects would follow the same logic in that it is dependent on the specific issue being analyzed. Water issues may be analyzed in terms of hydrologic recovery periods which can vary between 10 to 20 years or longer depending on site productivity and vegetative recovery period. Big game effects are dealt with in a similar fashion in that the distribution of forage, hiding and thermal cover is dependent upon site productivity and vegetative recovery period. As an example, when trees reach 4 5 feet in height these harvested acres are no longer considered created openings and other timber harvest projects could be considered in adjoining untreated areas

All activities would be included in estimates of sediment production to the extent that they can be measured and cause-and-effect relationships developed. In addition, since cumulative effects occur without regard to land ownership boundaries, consideration of cumulative effects will not be confined to those only occurring on National Forest System lands or to those occurring only as a result FS management actions. Significant actions taking place on other lands will be taken into account in the analysis

It is the policy of the Forest Service to provide the opportunity for public involvement in decisions regarding management activities, and all environmental assessment documents will be available for public review and comment

**COMMENT NO. 16:** UNDER CHAPTER 4, FOREST MANAGEMENT DIRECTION, FOREST MANAGEMENT GOALS, MUNICIPAL WATERSHEDS (PG.4-1) REVISE THE GOAL TO READ, TO MANAGE MUNICIPAL WATERSHEDS TO MAINTAIN OR IMPROVE WATER QUALITY AND STREAM FLOW

**FOREST SERVICE RESPONSE:**

The goal has been reworded as follows. "All domestic watersheds will be managed to maintain or improve water quality and streamflows so that, with adequate treatment by the purveyor, it will result in a safe and satisfactory water supply." The statement "with adequate treatment by the purveyor" has been left in the goal, not because we anticipate any reductions in water quality, but because untreated surface water rarely, if ever, is satisfactory for domestic use

**COMMENT NO. 17:** ON PAGE 4-25, WE SUGGEST DELETION OF THE ENTIRE STATEMENT, "MANAGEMENT ACTIVITIES MAY INCLUDE THE USE OF PESTICIDES AND FERTILIZERS WHEN SITE-SPECIFIC ANALYSIS INDICATES THAT WATER QUALITY WILL NOT BE ADVERSELY



AFFECTED.\* THE CITY [OF LA GRANDE] TAKES STRONG EXCEPTION TO THE USE OF CHEMICAL PESTICIDES AND FERTILIZERS IN THE WATERSHED. IT IS TO BE EXPECTED THAT ANY APPLICATIONS WILL BE CARRIED INTO THE MUNICIPAL WATER SUPPLY. BIOLOGICAL CONTROL METHODS OF INSECT INFESTATIONS ARE PREFERRED

**FOREST SERVICE RESPONSE:**

This standard has been reworded to state that, "Use of fertilizers and pesticides (chemical or biological) will occur within the watersheds only in emergency situations, and then only following close coordination with the City." Use of pesticides is expected to occur very rarely. The use of fertilizers will only occur when necessary to establish erosion control vegetation in situations where other methods have proven unsuccessful

**COMMENT NO. 18:** THE USE OF FIRE RETARDANTS IS MENTIONED. OUR AGREEMENT CALLS FOR THE USE OF FERTILIZER-BASED FIRE RETARDANTS WHEN FIRE SUPPRESSION IS NECESSARY. THIS REQUIREMENT SHOULD BE ADDED TO THE SECTION

**FOREST SERVICE RESPONSE.**

This change has been made

**COMMENT NO. 19:** THE LAST PARAGRAPH IN THIS SECTION DEALS WITH WASTE REMOVAL WITHIN THE WATERSHED " CAN BE TRANSPORTED..." SHOULD BE CHANGED TO "... WILL BE TRANSPORTED...".

**FOREST SERVICE RESPONSE**

This change has been made.

**COMMENT NO. 20:** ON PAGE 4-27, THE SENTENCE READING, "THE BEAVER CREEK RESERVOIR WILL REMAIN CLOSED TO FISHING, SWIMMING, WADING OR OTHER ACTIVITIES WHICH INCLUDE SUBSTANTIAL CONTACT WITH THE WATER." SHOULD BE AMENDED TO INCLUDE "AND INTAKES" AFTER "RESERVOIR".

**FOREST SERVICE RESPONSE:**

This change has been made.

**COMMENT NO. 21.** ON PAGE 4-24 UNDER STANDARDS AND GOALS APPLICABLE TO ALL DOMESTIC SUPPLY WATERSHEDS (THE CITY [LA GRANDE] DOES NOT WANT "LOGGING OR "TRANSPORTATION SYSTEMS" WITHIN THE WATERSHED.)

**FOREST SERVICE RESPONSE.**

The alternative of closing the La Grande domestic supply watershed to logging and road construction was considered during the planning process. The selected alternative, however, permits a limited level of harvest with an overriding goal of maintaining or improving water quality. This decision was made because it is the policy of the Forest Service to permit a variety of uses on lands where these uses are compatible. We believe that carefully planned and

implemented timber management activities are compatible with the primary use in the La Grande domestic supply watershed -- providing quality water

**COMMENT NO. 22:** MANAGEMENT ACTIVITIES MAY INCLUDE THE USE OF PESTICIDES AND FERTILIZERS WHEN SITE-SPECIFIC ANALYSIS INDISPUTABLY INDICATES THAT WATER QUALITY WILL NOT BE ADVERSELY AFFECTED. (SUGGESTED CHANGE TO STANDARDS AND GUIDELINES FOR MUNICIPAL WATERSHEDS).

**FOREST SERVICE RESPONSE.**

Adding the word "indisputably" to the standard would effectively preclude the use of pesticides and fertilizers since there is almost always room for dispute. (Also see response to Comments 17 and 18)

**COMMENT NO. 23:** ACTIVITIES HAVING THE POTENTIAL TO AFFECT WATER QUALITY WILL INCLUDE MONITORING TO DETERMINE IF OBJECTIVES ARE MET IF NOT, IMMEDIATE MITIGATION MEASURES WILL BE TAKEN AND PAID FOR BY THE PARTIES INITIATING THE ACTIVITY (SUGGESTED CHANGE TO STANDARDS AND GUIDELINES FOR MUNICIPAL WATERSHEDS )

**FOREST SERVICE RESPONSE**

The standards and guidelines have been revised to read as follows "Activities having the potential to affect water quality will include monitoring to determine if objectives are met. If not, on-site corrective measures within the municipal watershed will be immediately initiated by the Forest Service."

**COMMENT NO. 24:** FIRE RETARDANTS WILL NOT BE USED EXCEPT IN EXTREME EMERGENCIES. (SUGGESTED CHANGE IN STANDARDS AND GUIDELINES FOR MUNICIPAL WATERSHEDS)

**FOREST SERVICE RESPONSE:**

It is difficult to define an "extreme emergency" although many people would probably feel that any wildfire in a municipal watershed would qualify. We agree, however, that fire retardants should be used in a domestic supply watershed only when the threat from the fire is greater than the potential threat from use of fire retardants. The standard and guideline has been reworded as follows: "The use of fire retardants within domestic supply watersheds will be avoided when other effective measures of fire control are available. When the use of fire retardants within domestic supply watersheds is necessary, all reasonable efforts will be made to avoid direct application into live streams."

**COMMENT NO. 25.** FIRE CAMPS WILL NOT BE LOCATED INSIDE WATERSHEDS EXCEPT IN EXTREME EMERGENCIES. (SUGGESTED CHANGES TO STANDARDS AND GUIDELINES FOR MUNICIPAL WATERSHEDS)

**FOREST SERVICE RESPONSE**

This change has been made

**COMMENT NO. 26** ON PAGE 4-24 UNDER STANDARDS AND GUIDELINES SPECIFIC TO THE LA GRANDE WATERSHED:

ALL FOREST SERVICE ACTIVITIES WILL COMPLY WITH THE 1935 COOPERATIVE AGREEMENTS BETWEEN THE SECRETARY OF AGRICULTURE AND THE CITY OF LA GRANDE AS SUPPLEMENTED UNTIL A NEW AGREEMENT MORE RELEVANT TO PRESENT CONDITIONS IS SIGNED. (SUGGESTED CHANGE TO STANDARDS AND GUIDELINES FOR MUNICIPAL WATERSHEDS)

**FOREST SERVICE RESPONSE**

This statement has been changed to read as follows: "All Forest Service activities will comply with the 1935 cooperative agreement between the Secretary of Agriculture and the City of La Grande, as supplemented, until such time as the agreement is amended or terminated under the stipulations found therein "

**COMMENT NO. 27:** OTHER STANDARDS AND GUIDELINES INCLUDE: THE WATERSHED WILL BE MANAGED TO PROVIDE WATER OF A QUALITY WHICH IS CONSISTENT WITH CURRENT LEVELS OF PURITY ACTIVITIES WILL BE DESIGNED WITH THE OBJECTIVE TO MAINTAIN OR IMPROVE WATER QUALITY AND STREAMFLOWS [DELETE THE STATEMENT] "MAINTAINING THE WATER QUALITY AND QUANTITY WILL BE THE MAJOR FACTORS IN DESIGNING A DEVELOPING LOGGING AND TRANSPORTATION SYSTEMS" (WE WISH TO HAVE NO NEW ROADS WITHIN THE WATERSHED)

**FOREST SERVICE RESPONSE:**

Since the selected alternative permits timber harvest, we feel that the standards and guidelines pertaining to road construction and logging should be retained. (Also see response to Comment 21)

**COMMENT NO. 28.** ALL PROJECTS AND ACTIVITIES PROPOSED WITHIN THE WATERSHED, HAVING THE POTENTIAL TO AFFECT WATER QUANTITY OR QUALITY, WILL RECEIVE SITE-SPECIFIC ENVIRONMENTAL ANALYSIS UNDER THE FOREST SERVICE NEPA PROCESS. THIS ANALYSIS WILL INCLUDE CONSULTATION WITH THE CITY AND WHATEVER MEASURES REQUESTED BY THE CITY TO MAINTAIN WATER STANDARDS SHALL BE IMPOSED BY THE FOREST SERVICE. (SUGGESTED CHANGE TO STANDARDS AND GUIDELINES FOR MUNICIPAL WATERSHEDS.)

**FOREST SERVICE RESPONSE**

We agree that the Forest Service and the City of La Grande must maintain a strong partnership in the management of the domestic supply watershed. As discussed in the 1935 Agreement, we will continue to consult the officials of the City of La Grande and give full consideration to any requirements the City may desire as necessary for the safeguarding of the water supply. However, we cannot guarantee that every request by the City will be implemented

**COMMENT NO. 29. DELETE** (THE AREA IMMEDIATELY ADJACENT TO THE RESERVOIR AND DOMESTIC SUPPLY INTAKES, CONSISTING OF APPROXIMATELY 3,500 ACRES, IS PRESENTLY CLOSED TO CAMPING. IN THE FUTURE, IF THE CITY DESIRES TO FURTHER LIMIT USE AND ACCESS TO THE WATERSHED, A WRITTEN REQUEST TO THE FOREST SERVICE WILL BE ACTED UPON UNDER THE FOREST SERVICE NEPA PROCESS.

ROADS WITHIN THE WATERSHED WILL BE MANAGED TO LIMIT PUBLIC ACCESS, PROVIDE FOR FIRE PREVENTION AND SUPPRESSION, TO FACILITATE FOREST MANAGEMENT BY THE U.S FOREST SERVICE, AND ADMINISTRATION BY THE CITY).

**FOREST SERVICE RESPONSE:**

This, and several other comments (see following comments) from the City of La Grande, deal with access to the watershed. The standards and guidelines, as presently written, are based on historical access to the watershed, which has not proven detrimental to water quality or streamflows. The standards also define a process, available to the City, which can be used to propose different regulations on access to the watershed. Any proposals for changing access to the watershed will be considered by the Forest Service using the NEPA process.

**COMMENT NO. 30. NO ROADS WITHIN THE WATERSHED WILL BE OPEN TO THE PUBLIC EXCEPT THE ROAD OR THE CARETAKERS SITE AND PERIMETER ROADS. THESE ROADS MAY BE USED BY THE PUBLIC WITH PERMISSION FROM THE CITY. (SUGGESTED CHANGE TO THE STANDARDS AND GUIDELINES FOR MUNICIPAL WATERSHEDS)**

**FOREST SERVICE RESPONSE:**

See response to Comment 29.

**COMMENT NO. 31: (DELETE) THE WATERSHED WILL BE CLOSED TO OFF ROAD VEHICLE USE EXCEPT FOR OVER SNOW VEHICLES OPERATING ON FOUR OR MORE INCHES OF SNOW.**

**FOREST SERVICE RESPONSE.**

The requested change has not been made. Currently, use of the watershed, except for the one designated trail -- Road 43, by snowmobilers is very light. There is currently no evidence that use is adversely affecting the watershed. (Also see response to Comment 29)

**COMMENT NO. 32: THE ENTIRE WATERSHED WILL REMAIN OPEN TO NONMOTORIZED TYPES OF DISPERSED RECREATION INCLUDING HUNTING, HIKING, AND BACKPACKING. HOWEVER, THERE WILL BE STRINGENT REGULATIONS REGARDING WASTES, WADING IN STREAMS, ETC. PACK ANIMALS AND HORSES WILL NOT BE ALLOWED INSIDE THE WATERSHED**

**FOREST SERVICE RESPONSE.**

See response to Comment 29.

**COMMENT NO. 33: (DELETE) (A TRAIL SYSTEM PERMITTING ACCESS TO THE WATERSHED WILL BE PROVIDED)**

NO TRAIL SYSTEM SHALL BE MAINTAINED.

**FOREST SERVICE RESPONSE:**

The change has been made

**COMMENT NO. 34: ACCESS BY THE CITY TO THE RESERVOIR AREA AND OTHER FACILITIES WILL CONTINUE AS HAS BEEN ESTABLISHED OR AS APPROVED BY AGREEMENT WITH THE FOREST SERVICE IN ORDER TO MAINTAIN, REPAIR, REPLACE OR OTHERWISE MAINTAIN THE CARETAKER FACILITY, RESERVOIR, INTAKES, PIPELINES AND OTHER WATER FACILITY STRUCTURES. (SUGGESTED CHANGE TO STANDARDS AND GUIDELINES FOR MUNICIPAL WATERSHEDS)**

**FOREST SERVICE RESPONSE:**

The change has been made.

**COMMENT NO. 35. WHEN THE CURRENT SALE OF BEETLE-KILLED LODGEPOLE PINE HAS BEEN HARVESTED, THERE SHALL BE NO FURTHER TIMBER SALES IN THE WATERSHED AREA**

**FOREST SERVICE RESPONSE:**

(The City of La Grande later modified this recommendation.)

**COMMENT NO. 36: ON PAGE 4-26, CHANGE THE DESIGNATION OF THE REQUIREMENTS FOR THE 1935 COOPERATIVE AGREEMENT TO NUMERIC FORM INSTEAD OF ALPHABETIC**

**FOREST SERVICE RESPONSE:**

The change has been made

**COMMENT NO. 37 THE STANDARDS AND GUIDELINES SECTIONS FOR MUNICIPAL WATERSHEDS SHOULD STATE WHICH STANDARDS WILL BE MET FOR WATER QUALITY.**

**FOREST SERVICE RESPONSE:**

State water quality standards (for surface water) apply to the municipal watersheds as well as the rest of the Forest (see Watershed Standards and Guidelines)

**COMMENT NO. 38 THE PLAN DOES NOT DISCUSS MANAGEMENT CONSIDERATIONS FOR SMALL PRIVATE WATER SYSTEMS THAT MIGHT INCLUDE THE NATIONAL FOREST AS PART OF ITS WATERSHED. PROTECTION SHOULD BE PROVIDED TO ANY SUCH WATERSHEDS IN THE WALLOWA-WHITMAN NATIONAL FOREST THE PLAN SHOULD ALSO DESCRIBE HOW THE PROTECTION WILL BE MONITORED**

**FOREST SERVICE RESPONSE:**

These uses will be recognized and considered during project-level analysis. It is not the policy of the Forest Service, however, to provide water which meets drinking water standards. This is the responsibility of the user.

**COMMENT NO. 39:** THERE IS OFTEN A TENDENCY OF THE FOREST SERVICE FOR AN OVERDEPENDANCE ON MITIGATION TO SOLVE DEGRADED HABITAT PROBLEMS. MITIGATION FOR DEGRADED WATERSHED AND OTHER HABITAT HAS PROVEN NOT ONLY VERY EXPENSIVE BUT SERIOUSLY DEFICIENT IN RETURNING HABITAT TO OPTIMAL PRODUCTIVITY. PREVENTION OF FURTHER DEGRADATION OR LOSS OF NATURAL RESOURCES AND ENHANCEMENT OF SOIL, WATER, FLORA AND FAUNA IS THEREFORE PREFERABLE TO THE CONFEDERATED TRIBES

**FOREST SERVICE RESPONSE**

We rely on mitigation to prevent or reduce potential impacts to other resources. Prevention of impacts is always the first strategy; however, some impacts, notably soil disturbance, are not always preventable and "Best Management Practices" (BMP's) are used to reduce the severity of the impact. Where management activities result in unacceptable resource impacts the affected resources are rehabilitated. Resource restoration and rehabilitation are ongoing processes and the Forest is actively involved in resource improvement work.

**COMMENT NO. 40:** WATERSHEDS DETERMINED TO BE OF HIGH PRIORITY AND OF CRITICAL VALUE TO THE CONFEDERATED TRIBES ARE ADDITIONALLY RECOMMENDED TO INCLUDE PROTECTIVE CRITERIA OF MANAGEMENT STRATEGY 18. THESE STREAMS WITH APPROPRIATE REASONING ARE LISTED BELOW.

**NORTH FORK JOHN DAY RIVER** - THE MOST IMPORTANT PRODUCTION STREAM OF THE ENTIRE JOHN DAY BASIN; JOINT WILD FISH MANAGEMENT POLICY FOR SPRING CHINOOK AND STEELHEAD WHICH DEPEND ON OPTIMAL QUALITY HABITAT; DRAINS FROM WALLOWA-WHITMAN DOWNSTREAM INTO WILDERNESS AREA REQUIRING HIGH WATER QUALITY STANDARDS, AND HAS TRADITIONALLY BEEN AN ESPECIALLY IMPORTANT TRIBAL USUAL & ACCUSTOMED FISHERY.

**UPPER GRANDE RONDE BASIN** - CONTAINS ALL LIFE PHASES OF SPRING CHINOOK STEELHEAD TARGETED SPRING CHINOOK OUTPLANT AREA TO INCREASE NATURAL PRODUCTION UNDER LOWER SNAKE RIVER COMPREHENSIVE PLAN; INTENSIVELY FUNDED ANADROMOUS FISH HABITAT IMPROVEMENTS BY B.P.A.; FORMERLY PRODUCTIVE USUAL & ACCUSTOMED SUBSISTENCE FISHERY WITH CONSERVATION CLOSURE SINCE 1979 TO ALLOW ENHANCEMENT EFFORTS NOTED ABOVE TO SUCCESSFULLY GENERATE TRIBAL FISHERY; AND SERVES AS PRIME SUPPLY OF WATER FOR MID AND LOWER GRANDE RONDE AFFECTING REARING HABITAT QUALITY AND QUANTITY, WATER TEMPERATURES, AND SEASONAL FLOWS.

**CATHERINE CREEK** - FORMERLY VERY PRODUCTIVE SUBSISTENCE FISHERY OF SPRING CHINOOK BUT NOW VERY REDUCED POPULATIONS; TARGETED AREA UNDER LOWER SNAKE COMPREHENSIVE PLAN FOR SMOLT OUTPLANTING, AND CONSIDERABLE EXPENDITURES FOR SCREENING IRRIGATION DIVERSIONS DOWNSTREAM ARE ONGOING.

**JOSEPH CREEK** - WILD MANAGEMENT POLICY FOR STEELHEAD WHICH PLACES EMPHASIS ON QUALITY HABITAT; SITE OF INTENSIVE B.P.A. FUNDED ENHANCEMENT EFFORTS; AND AN IMPORTANT CULTURAL SITE.

IMNAHA - SPRING CHINOOK AND STEELHEAD WERE FORMERLY PRODUCTIVE TRIBAL SUBSISTENCE FISHERY BUT RARELY VIABLE TODAY DUE TO DEPRESSED LEVELS, NATURAL ENHANCEMENT MANAGEMENT POLICY OF TRIBES & ODFW PLACES EMPHASIS ON THE UNIQUE HABITAT OF THIS SYSTEM AND FISH RUN

LOSTINE - SPRING CHINOOK AND STEELHEAD ARE PROVIDING LIMITED TRIBAL SUBSISTENCE FISHERY WHICH IS ON THE UPSWING; RETAINMENT OF NATURAL RIPARIAN CHARACTER IS VITAL

LOWER MAINSTEM GRANDE RONDE - CONTAINS IMPORTANT JUVENILE REARING AND CRITICAL ADULT PASSAGE FOR SPRING CHINOOK AND STEELHEAD; POTENTIAL FALL CHINOOK HABITAT FOR SPAWNING AND REARING, AND PROPER TEMPERATURE LEVELS ARE CRUCIAL TO HABITAT QUALITY.

#### **FOREST SERVICE RESPONSE**

In the preferred alternative, Management Area 18 is applied to the lands within the North Fork John Day drainage that are not in wilderness. This is in response to language in the May 14, 1984 report from the Senate Committee on Energy and Natural Resources on the establishment of the North Fork John Day Wilderness. This language is as follows:

"In developing its recommendation for this area, the Committee has given high priority to protection of fisheries habitat. The North Fork John Day is an extremely important native fishery habitat for Columbia River salmon. The Committee notes that it has excluded nearly 100,000 acres which was included in the House proposal. In doing so, the Committee wishes to emphasize that its action does not reflect lack of concern for protection of fisheries in the excluded areas. Rather, the Committee feels that in the development of Forest Plans for these areas, the Forest Service can and should afford recognition of the importance of this habitat. Development activities should be undertaken in a manner which minimizes impacts upon this important resource."

We believe all alternatives protect the anadromous fish habitat through overriding standards and guidelines. Management Areas 1 and 3 have been revised to include more detailed standards. Management Area 18 takes a more conservative approach than the other areas.

**COMMENT NO. 41:** AS PRESENTED IN THE DEIS, THE SCOPE OF "WATERSHED MANAGEMENT" IS LIMITED TO A FEW SPECIFIC MUNICIPAL WATERSHEDS. IN THE FINAL EIS, SCOPE OF THE WATERSHED MANAGEMENT SHOULD BE BROADENED TO ENCOMPASS THE ENTIRE WALLOWA-WHITMAN NATIONAL FOREST. THESE WATERSHEDS SHOULD BE CONSIDERED AS NATURE'S RESERVOIRS AND ARE THE SOURCE OF CLEAN AND HIGH QUALITY SURFACE AND GROUND WATER. INDIAN CUSTOM, RELIGION, AND CEREMONY BEGIN AND END WITH WATER. IT IS CLASSIFIED AS "MEDICINE".

#### **FOREST SERVICE RESPONSE**

Standards and Guidelines for managing all watersheds on the Forest are found in Chapter 4 of the Plan. A separate, and more stringent, set of standards and guidelines for managing domestic-supply watersheds is also found in Chapter 4. We feel that implementation of these practices will provide the quality water you request.

**COMMENT NO. 42:** BAKER AND LA GRANDE WATERSHEDS SHOULD GET "NO-CUT ALLOCATIONS" THE CUMULATIVE EFFECTS OF ROADS SHOULD BE MEASURED. EIS'S SHOULD BE

DEVELOPED, NOT JUST E A 'S WATERSHEDS SHOULD BE MANAGED AS OLD GROWTH FOR EACH SPECIES.

**FOREST SERVICE RESPONSE**

Land allocations which would preclude scheduled timber harvest in the two domestic supply watersheds were considered in the EIS. The decision to permit harvest is being made through an EIS (for the Forest Plan)

The site-specific decisions on when, where, and what to harvest will be made through a separate environmental analysis. This may take either the form of an environmental assessment or an environmental impact statement, depending upon the scope and significance of the activity being considered. Also see response to Comment No. 14

**COMMENT NO. 43: MANAGING FOR TIMBER HARVESTING IN MUNICIPAL WATERSHEDS ON PUBLIC FOREST LANDS CONSTITUTES A SIGNIFICANT ACTION AND POTENTIAL IMPACT ON MAN AND HIS ENVIRONMENT. I FIND THE LACK OF SEPARATE ALTERNATIVES ADDRESSING THE SPECIFIC MANAGEMENT OF MUNICIPAL WATERSHEDS TO BE A GLARING OMISSION IN THE DRAFT PLAN AND PREFERRED ALTERNATIVE. A NO CUT ALTERNATIVE NEEDS TO BE ADDRESSED IN THE PLAN AND INCORPORATED INTO THE PREFERRED ALTERNATIVE**

**FOREST SERVICE RESPONSE:**

A range of alternatives for managing the watersheds was considered in the EIS, including an alternative which schedules no timber harvest. A section has been added to the EIS which discusses the potential effects of timber management activities on domestic water supplies

**COMMENT NO. 44: THE PREFERRED ALTERNATIVE SCHEDULES 1,000 ACRES OF WATERSHED IMPROVEMENT PROJECTS EACH YEAR. THE COMMUNITY STABILITY ALTERNATIVE WOULD SUPPORT ADDITIONAL PROJECTS IN EXCESS OF THOSE ALREADY PLANNED. AS WITH THE WILDLIFE HABITAT IMPROVEMENT, WE FEEL THAT THERE NEEDS TO BE A MORE COORDINATED EFFORT BETWEEN INDUSTRY AND THE FOREST SERVICE TO DETERMINE IF PROPERLY CONDUCTED ROADING AND HARVEST PROJECTS ARE IN FACT HAVING A DETRIMENTAL EFFECT ON WATERSHED MANAGEMENT.**

**FOREST SERVICE RESPONSE:**

Monitoring of management activities is an important part of Forest Plan implementation. One purpose of this monitoring is to determine if best management practices (BMP's) for watershed protection have been properly implemented. We agree that coordination between the Forest Service and timber industry, in assuring watershed protection, is important.

**COMMENT NO. 45: STANDARDS AND GUIDELINES -- SUGGESTED CHANGES OR ADDITIONS ARE IN [ ].**

WATERSHED - WATERSHED (INCLUDING) RIPARIAN ECOSYSTEMS, STREAMSIDE MANAGEMENT UNITS, FLOODPLAINS, WETLANDS, WATER RIGHTS, AND FISH HABITAT GOAL

TO MAINTAIN OR ENHANCE THE UNIQUE AND VALUABLE CHARACTERISTICS OF RIPARIAN AREAS AND TO MAINTAIN OR IMPROVE WATER QUALITY, STREAMFLOWS, WILDLIFE HABITAT, AND FISH HABITAT.



STANDARDS AND GUIDELINES

STREAMSIDE MANAGEMENT UNITS (SMU'S) AND FISH. MANAGEMENT AND ENHANCEMENT OF WATER QUALITY AND PROTECTION OF WATERCOURSES AND STREAMSIDE MANAGEMENT UNITS (SMU'S) WILL HAVE PRIORITY OVER USES DESCRIBED OR IMPLIED IN ALL OTHER MANAGEMENT STANDARDS OR GUIDELINES. SEE FOREST SERVICE MANUAL 2500 FOR DETAILED DISCUSSION OF STREAMSIDE MANAGEMENT

WATER QUALITY WILL BE MAINTAINED THROUGH THE APPLICATION OF BEST MANAGEMENT PRACTICES AS DESCRIBED IN FSM 2500, THE GOAL BEING TO MEET STATE WATER QUALITY STANDARDS FOR TEMPERATURE, TURBIDITY, AND OTHER PARAMETERS WHERE APPLICABLE IT IS RECOGNIZED THAT SHORT-TERM REDUCTIONS IN WATER QUALITY MAY RESULT FROM SOME ACTIVITIES [IN THESE CASES, NEGATIVE IMPACTS CAUSING REDUCTION IN WATER QUALITY WILL BE MITIGATED TO RETURN WATER QUALITY TO PREVIOUS LEVELS IN AS SHORT A TIME AS POSSIBLE.]

TREE STANDS WITHIN SMU'S WILL BE MANAGED TO MAINTAIN THE VEGETATIVE CHARACTERISTICS NEEDED FOR WATER QUALITY PROTECTION OR IMPROVEMENT.

THE NEED FOR VEGETATIVE TREATMENT WITHIN AN SMU WILL BE DETERMINED ON A CASE-BY-CASE BASIS THROUGH PROJECT ENVIRONMENTAL ANALYSIS [ONLY THOSE TREATMENTS THAT MAINTAIN OR ENHANCE WATER AND RIPARIAN QUALITY AND ARE CONSISTENT WITH WILDLIFE GOALS WILL BE APPLIED ]

[TEMPERATURES WILL NOT BE MEASURABLY INCREASED IN CLASS I AND II STREAMS. TEMPERATURE INCREASES ON FISH BEARING CLASS III STREAMS WILL BE LIMITED TO THE QUANTITATIVE CRITERIA IN STATE STANDARDS ] TEMPERATURES ON OTHER STREAMS MAY BE INCREASED ONLY TO THE EXTENT THAT WATER QUALITY GOALS ON DOWNSTREAM FISHBEARING STREAMS WILL BE MET NATURAL LARGE WOODY DEBRIS, PLUS TREES NEEDED FOR A FUTURE SUPPLY, WILL BE MAINTAINED AND MANAGED TO PROTECT OR ENHANCE STREAM CHANNEL AND BANK STRUCTURE, ENHANCE WATER QUALITY IN CLASS I, II AND [FISH BEARING CLASS III STREAMS, AND PROVIDE STRUCTURAL FISH HABITAT ]

SUITABLE TIMBERLAND WITHIN SMU'S IS PART OF THE REGULATED TIMBER HARVEST BASE, ALTHOUGH HARVESTS WILL BE AT LESS THAN FULL YIELD, REFLECTING WATER QUALITY AND OTHER RIPARIAN OBJECTIVES.

AREAS IN WHICH WATER QUALITY IS BEING ADVERSELY IMPACTED WILL BE GIVEN HIGH PRIORITY FOR TREATMENT TO MINIMIZE THE EFFECTS OF THE IMPACT OR TO CORRECT THE IMPACTING ACTIVITY.

WHERE STREAMBANKS HAVE BECOME UNSTABLE, OR COVER DOES NOT MEET FISH HABITAT NEEDS, STREAMBANK VEGETATION WILL BE IMPROVED WHERE IT CAN BE EFFECTIVE IN PROBLEM AREAS, MEASURABLE OBJECTIVES WILL BE SET (E G , HEIGHT AND DENSITY OF WILLOWS OR PERCENTAGE OF VEGETATIVE COVER) INCLUDING A SPECIFIC DATE FOR ACCOMPLISHMENT

[WATERSHED VALUES WILL BE PROTECTED TO THE FULLEST EXTENT POSSIBLE UNDER EXISTING LAWS IN EVALUATING AND DEVELOPING MINERAL OPERATING PLANS INPUT FROM HYDROLOGISTS, AND SOILS AND WILDLIFE SPECIALISTS WILL BE SOUGHT.]

WITHIN ANADROMOUS AND OTHER CLASS I, II, [AND III] FISH PRODUCING STREAMS AND OTHER STREAMS CRITICAL TO THE PROTECTION OF DOWNSTREAM FISH PRODUCING WATERS, [STREAM FLOWS WILL BE ALTERED ONLY TO THE EXTENT THAT STREAM AND DOWN

STREAM FISH AND RIPARIAN GOALS WILL STILL BE MET ] WHEN PROJECTS ARE PLANNED WHICH ARE LIKELY TO ADVERSELY AFFECT STREAMFLOW VOLUME OR TIMING, A HYDROLOGIC ANALYSIS WILL BE CONDUCTED CONSIDERING PAST, PRESENT, AND FUTURE ACTIVITIES IF STREAMFLOWS PROJECTED FROM THIS ANALYSIS WOULD ADVERSELY AFFECT THE SUITABILITY OF THE CONDITION, THE PROJECT WILL BE ALTERED TO MAINTAIN OR ENHANCE FISHERIES VALUES THIS MAY INCLUDE SUCH THINGS AS DELETING OR REARRANGING THE HARVEST UNITS IN TIMBER SALES, SELECTING DIFFERENT SILVICULTURAL PRESCRIPTIONS, OR DELAYING HARVEST FOR ONE OR MORE DECADES.

[THE NEED FOR SPECIAL TIMBER SALE CONTRACT CLAUSES TO PROTECT CHANNEL STABILITY AND WATER QUALITY WILL BE INCLUDED] IN TIMBER HARVEST, ROAD CONSTRUCTION, AND OTHER PROJECT ENVIRONMENTAL ANALYSES

FLOODPLAINS ALL PROJECT ENVIRONMENTAL ANALYSIS WILL ADDRESS THE PRESENCE OF AND POTENTIAL IMPACTS TO ANY FLOODPLAIN WITHIN THE PROJECT AREA.

INVESTMENTS IN MAJOR STRUCTURES, ROADS, OR OTHER FACILITIES WITHIN FLOODPLAINS MAY BE MADE ONLY IF NO FEASIBLE ALTERNATIVE SITE OUTSIDE THE FLOODPLAIN EXISTS

ACTIVITIES, PARTICULARLY TIMBER SALES, WHICH COULD HAVE SHORT-TERM ADVERSE IMPACTS ON FLOODPLAINS ARE PERMISSIBLE IF SPECIFIC MITIGATION MEASURES DESIGNED TO MINIMIZE THE IMPACTS ARE DOCUMENTED THROUGH A PROJECT'S ENVIRONMENTAL ANALYSIS. WHERE ACTIVITIES ADVERSELY AFFECT NATURAL FLOODPLAINS, THEY WILL BE RESTORED, TO THE EXTENT PRACTICABLE, SHORTLY AFTER THE ACTIVITY HAS CEASED (ALSO, SEE RIPARIAN ECOSYSTEM DIRECTION BELOW.)

WETLANDS. ALL PROJECT LEVEL ENVIRONMENTAL ANALYSIS WILL ADDRESS THE PRESENCE OF, AND POTENTIAL IMPACTS TO WETLANDS WITHIN THE PROJECT AREA. ADVERSE IMPACTS TO WETLANDS WILL BE AVOIDED TO THE EXTENT PRACTICAL

RIPARIAN ECOSYSTEMS. RANGE ALLOTMENT MANAGEMENT PLANS WILL INCLUDE OBJECTIVES FOR RIPARIAN AREAS THESE OBJECTIVES WILL DEFINE A DESIRED FUTURE RIPARIAN CONDITION BASED ON EXISTING AND POTENTIAL VALUES FOR ALL RESOURCES. WHEN THE CURRENT RIPARIAN CONDITION IS LESS THAN THE DESIRED FUTURE CONDITION, THESE OBJECTIVES WILL INCLUDE A SCHEDULE FOR IMPROVEMENT AND THE ALLOTMENT MANAGEMENT PLANS WILL IDENTIFY THOSE ACTIONS NEEDED TO MEET RIPARIAN OBJECTIVES WITHIN THE SPECIFIC TIME FRAMES THE PLAN WILL INCLUDE A COST-BENEFIT ANALYSIS AND WILL ADDRESS THE CONDITION ANALYSIS AND MONITORING NEEDED TO DETERMINE IF THE DESIRED RATE OF IMPROVEMENT IS OCCURRING ALLOTMENT MANAGEMENT PLANS CURRENTLY NOT CONSISTENT WITH THIS DIRECTION WILL BE REVISED ON A PRIORITY BASIS UNDER A SCHEDULE ESTABLISHED BY THE FOREST SUPERVISOR

TO THE EXTENT PRACTICAL, ROADS WILL NOT BE CONSTRUCTED THROUGH THE LENGTH OF RIPARIAN AREAS. ROADS CROSSING RIPARIAN AREAS WILL NOT ALTER STREAM OR GROUND WATER FLOW CHARACTERISTICS TO A DEGREE WHICH WILL IMPACT THE RIPARIAN CHARACTERISTICS ROAD DRAINAGE WILL BE DESIGNED AND MAINTAINED TO PREVENT THE INFLUX OF ROAD SEDIMENT RUNOFF INTO STREAMCOURSES

ROADS CURRENTLY LOCATED IN RIPARIAN AREAS OR STREAMSIDE MANAGEMENT UNITS WILL BE MANAGED TO MINIMIZE IMPACTS TO WATER QUALITY AND WILDLIFE HABITAT. IN SOME INSTANCES THIS WILL REQUIRE HIGHER LEVELS OF MAINTENANCE, ROAD SURFACING, OR DRAINAGE THAN WOULD NORMALLY BE JUSTIFIED ON THE BASIS OF ROAD USE ALONE. ROADS WILL BE CLOSED, OBLITERATED, AND REHABILITATED WHEN IT IS DETERMINED,

THROUGH ENVIRONMENTAL ANALYSES CONSIDERING ALL RESOURCES, TO BE THE BEST ALTERNATIVE

SKID ROADS WILL BE LOCATED TO AVOID PARALLELING STREAM CHANNELS IN STREAMSIDE MANAGEMENT UNITS. LOG LANDINGS WILL NOT BE PLACED IN RIPARIAN AREAS. SKIDDING LOGS DOWN STREAMCOURSES OR EPHEMERAL DRAWS WILL NOT OCCUR.

THE USE OF HEAVY EQUIPMENT (SUCH AS CRAWLER TRACTORS AND SKIDDERS) WITHIN RIPARIAN ECOSYSTEMS WILL BE AVOIDED TO THE EXTENT PRACTICAL. WHEN SUCH USE IS UNAVOIDABLE (AS IN THE CONSTRUCTION OF BRIDGES OR OTHER STREAMSIDE CROSSINGS OR DURING THE CONSTRUCTION OF STREAM CHANNEL IMPROVEMENTS), THE ACTIVITY WILL INCLUDE MITIGATION MEASURES DESIGNED TO MINIMIZE ADVERSE EFFECTS ON THE RIPARIAN ZONE AND DOWN STREAM VALUES.

RECREATION ACTIVITIES WILL BE MANAGED TO PREVENT SITE DETERIORATION WITHIN RIPARIAN AREAS. TRAILS WILL BE DESIGNED AND MAINTAINED TO MINIMIZE IMPACTS ON RIPARIAN COMMUNITIES

SLASH CREATED AS A RESULT OF ACTIVITY WITHIN THE NORMAL HIGH WATER ZONE OF CLASS I, II, [AND III] STREAMS WILL BE REMOVED UNLESS NEEDED FOR SOIL PROTECTION OR OTHER PURPOSES. [IN THESE CASES, THE AVERAGE DEPTH WILL BE NO GREATER THAN 1.5 FEET SO AS NOT TO IMPEDE WILDLIFE MOVEMENT ] SLASH REMOVAL FROM OTHER STREAMS MAY BE REQUIRED WHERE RESOURCE DAMAGE WOULD OTHERWISE RESULT SLASH PILES NORMALLY WILL NOT BE LOCATED WITHIN RIPARIAN AREAS SEWAGE EFFLUENT FROM CAMPGROUNDS, ADMINISTRATIVE SITES, AND OTHER DEVELOPED AREAS WILL BE DISPOSED OF IN A MANNER WHICH WILL PREVENT THE CONTAMINATION OF SURFACE OR SUBSURFACE WATER. [POINT SOURCE POLLUTION OF SEWAGE AND OTHER WASTE DISCHARGED INTO STREAMS AND WATERS WILL BE TREATED WHEN IDENTIFIED ] (ALSO, SEE WILDLIFE STANDARDS AND GUIDELINES)

WATER RIGHTS FILING FOR NONRESERVED WATER USES WILL BE ACCOMPLISHED IN ACCORD WITH STATE LAW AND FSM 2500

**FOREST SERVICE RESPONSE**

Many of the suggested changes/additions have been made in the text. Changes referring to Class III fish-bearing streams have not been made since, by definition, Class III streams do not have significant fish populations. Additional direction concerning point source pollution was not added since it is covered in the preceding sentence.

**COMMENT NO. 46:** MUNICIPAL WATERSHED SHOULD BE MADE PART OF A SEPARATE MANAGEMENT STRATEGY WITH THE GOAL OF MAINTAINING OR ATTAINING PRISTINE WATER QUALITY. OTHER USES, INCLUDING TIMBER HARVEST, WOULD BE PERMITTED ONLY WHERE NO CHANCE OF WATER QUALITY DEGRADATION EXISTS. GRAZING AND PESTICIDE USE WOULD NOT BE ALLOWED

**FOREST SERVICE RESPONSE**

The goal for municipal watersheds has been reworded. We believe that the special standards and guidelines applicable to municipal watersheds are as protective of water quality as a separate management strategy would be. Activities within the watersheds will be designed to prevent water quality degradation. Requiring "no chance" of degradation, however, would effectively prohibit all activities within the watersheds. Pesticide use is expected to occur only

rarely -- in instances where the water quality risks from not using them are high. Grazing use, except for recreational livestock, is prohibited within the Baker, La Grande, and Sumpter watersheds.

**COMMENT NO. 47:** ABOVE ALL, PLEASE CONSIDER LEAVING THE WATERSHEDS ALONE! WE ASK YOU TO PROHIBIT LOGGING, ROAD BUILDING, PESTICIDE USE, PACK ANIMALS, MOTOR VEHICLES, AND CONTROLLED BURNS WITHIN THE WATERSHED AND ALLOW EXISTING ROADS TO REVERT BACK TO NATURE PLEASE PROTECT OUR SOURCE OF WATER BEFORE ITS TOO LATE.

**FOREST SERVICE RESPONSE:**

Many shared this viewpoint

**COMMENT NO. 48.** THE CURRENT PLANS ARE TO LOG ALL LODGEPOLE IN DESIGNATED AREAS OF THE WATERSHED, DEAD OR GROWING. THAT IS AN EXPENSIVE TAX-PAYERS' SUBSIDY OF THE TIMBER INDUSTRY, TO SAY NOTHING OF THE HAZARD TO THE WATER QUALITY OF THE BEAVER CREEK WATER SUPPLY SYSTEM.

**FOREST SERVICE RESPONSE:**

The decision to salvage lodgepole pine within the watershed has been withdrawn pending further analysis

**COMMENT NO. 49** THREE BASIC WATERSHED MANAGEMENT CONCERNS SHOULD BE MORE SPECIFICALLY ADDRESSED IN THE DEIS: (1) SURFACE WATER DISCHARGE, (2) GROUND WATER RECHARGE, AND (3) WATER QUALITY PROTECTION. VEGETATION MANAGEMENT PRACTICES, ROAD DEVELOPMENT AND USE, AND LAND-USE PRACTICES IN GENERAL ON THE WALLOWA-WHITMAN NATIONAL FOREST PROFOUNDLY AFFECT THESE BASIC WATERSHED MANAGEMENT CONCERNS

**FOREST SERVICE RESPONSE:**

Additional, more specific, direction on protection of water quality has been added to the Plan Standards and guidelines require protection of both subsurface and surface water

**COMMENT NO. 50.** THE CONFEDERATED TRIBES BELIEVE IT IS INCUMBENT UPON THE WALLOWA-WHITMAN NATIONAL FOREST TO DEVELOP AND IMPLEMENT A FOREST PLAN WHICH INTENTIONALLY AND DIRECTLY ADDRESSES GOALS TO MAINTAIN AND IMPROVE WATER QUALITY, TO PROMOTE UNIFORM SEASONAL STREAMFLOW REGIMES, TO INCREASE WATER INFILTRATION, AND TO PRODUCE GOOD QUALITY WATER IN SUFFICIENT QUANTITIES TO MEET REASONABLE WATER NEEDS FOR MULTIPLE BENEFICIAL USES IN THE TRI-COUNTY AREA.

**FOREST SERVICE RESPONSE:**

We believe the Plan addresses these goals.

**COMMENT NO. 51.** PAGE III-11, LAST PARAGRAPH - THE DISCUSSION CONCERNING THE IMPACTS OF TIMBER MANAGEMENT ON STREAMFLOWS AND WATER QUALITY SHOULD

EXPLAIN THAT PROPER TIMBER MANAGEMENT TECHNIQUES CAN SUBSTANTIALLY PROTECT EXISTING STREAMFLOWS AND WATER QUALITY.

**FOREST SERVICE RESPONSE.**

This statement has been added

**COMMENT NO. 52:** RECOMMENDATION WATERSHEDS -- 30% OF 1ST ORDER STREAMS REMAIN BUFFERED - 200 YDS EACH SIDE

**FOREST SERVICE RESPONSE**

Almost all first order streams are ephemeral draws which only flow a few weeks each year--we are not aware of any benefit of complete protection (buffer) in this situation. Much protection is provided by not allowing log skid trails or roads to run down the draw bottoms.

**COMMENT NO. 53:** THE PLAN DOES NOT ADEQUATELY ADDRESS OREGON'S CLEAN AIR IMPLEMENTATION PLAN NOR ITS WATER QUALITY MANAGEMENT PLANS. BOTH STATE PLANS ARE EPA APPROVED AND ARE BASED ON THE FEDERAL CLEAN AIR AND WATER ACTS.

**FOREST SERVICE RESPONSE:**

Discussion of both subjects has been added to the Final Plan

**COMMENT NO. 54:** ALL THE ALTERNATIVES SUGGEST THAT THE QUANTITY OF WATER ORIGINATING ON FOREST LANDS WILL BE MAINTAINED OR IMPROVED, THEREFORE, WE HAVE NO PREFERENCE FOR THE FOREST PLAN FINALLY SELECTED

**FOREST SERVICE RESPONSE:**

Thank you for your comment.

**COMMENT NO. 55:** THE SECTION ON WATER SHOULD REFER TO THE STATE'S WATER POLICY FOR THE BASINS INVOLVED (BASIN PROGRAMS ENCLOSED). WE SUGGEST THE REPORT IDENTIFY POTENTIAL RESERVOIR SITES AND OTHER FACTORS THAT COULD PROVIDE ADDITIONAL WATER SUPPLIES ORIGINATING FROM FOREST LANDS

**FOREST SERVICE RESPONSE:**

Reference to these plans has been added. There are numerous potential reservoir sites on the Forest which could provide additional water supplies. Since construction of reservoirs is an activity normally conducted by agencies other than the Forest Service, we do not maintain a list of suitable sites.

**COMMENT NO. 56:** THIS NEW PLAN MUST RECOGNIZE WATERSHED AND WATER QUALITY WITH AS MUCH EMPHASIS AS THE UMATILLA NATIONAL FOREST THAT HAS OVER FIVE WATER MANAGEMENT ALLOCATIONS

**FOREST SERVICE RESPONSE**

We don't think that the number of allocations has any significance in determining the level of emphasis given to water management. The standards and guidelines applicable to all management areas require protection of water quality

**COMMENT NO. 57:** AN OBVIOUS DEFICIENCY IN THE PLAN IS THE NEGLECT IN THE "ISSUE, CONCERNS, AND OPPORTUNITIES" SECTION OF THE DRAFT ENVIRONMENTAL IMPACT STATEMENT (CHAPTER I) OF IMPACTS OF ALTERNATIVE MANAGEMENT STRATEGIES ON WATER QUALITY. IN APPENDIX A (P. A-10), THE PLANNING TEAM DEEMS IT UNNECESSARY TO RETAIN WATER QUALITY AS AN ISSUE WHICH VARIES ACROSS ALTERNATIVES WATER QUALITY WAS DELETED AS AN ISSUE IN ITSELF WITH THE ASSERTION THAT MINIMAL REQUIREMENTS OF THE NATIONAL FOREST MANAGEMENT ACT FOR PROTECTION OF WATER QUALITY CAN BE MET BY ADDRESSING THE WATER QUALITY ISSUE IN TERMS OF OTHER CONCERNS, SPECIFICALLY TRANSPORTATION, TIMBER HARVEST, AND LIVESTOCK

**FOREST SERVICE RESPONSE.**

Fish habitat/water quality has been added as an issue in the FEIS

**COMMENT NO. 58** IN IMPLEMENTING THE PROPOSED ALTERNATIVE, MONITORING THE EFFECTS OF MANAGEMENT ACTIVITIES ON GENERAL WATERSHED CONDITIONS AS WELL AS THE QUALITY AND QUANTITY OF FISH AND WILDLIFE HABITAT IS ESSENTIAL CONGRESS HAS DIRECTED FOREST PLANNERS TO MONITOR FISH AND WILDLIFE HABITAT AND WATERSHED CONDITIONS IN A MANNER WHICH INSURES PROPER PROTECTION (SENATE AGRICULTURE COMMITTEE REPORT NO. 893, 1976, P 39). THIS REQUIRES THAT UNACCEPTABLE IMPACTS BE CLEARLY DEFINED AND THAT MONITORING PROGRAMS BE ESTABLISHED WHICH ALLOW PLANNERS TO RECOGNIZE UNACCEPTABLE IMPACTS EARLY ENOUGH TO PREVENT DEGRADATION.

**FOREST SERVICE RESPONSE**

Monitoring of fish and wildlife habitat is a part of the Forest Monitoring Plan (Plan, Chapter 5) We feel that unacceptable impacts are clearly defined through water quality standards, and Forest Plan standards and guidelines.

**COMMENT NO. 59:** I AM VERY CONCERNED THAT THE FUNDING ALLOCATED FOR MONITORING WATERSHED CONDITIONS AND FISH AND WILDLIFE HABITAT IS INSUFFICIENT. FOR EXAMPLE, IN THE "MONITORING PLAN" (TABLE 5-1), EXPENDITURES TO MONITOR IMPACTS ON ELK WINTER RANGE ARE A MERE \$200 ANNUALLY FOR THE ENTIRE WINTER HABITAT ON THE FOREST! MONITORING OF WATERSHED CONDITIONS IS ANTICIPATED TO REQUIRE JUST \$12,400 ANNUALLY WITH APPROXIMATELY 2/3 OF THESE EXPENDITURES EARMARKED FOR ENSURING HIGH QUALITY IN MUNICIPAL WATERSHED. IT IS LUDICROUS TO SUGGEST THAT THESE NOMINAL AMOUNTS WILL BE SUFFICIENT TO GUARANTEE MONITORING ON A FOREST THE SIZE OF THE WALLOWA-WHITMAN

**FOREST SERVICE RESPONSE**

The Final Forest Plan includes a substantially revised monitoring plan, with updated estimates of monitoring costs.

**COMMENT NO. 60:** SPECIFIC INFORMATION SHOULD BE INCLUDED ON WHERE FISH AND WILDLIFE MONITORING STATIONS WILL BE LOCATED, WHAT SPECIFIC DATA ARE NECESSARY, AND HOW THEY WILL BE GATHERED. A DETAILED ANALYSIS OF THE FREQUENCY REQUIRED FOR MONITORING SPECIFIC IMPACTS SHOULD BE PRESENTED FOR PUBLIC SCRUTINY THE FREQUENCY OF MONITORING ACTIVITIES MUST BE SUFFICIENT TO PROVIDE INFORMATION IN A TIMELY MANNER SO THAT ACTIVITIES WHICH RESULT IN UNACCEPTABLE IMPACTS CAN BE DISCONTINUED BEFORE IRREVERSIBLE DAMAGE TO THE RESOURCE OCCURS TABLE 5-1 DOES NOT BEGIN TO ADEQUATELY ADDRESS THE MONITORING ISSUE.

**FOREST SERVICE RESPONSE:**

The monitoring plan displayed in the Forest Plan is not intended to provide this level of detail. It is intended to guide monitoring activities over the life of the Plan. Detailed monitoring plans, tiered to the Forest Plan, will be needed.

**COMMENT NO. 61** MUCH OF THIS SECTION [WATERSHED STANDARDS AND GUIDELINES] PRESENTS GENERAL GUIDELINES, MORE IN THE WAY OF MEASURABLE STANDARDS ARE NEEDED. SEVERAL SPECIFIC INSTANCES ARE HIGHLIGHTED BELOW

- HOW ARE TREE STANDS WITHIN SMZ's TO BE MANAGED TO MAINTAIN THE VEGETATIVE CHARACTERISTICS NEEDED FOR WATER QUALITY PROTECTION AND TO MAINTAIN OR ENHANCE STREAM CHANNEL STABILITY?
- WHAT AMOUNT OF LARGE WOODY DEBRIS IS NECESSARY TO PROTECT STREAM CHANNEL STABILITY, ENHANCE WATER QUALITY, AND PROVIDE STRUCTURAL FISH HABITAT (WITHOUT ANSWERING THIS, AN ADEQUATE NUMBER OF TREES TO PROVIDE A FUTURE SUPPLY CAN NOT BE ASSURED.
- WHAT DOES "LESS THAN FULL YIELD" MEAN REGARDING TIMBER HARVEST IN SMZ's; AND WHAT ASSURES THAT THIS LEVEL ADEQUATELY PROTECTS "OTHER RIPARIAN OBJECTIVES?"

**FOREST SERVICE RESPONSE**

It is very difficult to provide measurable standards and guidelines which fit every situation. Such things as treatment of tree stands or managing large woody debris to protect stream channel stability must be adjusted to fit site-specific stream situations such as natural stability, stream size, and downstream values. The standards and guidelines were written to retain this flexibility.

A reduction in timber yield of about 30% was assumed from riparian areas. During actual implementation, a greater or lesser reduction may be necessary in order to protect riparian values.

**COMMENT NO. 62:** CAPABILITY TO MEET LAND MANAGEMENT OBJECTIVE 'C' (PAGE 4-42) WOULD SEEM TO REQUIRE SUPPORTING STANDARDS AND GUIDELINES IN OTHER SECTIONS FOR THE SPECIAL CONDITIONS LISTED. IN ADDITION, A DEFINITION OF CRITICAL SOIL CONDITIONS IS NEEDED.

**FOREST SERVICE RESPONSE.**

Standards and Guidelines for streamside protection, wildlife needs, visual enhancement, and other resources are found throughout Chapter 4 of the Forest Plan. Critical soil conditions generally refer to slope instability or high soil erosion hazard.

**COMMENT NO. 63:** WATERSHEDS AND WATER QUALITY DESERVE IMPROVED PROTECTION. BENEFICIAL USES SUCH AS DOMESTIC WATER SUPPLIES, FISHERIES, AND HIGH QUALITY RECREATION DEPEND ON CLEAN WATER. THE FINAL PLAN SHOULD INCLUDE STREAM-BY-STREAM WATER QUALITY GOALS, A LISTING OF CRITICAL STREAMS WITH PLANS FOR NON-DEGRADATION.

**FOREST SERVICE RESPONSE:**

State water quality standards identify levels of protection for individual drainage basins. These water quality standards are incorporated, by reference, into the Forest Plan Standards and Guidelines. Although not listed by stream, Forest Service policy is nondegradation on all Class I streams as described in Chapter III of the EIS.

**COMMENT NO. 64:** IT IS IMPORTANT TO INSURE THAT THE PROPOSED ACTIVITIES OF TIMBER HARVEST, ROAD CONSTRUCTION, CHEMICAL HANDLING AND USAGE, SEWAGE DISPOSAL, LIVESTOCK GRAZING, AND OTHER FOREST LAND ACTIVITIES COMPLY WITH OREGON'S WATER QUALITY STANDARDS AND GUIDELINES. THE DRAFT EIS DOES NOT INCLUDE ADEQUATE TECHNICAL INFORMATION TO ALLOW WATER QUALITY IMPACTS OF THE PLAN TO BE ASSESSED. FINDINGS NEED TO BE MADE REGARDING: 1) THE CONSISTENCY OF THE PLAN WITH THE PROVISIONS OF THE CLEAN WATER ACT; 2) THE RELATIONSHIP BETWEEN BASELINE WATER QUALITY CONDITIONS AND THE EFFECTS OF PLANNED FOREST ACTIVITIES; 3) WATER QUALITY MONITORING PLANS; AND 4) THE DIFFERENT WATER QUALITY IMPACTS OF THE ALTERNATIVES

**FOREST SERVICE RESPONSE**

We believe we have met the requirements of the Clear Water Act

The EIS includes estimates of the relative differences among the alternatives with regard to sediment production. At the Forest Plan level, and even at the project level, it is extremely difficult to foresee whether or not an action will actually meet a specific water quality standard. The ability to meet water quality standards is much more dependent on how well an activity is conducted than how much of the activity occurs. That is why we show sediment production as an index value (actually an index of risk) and rely heavily on application of best management practices to actually protect water quality. The Forest Plan Monitoring Plan discusses the types of watershed monitoring which will occur.

**COMMENT NO. 65:** THE PLAN VIRTUALLY IGNORES THE GROUND WATER COMPONENT OF THE HYDROLOGICAL CYCLE. ALTHOUGH GROUND WATER PROBABLY WILL BE MINIMALLY AFFECTED BY FOREST MANAGEMENT ACTIVITIES, THE PLAN SHOULD RECOGNIZE THE IMPORTANCE OF GROUND WATER QUALITY PROTECTION AND DISCUSS THE FOLLOWING POINTS.

- A) ACTIVITIES THAT AFFECT GROUND WATER QUALITY WILL EVENTUALLY AFFECT SURFACE WATER QUALITY. CONVERSELY, CHANGE IN SURFACE WATER QUALITY MIGHT REFLECT IN GROUND WATER QUALITY



- B) LAKES WITH UNIQUE PRISTINE WATER QUALITY MAY NEED SPECIAL GROUND WATER PROTECTION REQUIREMENTS TO PREVENT NUTRIENT ENRICHMENT. PARTICULARLY WITH REGARD TO SEWAGE DISPOSAL PRACTICES ASSOCIATED WITH INTENSIVE RECREATIONAL USE.
- C) ALL SEWAGE DISPOSAL PRACTICES SHOULD BE IN COMPLIANCE WITH STATE REQUIREMENTS. PLEASE STATE THOSE REQUIREMENTS BY REFERENCE IN THE PLAN.
- D) GROUND WATER PROTECTION PLANNING SHOULD BE INCLUDED IN ALL CHEMICAL HANDLING PRACTICES IN THE FOREST. THIS WOULD INCLUDE HERBICIDES, PESTICIDES, FERTILIZERS, AND DEGREASING SOLVENTS AT MAINTENANCE SHOPS
- E) ACTIVITIES AND PROCEDURES THAT MINIMIZE EROSION, AND SURFACE WATER RUNOFF ALSO WILL INCREASE INFILTRATION ALLOWING FOR STABLE YEAR ROUND STREAM FLOWS.

**FOREST SERVICE RESPONSE**

Additional standards and guidelines dealing with groundwater have been added to the Forest Plan.

**COMMENT NO. 66** ON THE WWNF, 95% OF THE TOTAL WATER YIELD FROM THE FOREST IS USED IN IRRIGATION, MUNICIPAL, DOMESTIC, AND INDUSTRIAL USES (DEIS III-1) THIS IMPLIES THAT STREAM TEMPERATURE AND CHEMISTRY PROBLEMS ARE APT TO BE VERY SEVERE. GIVEN THE ALREADY CRITICAL NATURE OF THESE HABITAT CONCERNS, HOW CAN THE WWNF CONDONE PROLONGING STREAM REHABILITATION BY NATURAL MEANS AS OPPOSED TO STOP GAP PHYSICAL MEASURES (E G , GABIONS) WHICH RELY ON OUTSIDE FUNDING? KEY AMONG THESE MEASURES WOULD BE REDUCED GRAZING PRESSURE IN RIPARIAN ZONES TO HELP STABILIZE CHANNELS, BANKS, AND RESTORE TRAMPLED AND GRAZED VEGETATION. IN ADDITION, ALL RIPARIAN ZONES OF ALL STREAM CLASSES SHOULD BE ELIMINATED FROM THE TIMBER BASE

**FOREST SERVICE RESPONSE**

Although water rights total a high percentage of total streamflow, timing of flows is such that much water is not available when it is needed. Consequently, in a typical water year, there is much surplus water in April and May and a water shortage in June-August.

Stream temperature protection is a concern -- the Forest Plan has provisions for not raising present temperatures on streams emerging from National Forest land by more than what is allowed by State water quality standards. The Forest Plan further has provisions requiring livestock grazing and timber management to provide for increases in streamside shade vegetation to reduce existing water temperature problems.

We recognize that permitting natural recovery of riparian areas is often the most efficient method. In some instances, recovery can be accelerated by structural stream channel improvements. In many instances, recovery will also require removal of livestock

We believe that timber harvest can occur in riparian areas, at a reduced level, while still protecting the riparian values

**COMMENT NO. 67** I AM CONCERNED THAT BEST MANAGEMENT PRACTICES ARE THE MEANS GIVEN TO ENSURE WATER QUALITY. FIRST THE PRACTICES MUST BE IMPLEMENTED AND SECOND MOST REQUIRE MAINTENANCE IN ORDER TO FUNCTION. THE PAST RECORD OF ROAD MAINTENANCE HAS NOT BEEN GOOD AND WITH SHRINKING BUDGETS AND INCREASED MILES OF ROAD...??? I WONDER IF TIMBER MARKING WILL BE CURTAILED SHIFTING THE \$ TO ROAD MAINTENANCE?

**FOREST SERVICE RESPONSE:**

We agree that applying best management practices is complex and can be expensive. It is particularly difficult where roads are currently poorly located or designed. The expense of maintaining an expanding road system will be somewhat offset by a reduction in the miles of road open to use.

**COMMENT NO. 68.** IT IS ESSENTIAL TO PROPER MANAGEMENT OF THE FOREST'S WATER RESOURCES THAT THE WALLOWA-WHITMAN DEVELOP A SYSTEM OF DRAINAGE BY DRAINAGE WATER QUALITY STANDARDS THAT WILL INCLUDE A PROPER ASSESSMENT AND EFFECTIVE MITIGATION PROGRAM FOR THE IMPACTS THAT WILL RESULT FROM THE ROADING AND CUTTING THAT IS TO BE CONDUCTED IN ANY GIVEN DRAINAGE.

**FOREST SERVICE RESPONSE.**

State water quality standards were developed basin-by-basin, based on the beneficial uses made of the water. These standards have been incorporated into all alternatives. We currently have no basis to use different standards.

**COMMENT NO. 69:** THE EFFECTS OF VARIOUS COMMODITY MANAGEMENT ACTIVITIES ON BOTH IN-STREAM WATER QUALITY AND ON-GROUND WATER SUPPLIES FOR LOCAL COMMUNITIES IS NOT ADEQUATELY EVALUATED. THIS IS ESPECIALLY TRUE FOR GRAZING, ROAD CONSTRUCTION, TIMBER HARVEST, AND MINING, BOTH COMMERCIAL AND RECREATIONAL.

**FOREST SERVICE RESPONSE.**

Chapter IV of the EIS discusses the probable effects and risks to water quality resulting from management activities. Where possible, the effects are quantified, but in some instances the effects or risks are described in a more general way. It is extremely difficult to accurately predict the effects of Forest management activities on water quality. In assessing grazing, road construction, timber harvest, and mining, the quality of the design and implementation of the project or activity are much more important than the size of the project or the amount of the activity. A small, poorly designed or implemented timber sale may severely affect water quality while a large, well designed and implemented sale may not affect water quality at all. For this reason, the Plan emphasizes the importance of employing best management practices as a means of protecting water quality.

**COMMENT NO. 70.** WATER PRODUCTION ANALYSIS FOR THE VARIOUS ALTERNATIVES NEEDS TO BE SPECIFIC AS TO SEASON. IT IS CRUCIAL TO UNDERSTAND THIS VARIABLE, IN THAT HIGH WATER PRODUCTION IN THE SPRING MAY CONTRIBUTE TO FLOODING DOWNSTREAM, WHILE THE SAME QUANTITY PRODUCED MORE EVENLY OVER THE YEAR WILL BE A BENEFIT FOR WILDLIFE AND FOR LOCAL COMMUNITIES. THIS DATA IS ALSO ESSENTIAL TO UNDERSTANDING THE IMPACTS OF THE ARRAY OF ALTERNATIVES.

**FOREST SERVICE RESPONSE:**

We feel that the best place to perform the peakflow and lowflow parts of water production analysis is in conjunction with individual project design. Only at this stage are we able to adjust cutting unit locations to meet flow objectives. All of the Forest Plan alternatives would result in meeting the objectives. Direction in the Watershed Standards and Guidelines section gives preferential consideration (complete satisfaction before any other consideration) to insuring that peakflow and other streamflow changes are not significantly detrimental.

**COMMENT NO. 71: PERIODIC TESTING OF DRINKING WATER MADE AVAILABLE TO THE VISITING PUBLIC AND STAFF SHOULD BE INCLUDED IN THE MONITORING PLANS.**

**FOREST SERVICE RESPONSE:**

This type of monitoring currently occurs and will continue in the future. The Forest Monitoring Plan is intended to monitor only those factors tied to implementation of the Forest Plan. Drinking water testing is not one of these factors.

**COMMENT NO. 72. PAGE 4-40, STANDARDS AND GUIDELINES - THE CRITERIA TO BE UTILIZED TO DETERMINE THE PRACTICALITY OF " THE MANAGEMENT OBJECTIVES FOR STREAM SHADING, STREAMBANK STABILITY,...FOR FISH AND WILDLIFE ." SHOULD BE IDENTIFIED**

**FOREST SERVICE RESPONSE.**

Criteria have been added.

**COMMENT NO. 73: TECHNICAL PROBLEMS ARISING IN THE ESTIMATION OF SEDIMENT YIELDS UNDER THE VARIOUS ALTERNATIVES ARE CLOSELY RELATED TO THE DEFICIENCIES IDENTIFIED IN MY FIRST TWO COMMENTS. THE ANALYSIS OF THE EFFECTS OF TIMBER MANAGEMENT ON SOIL AND WATER AND ON STREAM FLOWS IS SUBSUMED IN THE CHAPTER IV OF THE DRAFT ENVIRONMENTAL IMPACT STATEMENT UNDER DISCUSSION OF "TIMBER HARVEST METHODS" (P. IV-32, 333), "LIVESTOCK GRAZING" (P. IV-22,23) AND "TRANSPORTATION (P.IV-48). BY DELETING WATER QUALITY IMPACTS AS AN ISSUE OF SPECIAL INTEREST THE PLANNING TEAM FAILS TO ADEQUATELY ADDRESS THE ISSUES.**

**FOREST SERVICE RESPONSE:**

Additional discussion on the effects of the alternatives on water and water quality has been placed in the FEIS.

**COMMENT NO. 74: THE DRAFT ENVIRONMENTAL IMPACT STATEMENT ACKNOWLEDGES THAT LIVESTOCK GRAZING, TIMBER HARVEST AND THE TRANSPORTATION SYSTEM IMPACT THE WATERSHED.**

LIVESTOCK GRAZING HAS CONTRIBUTED LOCALLY TO STREAMBANK INSTABILITY, CHANNEL CUTTING, SEDIMENTATION OF FISH SPAWNING GRAVELS AND REDUCTION OF DECIDUOUS STREAM SHADE (P IV-23). WATER RUNNING FROM ROADS OFTEN CARRIES SILT INTO STREAM-COURSES, ESPECIALLY AT STREAM CROSSINGS OR WHERE ROADS PARALLEL STREAMS FOR LONG DISTANCES. SECONDARY EFFECTS ARE DAMAGE TO FISH SPAWNING GRAVELS (P.IV-48)

ALTHOUGH STANDARDS AND GUIDELINES WILL BE FOLLOWED, SOME SOIL LOSS WILL OCCUR AND WILL AFFECT STREAMS WHEN TIMBER IS HARVESTED. THIS SEDIMENTATION WILL BE DETRIMENTAL TO WATER QUALITY AND FISH HABITAT (P IV-32) HOWEVER, EXCEPT FOR TIMBER HARVEST THERE ARE NO DETAILED ANALYSES OF THE IMPACTS ON WATER QUALITY OF MANAGEMENT ACTIVITIES ASSOCIATED WITH EACH ALTERNATIVE MADE AVAILABLE IN THE PLANNING DOCUMENTS.

#### **FOREST SERVICE RESPONSE**

There are three major management-related sources of sediment on the Wallowa-Whitman -- timber harvesting, roads, and livestock grazing. Projections of sediment production from roads, and timber harvesting were made as described in Appendix F to the Draft Environmental Impact Statement. Effects of livestock grazing were discussed narratively since no models, capable of dealing with the scope and variability of grazing on the Forest, are known to exist.

**COMMENT NO. 75:** APPENDIX F (P.F-2), FOR EXAMPLE, NOTES THAT ESTIMATES OF SEDIMENT PRODUCED BY ROADS BUILT FOR TIMBER HARVEST WERE OBTAINED USING A PROCEDURE DEVELOPED FOR AREAS IN CENTRAL COLORADO. HOWEVER, THE AUTHOR, C. LEAF ("A MODEL FOR PREDICTING EROSION AND SEDIMENT YIELD FROM SECONDARY FOREST ROAD CONSTRUCTION," FOREST SERVICE RESEARCH NOTE RM-274, U.S. DEPARTMENT OF AGRICULTURE, ROCKY MOUNTAIN FOREST AND RANGE EXPERIMENT STATION, DECEMBER 1974, P 1) CHARACTERIZES HIS MODEL AS "PRELIMINARY" AND SUGGESTS THAT "BETTER TOOLS ARE NEEDED TO QUANTIFY THE EFFECTS OF SOIL DISTURBANCES ON EROSION ONSITE AND DOWNSTREAM SEDIMENT YIELD." IN THE PLAN, ESTIMATES OF SEDIMENT RESULTING FROM ROADING ACTIVITIES OBTAINED USING THIS QUESTIONABLE METHODOLOGY DEVELOPED FOR A COMPLETELY DIFFERENT REGION ARE, AS INDICATED IN APPENDIX F (P F-2), "INCLUDED, ALONG WITH NONROAD SEDIMENT PRODUCTION, IN THE FORPLAN MODEL AS A SCHEDULED OUTPUT." THE READER IS ASSURED THAT A RECORD OF THIS ANALYSIS IS ON FILE AT NATIONAL FOREST HEADQUARTERS.

#### **FOREST SERVICE RESPONSE:**

We agree that better models for estimating sediment production (and many other outputs) are desirable. There are several models currently available, although none have been developed or validated locally. It is unlikely that reliable means of predicting sediment production will be available in the foreseeable future, given the complexity of the problem. We feel that the estimates we have developed are adequate for their intended use in comparing the alternatives.

**COMMENT NO. 76:** THERE ARE A NUMBER OF DIFFICULTIES WITH THE PLAN'S SEDIMENT PRODUCTION MODELING. AS INDICATED IN APPENDIX F (P F-1), ON-SITE EROSION IS ESTIMATED USING A TECHNIQUE DEVELOPED BY D. ANDERSON ("GUIDELINE FOR COMPUTING QUANTIFIED SOIL EROSION HAZARD AND ON-SITE SOIL EROSION," U.S. DEPARTMENT OF AGRICULTURE, FOREST SERVICE, SOUTHWESTERN REGION, 1969). ANDERSON DEVELOPED HIS PROCEDURE SPECIFICALLY FOR ARIZONA AND NEW MEXICO.

**FOREST SERVICE RESPONSE:**

See Response to Comment No. 75.

**COMMENT NO. 77.** THE USE OF PERCENT OF NATURAL SEDIMENT RATHER THAN ACTUAL SEDIMENT PRODUCTION TO CHARACTERIZE WATER QUALITY IMPACTS IS SUBTERFUGE, I E , DISINFORMATION WHICH SERVES TO OBFUSCATE RATHER THAN INFORM THE PUBLIC IN ECONOMETRIC THEORY THIS TECHNIQUE IS CLOSELY RELATED TO THE NOTION OF 'SPURIOUS' REGRESSION.

**FOREST SERVICE RESPONSE:**

Thank you for your opinion. Percentages were used rather than actual values so that readers would not infer more precision in the estimates than actually exists.

**COMMENT NO. 78** SEDIMENT YIELD ESTIMATES ARE PRESENTED IN TABLE II-3A IT IS NOT CLEAR THAT THESE ESTIMATES INCLUDE THE EFFECTS OF BOTH TIMBER HARVEST ACTIVITIES AND ROADS. (ARE TEMPORARY ROADS ALSO INCLUDED?) WE SUGGEST THE INTERMEDIATE STEPS BETWEEN APPENDIX F AND TABLE II-3A BE PROVIDED TO CLARIFY THE ASSUMPTIONS USED

THE DISCUSSIONS OF SEDIMENT YIELDS AND IMPACTS SHOULD BE EXPANDED IN THE FINAL EIS. INFORMATION SUMMARIZING THE EXTENT AND LOCATION OF HIGH HAZARD LANDS (RELATIVE TO EROSION AND MASS WASTING POTENTIAL) SHOULD BE PRESENTED, AND PERHAPS MAPPED (YOU MAY WISH TO REFER TO THE MAPS OF EROSION POTENTIAL RECENTLY PUBLISHED BY THE BUREAU OF LAND MANAGEMENT AS PART OF THEIR DRAFT BAKER AREA RESOURCE MANAGEMENT PLAN/EIS. THESE COVER W-WNF LANDS, AS WELL )

**FOREST SERVICE RESPONSE:**

The sediment yields displayed include estimates of sediment production both from road building and timber harvest activities. Information on the assumptions used is found in footnotes to Table F-1

The Forest maintains an inventory of soils on the Forest (Soil Resource Inventory) which includes information on erosion hazard and mass wasting potential. This inventory is available for public review at the National Forest Headquarters

**COMMENT NO. 79** THE FINAL EIS SHOULD SUMMARIZE THE KNOWLEDGE REGARDING SEDIMENTATION AND FISHERY IMPACTS, AND DESCRIBE ANY MITIGATING FACTORS THAT MAY EXIST ON THE W-WNF FOR EXAMPLE, APPROXIMATELY 20 PERCENT FINES BY DEPTH APPEARS TO BE A THRESHOLD ABOVE WHICH SURVIVAL TO EMERGENCE OF EGGS AND ALEVINs DECREASES DRAMATICALLY HOW WOULD THE SEDIMENT YIELD INCREASES PREDICTED IN APPENDIX F RELATE TO INSTREAM SEDIMENTATION ON THE W-WNF

FINALLY, FOREST-WIDE AVERAGES AS GIVEN IN TABLE II-3A ARE USEFUL FOR GENERAL COMPARISON AMONG ALTERNATIVES, HOWEVER, BENEFICIAL USES OF WATER MUST BE PROTECTED WHEREVER THEY OCCUR. HIGH SEDIMENT YIELDS IN ONE BASIN AVERAGED AGAINST NO INCREASES IN ANOTHER DO NOT ESTABLISH THAT BENEFICIAL USES ARE PROTECTED (STATEMENTS ON DEIS PAGE IV-32 REQUIRE REVISION ALONG THESE LINES.)

**FOREST SERVICE RESPONSE:**

Chapter IV of the EIS discusses the effects of management activities on fish, and also the mitigation measures which will be used to reduce adverse effects. The respondent is correct that it is important to assess and mitigate impacts to individual streams or basins. This is the purpose of the site-specific analysis required for all management activities.

**COMMENT NO. 80 INADEQUATE INFORMATION -- THE DRAFT PLAN AND DEIS DOES NOT ADEQUATELY PROVIDE INFORMATION ON EXISTING WATER QUALITY OR WHAT WATER QUALITY IMPACTS WILL OCCUR ONCE THE FOREST PLAN IS IMPLEMENTED. CERTAIN WATERSHEDS AND STREAMS WILL BE IMPACTED MORE THAN OTHERS UNDER THE PROPOSED FOREST PLAN THESE IMPACTS MUST BE DISCUSSED THOROUGHLY.**

**FOREST SERVICE RESPONSE:**

The Forest does not maintain a system of baseline water quality monitoring stations. We feel that, except in specific situations such as a municipal watershed, it is not cost-effective to spend the substantial amount of money required to characterize the quality of water in an individual stream. Although baseline monitoring may provide interesting information, it is not particularly useful in land management since natural variation in water quality often masks any effects of land management. Even if changes due to management activities are detected, baseline monitoring provides little information as to where the watershed problem is. In our experience, it is much more cost-effective to monitor individual projects where implementation of best management practices can be verified, and direct changes in water quality can be observed.

Assessment of water quality for individual basins will occur, as needed, during project-level analysis.

**COMMENT NO. 81: THE DEIS INCLUDES SOME RECOGNITION THAT MONITORING IS AN ACCEPTABLE APPROACH TO DEALING WITH UNCERTAINTY IN FOREST PLANS. IN THE CASE OF WATER QUALITY, FOR EXAMPLE, THE DEIS STATES THAT "STANDARDS AND GUIDELINES HAVE BEEN DEVELOPED WHICH REQUIRE ANALYSIS AND MITIGATION OF PROPOSED ACTIVITIES HAVING THE POTENTIAL TO ADVERSELY AFFECT SEDIMENT LEVELS OR STREAMFLOWS . . . [I]F SUCH ANALYSIS INDICATES SERIOUS ALTERATIONS IN STREAMFLOWS, THE PROJECTS WILL BE ALTERED OR RESCHEDULED ACCORDINGLY" (DEIS IV-33, EMPHASIS ADDED) THE FINAL DEIS SHOULD STRESS THIS IDEA AND THE SCIENTIFIC UNCERTAINTY OF THE FOREST'S MODELING PROJECTIONS THROUGHOUT THE DOCUMENT.**

**FOREST SERVICE RESPONSE**

Additional discussion has been placed in the EIS.

**COMMENT NO. 82: THE DEIS STATES THAT MMR'S PROVIDE "SUFFICIENT PROTECTION OF WATER QUALITY TO ADDRESS THE MAJOR ELEMENT OF THIS ISSUE (THE EFFECTS OF THE TIMBER HARVEST ACTIVITIES ON WATER QUALITY)" (DEIS A-10) AS A RESULT, THE PLANNING TEAM "FELT IT UNNECESSARY TO RETAIN WATER QUALITY AS AN ISSUE WHICH WOULD VARY WITH ALTERNATIVES" (IBID).**

NORTHWEST PINE GENERALLY SUPPORTS THE FOREST'S APPROACH TO THE WATER QUALITY ISSUE. THE SCIENTIFIC LITERATURE IS REPLETE WITH EVIDENCE THAT (1) THE IMPACT OF

TIMBER HARVEST AND ROADING ON WATER QUALITY IS VIRTUALLY IMPOSSIBLE TO PREDICT ACCURATELY WITH STATE-OF-THE-ART KNOWLEDGE; (2) THAT THE IMPACTS OF TIMBER HARVEST ACTIVITIES ARE MINIMAL RELATIVE TO THOSE CREATED BY CATASTROPHIC NATURAL EVENTS, AND (3) THAT MOST OF THE IMPACT DUE TO MANAGEMENT ACTIVITIES CAN BE ADEQUATELY CONTROLLED THROUGH WELL-DESIGNED MITIGATION MEASURES. GIVEN THESE FACTS, THERE IS NO SUPPORTABLE SCIENTIFIC BASIS FOR STRICT TIMBER HARVEST CONSTRAINTS TO PERFECT WATER QUALITY. AGAIN, MONITORING RATHER THAN MANAGEMENT CONSTRAINTS SHOULD BE THE PRIMARY TOOL FOR PROTECTING ENVIRONMENTAL VALUES IN FOREST PLANNING.

**FOREST SERVICE RESPONSE:**

Thank you for your comment

**COMMENT NO. 83:** THE PLAN REFERENCES THE BEST MANAGEMENT PRACTICES CERTIFIED TO PROTECT WATER QUALITY RELATIVE TO TIMBER MANAGEMENT ACTIVITIES. HOWEVER, DO THESE SAME STANDARDS AND GUIDELINES IDENTIFIED IN THE PLAN GOVERN LIVESTOCK GRAZING AND INTEGRATED PEST MANAGEMENT ACTIVITIES? IF NOT, WE RECOMMEND THAT A REFERENCE TO OREGON'S WATER QUALITY STANDARDS ALSO BE PLACED IN THE APPROPRIATE SECTION OF CHAPTER 4 OF THE PLAN DEALING WITH LIVESTOCK AND PEST MANAGEMENT. IN ADDITION, A STATEMENT PERTAINING TO OREGON ADMINISTRATIVE RULES FOR SEWAGE DISPOSAL ON THE FOREST LANDS SHOULD BE ADDED TO THE PRESENT WORDING ON PAGE 4-24 OF THE PLAN.

**FOREST SERVICE RESPONSE:**

Best management practices (BMP's) include those for grazing, pest management, roads, timber, mining, and other resource management activities. General BMP's have been added to the FEIS (Appendix O).

A statement on sewage disposal has been added to the Final Plan

**COMMENT NO. 84:** ADDITIONAL INFORMATION IS NEEDED TO IDENTIFY WHETHER THESE PREDICTIONS INCLUDE SEDIMENT PRODUCTION FROM INCREASED LIVESTOCK GRAZING PROPOSED FOR THE FOREST. WE RECOMMEND THAT THOSE PREDICTIONS BE INCORPORATED INTO TABLE 4-1 SEPARATE FROM THE YIELDS PREDICTED FOR TIMBER MANAGEMENT.

**FOREST SERVICE RESPONSE**

*There are currently no models which are adequate for projecting grazing-related sediment applicable to an area the size of a National Forest.*

**COMMENT NO. 85:** DISCUSSION OF EXISTING WATER QUALITY AND CURRENT TRENDS IS INADEQUATE CONSIDERING THE PUBLIC VALUE PLACED ON THE FOREST FOR VISUAL QUALITY, RECREATION, AND WATER QUALITY. WE SUGGEST THE PLAN AND DEIS PROVIDE THE EXISTING WATER QUALITY AND PROJECTED TRENDS IN A SECTION OF THE APPENDICES TO THE DEIS. WITH THE MAGNITUDE OF THE POTENTIAL IMPACTS THAT THIS PLAN CAN HAVE ON WATER QUALITY, IT IS VITALLY IMPORTANT TO DISPLAY THE BASELINE WATER QUALITY CONDITIONS IN SOME DETAIL PRIOR TO IMPLEMENTATION OF THE PLAN. WE ARE AWARE OF THE EXTENSIVE WATER MONITORING WORK DONE IN THE PAST BY THE FOREST STAFF. RESULTS OF THIS WORK AND THE PROBLEMS IDENTIFIED SHOULD BE DISPLAYED IN THE DEIS.

**FOREST SERVICE RESPONSE:**

See response to Comment No 80

**COMMENT NO. 86** STATEMENTS OF SOME ASPECTS OF WATER QUALITY AND SOIL EROSION PROBLEMS ARE MADE IN THE PLAN AND DEIS. STATEMENTS ARE ALSO MADE SPECIFIC TO A MANAGEMENT STRATEGY SUCH AS THOSE FOR WATER QUALITY IN CHAPTER 4 OF THE DEIS. HOWEVER, SPECIFIC STREAM PROBLEMS NEED TO BE ADDRESSED, INCLUDING MEASURES TO EITHER IMPROVE AN EXISTING PROBLEM OR PREVENT FURTHER DETERIORATION. IN ADDITION THE PROJECT INCREASED SEDIMENT YIELD DISPLAYED IN TABLE 4-1 REQUIRES AN EXPLANATION WITH RESPECT TO WHERE IT WILL OCCUR AND HOW IT WILL BE MITIGATED.

**FOREST SERVICE RESPONSE**

Specific stream problems are addressed at the project level where site-specific analysis can determine what actions are needed

Projections of sediment are made on a Forest-wide basis and are intended to display the comparative risk of the different alternatives. During project design, the goal is to not increase sediment above the levels found in the state water quality standards. Mitigation measures used to meet these goals include the standards and guidelines found in Chapter 4 of the Plan. (Also see BMP discussion in Appendix O.)

**COMMENT NO. 87:** THE PROPOSED LAND AND RESOURCE MANAGEMENT PLAN LACKS A COMPREHENSIVE WATER QUALITY MONITORING ELEMENT. TABLE 5-1 BRIEFLY MENTIONS THE WATER QUALITY MONITORING PLANS FOR THE FOREST. HOWEVER, THERE IS NO DISCUSSION OF WHICH WATER QUALITY PARAMETERS WILL BE MONITORED AND HOW THE FOREST STAFF INTENDS TO DETERMINE CUMULATIVE IMPACTS ON WATER QUALITY DURING THE LIFE OF THE PLAN. DUE TO THE HIGH VALUE THE PUBLIC PLACES ON THE WALLOWA-WHITMAN FOREST FOR VISUAL AND RECREATIONAL QUALITY, IT IS IMPORTANT FOR THE FOREST MANAGERS TO BE AWARE OF EXISTING AND DEVELOPING TRENDS IN WATER QUALITY. CUMULATIVE IMPACT TRENDS SHOULD PLAY A VITAL ROLE IN THIS ASSESSMENT AND SUBSEQUENT MANAGEMENT DECISIONS. THIS NEED IS ESPECIALLY TRUE FOR THE PROPOSED INCREASE IN LIVESTOCK GRAZING.

WE WOULD LIKE TO EMPHASIZE THE NEED TO SAMPLE A RANGE OF MANAGEMENT ACTIVITIES AND TO PRESENT THE RESULTS OF THE MONITORING TO THE APPROPRIATE FOREST MANAGERS. THE PLAN DOES NOT DISPLAY HOW THE RESULTS OF THE MONITORING ACTIVITIES WILL BE INCORPORATED INTO THE MANAGEMENT DECISIONS FOR THE FOREST. A PROCESS SHOULD BE DEVELOPED IN THE PLAN TO INCORPORATE RESULTS OF MONITORING ACTIVITIES AND OTHER INFORMATION INTO FUTURE MANAGEMENT DECISIONS.

**FOREST SERVICE RESPONSE:**

See response to Comment No. 60.

**COMMENT NO. 88:** IN CHAPTER 4 OF THE PLAN, WE CONCUR WITH THE STATEMENTS OF "DIRECTION" FOR THE "WATERSHED" ONLY IF THE STANDARDS AND GUIDELINES PERTAINING TO WATER QUALITY FOR WATERSHEDS INCLUDE RECOMMENDATIONS FOR LIVESTOCK GRAZING, INTEGRATED PEST MANAGEMENT AND SEWAGE DISPOSAL. IF THE STANDARDS AND GUIDELINES DO NOT INCLUDE THESE, THEN STATEMENTS TO THAT EFFECT SHOULD BE MADE



IN EACH MANAGEMENT STRATEGY "DIRECTION" FOR "RANGE", "RECREATION", AND "INSECT DISEASE".

**FOREST SERVICE RESPONSE**

The standards and guidelines apply to all these activities.

**COMMENT NO. 89.** IN THE MANAGEMENT STRATEGY DISCUSSION, STATEMENTS ARE MADE REGARDING DEGRADED WATER QUALITY AS A RESULT OF VARIOUS ACTIVITIES. MITIGATION OF THESE ACTIONS IS NOT READILY APPARENT WITHOUT SEARCHING THROUGH MUCH OF THE PLAN AND DEIS FOR MITIGATION STATEMENTS. WE RECOMMEND THAT A MITIGATION STATEMENT ACCOMPANY STATEMENTS OF WATER QUALITY DEGRADATION WHERE MITIGATION IS A HIGH PRIORITY

**FOREST SERVICE RESPONSE**

The suggested change has been made

**COMMENT NO. 90.** FOR THE ROADLESS AREA DISCUSSION IN APPENDIX C OF THE DEIS, A WATER QUALITY IMPACTS DISCUSSION SHOULD BE INCLUDED IN THE "ENVIRONMENTAL CONSEQUENCES" SECTION BEGINNING ON PAGE C-68. IT IS OUR OPINION THAT A MAJOR SOURCE OF SEDIMENT PRODUCTION IN FORESTED AREAS IS FROM ROADS AND IN PARTICULAR THE CONDITION OF THOSE ROADS. IF THIS IS A CORRECT ASSUMPTION FOR THE ROADLESS AREAS DISCUSSED IN APPENDIX C, THEN INCREASED SEDIMENT PRODUCTION TO THE STREAMS WILL OCCUR WITHOUT MITIGATION AND SHOULD BE SO STATED

**FOREST SERVICE RESPONSE**

Chapter IV of the EIS discusses the effects of logging and roadbuilding. These effects are similar, wherever they occur

**COMMENT NO. 91.** AN MOU WAS PRODUCED AMONG THE WWNF, OREGON DEQ, AND WASHINGTON DOE, REGARDING WATER QUALITY (APPENDIX G-17) WHAT DOES THIS MOU STATE AND WILL THESE GUIDELINES BE FOLLOWED?

**FOREST SERVICE RESPONSE:**

The Memorandum of Understanding (MOU), approved by the Regional Forester and the Director of the Oregon Department of Environmental Quality (DEQ), identifies the roles of the two agencies in protecting water quality on National Forest lands. It also discusses an implementation program including problem assessment, use of best management practices, public involvement, implementation mechanism, monitoring, and program review. It defines a process which will be followed, rather than setting specific guidelines.

**COMMENT NO. 92:** ALL ACTIVITIES HAVING THE POTENTIAL TO AFFECT WATER QUALITY [BAKER CITY WATERSHED] WILL INCLUDE MONITORING TO DETERMINE IF OBJECTIVES ARE MET (PLAN 4-25). THIS APPEARS TO IMPLY THAT ALL TIMBER CUTS WILL BE MONITORED OR DOES IT REALLY MEAN THAT ONLY REPRESENTATIVE ACTIVITIES WILL BE EXAMINED? HOW EXTENSIVE WILL MONITORING BE?

**FOREST SERVICE RESPONSE:**

All timber harvests will be monitored. In some instances, this may be comprised of monitoring to assure that contract requirements are met and standards and guidelines are being properly applied. In other cases, actual measurements of stream parameters may occur. The intensity of the monitoring will be based on the scope and risk associated with the project.

**COMMENT NO. 93:** THE OBJECTIVE OF MONITORING IS SAID TO BE COMPLIANCE WITH S AND G'S (PLAN 5-9). WHAT IS THE ROLE OF STATE WATER QUALITY STANDARDS HERE, WHAT ARE THOSE STANDARDS AND DOES THE WWNF EXCEED THESE AT PRESENT?

**FOREST SERVICE RESPONSE:**

Standards and guidelines are the practices (best management practices) intended to result in meeting state water quality standards. These water quality standards can be found in Chapter 340 of the Oregon Administrative Rules. Although water quality on the Forest is generally good, there are areas where turbidity and temperature standards are not met.

**COMMENT NO. 94:** IF THE EA AND PROJECT SAMPLING ARE THE PRIMARY MEANS OF WATER QUALITY MONITORING (PLAN 5-9), HOW ARE EFFECTS OF GRAZING (A MORE LARGE SCALE IMPACT) ACCOUNTED FOR? HOW MUCH BASELINE DATA WOULD BE COLLECTED FOR AN EA? WOULD THE BASELINE BE SIMPLY A MONITORING OF CONDITIONS DOWNSTREAM OF A PREVIOUS ACTIVITY WHICH RAISED NATURAL LEVELS? IF THIS IS TRUE, BASELINES WILL ALWAYS BE TAKEN AS THE CUMULATIVE RESULT OF MANY PREVIOUS ABUSES. WHAT ARE THE PLANS FOR LONG-TERM TOTAL SYSTEM EVALUATION AS OPPOSED TO BRIEF SPOT CHECKS AGAINST INSTANTANEOUS, ELEVATED BASELINES?

**FOREST SERVICE RESPONSE**

Monitoring activities will be designed to verify that Standards and Guidelines have been properly applied. Only in special situations will monitoring activities include physically sampling stream parameters such as temperature or sediment. In the case of range management, monitoring will be used to determine whether utilization standards are met, both in riparian areas and in uplands. Channel stability will be an additional consideration in monitoring riparian areas.

Prior to completing an environmental analysis, adequate information will be gathered so a reasoned decision can be made. In the case of a range allotment, this will include, among other things, information on range condition and trend, and on conditions found in the riparian zones. This data will usually be in the form of vegetative condition, soil condition, stream shade, and stream channel stability. These types of data are not as easily influenced by upstream activities as are sediment or temperature data, consequently, "elevated baselines" are rarely a problem.

**COMMENT NO. 95:** I AM UNABLE TO FIND, IN THE PLAN, A CONSIDERATION OF THE EFFECTS ON RANCHERS OF EARLIER WATERFLOWS. ADVANCING PEAK FLOWS BY 20 TO 30 DAYS COULD EASILY PUT RANCHERS OUT OF BUSINESS. I SUGGEST THAT AN ANALYSIS OF POTENTIAL INCOME AND "JOB" LOSSES FROM THIS CHANGE IS NECESSARY BEFORE EMBARKING ON THE PLAN.

**FOREST SERVICE RESPONSE**

The relationship between timber harvesting and streamflow is not well understood. Some types of timber harvest, particularly clearcutting, open up the timber canopy and may increase the rate of spring snowmelt. At the same time, the trees which were removed are no longer using water and more may be available to contribute to streamflows during the summer months. No attempt was made in the plan to assess how seasonal streamflows would be affected by the Plan or the other alternatives. Direction has been added to the Plan so that in watersheds where this is a concern, analysis can be done for an individual project or a group of projects. Given the state-of-the-art in streamflow predicting, it is not possible to make reasonable projections of effects on jobs or income resulting from streamflow changes.

**COMMENT NO. 96:** WE WOULD SUGGEST THE WALLOWA-WHITMAN FOREST PROVIDE ADDITIONAL DATA AND POSSIBLY INSTALL MONITORING EQUIPMENT TO DETERMINE THE ACTUAL LONG-TERM EFFECTS OF FOREST MANAGEMENT ON STREAMFLOW.

**FOREST SERVICE RESPONSE:**

The Forest relies on the U S Geologic Survey and other government agencies for streamflow data. Setting up an additional network of monitoring stations would not be cost-effective. In some instances, however, it may prove necessary to establish supplemental stream gages.

**COMMENT NO. 97.** WE SUGGEST AN ADDITIONAL CHAPTER BE DEVELOPED TO DISCUSS FOREST MANAGEMENT AND ITS EFFECTS ON LONG-TERM STREAMFLOW. THE CHAPTER COULD BE USED TO SUPPORT THE CLAIM THAT STREAMFLOW WILL BE MAINTAINED OR IMPROVED.

**FOREST SERVICE RESPONSE:**

See response to Comments No 95 and 96

**COMMENT NO. 98:** INCREASED EMPHASIS ON SOIL CONSERVATION AND CLEAN WATER IS GOOD. THE DEEPER THE SOIL THE MORE WATER STORAGE FOR TREE AND FORAGE PRODUCTION.

CLEAN WATER IS A GOOD INDEX OF HOW THE SOIL IS BEING TREATED.

**FOREST SERVICE RESPONSE.**

We agree

**COMMENT NO. 99:** THE TREE FARMING METHODS PROPOSED IN THE DRAFT PLAN ARE VERY LIKELY TO RESULT IN SERIOUS SOIL DEPLETION, AFFECTING FUTURE TIMBER GROWING ON LOGGED LANDS.

**FOREST SERVICE RESPONSE**

We believe that the Forest can be managed for a variety of uses including timber production, without seriously depleting soil productivity. This matter is a topic of on-going research.

**COMMENT NO. 100:** SOIL PRODUCTIVITY MUST BE MAINTAINED OR IMPROVED IN ALL FOREST AND RANGE SITES. THE LOGIC OF ALLOWING UP TO 20% DETRIMENTAL COMPACTION ON TIMBER SALES IS ABSURD. THIS MEANS THAT UP TO 20% OF TIMBER SALE AREAS ARE BEING TAKEN OUT OF PRODUCTIVITY. THE LEVEL OF SOIL CHARACTERIZATION PRIOR TO LOGGING AND POST LOGGING MONITORING IS ALSO GROSSLY INADEQUATE. WE ARE TAKING PRODUCTIVE FOREST LAND OUT OF PRODUCTION EACH YEAR DUE TO POOR INVENTORY AND MONITORING DATA.

**FOREST SERVICE RESPONSE:**

In order to manage the Forest it is necessary to build roads, trails, skid trails, and log landings. All of these activities reduce land productivity. It is difficult to determine how much productivity loss is acceptable. Roads typically occupy 2-4 percent of a managed forest stand. Much more significant is the area occupied by skid trails and log landings. Unconstrained, these features can occupy 40 percent or more of a managed stand. The 20 percent standard found in the Forest Plan is based on limiting the distribution of skid trails, so the average distance between skid trails is 100 feet or more. This represents the practical limits of existing ground-based timber-harvesting technology. While productivity is reduced on 20 percent of the area, it is not totally lost since trees may continue to grow in soils which have been compacted or displaced.

**COMMENT NO. 101:** THE PROBABLE NEED FOR PROTECTION AND MITIGATION MEASURES FOR FRAGILE SOILS IS MENTIONED. THIS SECTION SHOULD BE EXPANDED TO DESCRIBE WHAT TYPES OF PROTECTION AND MITIGATION MEASURES MAY BE USED, AND HOW THEIR NEED WILL BE TRIGGERED (I.E., STANDARDS FOR DEFINING WHEN IMPACTS BECOME UNDESIRABLE). EROSION AND MASS WASTING POTENTIAL (WHICH CAN HAVE SIGNIFICANT INSTREAM IMPACTS) SHOULD BE ADDRESSED AS WELL.

**FOREST SERVICE RESPONSE:**

The standards and guidelines for soil protection are found in Chapter 4 of the Forest Plan and Appendix D to the EIS. These include mitigation measures. Definitions of detrimental soil compaction and displacement have been added to the Glossary. Also see response to *Comment No. 110*.

**COMMENT NO. 102:** THIS SECTION SHOULD ALSO PROVIDE GUIDANCE FOR OVERALL SOILS MANAGEMENT, INCLUDING ALL ACTIVITIES WHICH MAY AFFECT STABILITY, EROSION, AND COMPACTION (I.E., PROVIDE CUMULATIVE STANDARDS FOR THE COMBINATION OF TIMBER HARVEST ROADS, GRAZING, ETC.).

**FOREST SERVICE RESPONSE:**

The standards for soil compaction and displacement provided are cumulative.

**COMMENT NO. 103:** STANDARDS AND GUIDELINES -- SOILS - GOOD. ADD - "GROUND DISTURBING ACTIVITIES WILL BE LIMITED TO 10% EXPOSED MINERAL SOIL WITHIN RIPARIAN ZONE OF THE INFLUENCE."

**FOREST SERVICE RESPONSE:**

The suggested change has been made

**COMMENT NO. 104: PAGE II-88 SEDIMENT: FROM WHERE DO YOU GET THESE FIGURES?**

**FOREST SERVICE RESPONSE:**

Development of sediment figures is discussed in EIS Appendix F.

**COMMENT NO. 105: IS IT ASSUMED THAT A GIVEN LAND TYPE (FORESTED OR NON-FORESTED) HAS A SINGLE REPRESENTATIVE PERCENTAGE GROUND COVER AND PERCENTAGE "GOOD COVER"? IS TABLE F-1 JUST A SAMPLE OR ARE MORE PRECISE ESTIMATES OF GROUND COVER ON VARIOUS AND TYPES TAKEN INTO ACCOUNT?**

**FOREST SERVICE RESPONSE**

A single average value is assumed.

**COMMENT NO. 106: HOW WAS SEDIMENTATION INTEGRATED? THAT IS, WAS IT A SUMMATION OF SMALL HILLSLOPES OR ESTIMATED FOR LARGE SUB-DRAINAGES? ALL METHODS FOR SEDIMENT CALCULATION USED WERE RESTRICTED FOR USE ON SMALL WATERSHEDS. SLOPE GRADIENT WAS MEANT TO EXPRESS A GIVEN SLOPE HOW WAS THIS TRANSLATED INTO SLOPE FOR A LARGE DRAINAGE BASIN?**

**FOREST SERVICE RESPONSE:**

Sediment estimations are based on a summary of individual acres treated. Within the FOR-PLAN model, a certain amount of sediment production is projected to occur for each acre where timber harvest or roadbuilding occur. The amount of sediment projected per acre depends upon the analysis area which is being treated and the type of treatment occurring. The slope factor used was the average for the analysis area.

**COMMENT NO. 107. CALCULATION OF SEDIMENT FROM ROADS WOULD APPEAR TO BE INADEQUATE STEMMING FROM THE LACK OF DIFFERENCES AMONG ALTERNATIVES AND THE FACT THAT ACRES OF ROADS APPEARS TO BE UNDERESTIMATED. LEAF (1974) USED 23 FEET AS THE DISTURBED WIDTH OF A ROAD. ROADS ON THE WWNF MUST HAVE AN EFFECTIVE WIDTH OF 9.5 FEET TO ARRIVE AT THE ROAD AREAS LISTED (DEIS III-19). THIS REPRESENTS A GREAT UNDERESTIMATE OF AREA CONTRIBUTING SEDIMENT. EVEN SO, WERE ALL SPUR ROADS INCLUDED IN EROSION ESTIMATES?**

**FOREST SERVICE RESPONSE:**

The area assumed to be disturbed due to roads varied from 10 feet for primitive wheel-track roads on gentle ground to more than 60 feet for higher standard roads on steep ground. The acreage of roads displayed on page III-19 of the DEIS includes only acres of forest land occupied by roads. The respondent's calculations do not take in to account the acreage of roads built on nonforest land.

All roads, including spur roads, were considered in the analysis. Differences between alternatives are not great because it is assumed that best management practices will be used in all alternatives, resulting in relatively low sediment delivery into the stream system (most erosion from roads and treatment areas is expected to be caught by vegetation or terrain features rather than entering stream channels).

**COMMENT NO. 108.** AT PRESENT, 48,000 ACRES OF THE FOREST ARE LISTED AS HAVING COMPACTED SOIL OR ACCELERATED EROSION (DEIS III-4). THE THRESHOLD FOR SOIL COMPACTION IS 20% REDUCTION IN PORE SPACE ON A SITE OF ANY SIZE? IT WAS STATED THAT 20% OF THE LAND IN GENTLE TERRAIN IS THE MAXIMUM PERCENTAGE OF A LOGGING UNIT WHICH IS COMPACTED BY HEAVY EQUIPMENT DURING LOG REMOVAL. IS THIS WHAT ESTABLISHES THE THRESHOLD?

**FOREST SERVICE RESPONSE**

A 20 percent reduction in pore space is generally considered to be the point at which root movement through the soil begins to become significantly impaired (i.e., the soil is considered to be compacted). It is not the same as the 20 percent standard for area which can be detrimentally compacted or displaced.

**COMMENT NO. 109:** MAPS OF SLOPES, REGENERATION DIFFICULTY, UNSTABLE SOILS, POTENTIAL VEGETATION TYPES AND STREAM CLASS WERE MAPPED AT ONE INCH TO THE MILE FOR THE WWNF (APPENDIX B-5). UNFORTUNATELY, NONE OF THIS USEFUL DATA WAS PROVIDED WHICH UNSTABLE SOIL AREAS BORDER WHICH KEY STREAMS? WHERE DOES REGENERATION DIFFICULTY OCCUR IN RELATION TO PROPOSED LOGGING AND STREAM CLASSES? TOO LITTLE INFORMATION IS AVAILABLE ABOUT THE FOREST TO HAVE ANY REAL CONCEPT ABOUT THE THOROUGHNESS OF CONSIDERATION FOR CRITICAL RESOURCES.

**FOREST SERVICE RESPONSE;**

At a scale of one inch per mile, it requires eight standard-sized maps to cover the entire National Forest. Providing eight maps showing each of these features (32 additional maps) with each DEIS would have been extremely expensive. All of this information is available for review at the National Forest Headquarters. Copies of specific maps are available upon request.

**COMMENT NO. 110** MAINTENANCE OF SOIL PRODUCTIVITY AND STABILITY WILL HAVE PRIORITY IN ALL MANAGEMENT PLANNING. SOIL WILL BE MANAGED ACCORDING TO FSM 2500 (PLAN 4-21). WHAT DOES THIS ENTAIL? WHAT METHODS ARE USED TO REDUCE LOSS OF SOIL PRODUCTIVITY?

**FOREST SERVICE RESPONSE:**

These methods are discussed in the Forest Plan Standards and Guidelines (Chapter 4) and in the Forest Service Manual. Some of the more common practices are (1) limiting the area disturbed by management activities through special management requirements such as designated skid trails, cable logging, or logging only when the ground is snowcovered, (2) requiring prompt revegetation of disturbed areas, (3) limiting or preventing vegetation-disturbing activities in sensitive areas, and (4) avoiding or minimizing road construction in areas where natural slope stability is poor.

**COMMENT NO. 111** THE THRESHOLD FOR CUMULATIVE SOIL PRODUCTIVITY LOSS IS REPORTED AS A SIGNIFICANT PRODUCTIVITY LOSS (PLAN 5-8) WOULD INABILITY TO RE-ESTABLISH TREES ON 20% OF A LAND AREA BE CONSIDERED SIGNIFICANT? HOW WILL PRODUCTIVITY CHANGE BE ASSESSED?

**FOREST SERVICE RESPONSE:**

The inability to reforest 20 percent of a land area would be considered a significant problem, although not necessarily a loss of site productivity (i.e., the site maintains the potential to produce as long as the soil is not lost or permanently damaged). Under the National Forest Management Act implementing regulations, we cannot harvest timber in areas that we do not know how to reforest

**COMMENT NO. 112.** AM CONCERNED ABOUT SOIL EROSION IN STEEP AREAS, EITHER FROM MOTORIZED VEHICLE USE ON STEEP GRADED OR FROM OVER GRAZING OF CATTLE (OR ELK) THIS IS ESPECIALLY IMPORTANT ON STEEP GRANITIC SOILS.

**FOREST SERVICE RESPONSE:**

We share your concerns

**COMMENT NO. 113:** WHERE THE FOREST HAS ALREADY BEEN DAMAGED, MANAGEMENT SHOULD CONCENTRATE ON EROSION CONTROL AND OTHER HEALING ACTIVITIES, USING NATIVE SPECIES ONLY.

**FOREST SERVICE RESPONSE:**

We agree in general Some nonnative species such as crested wheatgrass have proven useful. Often fast-growing nonnative species are used to provide immediate erosion control. As these nonnative plants die out, they are replaced by native species.

**COMMENT NO. 114:** THE DOCUMENT INDICATES THAT SURFACE WATER IS OVER-APPROPRIATED AND THAT SUPPLEMENTARY USE OF GROUND WATER ON THE NATIONAL FOREST SHOULD BE ADDRESSED, AND POTENTIAL EFFECTS--BOTH BENEFICIAL AND ADVERSE--OF THE PROPOSED MANAGEMENT PLAN ON GROUND-WATER RESOURCES SHOULD BE ASSESSED.

**FOREST SERVICE RESPONSE:**

Little is known about the groundwater resource of the Forest. There is no indication, however, that management activities will affect groundwater quantity or timing of groundwater availability. Management activities could affect groundwater quality if spills of chemicals were to occur Discussion of these risks has been added to the FEIS

**COMMENT NO. 115:** EROSION STANDARDS WOULD BE APPROPRIATE TO DEVELOP, ESPECIALLY FOR THE HIGH HAZARD LANDS. FOR EXAMPLE, AS SHOWN IN APPENDIX F, AS MUCH AS A 76 PERCENT INCREASE IN SEDIMENT YIELD CAN BE EXPECTED FOLLOWING CLEARCUTTING AND SHELTERWOOD HARVESTS THIS LEVEL OF INCREASE ALONE CAN TRANSLATE INTO SIGNIFICANT SEDIMENTATION OF SPAWNING AND REARING AREAS FOR ANADROMOUS FISH CONSIDERING THE ADDITIONAL INPUT FROM OTHER ROADS, AND FROM OTHER ACTIVITIES

SUCH AS LIVESTOCK GRAZING THAT MAY OCCUR IN THE SAME BASIN, CONCERN FOR FISHERY IMPACTS BECOMES MORE SIGNIFICANT IDEALLY, SEDIMENT YIELD PREDICTIONS, COUPLED WITH APPROPRIATE STANDARDS, COULD BE USED IN PLANNING AS ONE SCREENING TOOL TO HELP DETERMINE ALLOWABLE LEVELS OF ACTIVITIES WITHIN A BASIN OVER TIME IF SUCH MODELING IS NOT NOW AT A STATE WHERE YOUR STAFF FEELS IT HAS A USE AS DESCRIBED, APPROPRIATE STANDARDS CAN STILL BE SET AND MORE EMPHASIS PLACED ON MONITORING.

**FOREST SERVICE RESPONSE:**

*Although it would be possible to establish some general guidelines, we feel that soil protection is best served by analyzing each individual project or combinations of projects within a drainage.*

**COMMENT NO. 116:** METHODS FOR STABILIZATION OF DISTURBED AREAS TO CONTROL SOIL EROSION SHOULD BE SUMMARIZED. HOW WILL ADEQUACY OF CONTROL BE DETERMINED? INCLUSION OF INSTREAM SEDIMENTATION STANDARDS UNDER SOILS, AND REFERENCE TO IT HERE, WOULD BE APPROPRIATE.

**FOREST SERVICE RESPONSE**

See response to Comment 110. Also see Appendix O, Best Management Practices.

**COMMENT NO. 117.** COMPUTATION OF EROSION RATES ARE QUESTIONABLE BECAUSE IT APPEARS THAT IT MAKES NO DIFFERENCE WHICH ALTERNATIVE IS SELECTED. TABLE F-1 LISTS 13 LAND TYPES HOW ARE THESE RELATED TO SOIL SERIES DESCRIPTIONS. NO INFORMATION WAS GIVEN ON THIS IN APPENDIX B-13 LAND TYPES DESCRIBED APPEAR TO BE BROADER LEVEL ENVIRONMENTS THAN MIGHT BE TYPICAL OF A SINGLE SOIL SERIES. COVER TYPE IS CLASSIFIED AS FORESTED AND NON-FORESTED NON-FOREST LAND IS ANYTHING WITH LESS THAN 10% TREE COVER. THIS DESCRIPTION IGNORES COVER BY OTHER VEGETATION HOW DETAILED A VEGETATION ANALYSIS OF WATERSHEDS WAS EMPLOYED IN THE CALCULATION OF THE VEGETATIVE COVER COEFFICIENT?

THIS COEFFICIENT CHANGES RAPIDLY AS PERCENT TOTAL GROUND COVER DECLINES FROM 50% TO 0%. THE COLUMN HEADED "BASIC EROSION RATE" (TABLE F-1) SEEMS TO BE A FUNCTION OF SOIL TEXTURE AND PERMEABILITY (ANDERSON 1969) WHY DOES IT VARY WITH COVER TYPE AS SHOWN? BASELINE EROSION RATES VARY BY FACTORS OF 1.7 TO 6.1 BETWEEN FORESTED AND NON-FORESTED FOR ALL LAND TYPES CONSIDERED

**FOREST SERVICE RESPONSE**

Land types are a function of elevation, steepness, vegetation pattern, and suitability for timber management. They are described in Appendix B of the EIS Land types are much broader than are soil series. Mapping of the Forest by soil series is ongoing but is not currently completed This data is expected to be available by the time the next Forest Plan is completed (10-15 years).

Soil texture and permeability are two of the factors used in estimating the basic erosion rate The third factor is soil depth All else being equal, a shallow soil will normally have a higher basic erosion rate than a deep soil On the Wallowa-Whitman, nonforest areas typically have much shallower soils than do forested areas Consequently, within any landtype, the non-forested portion will have a higher basic erosion rate. This is reflected in Table F-1. Vegetative cover on nonforest lands was considered in estimating sediment production from those lands



**COMMENT NO. 118** WHERE ARE THE EFFECTS OF GRAZING AND MINING CONSIDERED IN EROSION ESTIMATES? BANK CALVING AND WIDESPREAD RANGE VEGETATION DEGRADATION LEAD TO SERIOUS EROSION HOW ARE VARIOUS LOGGING SYSTEMS REPRESENTED IN THEIR EFFECTS ON EROSION FROM FOREST LAND? IS MITIGATION OF ROAD-RELATED EROSION CONSIDERED IN CALCULATIONS? SURELY DIFFERENT LOGGING SYSTEMS WERE CHOSEN FOR THE SAME LAND TYPE AMONG VARIOUS ALTERNATIVES.

**FOREST SERVICE RESPONSE:**

The effects of grazing and mining are not considered in the erosion analysis. We are not aware of any accepted method of estimating these effects on a broad scale. We agree that grazing problems exist on the Forest, and although we cannot quantify them in terms of sediment production, standards and guidelines in the Forest Plan are designed to correct them. Erosion and sedimentation from mining activities are a major consideration in the environmental analysis for each specific mining proposal.

Mitigation of road-related sedimentation is considered in the calculations, and direction to do the mitigation activities is included in the Forest Plan standards and guidelines. Gentle land types (G2-G5) are modeled assuming ground-based logging systems. Steep land types were further divided into those accessible by shortspan cable systems (S1-S5) and those expected to require long-span cable systems or helicopter logging (S1H-S5H). These do not vary by Forest Plan alternative. Actual logging system selection for an individual project will be determined during the site-specific analysis for that project.

**COMMENT NO. 119** IT IS PROPOSED THAT TRANSPORTATION SYSTEMS WILL NOT CAUSE COMPACTION TO MORE THAN 20 PERCENT OF ANY ACTIVITY AREA. THIS SEEMS A HIGH VALUE WHEN COMPARED TO THE DEGREE OF ROADING GENERALLY THOUGHT TO BE RELATED TO SIGNIFICANT EROSION RISK (I.E., OVER ABOUT 3 LINEAR MILES PER SQUARE MILE, WHICH TRANSLATES TO LESS THAN 2 PERCENT OF AN AREA). THE EIS SHOULD PROVIDE ARGUMENTS TO JUSTIFY ANY COMPACTION STANDARDS PROPOSED, AND DESCRIBE THEIR RELATIONSHIP TO THE STANDARDS FOR ROAD DENSITY.

**FOREST SERVICE RESPONSE:**

See response to Comment 100.

**COMMENT NO. 120** STANDARDS FOR COMPACTION AND PUDDLING WERE GIVEN ONLY RELATIVE TO TIMBER HARVEST ACTIVITY. COMPACTION, ETC., AS A RESULT OF GRAZING AND OTHER USES SHOULD BE TRACKED AS WELL. AS FOR RANGE, AND FISH AND WILDLIFE, SOME CONDITION MONITORING IS NEEDED IN ADDITION TO MONITORING IMPROVEMENT PROJECTS

**FOREST SERVICE RESPONSE:**

Discussion of compaction in the Forest Plan emphasizes timber harvest activities since these are the activities most likely to result in detrimental soil compaction. The standards, however, apply to all activities including grazing.

**COMMENT NO. 121** BECAUSE PRE-COMMERCIAL THINNING IS SO IMPORTANT TO MAINTAINING A HIGH LTSY FOR THE WWNF, HOW WILL CUMULATIVE COMPACTION BE REDUCED?

**FOREST SERVICE RESPONSE**

Precommercial thinning does not result in significant compaction. We avoid cumulative compaction from logging operations by requiring low-ground-pressure equipment when applicable, limiting the number of skid trails, reusing existing skid trails, or requiring cable skidding. When compaction cannot be avoided, we can require plowing to reduce compaction.

**COMMENT NO. 122** ONLY 9,860 ACRES COMPARED TO 1 09 MILLION SUITABLE, AVAILABLE, AND CAPABLE ACRES WERE LISTED AS UNSUITED FOR HARVEST BECAUSE OF INSTABILITY (DEIS). WHAT WAS TAKEN AS THE CRITERION FOR INSTABILITY? WAS SLOPE GRADIENT CRITERION USED? WERE SOIL TYPES CONSIDERED?

**FOREST SERVICE RESPONSE:**

Slope gradient was not a major criterion in identification of unsuited lands because it is not generally a good indicator of future mass soil movement. The areas identified as too unstable for timber management are generally areas where experience has indicated significant problem potential or where the topography and soils of the area indicate natural instability.

**COMMENT NO. 123:** THE FOREST MAINTAINS THAT WATER QUALITY CAN BE PROTECTED IF THE UPPER GRANDE RONDE AREA IS DEVELOPED. YET NO SUPPORTING DATA IS CITED. IF ROADS INTERSECT TRIBUTARY FLOWS, RIPARIAN VEGETATION IS REMOVED, OR GROUND DISTURBING ACTIVITIES ARE PROXIMAL TO WATER, THERE WILL BE SOME IMPACT TO WATER QUALITY. THE ARGUMENT IS HOW MUCH? GRRRC MAINTAINS THAT ANY IMPACT TO WATER QUALITY IS UNAFFORDABLE AT THIS TIME. DOWNSTREAM WATER QUALITY AND HABITAT PROBLEMS MUST BE REMEDIATED BEFORE ANY NEW IMPACTS CAN BE JUSTIFIED.

**FOREST SERVICE RESPONSE:**

Any ground-disturbing management activity carries with it some risk to water quality. We believe that implementing the best management practices found in Chapter 4 of the Plan and in Appendix O of the FEIS will prevent any significant damage to water quality or watershed condition.

**COMMENT NO. 124 :** THE MANAGEMENT OF OUR LOCAL NATIONAL FORESTS IS A MAJOR CONCERN OF MINE. THE PRESERVATION OF EAGLE AND PINE VALLEYS' PRODUCTIVITY RELIES ON THE PROTECTION OF UNDISTURBED NATURAL FORESTED WATERSHEDS WITHIN THE WALLOWA-WHITMAN NATIONAL FOREST.

**FOREST SERVICE RESPONSE:**

We do not agree that precluding development is necessary to maintain the productivity of Pine Valley, as long as development is sensitive to water related concerns.

**COMMENT NO. 125:** THE WWNF DOES NOT ATTEMPT TO ESTIMATE THE AMOUNT OF SEDIMENT PRODUCED BY FOREST MANAGEMENT ACTIVITIES UNDER CURRENT MANAGEMENT.

**FOREST SERVICE RESPONSE:**

The FEIS, as did the DEIS, describes in narrative the probable effects of the "No Change" Alternative on sediment production. Quantitative estimates are not made because implementing the "No Change" Alternative would require the use of nonstandard riparian timber management practices for which no data exists.

**AIR QUALITY  
Code 830**

**COMMENT NO. 1:** THE OREGON DEPARTMENT OF ENVIRONMENTAL QUALITY HAS NOTED THAT PRESCRIBED BURNING IS THE MOST SIGNIFICANT SOURCE OF TOTAL SUSPENDED PARTICULATES (TSP) IN NORTHEASTERN OREGON. ALSO, THE CITY OF LA GRANDE CURRENTLY EXPERIENCES PROBLEMS WITH TSP FOR THESE REASONS WE SUGGEST THE EIS MORE THOROUGHLY EVALUATE AIR QUALITY, AND THE PLAN PROVIDE MORE GUIDANCE ON MINIMIZING AIR QUALITY IMPACTS. IN PARTICULAR, IT IS STATED THAT WITHIN 50 YEARS WOOD WILL NO LONGER BE AVAILABLE AS A MAJOR HEAT SOURCE FOR MOST AREA HOMES THIS IMPLIES MORE SLASH BURNING. IF SUCH IS TRUE, AIR QUALITY IMPACTS FROM ON-FOREST BURNING MAY BECOME MORE SIGNIFICANT. EVEN THOUGH TSP EMISSIONS ARE EXPECTED TO BE REDUCED OVERALL, THE TIMING OF THE EMISSIONS IS THE CRITICAL CONSIDERATION. THE PLAN SHOULD DESCRIBE THE MEASURES TO BE USED TO ASSURE THAT AIR QUALITY IMPACTS DO NOT BECOME SIGNIFICANT AT ANY TIME, IN ADDITION TO THOSE RESULTING IN REDUCED EMISSIONS OVERALL

**FOREST SERVICE RESPONSE:**

Fire is part of the natural ecosystem of northeast Oregon Forests. It is also the least-cost method to accomplish reforestation and dispose of the slash on many timber-harvested sites. It is expected there will be an increased use of prescribed fire on the Forest, and consequently, an increasing need to manage the smoke. This is done by combining favorable meteorological conditions with a variety of prescribed fire techniques designed to keep smoke emissions to a minimum. Techniques have been outlined in a variety of smoke management/air quality workshops and technical research publications. These techniques, plus state-of-the-art research information and implementation guides currently being verified by Pacific Northwest Forestry Sciences Lab, Seattle, will be used in order to meet air quality standards. Project environmental analysis is the proper means to provide specific guidance towards implementing future prescribed burns and minimizing air quality impacts, on a site-by-site basis. Additional discussion of fire management techniques has been added to the Forest Plan Standards and Guidelines.

The point about lack of wood for home heating in 50 years is based on greater anticipated wood utilization and the prediction of few dead trees and down logs, suitable for fuelwood

**COMMENT NO. 2:** REGARDING AIR QUALITY, THE DEPARTMENT'S MAIN AREA OF CONCERN IS THAT THE PLAN BE CONSISTENT WITH THE STATE AND FEDERAL AIR QUALITY STANDARDS. THE DRAFT EIS DOES NOT PROVIDE SUFFICIENT TECHNICAL INFORMATION IN ORDER TO ASSESS THE AIR QUALITY IMPACTS OF THE PLAN. FINDINGS NEED TO BE MADE REGARDING 1) AN ASSESSMENT OF THE PREFERRED ALTERNATIVE WITH RESPECT TO THE CLEAN AIR ACT AND THE OREGON CLEAN AIR IMPLEMENTATION PLAN; 2) HOW THE PLAN WILL NOT AFFECT PREVENTION OF SIGNIFICANT DETERIORATION (PSD) INCREMENTS, 3) THE IMPACT OF PROPOSED PRESCRIBED BURNING ACTIVITIES ON THE VISIBILITY PROTECTION PLAN; AND 4) THE PLAN'S CONSISTENCY WITH STATE AND FEDERAL POLICIES FOR WILDERNESS AREAS

**FOREST SERVICE RESPONSE.**

The Pacific Northwest Forestry Fire Science Lab at Seattle has developed smoke emissions models, which are the means to better assess the impacts of prescribed burning with respect to the Clean Air Act and Oregon's Implementation Plan. An assessment of the emissions

produced from the prescribed burning anticipated with the preferred alternative was performed during formation of the Region Six DEIS for Managing Competing and Unwanted Vegetation. (This additional information is found in FEIS, Chapters III and IV ) Since prescribed burning is proving to be the least-cost method for treatment of slash and accomplishing resource objectives -- especially site preparation for reforestation -- the use of fire is expected to increase. In turn, the land managers will need to use techniques outlined in smoke management/air quality technical publications, as well as the implementation guides. Special precautions will need to be taken regarding proposed prescribed burn units, especially along the south-southwest perimeter of Class I (Wilderness) Areas. In most cases, burning of these units will be accomplished prior to July 4 or after Labor Day. Also see response to Comment No 2

**COMMENT NO. 3: CURRENT INFORMATION DESCRIBING AIR QUALITY MONITORING ACTIVITIES AND SUMMARIZING AIR QUALITY CONDITIONS ACROSS THE STATE MAY BE FOUND IN THE AIR QUALITY DIVISION'S ANNUAL REPORT (ATTACHED)**

**FOREST SERVICE RESPONSE:**

We appreciate receiving this annual report, and will be consulting it as a reference

**COMMENT NO. 4: THE DEIS STATES (PAGE IV-19) THAT OFF-FOREST SOURCES ARE THE PRIMARY SOURCES OF AIR POLLUTANTS IMPACTING THE WALLOWA-WHITMAN. THIS IS NOT CONSISTENT WITH THE DEPARTMENT'S ASSESSMENT OF THE IMPORTANCE OF PRESCRIBED BURNING AS THE SINGLE LARGEST SOURCE IMPACTING FOREST LAND AIR QUALITY WITHIN NORTHEASTERN OREGON**

**FOREST SERVICE RESPONSE:**

The intent of this statement on page IV-19 of the DEIS was to highlight that there are other sources of smoke emissions that affect air quality of the Wallowa-Whitman Forest, over which Forest Managers have little or no control. The statement has been revised as follows "There are many off-Forest sources of emissions that affect air quality of the Wallowa-Whitman Forest which are not usually within control of the Forest Managers "

**COMMENT NO. 5: THE DEIS SHOULD INCLUDE A STATEMENT ASSESSING THE IMPACT OF THE PREFERRED ALTERNATIVE WITH RESPECT TO THE CLEAN AIR ACT AND OREGON CLEAN AIR IMPLEMENTATION PLAN REQUIREMENTS. SPECIFICALLY, THE DEIS MUST SHOW THAT THE PROPOSED ALTERNATIVE WILL NOT CAUSE OR SIGNIFICANTLY CONTRIBUTE TO AIR QUALITY STANDARD VIOLATIONS. AIR QUALITY IMPACTS WITHIN ATTAINMENT AREAS MUST NOT EXCEED PREVENTION OF SIGNIFICANT DETERIORATION (PSD) INCREMENTS (TABLE 2) NOR MAY THE IMPACT CAUSE VIOLATIONS OF AIR QUALITY STANDARDS (SEE ANNUAL REPORT) ESTIMATED BY SUMMING CURRENT AIR QUALITY CONDITIONS AND THE ESTIMATED INCREMENT FOR THE APPROPRIATE AVERAGING TIMES**

**FOREST SERVICE RESPONSE:**

An assessment of the emissions produced from prescribed burning with the preferred alternative was performed during formation of the Region Six DEIS for Managing Competing and All Unwanted Vegetation. Since prescribed fire use is expected to increase, land managers will need to use techniques outlined in smoke management/air quality technical reports, as well as implementation guides that were recently verified on Wallowa-Whitman Forest sites by the

Pacific Northwest Fire Science Lab, Seattle, in order to lessen impact and not violate Air Quality Standards outlined by Clean Air Act, and State of Oregon Smoke Management and Visibility Protection Plan.

**COMMENT NO. 6** PART C OF THE CLEAN AIR ACT, REQUIRES THE DEPARTMENT TO INSURE THAT POLLUTANT INCREMENTS IN CLASS I AREAS (TABLE 2) DO NOT EXCEED SPECIFIC LIMITS ADOPTED BY CONGRESS, IRRESPECTIVE OF THE ORIGINATING SOURCE SINCE THE PROPOSED ALTERNATIVE PROPOSES TO REDUCE EMISSIONS, THE DEIS SHOULD INCLUDE A STATEMENT TO THE EFFECT THAT PSD INCREMENTS WOULD NOT BE EFFECTED BY THE PLAN

**FOREST SERVICE RESPONSE:**

The suggested Statement has been added

**COMMENT NO. 7** THE OREGON VISIBILITY PROTECTION PLAN REQUIRES THE PROTECTION OF VISIBILITY WITHIN CLASS I AREAS. THE DEIS SHOULD EVALUATE THE IMPACT OF PROPOSED PRESCRIBED BURNING ACTIVITIES ON THE VISIBILITY PROTECTION PLAN WITH RESPECT TO (A) ASSURING THE CONTINUED PROTECTION OF VISIBILITY WITHIN CLASS I AREAS FROM FURTHER DETERIORATION, AND (B) THE EFFECT OF PROPOSED BURNING ACTIVITIES ON SHORT- AND LONG-TERM VISIBILITY CONTROL STRATEGIES AS OUTLINED IN THE STATE IMPLEMENTATION PLAN (SIP).

**FOREST SERVICE RESPONSE:**

The Forest is committed to the recently adopted Smoke Management and Visibility Protection Plan (January 1987) and will evaluate the effects of any planned prescribed burning near or upwind from existing Class I areas during project analysis. In some situations, burning will need to be performed prior to July 4, or performed after Labor Day in order to meet this Visibility Protection Plan. Through a strategy of burning when smoke will not intrude on Class I areas, and burning using techniques which will reduce total emissions, visibility within these areas will be maintained or improved. This is consistent with the State Implementation Plan.

**COMMENT NO. 8** DEPARTMENT POLICY (OAR 340-20-001) REQUIRES THAT THE HIGHEST AND BEST PRACTICABLE TREATMENT AND CONTROL BE APPLIED TO POLLUTION SOURCES WITHIN OREGON. OAR 340-13-005, ENVIRONMENTAL STANDARD FOR WILDERNESS AREAS, SETS FORTH POLICIES ON ENVIRONMENTAL IMPACTS WITHIN WILDERNESS LANDS WHILE USDA FOREST SERVICE REGION VI POLICY (SERVICE MANUAL NO. 2400, SUPPLEMENT 347, MARCH 1985) REQUIRES THAT IN RECOGNITION OF THE VALUE OF FOREST RESIDUES UTILIZATION, PRESCRIBED BURNING ONLY BE ACCOMPLISHED FOR THOSE UNITS WHERE ALL OTHER ALTERNATIVE TREATMENTS ARE UNACCEPTABLE. *THE DEIS SHOULD INCLUDE A STATEMENT ADDRESSING THE CONSISTENCY OF THE PROPOSED PLAN WITH RESPECT TO THESE POLICIES, STATING THE DEGREE TO WHICH ALTERNATIVE TO PRESCRIBED FIRE HAVE BEEN CONSIDERED (SEE TABLES 1 AND 2 ATTACHED TO RESPONSE)*

**FOREST SERVICE RESPONSE:**

We agree utilization should be first priority, if it's economically feasible. Often it is not. Measures are also taken to encourage utilization as firewood prior to burning. As other sources of firewood become scarce, we anticipate more slash will be utilized. In spite of efforts to encourage utilization, accumulations of slash/debris remain. The Forest policy recognizes that fire is an intricate part of the natural ecosystem of Northeast Oregon Forests. This fact, along

with increasing emphasis to manage the resources cost effectively, is proving that prescribed fire is the least cost method to accomplish reforestation and disposal of the slash for protection purposes. In some cases fire is useful to stimulate regeneration of forage for live-stock and wildlife.

**COMMENT NO. 9: SLASH BURNING/AIR POLLUTION ARE NOT ADDRESSED AIRSHED IN THE GRANDE RONDE VALLEY AND THE BAKER VALLEY ARE SEVERELY DEGRADED IN LATE SUMMER AND FALL BY FOREST SERVICE ACTIVITIES. OREGON DEQ IS PRESENTLY CONDUCTING FIELD HEARINGS ON THE WIDESPREAD AND MAJOR PROBLEM. THE FOREST SERVICE NEEDS TO BE A LEADER, NOT A DEFENDANT, IN COMBATTING AIRSHED POLLUTION.**

**FOREST SERVICE RESPONSE:**

We agree the Forest Service needs to be a leader in protecting the air resource of the Grande Ronde and Baker Valleys and other areas. In an attempt to accomplish this, the Wallowa-Whitman National Forest initiated a cooperative agreement with the Pacific Northwest Forestry Fire Sciences Lab. in Seattle to field verify guides they have been formulated from research. Their guides will be used with future prescribed fires to help determine the best conditions under which to conduct the burns to meet resource objectives and minimize smoke impacts. In addition, prescribed fire techniques have been outlined in recent smoke management/air quality workshops and technical publications that, when combined with proper consideration of meteorological conditions, can assist the land manager implementing prescribed burns while keeping smoke emissions to a minimum.

**LAND STATUS AND SPECIAL USES  
Code 900**

**COMMENT NO. 1:** MAP ERROR - A BRIEF EXAMINATION OF THE MAPS OF THE ALTERNATIVE LAND ALLOCATIONS REVEALS THAT PARCELS OF LAND WHICH ARE NO LONGER IN FEDERAL OWNERSHIP HAVE BEEN INCLUDED IN THE FOREST LANDBASE. OVER 2,000 ACRES OF LAND IN THE INDIAN CREEK AREA SHOWN ON THE MAPS AS USDA FS LANDS WERE ACTUALLY TRADED TO BOISE CASCADE CORPORATION IN 1984 THIS AND ANY OTHER MAPPING ERRORS SHOULD BE CORRECTED DOCUMENTATION IS NEEDED TO ESTABLISH THAT THESE PRIVATELY OWNED ACRES HAVE NOT BEEN INCLUDED IN THE FORPLAN DATA AS PART OF THE FOREST LANDBASE.

**FOREST SERVICE RESPONSE:**

The maps have been changed to reflect the Boise Cascade exchange, which was completed near the end of 1983. FORPLAN is based on land ownership as of early in 1985.

**COMMENT NO. 2:** THERE ARE A FEW ISOLATED PARCELS OF LAND WHICH THE DIVISION MAY WANT TO PROPOSE FOR EXCHANGE IF IT WILL ENHANCE BLOCKING OWNERSHIP.

**FOREST SERVICE RESPONSE**

We are agreeable to exchanges that will consolidate National Forest land

**COMMENT NO. 3** WHAT ABOUT MAINTENANCE OF THE ROCK CREEK ROAD AND DAM?

**FOREST SERVICE RESPONSE.**

The Rock Creek road was maintained historically by miners. Since active mining ceased, it has not been maintained. However, it is open to motorized use. The trail to Rock Creek Lake is not useable by motorized vehicles. If there was a need for motorized access for structural repair of the dam, the land allocation in the preferred alternative would not prohibit it. The decision would be based on a specific environmental analysis.

**COMMENT NO. 4.** LESS RED TAPE ON EXISTING CABINS.

**FOREST SERVICE RESPONSE:**

Thank you for your input

**COMMENT NO. 5:** EASTERN OREGON OUTFITTERS AND GUIDES ASSOCIATION WOULD LIKE TO EXPRESS OUR OPINION REGARDING THE PROPOSED LAND AND RESOURCE MANAGEMENT PLAN FOR THE WALLOWA-WHITMAN NATIONAL FOREST. OUR CONCERNS ADDRESS THE PROPOSED MANAGEMENT DIRECTION FOR THE EAGLE CAP WILDERNESS AREA. SPECIFICALLY, LIMITS ON GROUP SIZE TO 12 PEOPLE AND ANIMALS ARE COMPLETELY UNACCEPTABLE TO OUR MEMBERS THIS UNREALISTIC LIMITATION OF CLIENTS AND STOCK WOULD FORCE OUTFITTERS OUT OF BUSINESS AND DEPRIVE THE PUBLIC OF BOTH USE OF OUTFITTERS' SERVICES AS WELL AS NATIONAL FOREST LANDS IN ADDITION, LIMITATIONS ON USE AND



CAMPSITES WITHIN THE LAKES BASIN AREA ARE UNACCEPTABLE IF THEY APPLY ONLY TO COMMERCIAL OUTFITTERS. OUTFITTERS SHOULD NOT BE DISCRIMINATED AGAINST IN FAVOR OF THE SAME USE BY THE PRIVATE SECTOR. WE OBJECT TO THE ELIMINATION OF SPIKE CAMPS, BUT WOULD BE WILLING TO WORK WITH THE FOREST SERVICE IN ESTABLISHING CONTROLS OVER THE LENGTH OF TIME THAT THE CAMPS MAY BE SET UP. WE ALSO DESIRE TO WORK WITH THE FOREST SERVICE IN ESTABLISHING LIMITS TO LENGTH OF STAY IN THE LAKES BASIN AND AT OTHER SELECTED LAKES. THE SAME APPLIES TO ANY REDISTRIBUTION OF DAY RIDES ON THE WALLOWA RIVER TRAILS. OVERALL, WE FEEL THAT ANY LIMITATIONS ON COMMERCIAL OUTFITTERS AS TO LOCATION AND LENGTH OF STAY IN HEAVILY USED AREAS OF THE EAGLE CAP SHOULD BE BORNE BY THE PRIVATE SECTOR AS WELL. WE MAKE OUR LIVINGS BY OPERATING IN THESE AREAS AND FOR THAT REASON ARE COMMITTED TO PROTECTING THEM FOR FUTURE USE

**FOREST SERVICE RESPONSE.**

Management direction related to outfitting and guiding in the Hells Canyon and Eagle Cap Plans is intended to be phased in over several years, with full consultation with outfitters.

Regarding the limit on group size, a combined total of 30 people and animals may be allowed with prior written permission

We expect that many groups larger than the "12 combined" limit will be allowed, with some limits on when and where

Lakes Basin is being physically impacted by use and provides few of the opportunities for solitude that wilderness is supposed to provide. We anticipate having to restrict both outfitter and general public use there in the future.

The limitations on outfitters are no more severe than those imposed on the general public. For example, group size policy is the same; the public is not allowed spike camps, length-of-stay limits will apply to all, etc

**COMMENT NO. 6: 8 COMMERCIAL OUTFITTERS AND THEIR ATTENDANT STOCK ANIMALS SHOULD BE CAREFULLY REGULATED AND MONITORED ON FOREST LANDS - PARTICULARLY IN WILDERNESS AREAS. OUR OBSERVATIONS INDICATE THAT SUBSTANTIAL RESOURCE USE DAMAGE OCCURS FROM THE POORLY REGULATED USE OF COMMERCIAL PACK ANIMALS IN THE EAGLE CAP WILDERNESS. PRESERVATION OF NATURAL RESOURCES SHOULD TAKE PRECEDENCE OVER SUCH COMMERCIAL USES OF THE FOREST. OVERUSE BY COMMERCIAL OUTFITTERS IS ALSO BOTH A HEALTH HAZARD AND A SUBSTANTIAL ANNOYANCE AND BURDEN TO THE WILDERNESS FOOT HIKER. WATER SOURCES ARE FOULED AND MANY OF THE TRAILS, SUCH AS THOSE UP THE ANEROID LAKE TRAIL AND THE LAKES BASIN TRAIL ARE OFTEN HEAVILY LADEN WITH HORSE DROPPINGS, CAUSING BOTH DIRECT INCONVENIENCE AND INCREASED FLY POPULATIONS ALONG THE TRAIL CORRIDOR. WE RECOMMEND A GREATLY TIGHTENED REGULATION OF THE NUMBERS AND AREAS OF OPERATION BY COMMERCIAL OUTFITTER CONCERNS IN THE WILDERNESS. PRESCRIPTIONS SHOULD OUTLINE HOW AND WHEN WILDERNESS AREA VALUES WILL BE PROTECTED FROM OVERUSE AND DEGRADATION BY LARGE COMMERCIAL OUTFITTER PARTIES**

**FOREST SERVICE RESPONSE**

We believe that the direction provided in the Eagle Cap and Hells Canyon Wilderness Plans provides adequate protection.

**COMMENT NO. 7: PACKER PERMIT ALLOTMENTS SHOULD NOT BE INCREASED AND NO PERMANENT CAMPS SHOULD BE ALLOWED EXCEPT AT DESIGNATED, ALREADY DEVELOPED CAMP AREAS. NO-TRACE CAMPING SHOULD BE THE GENERAL RULE.**

**FOREST SERVICE RESPONSE:**

Permanent camps are allowed only at designated locations. The wilderness plans generally provide little or no increase in outfitter numbers.

**ENERGY  
Code 930**

**COMMENT NO. 1 TRANSMISSION LINES** OREGON DEPARTMENT OF ENERGY BELIEVES THE ANALYSIS IN THE DEIS IS ADEQUATE AND THE ESTABLISHMENT OF A UTILITY CORRIDOR ALONG INTERSTATE HIGHWAY 84 IS APPROPRIATE. THE POLICY FOR LOCATING TRANSMISSION LINES IN THE PROPOSED FOREST PLAN IS APPROPRIATE.

**FOREST SERVICE RESPONSE**

Thank you for your comments.

**COMMENT NO. 2** WE DID NOT FIND ANY RECOGNITION IN THE PLAN OF EXISTING WATERPOWER WITHDRAWALS WITHIN THE FOREST BOUNDARIES CURRENTLY, THERE ARE THE FOLLOWING WATERPOWER WITHDRAWALS, TOTALING ABOUT 60,000 ACRES POWER SITE CLASSIFICATIONS NOS 78, 191, 248, 263, 282, 348, 380, AND 4231, AND POWER SITE RESERVE NOS. 77, 170, 240, AND 553 WITHIN THE FOREST OF THESE, TWO HAVE BEEN RECOMMENDED FOR TERMINATION, AND THREE OTHERS HAVE BEEN TENTATIVELY IDENTIFIED AS CANDIDATES FOR TERMINATION. THE REMAINING SEVEN ARE SCHEDULED FOR FURTHER ANALYSIS, AND RECOMMENDATIONS ON RETENTION OR TERMINATION WILL BE MADE BETWEEN NOW AND 1990

**FOREST SERVICE RESPONSE.**

These withdrawals have been recognized in Chapter 2 of the Forest Plan and FEIS Chapter III. Nos. 77 and 553 are not on the Forest.

**COMMENT NO. 3** IT IS THE FOREST SERVICE'S DUTY TO IMPOSE TERMS AND CONDITIONS THAT WILL ASSURE ADEQUATE PROTECTION FOR NATIONAL FOREST LANDS FROM THE HARMS RESULTING FROM HYDROELECTRIC DEVELOPMENTS IT IS ALSO PART OF THE FOREST SERVICE'S TRUST RESPONSIBILITY TO THE TRIBES TO ENSURE THAT IT EXERCISES ITS DUTY TO IMPOSE TERMS AND CONDITIONS SO THAT THE TRIBES' TREATY RIGHTS ARE PROTECTED

THE NORTHWEST POWER PLANNING COUNCIL IS IN THE PROCESS OF DEVELOPING A LIST OF POTENTIAL HYDRO SITES WITH THE LEAST POTENTIAL FOR ADVERSE IMPACTS ON OTHER RESOURCES FOREST SERVICE ACTIVITIES RELATED TO HYDROELECTRIC POWER SHOULD BE COORDINATED WITH THE EFFORTS

**FOREST SERVICE RESPONSE.**

We agree that treaty rights are important considerations in the development of any projects on the National Forest. Coordination with the NWPPC is also important

**COMMENT NO. 4.** PAGE III-16, TABLE III-3B. THE SHEEP CREEK HYDROELECTRIC FACILITY HAS A TOTAL GENERATING CAPACITY OF APPROXIMATELY 7.0 MW NOT 0.1 AS INDICATED.

**FOREST SERVICE RESPONSE:**

We have corrected the table as you suggest

**COMMENT NO. 5: HYDROELECTRIC** THERE APPEARS TO BE LITTLE POTENTIAL TO DEVELOP ADDITIONAL HYDROELECTRIC FACILITIES WHICH ARE LARGER THAN 25 MEGAWATTS IN THE WALLOWA-WHITMAN NATIONAL FOREST. ODOE BELIEVES THE ANALYSIS IN THE DEIS AND THE ENERGY POLICY IN THE PROPOSED FOREST PLAN ARE APPROPRIATE.

**FOREST SERVICE RESPONSE:**

Thank you for your comments.

**COMMENT NO. 6 PAGE 4-3 - REGARDING ENERGY RESOURCES (OIL, GAS, AND GEOTHERMAL),** THE PLAN ASSERTS THAT THE FOREST SERVICE JOINTLY APPROVES DETAILED OPERATING PLANS. APPROVAL OF APDS FOR OIL AND GAS AND PLANS OF OPERATION FOR GEOTHERMAL ARE THE RESPONSIBILITY OF BLM BY MOU, THE FOREST SERVICE CONCURS IN THE APPROVAL OF PLANS OF OPERATIONS FOR GEOTHERMAL RESOURCES

**FOREST SERVICE RESPONSE**

We have corrected the statement.

**COMMENT NO. 7: FOSSIL FUELS:** THE LOW POTENTIAL OF FINDING OIL, GAS, AND COAL RESOURCES IN THE WALLOWA-WHITMAN NATIONAL FOREST IS INDICATED IN THE PROPOSED FOREST PLAN AND DEIS. ODOE AGREES WITH BOTH THIS CONCLUSION AND THE RESULTING LACK OF NEED TO HAVE POLICIES ADDRESSING DEVELOPMENT OF THESE ENERGY RESOURCES

**FOREST SERVICE RESPONSE:**

Thank you for your comments

**COMMENT NO. 8 LAND AND RESOURCE PLAN** WE SUGGEST A DISCUSSION ADDRESSING OREGON'S GEOTHERMAL POLICY AND THE IMPACT ON FOREST RESOURCE SHOULD BE INCLUDED IN THE REPORT. ALTHOUGH NOT EXTENSIVE, THERE ARE SOME GEOTHERMAL AREAS WITHIN THE FOREST BOUNDARIES WE HAVE ENCLOSED THE STATE'S GEOTHERMAL RULES.

**FOREST SERVICE RESPONSE.**

*As explained in the following comment, the opportunities for exploiting geothermal resources on the Forest are low. Therefore, we do not believe more extensive discussion in the documents is warranted.*

**COMMENT NO. 9: GEOTHERMAL THE LOW POTENTIAL OF FINDING EXPLOITABLE GEOTHERMAL RESOURCES IN THE WALLOWA-WHITMAN NATIONAL FOREST IS INDICATED IN THE PROPOSED FOREST PLAN AND DEIS. ODOE AGREES WITH BOTH THIS CONCLUSION AND THE RESULTING LACK OF SPECIFIC FOREST POLICIES ADDRESSING DEVELOPMENT OF THIS ENERGY RESOURCE IN ADDITION, OTHER FEDERAL STANDARDS ARE ALREADY IN PLACE SHOULD DEVELOPMENT EVER APPEAR LIKELY.**

**FOREST SERVICE RESPONSE**

Thank you for your comments

**MINERALS  
Code 940**

**COMMENT NO. 1.** NO NEW MINING LEASES SHOULD BE GRANTED ON ANY OF THE PROPOSED RESEARCH NATURAL AREAS UNTIL A FINAL DECISION AS TO THEIR RNA STATUS CAN BE MADE THIS IS ESSENTIAL TO PRESERVE THE PRIMARY RESOURCE VALUES OF EACH PRNA AND SO THAT LATER MANDATED MINERAL WITHDRAWAL CAN OCCUR UNHINDERED BY PREVIOUS LEASES

**FOREST SERVICE RESPONSE:**

There is currently little leasing activity on the Forest. Since leasing is discretionary, we would probably recommend against leasing in PRNA's, or include a NSO stipulation.

**COMMENT NO. 2:** I DO SUPPORT YOUR INCREASES IN ACREAGE FOR MINERAL EXPLORATION

**FOREST SERVICE RESPONSE:**

Most of the limitation on acreage of mineral land available for mineral exploration is due to Congressional action (Wilderness, HCNRA). Our withdrawal review process will help to maximize available acres outside of those designations.

**COMMENT NO. 3:** OVERALL THE PLAN DOES LITTLE TO ENCOURAGE SERIOUS MINERAL DEVELOPMENT OF THE SUBJECT NATIONAL FOREST BY THE FOREST SERVICE'S OWN RANKING, 85 PERCENT OF THE HIGHEST RANKED "KNOWN MINERAL AREAS" ARE EITHER CLOSED TO MINERALS OR HAVE RESTRICTED ACCESS UNDER THE PREFERRED ALTERNATIVE (TABLE IV-1, PAGE IV-8, DIES). OF THE 18 MANAGEMENT AREAS, NONE RECOGNIZES POTENTIAL OR CURRENT MINERAL DEVELOPMENT AS A PARTIAL GOAL OR USE OF AN AREA.

A PRIMARY MINERALS-RELATED ISSUE NOT ADDRESSED IS THE AVAILABILITY OF LAND FOR MINERAL DEVELOPMENT AND, IN PARTICULAR, THE AVAILABILITY OF LAND FOR EXPLORATION. UNDER THE PROPOSED ACTION, 54 PERCENT OF THE FOREST SERVICE'S "KNOWN MINERAL AREAS" ARE EITHER CLOSED OR RESTRICTED TO MINERAL DEVELOPMENT. EXCLUDING WILDERNESS, WILD AND SCENIC RIVERS, AND CLOSED PORTIONS OF THE HELLS CANYON NATIONAL RECREATION AREA, 59 PERCENT OF THE REMAINING LANDS IS EITHER RESTRICTED FOR MINERALS OR HAS BEEN WITHDRAWN FROM MINERAL ENTRY.

THE PLAN APPEARS TO IGNORE THE POTENTIAL RESOURCE VALUES OF MINERAL MATERIALS, INDUSTRIAL MINERALS, AND FEDERAL EASEABLE MINERALS (COAL, OIL AND GAS, AND GEOTHERMAL). THE AREAS DESIGNATED AS POTENTIALLY VALUABLE FOR OIL AND GAS GEOTHERMAL SHOULD BE CONSIDERED AS KNOWN MINERAL AREAS FOR THESE COMMODITIES.

THE PLAN SHOULD NOTE THAT BLM CURRENTLY HAS THE RESPONSIBILITY TO CLASSIFY LANDS FOR LEASEABLE MINERALS. REFERENCES TO THE U.S. GEOLOGICAL SURVEY SHOULD BE CHANGED TO THE BUREAU OF LAND MANAGEMENT.

THE PLAN AND DEIS LACK SPECIFIC INFORMATION RELATED TO:

- A THE LOCATION OF ACTIVE AND RECENTLY-ACTIVE EXPLORATION AND/OR MINING SITES
- B. THE NUMBER OF PEOPLE EMPLOYED, MONIES SPENT, AND QUANTITIES AND VALUE OF MINERALS PRODUCED.
- C THE NUMBER OF ACRES OF FEDERAL MINERALS UNDER LEASE.
- D THE AMOUNT OF FEDERAL REVENUE GENERATED BY THE LEASING PROGRAM IN THE RECENT PAST AND REVENUE PROJECTIONS FOR THE FUTURE.
- E. THE AMOUNT AND VALUE OF MINERAL MATERIALS NEEDED TO CONSTRUCT NATIONAL FOREST ROADS, AND
- F. THE AMOUNT AND VALUE OF MINERAL MATERIALS USED BY PRIVATE PARTIES AND LOCAL GOVERNMENTS DERIVED FROM NATIONAL FOREST LANDS.

**FOREST SERVICE RESPONSE**

Additional information has been added to Appendix J - Locatable Minerals Of the 192,790 acres of land with identified mineral potential which are withdrawn from mineral entry, 186,190 (97%) are within Wilderness or HCNRA withdrawn by Congressional action. Other withdrawals originally requested by the Forest are currently being reviewed and reduced or eliminated wherever possible.

"Restricted" areas are open to mineral development. Much of the restriction is due to the nature of the land, which may be the subject of future wilderness legislation outside the Forest Planning process.

Coverage of industrial minerals has been added Coverage of mineral materials and leaseable minerals has been handled relative to their importance on the Forest.

We don't feel it is realistic to identify areas designated potentially valuable for oil & gas and geothermal resources as "known mineral areas." Very little is "known" about these commodities in these areas

- A. Contained in Appendix J.
- B. Numerous (unquantified) people currently spend time on the Forest, engaged in some form of mining activity. Few people are regularly employed in such endeavors. Figures on monies spent and value of minerals produced are not available
- C. Presently 1 lease for 1920 acres (O&G)
- D. Approximately 840,000 acres were under O&G lease at the peak of activity. Future trends will depend on the energy market.

E,F.

AMOUNT AND VALUE OF COMMON  
VARIETY MINERALS BY USER FROM WALLOWA-WHITMAN

Year	Forest Service		Private Parties & Local Gov't	
	Amount (tons)	Value (\$)	Amount (tons)	Value (\$)
1987	Information not Available			
1986	115,000	26,800	12,600	2,900
1985	186,000	43,400	2,000	500
1984	Information not Available			
1983	354,000	82,600	138,000	32,200
1982	458,000	106,900	2,000	500
1981	593,000	138,400	6,000	1,400
1980	596,000	139,100	5,000	1,200

Value of mineral material is assumed to be \$0.35/CY and average weight of the material is calculated at 1.5 tons/CY

**COMMENT NO. 4** IT IS RECOMMENDED THAT MANAGEMENT AREAS 1, 3, AND 6 BE MODIFIED TO SPECIFICALLY RECOGNIZE THAT MINERAL DEVELOPMENT MAY REQUIRE SOME SURFACE DISTURBANCE NOT NECESSARILY ENTIRELY COMPATIBLE WITH THE MANAGEMENT AREA

**FOREST SERVICE RESPONSE:**

The essential disturbance would not be incompatible with these management areas or others which are not withdrawn from mineral entry.

**COMMENT NO. 5** PAGE III-8 - THE MINERALS MAPS ON PAGE III-8 ARE GOOD, BUT THE SCALE IS TOO SMALL. MAPS AT THE SAME SCALE AS THE "ALTERNATIVE MAPS", AND PREFERABLY IN COLOR, WOULD ALLOW DIRECT COMPARISONS BETWEEN ALTERNATIVES AND THE MINERAL POTENTIAL MAPS

**FOREST SERVICE RESPONSE:**

Working scale maps are available at the Supervisor's Office in Baker.

**COMMENT NO. 6:** PAGE IV-8 - THE BUREAU OF MINES HAS PROVIDED A SUGGESTED REVISION OF TABLE IV-1 (SEE ATTACHMENT 3) THIS FORMAT WILL PROVIDE NEEDED DETAIL AS WELL AS AN EASIER METHOD OF COMPARISON OF ALTERNATIVES.

**FOREST SERVICE RESPONSE:**

Additional modifications have been made to the table. We do not believe the amount of work necessary to put information into the suggested format is warranted.



**COMMENT NO. 7:** PAGE IV-9 - WHILE SOME GENERAL IMPACTS OF MINING ACTIVITY ARE LISTED, NO MENTION IS MADE OF IMPACTS TO FISH AND WILDLIFE. AS IS STATED ON PAGE IV-7, ALTERNATIVE E AND A ARE LESS FAVORABLE TO MINERAL EXPLORATION: WOULD THESE ALTERNATIVES THEN HAVE LESS ADVERSE IMPACTS TO HABITATS OF FISH AND WILDLIFE?

**FOREST SERVICE RESPONSE:**

Potentially, yes

**COMMENT NO. 8:** APPENDIX C - MINERAL POTENTIAL IS NOT DISCUSSED FOR ALL OF THE ROADLESS AREAS. IT WOULD ASSIST THE REVIEW IF THIS INFORMATION WAS GIVEN FOR EACH ROADLESS AREA AND IF IT WERE LOCATED IN THE SAME SECTION OF THE DISCUSSION

**FOREST SERVICE RESPONSE**

Minerals data for all roadless areas has been added

**COMMENT NO. 9:** APPENDIX 1, PAGE 1-7, G.1 - IT STATES THE "REMAINS OF OLD MINING ACTIVITY IS EVIDENT FROM PRE-1930'S RESIDUAL PLACER MINING FOR COPPER AND MOLYBDENUM" BUREAU OF MINES HAS NO RECORDS OF PLACER MINING FOR COPPER AND MOLYBDENUM, AND REQUESTS DETAILS ON THIS MINE BE SENT TO THE WESTERN FIELD OPERATIONS CENTER IN SPOKANE, WASHINGTON.

**FOREST SERVICE RESPONSE:**

This was an error which has been corrected

**COMMENT NO. 10:** APPENDIX J - WITH REGARD TO MINERALS, APPENDIX J IS WELL PREPARED THE DEFINITIONS ARE CLEAR AND CONCISE AND THE DATA ARE WELL RESEARCHED AND VERY USEFUL IT IS RECOMMENDED, HOWEVER, THAT SUBJECTIVE LANGUAGE SUCH AS "THE HORROR STORIES OF PAST OPERATIONS" (PAGE J-6) BE REMOVED.

**FOREST SERVICE RESPONSE:**

Done

**COMMENT NO. 11.** THE EVALUATION CRITERIA FOR NONENERGY MINERALS (TABLE J-3) IMPLY THAT ONLY SUBSTANTIAL DEVELOPMENT/PRODUCTION WITHIN 10 YEARS IS CONSIDERED IN THE PLANNING PROCESS. THIS IS TOO SHORT A TIME FRAME TO MAKE JUDGEMENTS RESTRICTING MINERAL DEVELOPMENT. LONG-RANGE PLANNING IS NEEDED FOR MINERAL RESOURCES

**FOREST SERVICE RESPONSE.**

We don't mean to imply that only 10 years is used for planning The matrix is designed to show the level of likelihood for development within 10 years Beyond that time frame, new discoveries may play an important role, and it may be necessary to modify the mineralized area boundaries and/or add new areas

**COMMENT NO. 12** THE MINERAL COVERAGE IS ADEQUATELY ADDRESSED AND COULD SERVE AS A MODEL FOR OTHER PLANS THAT ARE IN PROGRESS.

**FOREST SERVICE RESPONSE**

Thank you.

**COMMENT NO. 13 S-32 MINERALS**

THE DEIS REFERS TO ADVERSE EFFECTS ON MINING THAT WILL STILL BE PRESENT AFTER ALL PROTECTION MEASURES ARE IN OPERATION. HOWEVER, THE VARIOUS MINERAL SECTIONS THROUGHOUT THE THREE VOLUME DRAFT REPORT DO NOT SEEM TO DISCUSS THE ADVERSE EFFECTS.

**FOREST SERVICE RESPONSE:**

Additional information has been added to the EIS, Chapter IV, and the Summary. Temporary reduction in cover along riparian zones, potential for temporary impairment of stream quality, creation of mine waste rock and tailings piles.

**COMMENT NO. 14:** THE EXPERTISE AND QUALIFICATIONS OF THE INDIVIDUALS ON THE USDA FS PLANNING TEAM WITH RESPECT TO GEOLOGY AND MINERALS SHOULD BE DESCRIBED IN THE DOCUMENTS.

**FOREST SERVICE RESPONSE:**

This is briefly described in Chapter V of the EIS.

**COMMENT NO. 15:** APPENDIX B DESCRIBES THE ANALYSIS PROCESS USED IN DEVELOPING THE PLAN WE FOUND NO REFERENCE TO GEOLOGIC OR MINERAL RESOURCE INFORMATION SOURCES OF DATA ON MINERALS (E G , PUBLISHED MAPS AND REPORTS) SHOULD BE IDENTIFIED, PROBABLY UNDER PART B, PAGE B-5

**FOREST SERVICE RESPONSE.**

Reference information has been added

**COMMENT NO. 16:** THE BOURNE AREA PROBABLY QUALIFIES AS A CLASS I MINERALIZED AREA BECAUSE THE BALD MOUNTAIN MINE COULD BEGIN OPERATING WITHIN TEN YEARS AS A RESULT OF ON-GOING EXPLORATION EFFORTS BY AMERICAN COPPER AND NICKEL COMPANY AND NERCO. EXPLORATION, INCLUDING EXTENSIVE DIAMOND DRILLING, HAS BEEN UNDERWAY SINCE 1980 AND IS SCHEDULED TO CONTINUE IN 1986.

**FOREST SERVICE RESPONSE**

Text changed accordingly.

**COMMENT NO. 17** THE UPPER PARTS OF THE NORTH POWDER RIVER AND THE NORTH FORK OF THE JOHN DAY RIVER WHICH HEAD ON OPPOSITE SIDES OF ELKHORN RIDGE IS A CLASS II MINERALIZED AREA. MANVILLE CORPORATION HAS BEEN EXPLORING COPPER, MOLYBDE-

NUM, AND GOLD OCCURRENCES IN THE AREA FOR MORE THAN TEN YEARS AND RECENTLY LEASED THE PROPERTIES TO SHELL MINING COMPANY THE AREA PROBABLY SHOULD BE MADE A PART OF CABLE COVE AREA (MAP NO 16, PAGE J-14). MANVILLE'S ACTIVITY IS MENTIONED ON PAGE I-7

**FOREST SERVICE RESPONSE:**

The change has been made.

**COMMENT NO. 18:** THE STATEMENT IN PARAGRAPH G 1, PAGE I-7 REGARDING THE NORTH POWDER RIVER IS INCORRECT. GOLD, NOT COPPER AND MOLYBDENUM, WAS THE TARGET OF THE PRE-1930'S PLACER MINING ON THE STREAM

**FOREST SERVICE RESPONSE.**

Corrected.

**COMMENT NO 19** UNDER MULTIPLE USE MINING IS AN IMPORTANT UTILIZATION OF PUBLIC LAND THEREFORE, BEFORE FOREST PLANS ARE IMPLEMENTED, WHETHER LARGE OR SMALL, THE MINING CLAIMS OWNERS AFFECTED BY THESE PLANS SHOULD BE NOTIFIED AND ALLOWED COMMENT TO FACILITATE SAFE OPERATIONS. FOR EXAMPLE: 1) LOGGING OPERATION WHILE MINER IS USING EXPLOSIVES, 2) PESTICIDE SPRAYING OVER PLACER OPERATION; 3) NEW ROAD CONSTRUCTION DIRECTLY OVER A MINING OPERATION; AND 4) ANY ENVIRONMENTAL ASSESSMENT BEING DONE OVER A CLAIM WHICH MAY EFFECT MINING AND MILLING OPERATIONS.

**FOREST SERVICE RESPONSE:**

We agree and we try to keep miners informed. The time lag between location of a claim and appearance on BLM claim records may cause some claims to be missed, and on occasion, the claimant gives an incorrect location for his claim(s), again causing him not to be notified

**COMMENT NO. 20:** DEFINITIONS FOR "SIGNIFICANT DISTURBANCE" SHOULD BE PROVIDED RELATIVE TO FILING AN OPERATING PLAN. GENERAL MITIGATING MEASURES THAT WOULD BE REQUIRED SHOULD BE OUTLINED, SUCH AS RECLAMATION AND BONDING ALSO, THE FOREST SERVICE ROLE IN MONITORING AND ENFORCEMENT OF OPERATING PLAN REQUIREMENTS SHOULD BE DESCRIBED.

**FOREST SERVICE RESPONSE:**

Additional information provided on page 4-32 of the Plan

**COMMENT NO. 21** STANDARDS AND GUIDELINES MINERALS - ADD - RESOURCE SPECIALISTS WILL BE CONSULTED FOR ALL APPLICATIONS IN MANAGEMENT AREAS 3,5,6,7,8,9,10,11,12,13,14,15,18 NOT 19, SINCE IT IS WITHDRAWN FROM MINERAL ENTRY.

**FOREST SERVICE RESPONSE.**

Additional information provided on page 4-32 of the Plan.

**COMMENT NO. 22:** MY INPUT IS NO MINING IN ROADLESS AREAS. I WOULD BE LESS AGAINST SMALL MINING OPERATIONS IF I KNEW THAT THE USDA FS DID ITS JOB IN CLEANING THEM UP AND MAKING THEM ENVIRONMENTALLY SOUND, BUT YOU DON'T. I TOTALLY OPPOSE LARGE SCALE MINING BECAUSE THERE ISN'T A HOPE OF NOT DESTROYING THE LOCAL ECOSYSTEM. AGAIN, AS USUAL, I WOULD LIKE TO SEE YOU SPECIFICALLY LIST MITIGATION MEASURES TO AVOID STREAM, VEGETATION, WILDLIFE DAMAGE BY MINING. COMMIT YOURSELVES TO SOMETHING.

**FOREST SERVICE RESPONSE**

We are now getting good compliance from operators, and will impose additional operating restrictions and reclamation measures on operations in roadless areas. We have little or no long-term impact from large scale mining operations under the present regulations. Legitimate large-scale operators are generally ready and willing to comply with reasonable regulations.

General mitigation measures have been added to the Plan at page 4-32. A list of specific measures drawn from for Plans of Operation are on file at the Forest and District offices.

**COMMENT NO. 23:** THE REMAINING 34,400 ACRES ARE ALL AVAILABLE BUT LIE WITHIN UNDEVELOPED AREAS OR AREAS WITH SPECIAL ENVIRONMENTAL CONSTRAINTS WHICH MAY MAKE EXPLORATION MORE DIFFICULT.

**SUGGESTIONS:** (1) PROVIDE INFORMATION REGARDING THE EFFECT OF THE ADDED RESTRICTION ON EXPLORATION AND MINING IN THE LATTER 34,400 ACRES AND THE PROCEDURES TO BE FOLLOWED BY THE USDA FS IN REGULATING AND PERMITTING THESE ACTIVITIES

**FOREST SERVICE RESPONSE:**

Change made in DEIS, page IV-12.

**COMMENT NO. 24:** PROVIDE A PROCESS FOR ALTERING AREA MANAGEMENT PLANS TO ACCOMMODATE NEW DISCOVERIES, PARTICULARLY IN AREAS WHERE THE EXISTING PLAN IMPOSES MORE THAN NORMAL RESTRICTION ON DEVELOPMENT. THE PLAN MAY BE AMENDED AS CONDITIONS CHANGE (PAGE 5-3) BUT DOES THIS CALL FOR THE INCORPORATION OF NEW DATA OR MINERAL DEPOSITS INTO THE PLAN ON AN INTERIM BASIS?

**FOREST SERVICE RESPONSE.**

We disagree that a special process is necessary. Changing conditions would include new mineral information.

**COMMENT NO. 25.** TABLE 5-1 IDENTIFIES KEY ACTIVITIES AND OUTPUTS TO BE MONITORED DURING IMPLEMENTATION OF THE PLAN. MINERALS ARE NOT PART OF THAT PROGRAM.

**SUGGESTION: DOCUMENT THE AMOUNT OF FOREST USE (VISITOR DAYS) BY PROSPECTORS AND MINERS, BOTH PROFESSIONAL AND RECREATIONAL MONITOR RECLAMATION PLAN COMPLIANCE.**

**FOREST SERVICE RESPONSE.**

Minerals data added to Table 5-1

**COMMENT NO. 26: WHAT IS THE AMOUNT OF SEDIMENTATION ATTRIBUTABLE TO MINING?**

**FOREST SERVICE RESPONSE**

Currently negligible, overall.

**COMMENT NO. 27: WHAT S AND G'S (STANDARDS AND GUIDELINES) MUST BE FOLLOWED BY MINING OPERATORS?**

**FOREST SERVICE RESPONSE:**

Additional information provided on page 4-32 of the Plan

**COMMENT NO. 28: WHAT STREAMS HAVE CLAIMS AND HOW MANY ARE ACTIVELY WORKED?**

**FOREST SERVICE RESPONSE:**

Mining claim records are available at BLM and many Forest Service offices. No attempt has been made to quantify active claims, since this would require a definition for "active." Most placer claims are active if occasional panning by claimants is considered. The number would be greatly reduced if a 20 yard per day definition were used.

**COMMENT NO. 29: WHAT COSTS FOR STREAM REHABILITATION ARE GENERATED BY THIS ACTIVITY AND ARE ANY OF THESE COSTS BORNE BY THE OPERATORS? WHAT LEVEL OF ENFORCEMENT IS ENACTED ON THESE MINERS? WHAT CONSTITUTES "SUBSTANTIAL" DEGRADATION AND HOW LONG CAN THE IMPACT BE MAINTAINED? ISN'T THIS ACTIVITY ONE WHICH CONTINUES YEAR AFTER YEAR AT A SITE WITH LITTLE STREAM RECOVERY PERIOD PROVIDED?**

**FOREST SERVICE RESPONSE:**

Cost of stream rehabilitation for current mining operations is borne by the operator. We have diligent administration of mining operations, but some infractions occasionally occur. I'm not sure what the respondent is talking about in reference to "substantial" degradation. Some placer operations are long term (particularly small-scale operations). In general, we press for reclamation in a timely fashion. Fencing is frequently utilized to protect riparian revegetation within grazing allotments.

**COMMENT NO. 30: THERE ARE NO DIFFERENCES AMONG ALTERNATIVES IN EFFECTS OF MINING (DEIS S-32) WHAT ARE THE COMMON STANDARDS? IS MINING SIMPLY A WILD CARD GIVEN FREE REIN?**

**FOREST SERVICE RESPONSE:**

Additional information provided on page 4-32 of the plan

**COMMENT NO. 31** THE PLAN, BY REDUCING ACCESS TO TIMBER OPERATORS, WILL RESULT IN REDUCING ACCESS TO THE COTTAGE LEVEL MINERALS INDUSTRY. THE MINERAL INDUSTRY RELIES HEAVILY UPON TIMBER OPERATIONS TO ESTABLISH NEW ROADS AND MAINTAIN EXISTING ROADS. FEW IN THE COTTAGE LEVEL MINING INDUSTRY CAN AFFORD TO BUILD NEW ROADS, THEREFORE, REDUCTIONS IN TIMBER ACCESS RESULT IN LESS MINERALS ACCESS OR THE BUILDING OF POOR QUALITY ROADS.

**FOREST SERVICE RESPONSE:**

Road building can be a real plus for mineral exploration and development due to improved access and new exposures of road cut geology. Roads are not constructed by the Forest Service for these reasons, however. Miners and prospectors will have to make-do with existing routes and exposures, or bear the cost and responsibility for new routes which do not fit with the Forest Service road development program.

**COMMENT NO. 32.** THE FOREST SHOULD BE WITHDRAWN FROM APPROPRIATION UNDER THE MINING OR MINERAL LEASING LAWS, INCLUDING A COMPLETE MORATORIUM ON ENERGY LEASING

**FOREST SERVICE RESPONSE:**

This view is counter to the Mining and Minerals Policy Act of 1970, and we believe it would be against the best interests of the Region, State, and Nation.

**COMMENT NO. 33:** SUGGESTIONS: (1) PROVIDE MORE INFORMATION ON THE DISTRIBUTION AND PRODUCTION OF NONMETALLIC MINERAL OCCURRENCES IN APPENDIX J PAGES 2-6 AND ELSEWHERE AS APPROPRIATE. LIMESTONE RESOURCES ARE WIDELY SCATTERED IN ASSOCIATION WITH PERMIAN AND TRIASSIC SEDIMENTARY AND VOLCANIC ROCKS. THE LARGEST EXPOSURES ARE COMPRISED OF THE MARTIN BRIDGE FORMATION IN THE WALLOWA MOUNTAINS BOTH WITHIN AND OUTSIDE OF THE EAGLE CAP WILDERNESS AREA. (WALLOWA AREA, PAGE J-4) BECAUSE THESE DEPOSITS ARE POORLY LOCATED IN REGARD TO TRANSPORTATION THEY PROBABLY WILL NOT BE MINED FOR MANY YEARS, BUT THEY CONSTITUTE A HUGE RESOURCE.

THE REPORT BY MOORE PROVIDES SOME INFORMATION ON THE DEPOSITS AND SHOULD BE ADDED TO THE BIBLIOGRAPHY (B. N. MOORE, 1937, NONMETALLIC MINERAL RESOURCES OF EASTERN OREGON: U. S. GEOLOGICAL SURVEY BULLETIN 875).

**FOREST SERVICE RESPONSE.**

This information has been added as suggested

**COMMENT NO. 34:** TWO CHEMICAL GRADE PRIVATELY OWNED LIMESTONE DEPOSITS OCCUR JUST OUTSIDE THE BOUNDARY OF MARBLE POINT ROADLESS AREA, ONE ON MARBLE CREEK AND THE OTHER ON BABOON CREEK (BAKER AREA, J-11 AND PAGE C-42). CHEMICAL LIME

COMPANY PRODUCED LARGE TONNAGES OF LIMESTONE FROM BOTH DEPOSITS IN 1958 - 1969. RESERVES REMAIN AND SOMEDAY WILL BE MINED.

**FOREST SERVICE RESPONSE.**

This information has been added as suggested.

**COMMENT NO. 35:** PERLITE OCCURS IN LARGE QUANTITIES ON DOOLEY MOUNTAIN (BALD-DOOLEY AREA, PAGE J-12). THERE HAS BEEN MINOR PRODUCTION IN RECENT YEARS. DEMAND FOR THIS RESOURCE WILL INCREASE AS MORE EASILY ACCESSIBLE DEPOSITS ELSEWHERE ARE DEPLETED.

**FOREST SERVICE RESPONSE:**

This information has been included in the FEIS

**COMMENT NO. 36:** BUILDING STONE HAS BEEN PRODUCED IN SMALL QUANTITY FOR MANY YEARS FROM QUARRIES ON DOOLEY MOUNTAIN (BALD-DOOLEY, PAGE J-12) . THE STONE, USED MAINLY FOR DECORATIVE PURPOSES AND SOLD UNDER THE TRADE NAME "MOON MESA" HAS BEEN MARKETED IN SEATTLE, PORTLAND, SPOKANE AND OTHER AREAS OF THE NORTHWEST

**FOREST SERVICE RESPONSE:**

This information has been included in the FEIS

**COMMENT NO. 37:** THE WALLOWA COUNTY COAL FIELD IS DISCUSSED BRIEFLY ON PAGES I-5 AND J-3 (APPENDICIES). FERNS' COAL REPORT SHOULD BE ADDED TO THE BIBLIOGRAPHY (PRELIMINARY REPORT ON NORTHEASTERN OREGON LIGNITE AND COAL RESOURCES, UNION, WALLOWA AND WHEELER COUNTIES ORE DEPARTMENT OF GEOLOGY AND MINERAL INDUSTRIES, OPEN FILE REPORT NO. 0-85-2, M. L. FERNS, 1985) MENTION SHOULD BE MADE THAT SEDIMENTARY DEPOSITS OVERLYING THE COAL MAY CONTAIN LOCAL CONCENTRATIONS OF QUARTZ-FELDSPAR SAND THAT COULD BE MINED, ALTHOUGH NOTHING FOUND TO DATE IS JUDGED TO BE OF COMMERCIAL GRADE

**FOREST SERVICE RESPONSE.**

This information has been included in the FEIS.

**COMMENT NO. 38.** AN INVENTORY OF CRUSHED ROCK AND SAND AND GRAVEL SOURCES IS NOT INCLUDED AND MAY NOT BE NEEDED IT MAY BE DESIRABLE, HOWEVER, TO PROVIDE DATA ON THE QUANTITY AND TYPES OF MATERIALS UTILIZED, WHERE AND BY WHOM, NUMBER OF PITS AND SUCH OTHER INFORMATION AS WOULD HELP DEMONSTRATE THE USEFULNESS OF THE RESOURCE

**FOREST SERVICE RESPONSE:**

We do not have a complete inventory of all crushed rock or sand and gravel sources. The quantity of material utilized varies considerably, depending largely upon the amount of road projects in any given year which call for crushed rock. The large majority of crushed rock is

used by Forest Service, State, or County road contractors. Without this resource, many of the uses of the National Forest would not be possible because access could not be provided at a reasonable cost

**COMMENT NO. 39: SMALL ECONOMIC MANGANESE DEPOSITS OCCUR IN THE BALD-DOOLEY AND GREENHORN-WHITNEY (PAGE J-19) AREAS**

**FOREST SERVICE RESPONSE**

This information has been included in the FEIS.

**COMMENT NO. 40: TALC OCCURRENCES ARE KNOWN IN THE BALD-DOOLEY (PAGE J-12) AND MT. IRELAND (PAGE J-23) AREAS.**

**FOREST SERVICE RESPONSE.**

This information has been included in the FEIS

**COMMENT NO. 41: THERE ARE TWO GOLD AREAS WITHIN THE UPPER GRANDE RONDE ROAD-LESS AREA G275) THAT HAVE HAD PAST MINERAL PRODUCTION. (1) THE GRANDE RONDE MINES, WITH ALTERNATE NAMES OF THE GOLDEN GATE AND THE SUNSET, ARE LOCATED IN SEC. 26, T 6 S., R. 36 E. THIS MAY BE THE SAME LOCATION AS THE AURELIA MINE MENTIONED ON PAGE C-6 OF THE SUPPLEMENT. (2) THE CAMP CARSON AND CARSON CREEK PLACER AREAS ARE LOCATED IN SECS 22 AND 28, T 6 S., R. 36 E OUR OFFICE IS LACKING MINERALS INFORMATION ON THESE AREAS; THEREFORE, WE SUGGEST THAT A MINERALS SURVEY BE CONDUCTED OR INFORMATION BE PROVIDED TO US ON THESE AREAS PRIOR TO SELECTION OF A MANAGEMENT ALTERNATIVE.**

**FOREST SERVICE RESPONSE:**

We have added this information to the description of the area. We do not believe it necessary to conduct additional mineral surveys prior to selecting a management alternative since mineral entry will not be precluded with any of those alternatives being considered.



**TRANSPORTATION SYSTEM IN GENERAL**  
**Code 1000**

**COMMENT NO. 1: I OPPOSE THE USE OF TAX FUNDS TO BUILD ROADS WHICH IN EFFECT SUBSIDIZE THE TIMBER COMPANIES.**

**FOREST SERVICE RESPONSE:**

Each timber sale is planned and all activities that are needed to carry out the sale are considered in this plan. The timber sale plan would include such things as (1) which trees will be cut, (2) what type of equipment will be needed to log the area, (3) what roads will be needed to haul the logs to the mill, and many other factors. In some cases, the roads needed to get to the sale and haul the logs to the mill are already in place, in which case the only road cost involved would be for maintenance. However, if there are no roads into the sale area, or if existing roads are not adequate for some reason, then construction or reconstruction of roads becomes part of the cost of carrying out that timber sale.

Normally, the method used to pay for such needed roads is to simply reduce the price that the timber purchaser would have to pay for the timber by the amount that the road construction costs (called purchaser road credits)

We occasionally request appropriated funds to construct roads into areas where the present timber values are insufficient to cover the road costs. In these instances, the roads may be necessary for other management needs or may be cost effective for timber management in the long-run.

**COMMENT NO. 2. NEW ROADS ARE NOT NECESSARY AND MANY EXISTING ROADS SHOULD BE CLOSED TO USE.**

**FOREST SERVICE RESPONSE:**

The large majority of new road construction planned over the next three decades is tied directly to accessing currently unroaded areas. With the decision to emphasize timber harvesting in those areas, new road access is necessary. Approximately 34 percent of the existing roads on the Forest is presently planned for closure, and we anticipate this percentage increasing as the Forest Plan is implemented and we bring areas into compliance with the road density guidelines contained in the Plan.

**COMMENT NO. 3: FROM A TOURISM STANDPOINT, SOME OFFICIALS IN EASTERN OREGON ARE ALSO CONCERNED THAT ALTERNATIVE C LACKS PROPER PLANNING FOR ROAD ACCESS TO RECREATION AREAS.**

**FOREST SERVICE RESPONSE**

The major area of additional recreational development on the Wallowa-Whitman National Forest is within the Hells Canyon National Recreation Area. The Comprehensive Management Plan details a significant number of new recreation developments to be carried out under that plan, including several major road projects over the next ten years. Most of the other developed recreation facilities on the Forest already have suitable access.

**COMMENT NO. 4** I ONCE OBSERVED THE FORESTER IN CHARGE OF THE SALE TRY TO JUSTIFY RUNNING A ROAD OVER A QUARTER OF A MILE THROUGH AN OPEN HILLSIDE TO A FINGER OF TREES IN A DRAW. SINCE HE DECIDED HE COULD CUT ENOUGH TREES TO BREAK EVEN ON ROAD CONSTRUCTION, THE ROAD WAS BUILT. THIS LEFT A TERRIBLE SCAR ON THE LANDSCAPE AND DIDN'T MAKE MONEY FOR ANYBODY BUT THE ROAD CONSTRUCTION PEOPLE THIS KIND OF THING SHOULD BE STOPPED.

**FOREST SERVICE RESPONSE:**

We agree.

**COMMENT NO. 5** I DON'T BELIEVE IN THESE LOGGING COMPANIES NEEDING A ROAD EVERY THREE HUNDRED YARDS ALONG THE SIDE OF THE MOUNTAIN FOR POACHERS, ROAD HUNTERS, AND THE SCARRING OF THE FOREST WHATS WRONG WITH DOING IT LIKE THEY USED TO WITH DONKEY ENGINES SKIDDING THE LOGS DOWN THE MOUNTAIN OR SLIDES FOR THE LOGS TO GO DOWN.

**FOREST SERVICE RESPONSE:**

There is a balance between roading an area and skidding distance for logs that we try to look at on every sale. Economics and resource protection are the two main concerns in arriving at proper spacing of logging roads. We agree that frequent mid-slope roads are undesirable and we minimize them as much as possible now days. Timber purchasers no longer use donkey engines or slides by their choice.

**COMMENT NO. 6:** THE WORST OFFENDER IN THE DESTRUCTION OF OUR WILD PLACES IS LUMBER HARVEST. LOGGING BUILDS ROADS ALSO, WHICH PLACES OUR FORESTS AND WATERSHEDS IN DOUBLE JEOPARDY. WE, THE PUBLIC ARE LEFT WITH ROADS TO NOWHERE.

**FOREST SERVICE RESPONSE:**

We believe timber harvesting can be done in much of the National Forest without causing permanent damage. Obviously, timber harvesting and some other uses of the Forest are incompatible with some recreational uses.

**COMMENT NO. 7:** IF YOU DON'T HAVE ROADS, MOST PEOPLE WILL SEE ONLY A SMALL PART OF AN AREA.

**FOREST SERVICE RESPONSE:**

We believe a reasonable amount of access for the general public is essential to the enjoyment of the National Forests. The question is, how much is a reasonable amount? And where will it be?

**COMMENT NO. 8** ROAD MANAGEMENT SHOULD REFLECT THE MAJORITY BENEFIT TO THE TAXPAYERS OF THE U. S. ROAD MAINTENANCE COST AND STREAM SEDIMENTATION RESULTING FROM ROADS, INCREASES IN PROPORTION TO THE LEVEL OF TRAFFIC THEY RECEIVE. ROAD DENSITIES SHOULD BE REDUCED TO BELOW 1.0 MILE PER SQUARE MILE FOREST WIDE. FIREWOOD CUTTING SHOULD BE ALLOWED FOR TWO YEARS FOLLOWING TIMBER HARVEST, THEN ROADS CLOSED, EXCEPT MAIN ARTERIAL ROUTES. MANY EXISTING ROADS/TRAILS IN

FRAGILE SOIL AND RIPARIAN AREAS SHOULD BE OBLITERATED THROUGH SEEDING/DISCING IT DOESN'T MAKE GOOD RESOURCE MANAGEMENT SENSE TO LEAVE THOUSANDS OF ACRES IN A NONPRODUCTIVE STATE.

**FOREST SERVICE RESPONSE:**

We have tried to plan for a mixture of road situations. Only about 10 percent of the road miles on the Forest are planned for low clearance vehicles, such as passenger cars. Another 30 to 40 percent of the miles will be closed between timber harvest entries, and will not receive any use during their closure. There are quite a few miles of roads on the National Forest that are relatively low standard, receive minimal use, but still serve a useful purpose to the public. These are roads (typically classed as high clearance or pickup-type roads) which provide access for recreational uses of all types (hunters, berry pickers, mushroom gatherers, fishermen, and people who just enjoy driving on primitive roads). These roads also serve to distribute firewood cutting over a larger portion of the Forest, which provides a service to that segment of the public. We believe that, if only main arterial routes were left open after timber harvest, we would not be providing for uses of the National Forests which are historical and important.

**COMMENT NO. 9 RECOMMENDATION ROADS**

1. NO MORE BE BUILT
2. KEY RECREATION ROADS BE PAVED (NOT WIDENED)
3. LA GRANDE WATERSHED ROADS SHOULD BE SEEDED AND PUT TO BED

**FOREST SERVICE RESPONSE**

Decisions to build new roads are driven by the type of management emphasis that is placed on an area. If no more development of the Forest is planned, then no more new roads will be needed. New roads are built primarily for accessing new timber management areas.

We have paved several of the main recreation roads on the Forest in recent years, where traffic and conditions seemed to warrant pavement. Examples are Elkhorn Drive, Wallowa Mountain Loop, and the Grande Ronde River Road. Widening may or may not be necessary. Roads on National Forests that serve the general public recreationist are covered by the Highway Safety Act. This law requires that we meet certain standards, such as lane width, signing, and hazard marking, so the public will not be subjected to unexpected safety hazards. If a road has a certain amount of traffic, these standards may require that we widen a road to a full two-lane width. Since most of our roads start out as single-lane roads, this occasionally results in the need for widening as traffic increases on a route.

Most of the roads being built in the La Grande Watershed will be closed until the next timber sale entry.

**COMMENT NO. 10: THERE SHOULD BE NO NEW ROAD CONSTRUCTION IN THE FOREST, AND A REVIEW OF ALL EXISTING ROADS SHOULD BE MADE TO DETERMINE WHICH ARE UNNECESSARY OR DAMAGING TO THE ENVIRONMENT.**

**FOREST SERVICE RESPONSE**

The decision to build new roads is based on the need as expressed by the resource management areas. If new timber sale areas are to be opened up, then new road construction will usually be needed.

All roads on the Wallowa-Whitman National Forest have been inventoried (even the wheel track roads that have simply "appeared" over the years), and we have made decisions on which ones are needed for long-term management purposes and which ones should be closed and returned to resource production. Environmental damage is one of the main criteria for determining whether to keep a road or close it. Every road that is to be kept on the permanent road system has a written management objective which details the purpose of the road and how it is to be managed, including any environmental concerns.

**COMMENT NO. 11: WE NEED BETTER ROADS FOR BETTER RECREATION SO OUR VERY YOUNG AND VERY OLD AND DISABLED CAN ENJOY THE OUT OF DOORS TOO.**

**FOREST SERVICE RESPONSE**

We have identified approximately 10 percent of the road miles on the Forest to be maintained to a standard which will allow all types of traffic to use these roads. In addition, there are another 40 to 50 percent of the roads which will be accessible to standard pickups. We believe this provides a reasonable amount of access to the various areas on the Forest.

**COMMENT NO. 12: INCREASE AND IMPROVE THE ROADS WE HAVE ON THE NATIONAL FOREST I WANT TO USE THESE ROADS FOR RECREATION SUCH AS PICNICS, MUSHROOMING, BERRY PICKING, ETC.**

**FOREST SERVICE RESPONSE**

We expect to have approximately 50-60 percent of the total mileage of roads on the Forest open to some type of use. For various reasons, many of these roads will not be maintained for certain types of vehicles, but should be accessible by standard pickup-type vehicles. We think that the mixture of open and closed roads we are planning provides a reasonable amount of access, while minimizing the negative impacts of open roads on wildlife, watershed values, and those who enjoy more primitive forms of recreation.

**COMMENT NO. 13: AS A FOREST PROPERTY OWNER ON MT EMILY, I AM DEEPLY CONCERNED ABOUT YOUR PLANS TO BUILD MORE PERMANENT ROADS AND ALLOW MORE LOGGING. IF TREES MUST BE HARVESTED FROM THIS AREA, PLEASE DO NOT PLAN ANY PERMANENT ROADS.**

**WE HAVE ALREADY HAD PROBLEMS WITH PEOPLE ABUSING OUR PROPERTY. IF NEW ROADS ARE BUILT, INCREASING PUBLIC ACCESS, WE MAY HAVE TO CLOSE THE PROPERTY TO PUBLIC USE, A THING WE HAVE NEVER DONE**

**FOREST SERVICE RESPONSE:**

Your concerns will be carefully considered in any timber sale plans for the area. You are encouraged to keep in contact with the District Ranger in order that you may be aware of long-range plans.

**COMMENT NO. 14.** EFFECTIVE THINNING OF TREES ADJACENT TO HIGHWAYS IS IMPORTANT TO THE SAFETY OF THE TRAVELING MOTORIST. BY LEAVING A CLEAR ZONE BETWEEN THE HIGHWAY AND TIMBER STANDS, THE MOTORIST BENEFITS IN TWO WAYS: (1) FEWER ACCIDENTS BETWEEN AUTOMOBILES AND DEER/ELK; AND (2) THE CLEAR ZONE WILL ELIMINATE SHADY SPOTS ON THE HIGHWAY WHICH ALLOW MOISTURE ON THE ROAD SURFACE TO FREEZE IN COLD WEATHER, CAUSING UNSAFE DRIVING CONDITIONS.

THE DRAFT ENVIRONMENTAL IMPACT STATEMENT SHOULD INCLUDE THIS INFORMATION IN ITS POLICY CONCERNING TIMBER HARVESTING AND MANAGEMENT OF LANDS ADJACENT TO STATE HIGHWAYS.

**FOREST SERVICE RESPONSE:**

We agree with the advantages stated, and try to work with the Oregon State Highway Division on specific situations regarding this problem. The Forest Service and the State of Oregon do have in effect a Memorandum of Understanding which provides the vehicle for coordination on State Highways crossing National Forest lands.

**COMMENT NO. 15:** I HAVE SEEN THE DESTRUCTION OF WILDLIFE HABITAT CAUSED BY LOGGING, THE SILTING OF STREAMS, AND THE MYRIAD OF ROADS THAT PERMIT NO SAFE HAVEN FOR GAME. AS A CAMPTENDER, THE ONLY TRANSPORTATION WAS BY HORSE, AND NOW IN THOSE AREAS THERE ARE COUNTLESS ROADS. OUR FORESTS DO NOT NEED MORE DEGRADATION. THE TIMBER IS SCATTERED, AND THE COST OF ROAD BUILDING IS EXCESSIVE IN RELATION TO THE VALUE OF THE TIMBER HARVESTED. IT IS IMPOSSIBLE TO RESTORE THE LAND AND VEGETATION TO ITS FORMER STATE

**FOREST SERVICE RESPONSE:**

Increased demands on the resources of the National Forests, particularly for timber, lead to some tough decisions about how to manage those resources. It is no longer possible to provide for all the services that the public wants out of their National Forests without some allocations where timber will be harvested and other commodity uses allowed. The public has also given strong direction in recent years as to how they want the resources protected, through passage of environmental protection laws. The Forest Service complies with all of those laws during the implementation of any activity. Timber sales and associated road work are subjected to detailed analysis of the effects, including economics, and no sale or road is allowed which does not comply with the appropriate resource protection laws.

**COMMENT NO. 16:** THE RANCHERS CLAIM THEY NEED ROADS TO BRING SALT TO THEIR CATTLE. I PACKED SALT ON PACK MULES AND THEY CAN DO THE SAME.

**FOREST SERVICE RESPONSE.**

Roads are rarely (if ever) constructed simply for the purpose of providing access for salting cattle. Occasionally, this factor will enter into a decision on whether or not to close a road.

**COMMENT NO. 17.** NEW ROADS MAY BE MINIMIZED BY MAINTAINING UNROADED NATURAL AREAS AND UTILIZING MANAGEMENT AREAS 3, 3A, 6, OR 18, INSTEAD OF AREAS 1 OR 2 FOREST-WIDE. OPEN ROADS IN MANAGEMENT AREA 18 SHOULD BE A MAXIMUM OF 1.5 MILES/SQUARE MILES TO PROTECT ELK UTILIZATION IN THESE ASSIGNED AREAS. IT IS UNNECES-

SARY TO FORCE A COMPROMISE OF PROTECTION FOR ELK AND FISHERIES HABITAT BETWEEN MANAGEMENT AREAS 3, 3A, AND AREA 18

**FOREST SERVICE RESPONSE:**

We agree that 1.5 miles per square mile of open road would be more appropriate for this area. That change will be reflected in the final plan. We think that the mix of management areas in the selected alternative are responsive to the issues involved in managing the Forest.

**COMMENT NO. 18:** IF THE NUMBER OF "OPEN" ROAD MILES ON THE WWNF IS ONLY 6,000 AT A ROAD DENSITY OF 2.5 MILES/SQUARE MILE, THEN 1,536 MM ACRES COULD BE FULLY ROAD-ED. THERE ARE ONLY 1,411 MM ACRES OF FORESTED LAND ON THE WWNF INCLUDING THE SUITABLE ACRES OF WILDERNESS. THOUGH IT IS TRUE THAT SOME OF THE 921,218 NON-FOREST ACRES HAVE ROADS (DEIS III-19), 468,000 ACRES OF THIS IS ROADLESS, LEAVING ONLY 453,218 ACRES OF NON-FORESTED LAND WHICH IS POTENTIALLY ROAD-ED. THE WWNF DOES NOT CONSIDER IT WORTHWHILE TO HEAVILY ROAD SUCH LANDS FOR ACCESS BY LIVESTOCK INTERESTS AND CONSIDERING THE FACT THAT THE MAJORITY OF THE WWNF WAS TO HAVE A MAXIMUM ROAD DENSITY OF 1.5 MILES/SQUARE MILE, IT SEEMS THAT EITHER THERE ARE NOT AS MANY MILES OF ROAD AS REPORTED OR THE DENSITIES MAY BE MUCH HIGHER. THE PLAN 4-11, STATES THAT 1,745 MILES OF ROAD WOULD BE REQUIRED TO REACH THE ROAD DENSITY ASSIGNED TO ALL AREAS. SINCE DENSITIES ARE CALCULATED BY TAKING AVERAGES FOR 7,000 ACRE UNITS IN THE TRI SYSTEM (PLAN 4-33), LOCALIZED DENSITIES MIGHT BE HIGHER THAN 2.5 MILES/SQUARE MILE. DOES THIS SYSTEM AVERAGE IN LAND IN WILDERNESS AREAS OR WATER AREAS WHEN DETERMINING DENSITIES?

**FOREST SERVICE RESPONSE:**

Land which is officially classified as Wilderness is not included in the calculations for road densities. However, the current situation includes many areas which are well above the density criteria of 2.5 miles per square mile (there are also areas which are under this average). We estimate that, based on the allocations in the preferred alternative, the implementation of the plan will require that we eventually close approximately 1,745 miles of road to get down to the levels called for in the plan.

If there are areas where resource use and activities do not require that many roads, then these would obviously never be a problem. The important point is that we do plan to manage the road system to maintain an open road density to the levels shown for each allocation. This approach will be managed (measured) on a compartment-by-compartment basis (a compartment averages around 7,000 acres in size), which will eliminate the need to be concerned about gross figures.

**COMMENT NO. 19:** IF THERE ARE 9,300 MILES OF ROAD ON THE WWNF AND ALL ROADS ARE 12 FEET WIDE THERE WOULD BE 13,527 ACRES INSTEAD OF 10,686 (DEIS III-19). WHAT IS THE AVERAGE ROAD WIDTH INCLUDING DITCHES? LEAF (1974) (APPENDIX F-2, RESEARCH NOTE RM-274) USED A DISTURBED ROAD WIDTH OF 23 FEET.

**FOREST SERVICE RESPONSE:**

Several factors contribute to this apparent discrepancy. First, road widths vary substantially. In the study by Leaf (1974) the assumed road width was 14 feet and sideslopes averaged 26%. This resulted in a disturbed area width of 23 feet. Our lowest standard constructed roads are 12 feet wide. If a road of this width is built on a 10 percent sideslope (the average slope of our

62 x 63 land types) the typical disturbed area is about 13.5 feet. On the other end of the scale, 30 foot wide road on an SS landtype (average sideslope of 42%) would typically result in a disturbed width of 60-70 feet.

The majority of the constructed roads on the Forest are relatively low standard and the gentle landtypes are the most heavily roaded. The second factor is the wheel-track roads. Thirty percent of the inventoried road system consists of primitive wheel-track roads. Many of these are very narrow -- eight to ten feet in width. The third factor is the timing of the inventories. The 9,300 mile total reflects an updated inventory from what was used on page III-19 of the DEIS.

**COMMENT NO. 20** THE WWNF'S COST FOR MAINTAINING ROADS FOR PUBLIC USE IS \$9,000,000/YEAR. BECAUSE HIGH MAINTENANCE COSTS ARE SUPPORTED BY INCREASED CUTTING, WHAT IS THE JUSTIFICATION FOR OPENING ROADS INTO MARGINAL TIMBER LAND WHICH WILL YIELD BELOW COST SALES FOR AT LEAST TWO OR THREE ROTATIONS?

**FOREST SERVICE RESPONSE.**

The Wallowa-Whitman National Forest road maintenance budget averages about \$900,000 per year. These are the funds which are used to maintain the road system for public use. The decision to open new roads into an area always considers the total economics of the situation, including the cost of maintaining the additional road mileage. In reality, most of the new areas that are accessed do not add significantly to the annual maintenance costs for public access, because the large majority of the new roads constructed into areas like this are being closed after the sale is finished.

**COMMENT NO. 21:** WHY ARE MORE ROADS NOT OBLITERATED AFTER USE? THE PLAN (4-33) STATES THAT ROADS NOT NEEDED FOR FUTURE MANAGEMENT WILL BE OBLITERATED AT THE END OF PROJECT USE. HOW MANY MILES OF ROADS WILL BE CONSIDERED NOT TO BE NEEDED?

**FOREST SERVICE RESPONSE:**

As we plan the road system for an area, we consider three types of roads. One is where there is a need to provide for continuous public access into an area. These roads are built for that type of use and left open after the sale. A second type of road is one which is only needed for timber sale activities but will be needed the next time there is a timber sale or related activity in the area. These roads are built as permanent features, but are closed after the activity and not opened again until needed for a future sale. The third kind of road we plan for are those roads which are needed for one timber sale, but we see no need for them in the future. These roads are built as temporary facilities and as soon as the activity is completed, they are obliterated and returned to resource production. One-third to one-half the miles of roads on a typical timber sale are temporary.

**COMMENT NO. 22:** TRANSPORTATION SYSTEM: HELISPOTS SHOULD NOT BE CONSTRUCTED IN MANAGEMENT AREA 6 AREAS

ALL NEW ROADS SHOULD BE DEMONSTRATED TO BE SPECIFICALLY NECESSARY FOR TIMBER HARVEST OR OTHER USES, AND TO BE COST-EFFECTIVE

**FOREST SERVICE RESPONSE:**

We believe that it might be necessary to construct temporary helispots in the event of catastrophic fire or insect/disease epidemic, but that these temporary facilities should be treated the same as roads and obliterated following use. This language has been added to the final plan.

We certainly agree that any new roads should be essential and cost-effective, and our project planning process attempts to look at this issue.

**COMMENT NO. 23 IT WOULD ALSO BE GOOD TO INCLUDE A LIST OF MORE SPECIFIC MITIGATION MEASURES WHEN DEALING WITH ROAD IMPACTS ON FOREST RESOURCES**

**FOREST SERVICE RESPONSE.**

Specific mitigation measures cover such a wide variety of possibilities that we feel it would be practically impossible to come up with anything meaningful for a plan as broad as this. We feel we have dealt with the significant broad-based issues (e.g., road density, development of new access into unroaded areas, and how much public access is needed). In addition, we have covered some of the general types of mitigation efforts that would apply (see Chapter 4, Forest Plan). Beyond that, we think that specific mitigation measures are best dealt with when analyzing a specific project.

**COMMENT NO. 24: NO MORE LOGGING ROADS - THERE ARE ENOUGH AND I'M TIRED OF PAYING FOR THEM.**

**FOREST SERVICE RESPONSE**

The Forest Service only builds new logging roads when they are needed to access timber. This need can come from opening up new areas that have previously been unroaded, or it can come from re-entering areas that were logged previously but where road systems were not properly located to serve today's needs. Some new roads will be needed if we are to provide the level of timber harvest specified in the selected alternative.

**COMMENT NO. 25: I'D LIKE TO SEE MORE USE OF SEASONAL ROAD CLOSURES TO PREVENT THE DAMAGE TO ELK HERDS DURING THEIR CALVING TIMES. THIS IS A MUCH MORE LOGICAL USE OF OUR NATIONAL FOREST THAN THE LOCKING UP OF ENTIRE AREAS FOR WILDLIFE USE EXCLUSIVELY.**

**FOREST SERVICE RESPONSE:**

The proposed plan does not lock up any areas exclusively for use by wildlife, although it does propose reduced open road density over much of the Forest and permit continued seasonal road closures in some areas. Neither of these policies closes large areas to public access. Instead, they reduce harassment of big game and provide a hunting experience that is less dependant on roads -- one that some people find more enjoyable.

**COMMENT NO. 26 PLEASE REVIEW AND CONSIDER ONRC'S BIG GAME EMPHASIS MS REQUIRING CLOSURE OF ALL ROADS AT THE .5- .75 MI/SQ MI LEVEL TO MAINTAIN HABITAT EFFECTIVENESS.**



**FOREST SERVICE RESPONSE:**

Lower open road densities than those proposed were considered during benchmark analysis. However, open road densities of .5 or .75 miles per square mile were determined to be prohibitively restrictive to Forest users such as firewood cutters, berry pickers, and mushroom pickers.

**COMMAND NO. 27:** IT IS CLEAR FROM NUMBERS OF STUDIES THAT ROADS HAVE A SIGNIFICANT NEGATIVE EFFECT ON ALL OTHER RESOURCES. ROAD DENSITIES IN EXCESS OF 12 MILES PER SQUARE MILE (WHICH OCCURS MORE THAN ONCE ON THE WALLOWA-WHITMAN) ARE NOT HELPING ANY OF US. ROAD DENSITY AND EXCESSIVE STANDARDS ARE MAJOR CONCERNS OF OUR CLUB.

**FOREST SERVICE RESPONSE:**

Many Forest users share your concern.

**COMMENT NO. 28.** THE MONTANA ELK-LOGGING STUDY NOTED THAT ROADS, "AND THE PEOPLE AND TRAFFIC ASSOCIATED WITH THEM" HAVE A MORE SIGNIFICANT INFLUENCE ON ELK SECURITY THAN "MOST OTHER FACTORS COMBINED." \*

\* LYON, JACK L., ET AL., COORDINATING ELK AND TIMBER MANAGEMENT: FINAL REPORT OF THE MONTANA COOPERATIVE ELK-LOGGING STUDY 1970-1985

ONE OF THE STUDY'S MOST SIGNIFICANT RESULTS WAS THE RECOGNITION THAT LOSSES IN HABITAT EFFECTIVENESS FOR ELK CAN BE (1) "AT LEAST PARTIALLY MITIGATED" BY IMPOSING STRICT DESIGN AND LOCATION STANDARDS DURING ROAD CONSTRUCTION, AND (2) "GREATLY REDUCED THROUGH APPROPRIATE TRAFFIC CONTROL AND ROAD CLOSURES" (EMPHASIS ADDED). IDAHO RESEARCHERS HAVE GONE EVEN FURTHER AND STATED THAT "ROADS THEMSELVES ARE NOT AT FAULT SINCE CLOSED ROADS ARE OFTEN PREFERRED BY ELK AS TRAVELWAYS" (EMPHASIS ADDED) (LEE, 1984). THE MONTANA ELK-LOGGING STUDY CONCLUDED THAT "FEW CONSIDERATIONS IN FOREST MANAGEMENT APPEAR TO PROVIDE A BETTER OPPORTUNITY FOR IMMEDIATE MITIGATION IN THE MANAGEMENT OF ELK HABITAT THAN ROAD CLOSURES."

**FOREST SERVICE RESPONSE:**

The relatively high road density on the Forest and the importance to manage that density for many values and interests is recognized. There are many people that desire more road access than is presently proposed.

We are hopeful that the road density proposed in the Plan of 2.5 miles of open road for Area 1 and 1.5 miles of open road per square mile of land for Area 3 and Area 18 will result in a situation satisfying most people. These open road densities, while being management goals, will be flexible, depending on such things as timber harvest activity, hunting and other recreational needs, fuelwood demand, and availability of other resource values. It is planned that the density figure will be averaged by TRI compartment (TRI means total resource inventory compartment; these compartments average about 7,000 acres in size).

This projected open road density, upon implementation, will result in a significant decrease, Forest-wide, of road density. Existing and future public and Forest Service uses and resource needs will all be considered when this direction is implemented.

Besides this direction for all Area 1, 3, and 18 lands on the Forest, we plan to continue, and probably expand, the program for seasonal road and area closures where big game or hunting recreational needs indicate a lower road density is desirable, at least during the hunting season.

**COMMENT NO. 29** OPTIONS E AND F SPECIFICALLY AND OTHERS HINT AT CLOSING THE NORTH POWDER RIVER ROAD MY WIFE AND I GO INTO THAT AREA 8-10 TIMES A SEASON IN A 2-WHEEL DRIVE PICKUP MORE THAN HALF THE TIME WE NEVER SEE ANOTHER PERSON CLOSE THAT ROAD AND VERY FEW PEOPLE WILL EVER GET TO ENJOY THE BEAUTY OF THE UPPER REACHES AND TWO OF THE LAKES.

**FOREST SERVICE RESPONSE:**

None of the Forest Plan Alternatives would result in closure of the North Powder River Road. The transportation system goal for Management Area 6 is to keep road access in this, and similar areas, at approximately current levels. It is possible that the road could be closed through the Forest Travel Plan at some future time if public opinion indicates such an action is desirable.

**COMMENT NO. 30.** THE WALLOWA-WHITMAN FOREST ROAD MANAGEMENT PROGRAM OBJECTIVE GENERALLY LEAVES NO MORE THAN 2.5 MILES OF OPEN ROAD PER SQUARE MILE. THAT PROPOSAL IS HIGHLY LIKELY TO PROMOTE SECURE WILDLIFE HABITAT AND IS ENDORSED BY THE DEPARTMENT

**FOREST SERVICE RESPONSE:**

We hope the implementation of this direction will result in a situation on-the-ground that will be supported by most people. We realize that this direction will be one of the more difficult and controversial to implement due to the importance of the road system for recreation and fuelwood gathering.

**COMMENT NO. 31** IN GENERAL, I AM IN AGREEMENT WITH YOUR ROAD CLOSURE PROGRAM AND RESTRICTION OF HARVEST DURING ELK CALVING SEASON. BUT THESE MANAGEMENT TOOLS CAN ALSO BE OVER-USED IF THEIR USE IS NOT GUARDED CAREFULLY.

**FOREST SERVICE RESPONSE**

These management tools will be used only after serious thought and study of the effects

**COMMENT NO. 32.** THE EXISTING 9,300 MILES OF ROADS SHOULD BE ADEQUATE TO MANAGE ANY FOREST. THE DP'S PROPOSED 1,700 MILES OF NEW ROADS (18 PERCENT INCREASE) WOULD BE DETRIMENTAL TO SOIL, WATER, FISH, WILDLIFE AND ROADLESS VALUES. HOW MANY OF THE NEW ROADS WILL PAY FOR THEMSELVES? WHAT IS THE PROJECTED COST FOR APPROPRIATED ROAD MONIES?

**FOREST SERVICE RESPONSE**

The additional 1,700 miles of road are in response to the area associated with opening up previously undeveloped or underdeveloped areas for timber harvest. If the 9,300 miles of

existing road were evenly distributed over the Forest, it is quite possible that this would be enough to adequately manage the area.

As for the new roads paying for themselves, that will be determined on a case-by-case basis, usually as part of the analysis of a timber sale. The projected cost of appropriated road monies is \$1,459,000 per year. Of this total, \$648,000 is earmarked for improvements of roads within the Hells Canyon NRA. Approximately half of the funding for appropriated road work is for reconstruction of existing roads.

**COMMENT NO. 33.** THE ROAD ISSUE IS WELL ADDRESSED IN THE PLAN AND IF SUFFICIENT ROAD MILEAGE CAN BE CLOSED TO VEHICLE USE THE PROBLEM OF ROADS AND BIG GAME HARASSMENT WILL APPROACH RESOLUTION

**FOREST SERVICE RESPONSE:**

Thank you for your comment

**COMMENT NO. 34:** THE DEPARTMENT RECOMMENDS A ROAD MANAGEMENT PROGRAM DESIGNED TO PROTECT FISH AND WILDLIFE HABITATS, MINIMIZE DISTURBANCE OF FISH AND WILDLIFE POPULATIONS, AND PROVIDE A VARIETY OF RECREATIONAL EXPERIENCES. ROAD AND AREA CLOSURES, EITHER SEASONAL, ANNUAL, LONG TERM, OR PERMANENT ARE OFTEN NEEDED TO ACCOMPLISH THESE OBJECTIVES. THE DEPARTMENT RECOMMENDS DESIGN OF NEW ROAD CONSTRUCTION SO AS TO AVOID IMPORTANT WILDLIFE HABITATS SUCH AS WINTER RANGES, THERMAL COVER AREAS, ELK CALF REARING AREAS, MIGRATION CORRIDORS, DEDICATED OLD-GROWTH STANDS, AND RIPARIAN AREAS.

**FOREST SERVICE RESPONSE:**

We agree with your recommendations and will consider these factors in any new road construction

**COMMENT NO. 35** WHILE THE DEPARTMENT (OF FISH AND WILDLIFE) ENDORSES THE ROAD MANAGEMENT PROPOSAL, THE FINAL PLAN NEEDS TO DISPLAY A COMPREHENSIVE ROAD MANAGEMENT PLAN THAT PROVIDES IMPLEMENTATION DIRECTION. THE DRAFT PLAN PROVIDES LITTLE DIRECTION BEYOND THE PROPOSAL TO LEAVE OPEN ONLY 2.5 MILES OF ROAD PER SQUARE MILE OR 1.5 MILES PER SQUARE MILE ON WINTER RANGES. AS MENTIONED ABOVE, THERE ARE MANY OPTIONS IN ROAD MANAGEMENT INCLUDING ROAD OBLITERATION, SEASONAL AND PERMANENT CLOSURES, AND AREA CLOSURES. EACH METHOD HAS MERIT TO MEET DIFFERENT OBJECTIVES, AT DIFFERING COSTS, AND WITH VARIABLE SUCCESS. THE FINAL PLAN NEEDS TO GO INTO GREATER DEPTH DESCRIBING WHICH METHODS WILL BE USED WHEN, HOW SOON, AND IN WHAT PRIORITY ORDER THE PLAN WILL BE IMPLEMENTED. DEPARTMENT BIOLOGISTS ARE AVAILABLE TO ASSIST IN DRAFTING A MORE COMPREHENSIVE ROAD MANAGEMENT PLAN.

THIS PROPOSAL ALSO NEEDS TO RECOGNIZE THAT A ROAD CLOSED TO THE PUBLIC BUT STILL USED FOR FOREST MANAGEMENT MAY, IN TERMS OF HABITAT EFFECTIVENESS, STILL BE AN OPEN ROAD. ROAD MANAGEMENT AREAS NEED TO INCLUDE STANDARDS FOR FOREST MANAGEMENT TRAFFIC.

**FOREST SERVICE RESPONSE:**

The Forest Plan identifies the overall road density levels for the various management areas of the Forest. It is not intended to be detailed enough to make site-specific decisions on individual roads. Decisions on individual roads will continue to be made during project level analysis, a process which often involves the Department of Fish and Wildlife. We disagree that standards for administrative traffic are necessary except to say that we agree that it should be minimized.

**COMMENT NO. 36. CURRENT LOGGING ROADS SHOULD BE USED AND NO NEW ONES BUILT. EXISTING ROADS SHOULD BE CLOSED AND REHABILITATED AND REPLANTED WHENEVER POSSIBLE.**

**FOREST SERVICE RESPONSE:**

Thank you for your opinion, with which we agree in principle. We attempt to minimize new road construction.

**COMMENT NO. 37 THE MORE ROADS AND AREAS THAT ARE CLOSED, THE LESS ACCESS I WILL HAVE TO MY FAVORITE SPOTS. DON'T CLOSE IT UP SO THAT ONLY PEOPLE WITH LOTS OF MONEY AND THAT HAVE LOTS OF TIME CAN VISIT IT.**

**FOREST SERVICE RESPONSE:**

Thank you for your comment. We believe the road density guidelines will provide sufficient access for the majority of forest users.

**COMMENT NO. 38: ROAD CAUSED IMPACTS ARE PERHAPS THE HIGHEST ON THE PRIORITY LIST OF PROBLEMS ASSOCIATED WITH ELK USE OF ANY PARTICULAR GEOGRAPHICAL AREA. THE CONFEDERATED TRIBES, THEREFORE, RECOMMEND A VERY AGGRESSIVE ROAD CLOSURE PROGRAM WITH ROADS BEING PUT TO BED AND A REDUCTION IN UNNECESSARY CONSTRUCTION QUALITY FOR SECONDARY ROADS**

**FOREST SERVICE RESPONSE:**

We believe direction in the Plan addresses both of these concerns.

**COMMENT NO. 39: THE CONFEDERATED TRIBES ARE VERY CONCERNED WITH THE AMOUNT OF ROADS ON THE WALLOWA-WHITMAN NATIONAL FOREST AND THE MANAGEMENT OF THOSE ROADS. A ROAD MAY BE BUILT PREVIOUS TO A TIMBER SALE AND THEN WHEN THE TIMBER IS ACTUALLY SOLD THE SUCCESSFUL BIDDER HAS UP TO 5 YEARS TO HARVEST THAT SALE. HARVEST TIME MAY TAKE 2-3 YEARS AND IT IS NOT UNCOMMON TO WAIT 2-3 YEARS TO DETERMINE WHETHER OR NOT SEEDLINGS SHOULD BE PLANTED. THE PRESSURE TO UTILIZE FIREWOOD IN HARVESTED AREAS OFTEN KEEPS THESE ROADS OPEN FOR 2-3 YEARS AFTER HARVEST IS COMPLETE. A CONTINUOUS OPEN ROAD TIME OF 10-12 YEARS IS AND HAS BEEN VERY REALISTIC. THIS TIME DOES NOT EVEN TAKE INTO ACCOUNT THE PRECOMMERCIAL THINNING ON THE ORIGINAL SALE OR ANOTHER ENTIRELY DIFFERENT SALE ON THE SAME ROAD. THE CONFEDERATED TRIBES RECOMMEND A SYSTEM OF TIME CONSTRAINTS BE IMPLEMENTED AND ENFORCED TO SIGNIFICANTLY REDUCE THIS HIGH LEVEL OF OPEN ROAD TIME.**

**FOREST SERVICE RESPONSE:**

This particular point is definitely one of the difficult aspects of managing the road system within the guidelines of the Plan. It will take a number of different techniques and approaches to be able to accomplish the objectives in areas which are being managed intensively. However, some of the points mentioned as disadvantages can also become advantages. For example, even though a timber sale may be under contract for five years or longer, actual use in a particular area rarely occurs for more than one or two years out of that total time period. Also, if a road is to be constructed prior to a timber sale, it is very easy to build the road and leave it closed to all traffic until such time as it is needed.

The problems associated with post-sale activities, such as fuelwood harvesting and timber stand improvement work, are much more difficult to manage, though not impossible. We envision some major changes in the way a road system is managed. For example, it will probably be necessary to open up smaller areas for shorter periods of time instead of leaving an entire drainage open at one time. The bottom line will definitely be whether or not we are meeting the open-road density guidelines within an area; if not, then some roads will have to be closed.

**COMMENT NO. 40:** FIREWOOD GATHERING SHOULD BE REGULATED IN SUCH A MANNER AS TO ALLOW PERMITTEES ADEQUATE ACCESS TO SPECIFIC ROADS AND AREAS INSTEAD OF LEAVING ROADS OPEN FOR SEVERAL YEARS TO ANY ENTRANT.

**FOREST SERVICE RESPONSE:**

In newly-opened firewood gathering areas, we often keep the roads open for two to three years and then close selected roads to achieve the desired road density. Although the approach suggested by the respondent would also work, the added restrictions do not appear justified given the levels of use the Forest is currently receiving.

**COMMENT NO. 41:** GATES SHOULD BE UTILIZED FOR ROAD CLOSURES DURING NON-PERMITTED USE TIMES AS WELL AS SIGNS DENOTING CLOSURE OR AUTHORIZED USE.

**FOREST SERVICE RESPONSE:**

Although gates are often used to control access, they are very expensive. It is often more cost-efficient to use other means such as signing or blocking with logs or soil.

**COMMENT NO. 42:** ROAD CONDITION MONITORING TO IDENTIFY IMPROVEMENT/CLOSURE NEEDS SHOULD BE INCLUDED. THIS IS PARTICULARLY IMPORTANT ON THE W-WNF, WHICH ALREADY HAS MORE MILES OF ROADS THAN ANY OTHER NATIONAL FOREST IN THE PACIFIC NORTHWEST REGION.

**FOREST SERVICE RESPONSE:**

We agree.

**COMMENT NO. 43:** HOW MANY CITATIONS WERE ISSUED FOR NON-COMPLIANCE WITH ROAD CLOSURE ON THE W-WNF IN THE LAST DECADE?

**FOREST SERVICE RESPONSE:**

During the nine years for which records are available (1979-1987), 31 citations and 54 warnings were issued

**COMMENT NO. 44:** WE DO NOT LIKE THE ROAD CLOSURES DURING HUNTING SEASON. IT HAS NOT MADE HUNTING NICER FOR US, BUT TAKEN SOME AREAS TOTALLY AWAY AND GIVEN IT TO THOSE WHO HAVE HORSES.

**FOREST SERVICE RESPONSE:**

The direction relating to road density is in response to concerns regarding high open road density, lack of funding to adequately maintain the high existing road mileage, and resource damage and water quality problems resulting from roads. While efforts are made to avoid closing roads which have traditionally been used for hunter access, this is not always possible

Seasonal closures, such as the "green dot" system are a cooperative effort between the Forest Service and Oregon Dept of Fish and Wildlife. The purpose is to provide a different hunting experience than found in open road areas. It has been popular with most hunters.

**COMMENT NO. 45:** I DO SUPPORT THE ROAD CLOSURE SYSTEMS THAT HAVE GONE INTO EFFECT IN THE LAST FEW YEARS. I DO FEEL THE ROAD SYSTEMS IN EXISTENCE NOW ARE ADEQUATE FOR THE FOREST AND WHEN ADDITIONAL ROADS FOR LOGGING ARE REQUIRED, THEY SHOULD BE CLOSED AFTER USE WE DO NOT NEED ROAD SYSTEMS SUCH THAT THE WILLAMETTE VALLEY MOTOR HOME CAN PARK UNDER EACH TREE DURING ELK SEASONS.

**FOREST SERVICE RESPONSE:**

With the planned reduction in road densities in Areas 1, 3, and 18, we believe the Plan will provide for your desires. The roads that are left open will, however, be of higher quality, providing for easier, less costly maintenance and better water drainage

**COMMENT NO. 46.** PERMANENT ROAD CLOSURES AND BACK COUNTRY DESIGNATIONS MEANS OTHER FOREST RECREATION USERS ARE GETTING SQUEEZED INTO SMALLER AND SMALLER PLACES WHEN PEOPLE HAVE TO RECREATE IN SMALLER AREAS, THEY END UP WITH CROWDED CONDITIONS AND POOR-QUALITY RECREATIONAL EXPERIENCES.

**FOREST SERVICE RESPONSE:**

According to our analysis, roaded recreation opportunities will increase by about 22 percent over the next 50 years, exceeding predicted demand by more than 300 percent.

**COMMENT NO. 47:** I AM NOT SUGGESTING THAT THE BEETLE INFESTED STANDS SHOULDN'T BE CONTROLLED, ONLY THAT THE LOGGING BE ACCOMPLISHED WITH NO ROADS OR AT LEAST A BARE MINIMUM; AND PERHAPS THESE ROADS COULD BE TEMPORARY ONLY, WITH THE DRAINAGE PATTERNS OF THE HILLSIDES RE-ESTABLISHED AFTER THE LOGGING IS COMPLETE

**FOREST SERVICE RESPONSE**

In designing road systems for harvesting beetle-infested stands, we attempt to complement the long-term management goals for each area. If, in the long term, permanent road access is needed into a beetle-infested area, it is often most efficient to build a permanent road to salvage the beetle-killed timber. If permanent roads are not needed, temporary roads will be built. Maintaining drainage is always a major consideration, whether building permanent or temporary roads.

**COMMENT NO. 48:** I WOULD LIKE TO SEE ROADS AND BRIDGES MAINTAINED AND REPAIRED SO WE COULD AGAIN CAMP ON RIVERS LIKE EAST EAGLE AND MAIN EAGLE

**FOREST SERVICE RESPONSE:**

The Wallowa-Whitman has had a program for several years which has attempted to improve some of the main recreation access roads on the Forest. With limited funds, particularly during high concern for federal deficits, we are only able to work on a few of these roads at any one time. Examples of recreation roads which have been improved recently are (1) Elkhorn Drive, (2) Wallowa Mountain Loop, (3) Lostine River Road, and (4) Hells Canyon Dam Road. In the fall of 1986, we also let a contract to rebuild the bridge on East Eagle Creek. This work should be completed in 1987. We have been working to improve the main Eagle Drive Road, but this will take time.

**COMMENT NO. 49:** I WOULD LIKE TO SEE SOME OF THE MORE HEAVILY TRAVELED FOREST ROADS MAINTAINED AT A HIGHER LEVEL TO FACILITATE ACCESSIBILITY TO HIKING AREAS FARTHER INTO THE NATIONAL FOREST.

**FOREST SERVICE RESPONSE:**

We do try to provide maintenance which will allow access by passenger cars on those main roads to heavily-used areas such as campgrounds and major trailheads. Some minor trailheads are only accessible to high-clearance vehicles, such as pickups. With limited maintenance (or reconstruction) dollars, choices have to be made, and all roads cannot be maintained to high standards. We feel this also provides some variety to the recreation user, and is, in fact, closely coordinated with recreation opportunities management.

**COMMENTS NO. 50 AND 51:** I TALK DAILY WITH VISITORS AT THE WALLOWA COUNTY CHAMBER OF COMMERCE BOOTH IN ENTERPRISE, AND I'M FORCED TO EXPLAIN TO THEM THAT THEY CAN'T DRIVE THEIR MOTOR HOME UP TO HAT POINT, OR THAT THE ROAD IS SO POORLY MAINTAINED THAT THE TRIP IS DIFFICULT TO ACCOMPLISH IN A STANDARD AUTOMOBILE

AND, YOUR FOREST SERVICE PAMPHLET ON HAT POINT HAS THE AUDACITY TO INDICATE A ROAD OF EQUAL SUBSTANCE FROM JOSEPH TO HAT POINT! CLEARLY A SUBTERFUGE ON YOUR PART! WE NEED ROADS THAT ARE USABLE BEFORE RECREATION USAGE CAN BECOME EVEN REMOTELY ECONOMICALLY FEASIBLE.

**FOREST SERVICE RESPONSE.**

The Hat Point road is one of the Forest's high priority reconstruction projects. It is within the Hells Canyon National Recreation Area, and was listed in that plan for such work. Unfortunately, the Hells Canyon "Comprehensive Management Plan" was not approved until 1984,

and we were not able to program improvement expenditures until approval of the plan. Work has already been done on the road and other facilities at Hells Canyon Dam, the Wallowa Mountain Loop road, and some other areas within the HCNRA. At the present time, we do have funding for surveying the Hat Point and Dug Bar roads in 1987. We hope to begin construction on the Hat Point road in 1988, but improvement work will be a major expense and could take several years to complete.

It is unfortunate that the Hat Point brochure was printed showing a paved road all the way to the overlook. We have instructed our public information personnel to point out this error when distributing the brochure. It will be corrected in future printings.

**COMMENT NO. 52.** BEGINNING WITH PAGE 1-6 UNDER TRANSPORTATION IT WOULD BE GOOD IF YOU COULD GIVE A SMALL TABLE OF WHAT IT COSTS TO BUILD A ROAD AND TO MAINTAIN IT (PER MILE FOR BOTH LOGGING ROADS AND FOR GENERAL TRANSPORTATION ROADS).

**FOREST SERVICE RESPONSE:**

This could be done. However, the costs to build a road, as well as the cost to maintain a road, are subject to such a large number of variables that it is difficult to come up with a meaningful number. For example, the cost to construct a low standard logging road (which is the typical road built under a timber sale) varies from about \$5,000 per mile, up to as much as \$25,000 per mile. On the low end of the range, we are talking about a road on flat ground, with very little clearing, and no surfacing. At the other extreme, a road built in steep, rocky terrain, through heavy timber, requiring special drainage features and crushed rock surfacing to support log trucks, can easily cost \$25,000 per mile.

Costs for general transportation routes are also difficult to pin down, mainly because most of our general transportation routes are already in existence and the work that is usually required on them is in the form of reconstruction. This can vary from as low as \$1,000 per mile, where we may only be adding a few turnouts, or replacing a few culverts, up to as much as \$75,000 per mile where we may be widening and paving a major arterial route.

Maintenance costs also vary considerably, depending upon the class of road involved. On the low end of the scale are the roads which are intended to be closed between project uses. These are classified as "Level 1" maintenance, and the only work we do on these is to make sure the closure features are working and no resource damage is occurring due to the road. Average costs for maintaining this class of road runs less than \$20 per mile per year. The next class of road is the "Level 2" maintenance road, which is only maintained for pickup type travel. We estimate that it costs an average of \$100 per mile per year for these roads. Roads in the other classes of maintenance (Levels 3-5) are maintained for passenger car use, and cost on the average from \$200-\$1000 per mile per year. The higher costs are for some of the main paved roads that receive heavy logging and recreation traffic.

**COMMENT NO. 53.** PAGE III-22 I WOULD LIKE TO SEE A MORE DETAILED BREAKDOWN OF COSTS FOR ROADING RATHER THAN GROSS COSTS FOR THE FORESTS AS A WHOLE

**FOREST SERVICE RESPONSE.**

The table on page III-22 is intended to show only the total cost of roads needed for harvesting timber, as a means of comparing total costs versus benefits of timber harvesting.



**COMMENT NO. 54:** I THINK THAT HALF OF THE PRESENT PERMANENT ROAD SYSTEM ON THE WALLOWA-WHITMAN IS SUFFICIENT TO MEET MANAGEMENT NEEDS AND THAT THE OTHER HALF SHOULD BE PERMANENTLY CLOSED

**FOREST SERVICE RESPONSE:**

There are numerous roads which are not needed for management. Our latest inventory of roads shows that we have approximately 34 percent of the roads classified in a closed category. However, this does not tell the whole story. We manage roads in three basic categories: (1) Level 1 roads are those that are closed to all uses between projects, (2) Level 2 roads are those low standard roads that are only maintained for high clearance, or pickup-type, traffic; (3) Levels 3-5 are those roads that are managed for all types of traffic, including passenger cars. In addition to the 34 percent closed roads, we also have another 56 percent that are classified for high clearance only. Therefore, we only maintain about 10 percent of the total road mileage on this Forest for high standard, passenger car use.

We anticipate further reductions in the mileage of open roads as the Forest Plan guidelines on open road density are carried out. These guidelines call for open road densities varying from 1.5 to 2.5 miles per square mile, depending upon the land allocation and management area.

**COMMENT NO. 55:** I AM CONCERNED THAT THE PROPOSED OPEN ROAD DENSITY IS EXCESSIVE AND I FEAR THIS WILL HAVE AN ADVERSE EFFECT ON BIG GAME ANIMALS.

**FOREST SERVICE RESPONSE:**

We have dealt with this issue in the plan by providing road management direction for the various management areas. This direction limits the amount of open roads to that which we think is appropriate for the particular uses which are being emphasized. For example, in Management Area 3 areas, timber production is constrained to maintain high-quality big-game habitat, density of open roads is specified as not more than 1.5 miles per square mile. We believe we have provided the correct level of use and protection for each area in the plan. However, if specific situations arise after the plan is implemented which indicate the need for more restrictions on roads, we can initiate further closures under the Forest Travel Plan.

**COMMENT NO. 56:** I AM OPPOSED TO ANY MORE ROAD BUILDING IN THE WALLOWA-WHITMAN NATIONAL FOREST. I HAVE HUNTED ELK IN THESE FORESTS FOR THE LAST SEVERAL YEARS AND HAVE HAD TO CHANGE HUNTING AREAS THREE DIFFERENT TIMES IN THOSE YEARS BECAUSE OF THE ROAD BUILDING. MY EXPERIENCE HAS SHOWN THAT AS MORE ROADS GET BUILT INTO THESE AREAS, MORE HUNTERS MOVE IN AND THE ELK ARE EITHER KILLED OFF OR RUN OUT OF AN AREA AFTER THE FIRST DAY'S HUNT.

**FOREST SERVICE RESPONSE:**

Balancing the need for timber harvest access with the concerns of hunters for specific areas that they want left alone is one of the very difficult aspects of Forest management. In order to meet the continuing demand for lumber, we must look to areas where timber harvesting appears to be reasonably compatible with other uses of the National Forest. When these areas happen to fall in favorite hunting spots, the conflict becomes very personal. We would like to be able to provide a reasonable amount of timber from the Forest without impacting other uses, but this is not possible. We are trying to minimize some of the impacts, look for areas where

hunting or other uses can occur without conflicts with timber harvesting, and hope that the public will realize that compromises do have to occur.

**COMMENT NO. 57.** DESPITE THE OVERWHELMING NUMBER OF FACTS WHICH WARRANT PROTECTING THIS DELICATE AND PRECIOUS RESOURCE, THE DRAFT PLAN APPEARS TO BE EXTREMELY BIASED TOWARDS DEVELOPMENT AND RESOURCE CONSUMPTION. THE PLAN CALLS FOR 2,000 MILES OF NEW ROAD CONSTRUCTION, WHICH WOULD VIRTUALLY DECIMATE EXISTING TRAIL SYSTEMS, ELIMINATE THE LAST LARGE UNDISTURBED ROADLESS AREAS WITHIN THE WALLOWAS, CREATE WATER PURITY AND EROSION PROBLEMS, ELIMINATE ANADROMOUS FISH RUNS, AND SEVERELY DEplete WILDLIFE HABITAT.

**FOREST SERVICE RESPONSE:**

The decision to build additional roads hinges on the type of management that is decided upon for the resources. Maintaining a reasonably high level of timber output, as called for in the preferred alternative, will be virtually impossible without additional road access, and without entering some of the remaining unroaded areas.

**COMMENT NO. 58.** THE ROADING PROGRAM OF THE PA IS VERY EXCESSIVE AND WOULD ADD NEARLY 2000 MILES OF NEW ROADS, CREATING A HOST OF MANAGEMENT PROBLEMS. IN ADDITION, THE PA PROPOSES TO BUILD MOST OF THESE ROADS IN THE FIRST DECADE, INDICATING AN INTENTIONAL BIAS AGAINST ROADLESS AND WILDERNESS RESOURCES BY A SYSTEMATIC PENETRATION WITH ROADS INTO MOST OF THE REMAINING ROADLESS AREAS, THUS PRECLUDING THEIR FUTURE CONSIDERATION AS WILDERNESS. THIS BIAS IS UNACCEPTABLE.

**FOREST SERVICE RESPONSE.**

It is difficult to predict exactly how many miles of new roads would be needed, but historically the Wallowa-Whitman has reconstructed more existing roads than it has built new roads. The ratio has been approximately 3:1 reconstruction versus actual new construction. Of course, the number or miles of roads is not the real issue. The need for more or less roads is driven by the decisions on how land areas will be managed. If timber harvesting is to be emphasized in an area, then roads are needed. If not, then fewer roads will serve the purpose. Rather than debate the issue of how many miles of roads will or will not be built, we need to concentrate on the land management decisions, which will then drive the need for more or less access.

**COMMENT NO. 59.** WE FEEL THAT ROAD BUILDING IS EXTREMELY EXCESSIVE. THE FOREST SHOULD BE CLOSING DOWN EXISTING ROADS TO PROTECT ELK AND DEER HABITAT. WE DEFINITELY DON'T NEED 2,000 MORE MILES OF ROAD. ROAD BUILDING COSTS ALSO CAUSE MANY TIMBER SALES TO BE DEFICIT SALES.

**FOREST SERVICE RESPONSE.**

The Forest is closing existing roads, for a variety of reasons (see No. 10). We do not think road building, in itself, is good or bad. If we stopped harvesting timber in any new areas today, we would not need many new timber roads (which account for the large majority of actual new road miles). However, we would still need to reconstruct existing roads as they wear out. The volume of timber being harvested would eventually be drastically reduced. The point is, road decisions are driven by what we need or decide to do to manage the resources.

As for road building costs causing deficit timber sales, it is true that the cost of access can sometimes be a major part of the overall cost of harvesting timber. That is also true of most of the other aspects of this activity, such as logging costs, hauling costs, environmental protection, or even reforestation after the sale. Eliminating one of the cost factors usually is not the answer to solving a deficit sale problem. Rather, it is a combination of several things that can help to make an individual sale cost effective.

**COMMENT NO. 60:** ACCORDING TO TABLE C-9 IN APPENDIX C OF THE DEIS (PGS C-91 TO C-93) THE TOTAL AMOUNT OF ROADS CONSTRUCTED IN ROADLESS AREAS (UNDER THE PREFERRED ALTERNATIVE) WILL EXCEED 1,000 MILES WITHIN 30 YEARS OF THE DRAFT FOREST PLAN IMPLEMENTATION. THIS INFORMATION DIRECTLY CONTRADICTS INFORMATION PRESENTED ON PAGE 4-11 OF THE DRAFT PLAN. THE PLAN STATES 'ROAD CONSTRUCTION IN AREAS WHICH ARE CURRENTLY ROADLESS WILL TOTAL 279 MILES IN THE FIRST DECADE, 170 MILES IN THE SECOND DECADE, AND 11 MILES IN THE THIRD DECADE.' HOW DOES THE FOREST SERVICE ACCOUNT FOR THIS CONTRADICTION? WHICH DATA FIGURE IS CORRECT? NEPA REQUIRES DEIS'S TO PROVIDE ACCURATE INFORMATION WHICH IS UNDERSTANDABLE TO THE PUBLIC. THE DATA PRESENTED ON ROAD CONSTRUCTION IS CERTAINLY NOT PRESENTED CLEARLY WITH SOME OF IT INACCURATE.

**FOREST SERVICE RESPONSE:**

The significant figure that is involved in the discussion of roadless areas is the amount of new, permanent roads that will be built if these areas are accessed. The total of 460 miles on page 4-11 of the draft plan ( $279 + 170 + 11 = 460$ ) refers to only those new roads which would be built and left open as roads in the first three decades. Taking the charts from Table C-9 in Appendix C (pp C-91 to C-93) and extracting the miles of new, permanent construction shows the following:

Arterial & Collector, Construction =  $5.7 + 4.6 + 0.0 = 10.3$  miles  
 Local, Construction =  $273.3 + 165.2 + 11.6 = 450.1$  miles  
 Total amount of new, permanent construction, 1st 3 decades = 460.4 miles

The remainder of the mileage shown in the tables in Appendix C is for reconstruction of existing roads (68.0 miles) and temporary roads (546 miles). Temporary roads are those spur roads that are needed for a single sale, but not needed again for future use. They are normally placed back into resource production following a timber sale.

**COMMENT NO. 61.** SINCE THE APPENDIX C INFORMATION HAS INDIVIDUAL ROAD CONSTRUCTION FIGURES FOR EACH ROADLESS AREA, WE ASSUME THE INFORMATION PRESENTED THERE IS ACCURATE. THE QUANTITY OF ROAD CONSTRUCTION MILES TARGETED FOR ROADLESS AREAS (UNDER THE PREFERRED ALTERNATIVE) IS APPALLING. THE OVER 1,000 MILES OF ROAD CONSTRUCTION PROPOSED WILL HAVE SEVERE IMPACTS ON ROADLESS AREAS DUE TO: INCREASED HUNTING PRESSURES, INCREASED WILDLIFE POACHING AND HARASSMENT, DECREASED PRIMITIVE RECREATION OPPORTUNITIES, AND DECREASED WILDLIFE HABITAT. THE ROAD CONSTRUCTION TARGETED FOR ROADLESS AREAS MUST BE REDUCED.

**FOREST SERVICE RESPONSE.**

(See also comments on Response Nos. 33/34). Well over half the miles listed in Appendix C for roadless area access are for temporary spur roads. These roads will be put to bed following an individual sale, and will not be open for any post-sale use. You have correctly identified a number of the issues related to the decision to enter a roadless area and begin managing for

timber production. However, the key decision is not whether to build or not build roads, it is whether we are to manage those areas for timber production or some other resource emphasis. Once that decision is clear, the amount of access needed becomes apparent. We need no roads for wilderness, very few roads for primitive recreation or wildlife management, but many more miles of road for timber management.

We have made a detailed study of each of the major roadless areas listed in Appendix C, and feel that the amount and mix of access is fairly accurate if the decision is to manage those areas for timber emphasis.

**COMMENT NO. 62.** THE DRAFT PLAN STATES "NO SIGNIFICANT ADDITIONS TO THE ROAD SYSTEM ARE ANTICIPATED AFTER THE THIRD DECADE." (PAGE 4-11). EVEN ONE MILE OF ROAD CONSTRUCTED POORLY OR IN A POOR LOCATION CAN HAVE SEVERE ENVIRONMENTAL CONSEQUENCES SINCE THE FOREST SERVICE IS USING A 50-60 YEAR PLANNING HORIZON FOR FOREST PLANS, ANTICIPATED ROAD CONSTRUCTION DATA TO 50 YEARS MUST BE PROVIDED FOR PUBLIC SCRUTINY

**FOREST SERVICE RESPONSE:**

According to the information in the plan, all of the management areas where significant access is needed will be accessed by the end of the third decade. We do not anticipate any additional new roads after that time, although reconstruction of existing roads will continue to take place as these wear out over time.

**COMMENT NO. 63.** BUILD FEWER HEAVY GRAVEL ROADS LET LOGGERS BUILD THEIR OWN ROADS, THEN LET THEM GO BACK TO GRASS

**FOREST SERVICE RESPONSE.**

We agree with this comment, to a certain extent. There has been a major shift away from the expensive gravelled roads of a few years ago to a road which is very low standard. The large majority of these roads are, in a sense, built by the loggers in that they are built under the stipulations of an individual timber sale contract. This concept applies quite well to the short, local roads that are only used to access small portions of individual sales. However, once the local roads start feeding into one another and becoming "collector" type roads, the need for higher standard roads increases because of the larger volumes of traffic over longer periods of time. Another significant factor that has to be considered when determining road standards is season of use. Roads with no gravel surfacing will usually not stand up to any use during wet weather. Therefore, a select few of the main roads need to be built stronger to handle some use during periods of time when weather conditions may not be ideal.

**COMMENT NO. 64.** REHABILITATE EXISTING ROADS RATHER THAN BUILD NEW ONE IN THE SAME AREA.

**FOREST SERVICE RESPONSE:**

We always try to do this when it is feasible. In fact, we have historically rebuilt roads about three times as often as we have built new roads (in other words, reconstruction mileage is about triple new construction mileage each year). The only time we do not use an existing road is when it is causing serious environmental damage that we cannot correct with reconstruction, or when it is just in the wrong place for the planned use. Many of the older roads on the Forest

fall into one of these categories because they were built before concerns for the environment became important, or before modern logging equipment came into use.

**COMMENT NO 65** THIS SECTION (TRANSPORTATION SYSTEM STANDARDS AND GUIDELINES) SHOULD REFLECT CONCERN FOR INSTREAM IMPACTS DUE TO EROSION FROM BOTH PERMANENT AND TEMPORARY ROADS CONSIDERATION SHOULD BE GIVEN HERE (AND UNDER SOILS) TO DETERMINING WHETHER EROSION IS WITHIN THE BOUNDS PREDICTED AND DETERMINED TO BE ACCEPTABLE IN THE EIS KINDS OF MEASURES THAT WOULD BE APPLIED TO ENSURE EROSION IS NOT EXCEEDING ACCEPTABLE LIMITS SHOULD BE OUTLINED

**FOREST SERVICE RESPONSE**

Additional discussion has been placed in this section.

**COMMENT NO. 66:** I DO SUPPORT SEASONAL ROAD CLOSURES FOR BIG GAME

**FOREST SERVICE RESPONSE**

Many people agree

**COMMENT NO. 67:** THE ROADS ARE NECESSARY TO PRESERVE THE FOREST FOR USE BY ALL FOR LIVELIHOOD, FUEL AND ENJOYMENT. ALSO THESE ROADS SHOULD NOT BE LOCKED OFF BY THE GREEN DOT SYSTEM TO THE POINT THAT ELDERLY OR DISABLED CANNOT AVAIL THEMSELVES OF THEIR RIGHT TO HUNT AND OBTAIN FIREWOOD.

**FOREST SERVICE RESPONSE:**

The green dot system is most often used for seasonal closures There are usually times when woodcutters may use non-green dot roads

**COMMENT NO. 68** PAGE 3-3 OF THE DEIS STATES "OF THE 107,000 FORESTED ACRES OF ROADLESS AREA OUTSIDE THE HELLS CANYON NATIONAL RECREATION AREA 74% ARE CONSIDERED TECHNICALLY OR ECONOMICALLY UNSUITED FOR TIMBER PRODUCTION." THIS LEAVES ONLY 26% OF THAT FORESTED ROADLESS AREA OUTSIDE THE HCNRA OR ONLY 27,820 ACRES SUITABLE FOR HARVEST. ALL OF THESE ACRES ARE SCHEDULED FOR HARVEST, MOST OF WHICH WILL OCCUR DURING THE NEXT 3 DECADES. THIS PROPOSED FURTHER REDUCTION OF FORESTED SEMIPRIMITIVE ROADLESS AREA LEAVES INADEQUATE AREAS FOR REFUGE FOR ELK IN BOTH WINTER AND SUMMER RANGE AND DECREASES QUALITY RECREATIONAL OPPORTUNITIES IN SEMIPRIMITIVE AREAS THE CONFEDERATED TRIBES THEREFORE ADVOCATE ONLY MANAGEMENT AREAS 3, 3A OR 18 BE CONSIDERED IN THESE AREAS TO BE ENTERED AND ROADS ONLY BE LEFT OPEN TEMPORARILY DURING HARVESTING AND TREATMENT, ACCORDING TO STRICT TIME CONSTRAINT GUIDELINES WITH SUBSEQUENT GATED ROAD CLOSURES. THIS WILL HELP PROTECT THE VERY LIMITED ROADLESS NATURAL AREA LEFT ON THE WALLOWA-WHITMAN NATIONAL FOREST.

**FOREST SERVICE RESPONSE:**

This suggestion has been largely incorporated into the preferred alternative.

**FIRE  
Code 1110**

**COMMENT NO. 1: THE FOREST SHOULD BE ALLOWED TO RETURN TO A NATURAL FIRE ECOSYSTEM.**

**FOREST SERVICE RESPONSE.**

Fire management policy recognizes the positive aspects of fire as well as the need to provide protection. Presently, the Wallowa-Whitman has three approved fire management plans (Eagle Cap Wilderness, Hells Canyon Wilderness, and the Elkhorns), which permits natural ignitions (lightning starts) to play a more active role in developing and maintaining ecosystems of those areas. In addition, the Forest Plan recognizes the benefits of fire use and contains direction for management areas where prescribed burning should be considered

**COMMENT NO. 2 THE GRANITE AREA IS GOING TO BE A FIRE BOX AS THEY WON'T LET THE PEOPLE COME IN AN USE THOSE DEAD TREES**

**FOREST SERVICE RESPONSE·**

Most of the wood in the Granite area is available to woodcutters now and more will be available when currently active timber sales are closed.

**COMMENT NO. 3: MY HOUSE ON THE MORGAN LAKE ROAD BURNED DOWN IN THE ROOSTER PEAK BURN IN 1973, EVEN THOUGH THERE WERE NO DEAD TREES BEFORE THE FIRE WHEN A FOREST IS GOING TO BURN IT WILL, WHETHER DEAD TIMBER IS PRESENT OR NOT**

**FOREST SERVICE RESPONSE·**

We agree that this is often true under certain conditions As more people locate homes in wildlands, damage to private property is becoming more of a problem

**COMMENT NO. 4: A GENERAL DEFICIENCY WE HAVE OBSERVED IN MANY DRAFT PLANS HAS BEEN THE IMPLICIT ASSUMPTION THAT ALL ADVERSE ENVIRONMENTAL IMPACTS RESULT FROM TIMBER HARVEST, GRAZING, OR OTHER HUMAN ACTIVITIES ON THE LAND ALMOST UNIVERSALLY, THE FORESTS HAVE IGNORED THE FACT THAT NATURAL EVENTS, SUCH AS CATASTROPHIC FIRES AND FLOODS, CAN HAVE FAR GREATER IMPACT ON ENVIRONMENTAL VALUES THAN A WELL-DESIGNED AND IMPLEMENTED TIMBER SALE PROGRAM. INVARIABLY, THE "ENVIRONMENTALLY PREFERABLE" ALTERNATIVE HAS BEEN THE ONE THAT HAS THE LARGEST ROADLESS MANAGEMENT ACREAGE AND LOWEST TIMBER HARVEST LEVEL THE WALLOWA-WHITMAN'S DEIS HINTS AT THE POTENTIAL IMPACTS OF NATURAL CATASTROPHIC EVENTS. IT NOTES, FOR EXAMPLE, THAT "PRIOR TO THE ARRIVAL OF EUROPEAN MAN . . . STAND REPLACEMENT FIRES (FIRES THAT DESTROY THE EXISTING STAND) OCCURRED IN LODGEPOLE PINE EVERY 80-120 YEARS AFTER EPIDEMIC OUTBREAKS OF MOUNTAIN PINE BEETLE" (DEIS III-43). ELSEWHERE IN THE DEIS, THE FOREST STATES THAT· (1) "A MOUNTAIN PINE BEETLE EPIDEMIC ON THE FOREST IN THE 1970'S RESULTED IN LARGE AREAS OF TREE MORTALITY, PRIMARILY IN LODGEPOLE PINE," AND (2) "FOREST FIRES MAY . . . REDUCE WATER QUALITY BY INCREASING SOIL EROSION AND REDUCING STREAM SHADE EXTREME HEAT**

GENERATED BY WILDFIRES MAY SIGNIFICANTLY REDUCE WATER QUALITY FOR SEVERAL YEARS UNTIL VEGETATION RETURNS\* (DEIS III-25, III-14) NEVERTHELESS, THESE SCATTERED REFERENCES ARE NOT BROUGHT TOGETHER INTO A CLEAR STATEMENT THAT THE ENVIRONMENTAL EFFECTS ON NONMANAGEMENT CAN BE AS BAD AS, OR EVEN WORSE THAN, THE EFFECTS OF PLANNED MANAGEMENT ACTIVITIES THE FINAL EIS SHOULD MAKE THIS FACT CLEAR

**FOREST SERVICE RESPONSE**

Natural events such as fires can, of course, have serious environmental consequences in areas managed for timber production as well as those managed for wilderness or other values. Additional information has been added to Chapter IV of the FEIS about the possible affects of fire where timber is not harvested. We disagree that lack of timber management means "non-management." It means certain areas are managed for values such as wilderness, where by definition timber harvest is not compatible. We realize, however, that many people associate management with the growing and harvesting of renewable resources.

**PESTICIDE USE  
Code 1120**

**COMMENT NO. 1:** THE FOREST SERVICE SHOULD NOT BE LOOKED AT OR EXPECTED TO BE JUST 'TREE FARMERS' - ITS MUCH MORE COMPLICATED THAN THAT AND SHOULD BE IT IS CRITICAL THAT SPECIES DIVERSIFICATION AND ENHANCEMENT BE PROMOTED AND WATER QUALITY MAINTAINED. THIS INCLUDES MORE RESTRICTED IF NOT COMPLETE ELIMINATION OF PESTICIDE AND HERBICIDE USE. THE BENEFITS JUST DO NOT JUSTIFY THIS PRACTICE EXCEPT IN EXTREME CRITICAL PROBLEM AREAS.

**FOREST SERVICE RESPONSE:**

We share your concerns for good forest management with careful attention to the entire ecosystem. No chemical herbicides have been used on the Forest for years (due to a federal court injunction) and use in the future will be in accordance with the decision reached in 1988 through the Regional Vegetation Management Environmental Impact Statement. In addition to that analysis, an environmental analysis will be conducted to handle the site-specific condition of a single project on the Forest.

We must also consider the immediate and long-term effects of other vegetation control practices. Tools other than herbicides and pesticides (fire, mechanical) also affect the environment.

**COMMENT NO. 2:** IF THE SPRUCE BUDWORM CONTINUES AS IT HAS STARTED IN THE CATHERINE CREEK AND EAGLE DRAINAGES, THEY WILL HAVE NOTHING BUT A FOREST OF DEAD TREES AS WELL AS A FIRE TRAP AND INSECT HAVEN.

**FOREST SERVICE RESPONSE:**

The literature indicates that the main damage caused by the spruce budworm occurs in the form of reduced growth. This is translated into longer rotation lengths for stands, or less volume at the time of harvest. Mortality does occur, but on the whole, it is relatively minor. Based on the literature and the best estimates of our silviculturists, we do not share your projection of such dire consequences.

**COMMENT NO. 3:** A MAP OF CURRENT DISEASE AND INSECT DAMAGED STANDS WITH ACREAGE SIZE AND POTENTIAL MANAGEMENT EFFECTS ON FISHERIES AND WILDLIFE HABITAT SHOULD BE INCLUDED IN THE FINAL DEIS. AN UPDATED MAP AND APPROPRIATE ACREAGES SHOULD BE PROVIDED FOR INTERESTED AGENCY REVIEW ON AN ANNUAL BASIS.

**FOREST SERVICE RESPONSE.**

We do not expect that "current (or anticipated) disease and insect damaged stands" will affect our management of fisheries and wildlife habitat to any notable extent.

**COMMENT NO. 4:** IMMINENT DANGER FROM INSECT OR DISEASE ATTACK IS LISTED (P 4-45) AS A CIRCUMSTANCE UNDER WHICH COMMERCIAL HARVEST ON TECHNICALLY UNSUITED LAND MAY OCCUR. INSECT OR DISEASE ATTACK SHOULD NOT BE A PROBLEM, BY ITSELF, WHERE TREES ARE NOT SLATED FOR HARVEST. WE SUGGEST THE FOLLOWING BE ADDED TO THE APPROPRIATE SENTENCE "AND RISK OF SPREAD TO COMMERCIAL STANDS IS HIGH."



**FOREST SERVICE RESPONSE.**

We agree and have added the phrase you suggest

**COMMENT NO. 5:** (PAGE III-25) "FOREST PESTS": FROM THE BLEAK PICTURE THAT YOU PAINT ON FOREST PESTS IT IS AMAZING THAT THERE ARE ANY FORESTS LEFT IN THE WORLD FROM WHAT I HAVE SEEN OF USDA FS FOREST PRACTICES, YOU PEOPLE LEAVE (DESTROY) MORE OF THE WOOD RESOURCE AFTER HARVEST BY BURNING (AND OTHER MANAGEMENT TECHNIQUES) THAN ANY PEST THAT I'VE EVER SEEN. ALSO, AGAIN YOU GIVE NO REFERENCES AS TO IF ANY OF YOUR "MANAGEMENT" PROGRAMS ARE EFFECTIVE AT STOPPING THESE PESTS. A MAJOR REASON FOR SOME PEST OUTBREAKS IS THE "MANAGEMENT" YOU USE, ESPECIALLY MONOCULTURE AND PESTICIDE USE ALSO, I THINK THAT YOU LOSE MORE RESOURCES DUE TO THE DECREASE ON FOREST PRODUCTIVITY WHICH RESULTS FROM USDA FS "MANAGEMENT".

**FOREST SERVICE RESPONSE**

We are less critical of our management, but we realize our practices do cause damage. We are continually critiquing our practices and trying to find improved post-harvest treatment methods. We believe our use of pesticides to control the Douglas-fir tussock moth in the early 1970's was successful as was the use of bacterial insecticide to help curtail the spruce budworm in recent years

**COMMENT NO. 6:** HAVE YOU FULLY CONSIDERED ALL THE EFFECTS OF THE SERIES OF INSECT EPIDEMICS INCLUDING TUSsock Moth, LARCH CASE BEARER, MOUNTAIN PINE BEETLE, AND NOW THE SPRUCE BUDWORM? SPRUCE BUDWORM IS STILL HARD AT WORK

**FOREST SERVICE RESPONSE**

No. It is impossible to fully consider said insect epidemics (and other disease and pest blights) because adequate information to do so is not available and will likely never be available. We have considered their effects to the extent possible as to their cumulative impact on timber yields as reflected in Forest yield tables. New timber inventories will provide more information. (The next inventory is scheduled for 1989-90.) In general, with much of the Forest converted to thrifty young stands, the incidence of such outbreaks, especially that of bark beetles, is expected to be reduced.

**COMMENT NO. 7:** I WOULD ACTUALLY PREFER TO SEE MORE MONEY SPENT ON REFORESTATION AND PEST CONTROL.

**FOREST SERVICE RESPONSE**

Such sentiments were expressed many times

**COMMENT NO. 8:** CUT THE TIMBER THAT NEEDS CUT SUCH AS BUG TREES INSTEAD OF LETTING IT GO TO WASTE AND TO CUT DOWN ON FIRE HAZARD

**FOREST SERVICE RESPONSE:**

Many expressed similar views

**COMMENT NO. 9: ALLOWING DISEASE, BLOWDOWN, CHOKED STANDS, ROT, AND FIRE IS NEGLIGENCE ON THE CRIMINAL LEVELS.**

**FOREST SERVICE RESPONSE:**

Many people expressed similar views.

**COMMENT NO. 10 TAKING THE MATURE AND DISEASED TREES OUT AND LETTING NEW GROWTH START HELPS WILDLIFE ANYWAY.**

**FOREST SERVICE RESPONSE.**

We agree that some wildlife species may benefit. But those that rely on mature trees for food or shelter will not.

**COMMENT NO. 11: MANAGEMENT PROTECTS THE ENVIRONMENT AS WELL. MANAGEMENT CAN PROTECT THE FOREST FROM FIRE, DISEASE, PEST DAMAGE AND EROSION.**

**FOREST SERVICE RESPONSE:**

We agree.

**COMMENT NO. 12. I'M A LOGGER, I HAVE SEEN THE FOREST REGENERATE ITSELF AFTER A LOGGING OPERATION IS DONE. I'VE SEEN STANDS OF TIMBER THAT ARE SO BUG INFESTED THAT IF THE SITUATION ISN'T TAKEN CARE OF THERE WON'T BE ANY WOODS TO VIEW. JUST DEAD STANDS OF TIMBER. HOW PICTURESQUE. WE NEED TO KEEP THE FOREST HEALTHY. ADOPT THE COMMUNITY STABILITY ALTERNATIVE.**

**FOREST SERVICE RESPONSE**

Many expressed similar views

**COMMENT NO. 13: INSECT EPIDEMICS - (DEIS, PAGE III-25) THE TEXT DEVOTES VERY LITTLE DISCUSSION TO THE PRESENT AND PAST INSECT EPIDEMICS WHICH HAVE HAD MAJOR EFFECTS ON THE SPECIES COMPOSITION AND GROWTH RATES OF WALLOWA-WHITMAN TIMBER. THE TEXT CORRECTLY STATES THAT THE ABILITY TO PREVENT FUTURE INSECT OUTBREAKS IS SOMEWHAT DEPENDENT UPON THE LEVEL AND INTENSITY OF TIMBER MANAGEMENT. WITH THE LARGE, AND APPARENTLY INCREASING NUMBER OF ACRES WHICH PROHIBIT OR REDUCE TIMBER MANAGEMENT, FUTURE EPIDEMICS ARE LIKELY. HOW IS THE LIKELIHOOD OF FUTURE INSECT EPIDEMICS, AND THE DRAMATIC CHANGES THAT ACCOMPANY THEM, TO BE USED IN MAKING THE FINAL PLAN DECISION? THE DEIS SHOULD PROVIDE MORE DETAIL ON HOW THE CURRENT WESTERN SPRUCE BUDWORM EPIDEMIC WILL BE ADDRESSED BY THE DIFFERENT ALTERNATIVES AND HOW THE DIFFERENT MANAGEMENT AREAS WILL PREVENT OR PROMOTE FUTURE OUTBREAKS OF THE BUDWORM, TUSsock MOTH AND PINE BEETLE. IN ADDITION, AT LEAST ONE OF THE DEIS ALTERNATIVES SHOULD CONSIDER ACCELERATED HARVEST OF**

HOST TREE SPECIES TO CAPTURE MORTALITY RESULTING FROM THE ONGOING BUDWORM INFESTATION. THE DEPARTMENT RECOMMENDS THAT INTENSIVE FOREST MANAGEMENT PRACTICES BE IMPLEMENTED AT LEVELS THAT WILL HELP PREVENT FUTURE LOSSES.

**FOREST SERVICE RESPONSE:**

Research and experience show that the bark beetles can be satisfactorily controlled by forest management practices that keep trees growing rapidly. The defoliators are another matter and we will have to consider them on a case-by-case basis, regardless of alternative. The use of pesticides will be an important consideration.

**COMMENT NO. 14. INSECTS AND DISEASE: NO TREATMENT OF INSECTS OR DISEASE WILL BE MADE IN MANAGEMENT AREAS 15 (OLD-GROWTH) OR 6 (BACKCOUNTRY) AREAS UNLESS A) INFESTATION IN THOSE AREAS THREATENS COMMERCIAL TIMBER, B) ANALYSIS INDICATES TREATMENT WILL BE EFFECTIVE IN HALTING THE OUTBREAK, AND C) ANALYSIS SHOWS A POSITIVE COST/BENEFIT RATIO FACTORING IN ANY EFFECTS ON THE ENVIRONMENT INCLUDING HUMAN HEALTH.**

MONITORING OF INSECT AND DISEASE MANAGEMENT SHOULD INCLUDE SPECIFIC MEASURABLE STANDARDS AND DIRECT LINKAGES BACK TO THE PLAN TO INITIATE CORRECTIVE ACTION.

**FOREST SERVICE RESPONSE.**

In general, we are supportive of the language contained in the first sentence. Including it as direction, however, would unnecessarily reduce the decisionmaker's degree of discretion. We have, therefore, not included it.

We do not believe it is realistic to address the full range of pest/site considerations in advance of their occurrence and provide a cookbook response to the problem. Such occurrences must be analyzed on a case-by-case basis.

**COMMENT NO. 15. PEST MANAGEMENT SHOULD NOT TAKE PLACE IN WILDERNESS AND IN RNA'S ONLY AS PART OF SCIENTIFIC STUDIES.**

**FOREST SERVICE RESPONSE.**

We are in general agreement with this statement and feel it is reflective of the management we expect in those areas.

**SOCIAL AND ECONOMIC CONSIDERATIONS**  
**Code 1200**

**COMMENT NO. 1:** THE TIMBER INDUSTRY IS IMPORTANT TO THE LOCAL ECONOMY, BUT AT WHAT COST? THE BARGAIN BASEMENT PRICES THAT HAVE BEEN GIVEN TO THE TIMBER COMPANIES ARE A NATIONAL SCANDAL. MUCH OF THE HARVEST DOES NOT EVEN CREATE LOCAL JOBS – ROUGH LOGS ARE SENT TO JAPAN FOR PROCESSING. PREFERENTIAL TREATMENT OF THE TIMBER INDUSTRY IS NOT IN OUR LONG-RANGE BEST INTEREST, AND MUST END.

**FOREST SERVICE RESPONSE:**

Many respondents share these opinions. It is, however, not legal to export unprocessed logs from National Forests. Nor can they legally be used as substitute for logs from other sources which have been exported.

**COMMENT NO. 2:** OPTIONS FOR EMPHASIZING TOURISM, HUNTING, FISHING, AND PRIMITIVE RECREATION OPPORTUNITIES AS A MEANS TO ECONOMIC STABILITY MUST BE MAINTAINED WHILE WE STILL HAVE THAT OPPORTUNITY.

**FOREST SERVICE RESPONSE**

Many respondents agree. We are confident the National Forest will continue to provide a wide variety of opportunities.

**COMMENT NO. 3:** INTENSIVE LOGGING, ROADBUILDING, AND GRAZING ARE IN MANY CASES NOT COST EFFECTIVE WHEN BENEFIT/COSTS RATIOS ARE STUDIED. AGAIN AND AGAIN WE ARE SUBSIDIZING DESTRUCTION OF WILD FISHERIES RESOURCES, ENDANGERED WILDLIFE AND LESS TOURISM REVENUE THROUGH EXCESSIVE TIMBER HARVESTING AND ROADBUILDING.

**FOREST SERVICE RESPONSE:**

We cannot agree that the wild fisheries resource is being destroyed nor that other values upon which tourism may depend are being seriously threatened.

**COMMENT NO. 4:** THE DOCUMENTS CITE A NEED TO SUPPORT THE LOCAL ECONOMY AS A JUSTIFICATION FOR LIVESTOCK GRAZING, YET PUBLISHED DATA SHOW THAT THE USFS RECOVERS ONLY 38 CENTS FOR EVERY \$1 SPENT ON GRAZING PROGRAMS. WHAT ABOUT GRAMM-RUDMAN? IF NATIONAL POLICY DEMANDS THAT LOCAL ECONOMIES BE SUBSIDIZED, IT COULD BETTER BE DONE BY ENCOURAGING MULTIPLE USES THAT DO NOT DAMAGE RIPARIAN ZONES, LEAD TO WINTER KILLS OF BIG GAME, CREATE SOIL EROSION, ETC.

**FOREST SERVICE RESPONSE**

Grazing fees have long been influenced by political forces and may currently be a bargain. This does not, however, relieve the Forest Service of its multiple use mandate of which grazing is a part. We are continually striving to eliminate the adverse effects livestock grazing can cause.

**COMMENT NO. 5: THE TREATMENT OF ECONOMIC EFFECTS IN THE DEIS IS EXCEEDINGLY SUPERFICIAL AND MISLEADING. WE CANNOT ACCEPT THE VALIDITY OF THE STATEMENT ON PAGE IV-57 THAT THE PREFERRED ALTERNATIVE C WILL HAVE A POSITIVE EFFECT ON LOCAL ECONOMIES RECREATION EMPLOYMENT IS NOT EQUIVALENT TO FOREST INDUSTRY EMPLOYMENT AND THE ALLEGED GAIN IN THE FORMER WILL NOT COMPENSATE FOR THE LOSS IN THE LATTER WHICH WOULD BE INEVITABLE UNDER 'C' THERE IS NO SUBSTANTIAL EVIDENCE PRESENTED THAT RECREATION EMPLOYMENT WOULD INCREASE DURING THE PLAN PERIOD UNDER THE PROPOSAL**

**FOREST SERVICE RESPONSE:**

Page IV-57 of the DEIS describes Alternative C-departure, not Alternative C This section of the DEIS compares the other alternatives to Alternative A Page IV-56 of the DEIS points out that in terms of lifestyle, Alternative C " . would be quite similar to Alternative A ...."

We agree that recreation employment is not the equivalent of forest industry employment (as shown in Appendix B of the DEIS). We anticipate no increase in recreation other than that which would be associated with expected population increases We have provided more detail of estimated employment and income effects in Chapter II of the FEIS.

**COMMENT NO. 6: NON-MOTORIZED RECREATION IN ROADLESS AREAS IS A GROWING RESOURCE ON THE WALLOWA-WHITMAN, AND YOU SHOULD CONSIDER THE ECONOMIC BENEFITS OF SUCH USES TO THE LOCAL COMMUNITIES, THROUGH INCREASED TOURIST AND SUPPORT EQUIPMENT TRADE.**

**FOREST SERVICE RESPONSE:**

We have included this recreation experience in our analysis

**COMMENT NO. 7: YOUR ECONOMIC ANALYSIS CONSISTENTLY UNDERVALUES AMENITY VALUES AND OVERESTIMATES COMMODITY VALUES, BOTH IN THE PNV AND THE EFFECTS ON THE LOCAL COMMUNITIES. YOU SHOULD RECONSIDER THIS ANALYSIS**

**FOREST SERVICE RESPONSE.**

We have looked at the values contained in the documents (see pages B-55 through B-57 of the DEIS Appendices) and feel that they are representative of what people are willing to pay We recognize that the values used are average values and that individuals are likely to see them as being either undervalued or overvalued in their own perspective.

**COMMENT NO. 8 RECREATION WILL EMERGE AS THE PREDOMINANT ECONOMIC BASE FOR ALL OF NORTHEAST OREGON WHILE IT HAS BEEN HISTORICALLY TRUE THAT TIMBER PRODUCTION AND CATTLE RANCHING HAVE PROVIDED MUCH OF THE ECONOMIC LIVELIHOOD TO THIS AREA IN THE PAST, IT IS OUR VIEW THAT THESE BUSINESSES ARE IN DECLINE AND THAT RECREATION IS THE ONLY LIKELY INDUSTRY THAT CAN PICK UP THE SLACK AS THE BEEF AND TIMBER INDUSTRIES FALL OFF**

**FOREST SERVICE RESPONSE:**

Thank you for your view.

**COMMENT NO. 9. METHODS FOR ASSIGNING VALUE TO THE TIMBER IN THE NATIONAL FORESTS NEED TO BE DRASTICALLY ALTERED. THE EXTREMELY LOW PRICES SET AS MINIMUM FOR TIMBER SALES ARE A DIRECT SUBSIDY TO CORPORATIONS. AS OWNER OF APPROXIMATELY 700 ACRES OF WOODED LAND IN WALLOWA AND UNION COUNTIES, I AM DEPRIVED OF A HEALTHY MARKET FOR MY TIMBER SINCE THE FOREST SERVICE HAS SO DEPRESSED THE PRICES. PRIVATE OWNERS ARE THEREBY PAYING THE PENALTY TWO-FOLD: IN TAXES TO SUPPORT THE NATIONAL FOREST AND IN BEING SUBJECTED TO UNFAIR COMPETITION.**

**FOREST SERVICE RESPONSE.**

Many people feel that the government's willingness-to-sell timber at prices below the cost of production depresses timber production by the private sector -- to the detriment of the overall economy. As the commenter says, this can be disturbing to the private timber producer who must support his competition (government).

**COMMENT NO. 10: NATIONAL FOREST LANDS SHOULD BE MANAGED FOR OPTIMUM BENEFIT OF NON-GAME, NATIVE WILDLIFE, AND THE RESTORATION AND PRESERVATION OF THE LAND TO THE CONDITION BEFORE NON-NATIVE AMERICANS ALTERED IT FOR COMMERCIAL AND OTHER EXPLOITATION. I BELIEVE THAT SUCH A RESTORATIVE, NON-CONSUMPTIVE POLICY WOULD IN THE LONG RUN BENEFIT THE VAST MAJORITY OF AMERICANS, AND IS FAR MORE IMPORTANT THAN SHORT-TERM, LOCAL ECONOMIC CONSIDERATIONS.**

**FOREST SERVICE RESPONSE.**

Thank you for your opinion.

**COMMENT NO. 11: A LOSS OF 107 TIMBER JOBS IS PROJECTED UNDER THE CURRENT DIRECTION (ALTERNATIVE A)(DEIS II-82). BECAUSE EACH 1 MMBF = 11 JOBS (PLAN IV-25), 10 MMBF MORE TIMBER COULD BE CUT TO MAINTAIN THE TIMBER JOBS. ALTERNATIVE A PLANNED FOR A SAWLOG HARVEST OF 139 MMBF, ALTERNATIVE C PLANS FOR 143 MMBF. THIS HARVEST INCREASE IS APPARENTLY DESIGNED TO INCREASE EMPLOYMENT. AS EVERY TECHNOLOGICAL CHANGE INTRODUCED BY THE TIMBER COMPANIES REDUCES THE NEED FOR A TIMBER LABOR FORCE, THERE IS AN ACCOMPANYING DEMAND FOR MORE TIMBER TO REPLACE THE SAME JOBS.**

**FOREST SERVICE RESPONSE.**

Under Alternative A, 134 MMBF would be available if it were adopted through this planning effort. The timber volume actually being offered was based on the timber management plan and amounted to 159 MMBF. So the 143 MMBF is a decrease from the recent past. We agree that technological updating has had a downward effect on employment. It would be incorrect to assume, however, that the local timber industry is therefore predestined to employ fewer and fewer people. The local industry may integrate vertically -- doing more processing of the material here -- and thereby employ more people.

**COMMENT NO. 12** THIS ALTERNATIVE IS THE END RESULT OF YOUR DIVISION, RATHER ARBITRARILY, OF FOREST VALUES INTO COMMODITIES AND AMENITIES, A LOADED SEMANTIC TRAP. YOUR ASSIGNMENT OF ZERO OR INCREDIBLY LOW VALUES, IN DOLLARS, TO SUCH THINGS AS ANADROMOUS FISHERIES, WILDLIFE HABITAT AND YOUR OTHER AMENITIES IS NOT ONLY SHORT-SIGHTED BUT ERRONEOUS. HAVE YOU REALLY NOT SEEN OR CONSIDERED ANY OF THE RECENT WORK IN FOREST ECONOMICS THAT ATTEMPTS TO ASSIGN DOLLAR VALUES TO YOUR AMENITIES? IF YOU HAVE SEEN THESE THINGS, YOUR MODEL AND ANALYSIS CLEARLY NEGLECTS THEM.

WHY DON'T YOU MAKE AN EFFORT BEFORE THE INTERMIDABLE APPEALS OF ACTIVITIES SUCH AS TIMBER SALE, LITIGATION, AND EXPENSIVE DELAYS OCCURS? I DON'T WANT TO SEE IT HAPPEN AND I'M SURE YOU DON'T, YET YOU HAVE INSURED NOT ONLY THE OCCURRENCE BUT THE LOSS OF LITIGATION BY YOUR FAULTY ANALYSIS.

#### **FOREST SERVICE RESPONSE**

Dividing Forest outputs or activities into commodity and amenity groupings has caused a lot of concern. Some feel that the labels do convey a sense of direction -- others that they heighten confusion.

We have dollar-valued our anadromous fisheries program (which, though small, is growing) and our wildlife habitat by valuing their output in terms of fish caught or in terms of recreation provided. We recognize in a theoretical sense that everything can be assigned a dollar value, but we further recognize that there are good reasons for not assigning dollar values -- such as when the great body of knowledge provides no clear direction. This management of such dollar values is consistent with Forest Service Manual 1971.63-1. "Values should only be determined for outputs that are sold or could potentially be sold if the law or Forest Service policy permitted."

We recognize that this explanation may not address the commenter's concerns. Our response is admittedly anthropocentric (as was the entire analysis). If the commenter does not share that perspective, the economic analysis presented is only of limited use, primarily as an accounting tool.

**COMMENT NO. 13.** THE KEY TO THE PLAN SEEMS TO BE IN UNDERSTANDING THAT THE FOREST PRODUCTS INDUSTRY IS CHANGING AND THAT IT IS IMPOSSIBLE TO DETERMINE TODAY EXACTLY WHAT ITS NEEDS WILL BE TOMORROW. THUS, MAINTAINING OPTIONS FOR THE FUTURE SEEMS A WISE APPROACH. WHAT DOES APPEAR CLEAR IS THAT OVERALL, EMPLOYMENT PER BOARD FOOT PROCESSED IS DECLINING. TECHNOLOGY HAS IMPROVED PRODUCTIVITY AND WILL CONTINUE TO DO SO; THUS, SOME DISLOCATION WITHIN THIS INDUSTRY IS INEVITABLE. LIKEWISE, THERE IS NO CERTAINTY THAT THE MAJOR ECONOMIC PLAYERS TODAY WILL BE THE MAJOR PLAYERS TOMORROW, SO DESIGNING A PLAN TO MEET THE SPECIFIC NEEDS OF SPECIFIC CORPORATIONS WOULD BE VERY SHORT-SIGHTED. FINALLY, IF SHORT-TERM ECONOMIC CONCERNS ARE TO PREVAIL OVER LONGER-TERM RESOURCE MANAGEMENT CONSIDERATIONS, IT SEEMS DESIRABLE TO MAKE CHANGES WITHIN THE MANAGEMENT AREAS ESPECIALLY WITHIN THE PREFERRED ALTERNATIVE, RATHER THAN TO ATTEMPT TO CHANGE ALTERNATIVES OR TIMBER HARVESTING SCHEDULES.

#### **FOREST SERVICE RESPONSE:**

We generally agree with your opinions. In the Final EIS and Plan, we have made changes in the preferred alternative as well as the areas, in response to comments.

**COMMENT NO. 14:** I CONTINUE TO HOLD THE FIRM CONVICTION THAT MANY YEARS OF VERY EFFECTIVE LOBBYING BY A SMALL BUT LOCAL FACTION OF THE PUBLIC, THE PRESERVATIONISTS, HAS IMPARTED AN ANTI-INDUSTRY SLANT TO THE MANAGEMENT OF OUR FORESTS

**FOREST SERVICE RESPONSE:**

Thank you for your point of view.

**COMMENT NO. 15:** MY MOST VITAL CONCERN IS FOR THE TAX INCREASES I WILL HAVE TO FACE AS A RESULT OF LOST REVENUES TO THE COUNTY. THE WAGE FREEZE I AM PRESENTLY WORKING UNDER, AND AM FACING FOR AN INDEFINITE PERIOD IN THE FUTURE, AS WELL AS THE STRUGGLE OF MY LOCAL SCHOOL DISTRICT TO CONTINUE OPERATIONS ON A YEAR-TO-YEAR BASIS, MAKES ANY THREAT OF INCREASED TAXES AND/OR REDUCED REVENUES EXTREMELY SERIOUS.

**FOREST SERVICE RESPONSE:**

These and like concerns weighed heavily in the decision to attempt to increase the timber harvest in the final version of the preferred alternative.

**COMMENT NO. 16:** OUR CONCERN IS THAT THE PLAN INADEQUATELY ANALYZES THE ECONOMIC IMPACT OF ITS PROPOSED ACTIONS FOR EXAMPLE, ANY REDUCTION OF RAIL VOLUME INCREASES THE PROBABILITY OF RAIL LINE ABANDONMENT WHICH WOULD SERIOUSLY ADVERSELY AFFECT ALL MILLS IN THE AREA. ALSO, REDUCTIONS IN HARVESTABLE VOLUME OR CHANGES IN THE COMPOSITION WILL NOT LIKELY BE SPREAD OVER MANY MILLS RATHER, MARGINAL MILLS WILL SHUT DOWN WITH SERIOUS COMMUNITY IMPACTS

CONSEQUENTLY, PACIFIC POWER URGES THE FOREST SERVICE TO TAKE NO ACTION WHICH WILL REDUCE THE VOLUME OR COMPOSITION OF HARVESTABLE TIMBER

**FOREST SERVICE RESPONSE:**

Rail line abandonment, loss of motor freight service, and the loss of any one of a number of specialty shops are all possibilities in a contracting economy. Certainly, the local area has seen some of that kind of thing over the last several years. Some such enterprises require a large degree of capitalization -- once lost to an area, they are unlikely to return, absent the promise of a protracted upturn. Others, like aircraft service, are relatively flexible and can respond quickly to shifts in the area's economy

It is true that some firms operating on the very margin of existence will fold. It is important to remember though that they may well fold for other reasons as well. Some of the area's installed mill capacity was put in place after the area's "timber deficit" had already been reported. Certainly National Forests are not to be managed to cover mistaken overexpansion in the timber sector

**COMMENT NO. 17.** DON MCPHAIL IN A "1985 TOURISM STUDY" MAINTAINS THAT: "TO BE BENEFICIAL FOR A COMMUNITY, TOURISM MUST PROVIDE SIGNIFICANT NEW REVENUE AND/OR EMPLOYMENT FOR THAT COMMUNITY WITHOUT SEVERELY BURDENING EXISTING COMMUNITY SERVICES. TOURISM SHOULD BE TARGETED FOR SPECIFIC, PRODUCTIVE TYPES OF VISITORS, AND NOT FOR GENERAL "TRAFFIC BUILDING" IN ADDITION, TOURISM PROGRAMS SHOULD OFFER DISTINCT, MEASURABLE 'POINT-OF-PURCHASE' MECHANISM." WE WON'T



ARGUE WITH YOUR CONCLUSION OF A REDUCTION IN PERSONAL INCOME OTHER THAN TO SAY THAT IT WILL BE MORE THAN SLIGHT\*.

COMMON SENSE SUGGESTS THAT YOUR PREFERRED ALTERNATIVE WILL ONLY RESULT IN LOST TIMBER JOBS, REDUCTIONS IN PERSONAL INCOME, AND DECREASES IN PAYMENT TO LOCAL GOVERNMENTS. THEREFORE, WE CANNOT SUPPORT ALTERNATIVE "C".

**FOREST SERVICE RESPONSE:**

Many reviewers shared your thoughts

**COMMENT NO. 18:** THE PLAN AS IT NOW STANDS WOULD REDUCE ECONOMIC DEVELOPMENT OPPORTUNITIES. LIMITING ALLOWABLE HARVEST OF PONDEROSA PINE AND THE CUTBACK OF OLD GROWTH WOULD BE DETRIMENTAL TO THE TIMBER INDUSTRY IN THE FOLLOWING SECTORS: WOOD PRODUCTS/MILLWORK, SECONDARY INDUSTRIES, AND EXPORTS.

RESEARCH ALSO SUGGESTS THAT THE WALLOWA-WHITMAN DRAFT ENVIRONMENTAL IMPACT STATEMENT AND THE ALTERNATIVES CONTAINED DO NOT ALL ALLOW FOR SUFFICIENT RECREATION/TOURISM EXPANSION

IN SUMMARY, WE ADVOCATE DEVELOPMENT OF ANOTHER ALTERNATIVE FOR CONSIDERATION IN THE WALLOWA-WHITMAN NATIONAL FOREST DRAFT IMPACT STATEMENT THAT WOULD PROVIDE ADEQUATE TIMBER SUPPLIES (BOTH QUANTITY AND QUALITY) AT LEAST TO MAINTAIN EMPLOYMENT AT CURRENT LEVELS, AND TO PROMOTE RECREATION/TOURISM

**FOREST SERVICE RESPONSE**

The final version of the Forest Plan has been modified to call for more harvesting of ponderosa pine than shown in the DEIS preferred alternative. The plan also calls for further developments of recreational and tourism facilities, particularly in the Hells Canyon National Recreation Area

**COMMENT NO. 19.** THE INCREASE OR REALLOCATION OF FOREST LANDS FROM TIMBER PRODUCTION OR MULTI-USE FUNCTION TO MORE RESTRICTIVE RECREATIONAL OR PRESERVATION STATUS SEEMS UNWARRANTED . . . THE CURRENT AVAILABLE LAND SHOULD BE MANAGED FOR MAXIMUM MULTI-USE AND REMAIN IN PRODUCTION THIS WOULD EASILY PROVIDE THE REQUIRED 160-170 MBF REQUIRED TO MAINTAIN CURRENT PRODUCTION STANDARDS.

**FOREST SERVICE RESPONSE:**

In comparing the map for Alternative C with the map for Alternative A (current situation), it can be noted that Alternative C is more commodity-oriented. More of the available land is to be managed for timber production under the preferred alternative (C) than under the current situation.

Alternative A best represents the existing land allocation under the current land management plans (Unit Plans). That group of land allocations (run for the entire Forest) produced a first decade harvest level of 134 MMBF. Moving from 134 to 160 or 170 MMBF would mean that we could not maintain that harvest level indefinitely.

**COMMENT NO. 20** HUNTING AND FISHING IS A MAJOR SOURCE OF RECREATION AND INCOME TO THE STATE OF OREGON AND IN THIS PLAN AS WELL AS MANY OTHERS THE SPECIAL INTEREST LOGGING LOBBYS ARE GETTING THEIR WAY AT THE EXPENSE OF WILDLIFE AND THE OREGON SPORTSMAN

**FOREST SERVICE RESPONSE.**

Thank you for your opinion.

**COMMENT NO. 21:** PAGE II-124 THROUGH 132: YOU ARE BASING THIS ECONOMIC ARGUMENT ON 1982 DOLLAR VALUES FOR TIMBER, WHICH WAS A GREAT DEAL MORE THAN THE CURRENT ECONOMIC PICTURE FOR TIMBER. THIS BIASED OUTLOOK MAKES IT SEEM THAT YOU WILL ACTUALLY GET MORE FOR THE WOOD THAN YOU WILL. ALSO, COSTS FOR 1986 AND BEYOND WILL BE HIGHER AND THEREFORE THE PROFIT MARGINS WILL BE LESS.

**FOREST SERVICE RESPONSE:**

Dollar figures presented in the document reflect the purchasing power of a dollar in 1982 -- not the actual costs or prices of 1982. In developing Forest Plan cost and benefit data, we commonly used information from more than a single year to insure that our figures were not being thrown off by unusual single-year occurrences. It was necessary, therefore, that stumpage values for timber, which were taken from a period of several years, be converted to the common 1982 dollar base.

**COMMENT NO. 22:** AS FOREST SUPERVISOR YOUR MOST IMPORTANT FUNCTION IS TO LOOK OUT FOR THE ECONOMIC WELL BEING OF THOSE PEOPLE AFFECTED

**FOREST SERVICE RESPONSE**

Concern for the local economy was one of the key issues in preparing the Forest Plan

**COMMENT NO. 23:** THE PROPOSED DROP IN THE ALLOWABLE CUT ON THE WALLOWA-WHITMAN HAS FAR-REACHING EFFECTS ON NOT ONLY THE LOCAL AREAS BUT THE ADJOINING FORESTS. FOR INSTANCE, THE MALHEUR HAS STARTED TO NOTICE A RIPPLE OR SPILLOVER EFFECT SUPPLIED BY A DEPRIVATION OF TIMBER ON THE WALLOWA-WHITMAN. THIS RESULTS IN TIMBER SALES WHICH ARE BID TO BREAK EVEN OUT OF NECESSITY FOR SURVIVAL, WITH NO HOPE OF MAKING A PROFIT. IN TURN, THIS PLACES A FURTHER STRAIN ON AN INDUSTRY WHICH HAS ALREADY BEEN PUSHED TO ITS FINANCIAL LIMIT. SINCE THIS STRAIN IS NOT FELT BY ANY GIVEN COMPANY, BUT IN FACT BY ALL, IT SUPPLIES A FACTOR WHICH HELPS BREED FOR AN INSTABILITY WHICH IN TURN CREATES AN UNSTABLE ECONOMY, THEREFORE, UNSTABLE COMMUNITIES. THE SOCIAL RAMIFICATIONS WHICH STEM FROM THIS ISSUE COME IN THE FORM OF A REDUCED TAX BASE (I.E., LOST REVENUES OF FOREST RECEIPTS AND EMPLOYEE TAXES), A FOREST MANAGED FOR A GIVEN FEW RATHER THAN THE PEOPLE WHO ACTUALLY USE IT AND CURTAILED DOLLARS WHICH WOULD NORMALLY FLOW INTO THE COMMUNITY WHICH WILL NO LONGER BE AVAILABLE

**FOREST SERVICE RESPONSE:**

Since the Forest's allowable harvest has been adjusted only slightly in the past 10 years, we doubt that this has been the reason for increased bidding on the Malheur. We do recognize, however, that the Malheur National Forest has been logged less intensively in the past than

has the Wallowa-Whitman. It is normal to log the most merchantable sales first, so that as a Forest's sale program ages, its attractiveness tends to decline

On the Wallowa-Whitman, this aging of the sale program reflects the fact that ponderosa pine was cut more heavily in the past, and the most accessible and easily harvested lands were logged first.

**COMMENT NO. 24** THE WALLOWA COUNTY UNEMPLOYMENT RATE STOOD AT 17.6% IN APRIL, 1986. IT WOULD HAVE BEEN WORSE EXCEPT FOR THE FACT THAT THE LABOR FORCE HAD DECLINED BY 220 SINCE APRIL, 1985. THE STATE OF OUR ECONOMY IS FURTHER REVEALED BY THE FACT THAT MORE THAN 20 (NET COUNT) SERVICE AND RETAIL BUSINESSES HAVE CLOSED DURING THE PAST TWO YEARS AND OUR POPULATION DECLINED BY 2% DURING THE PAST YEAR. WE THINK THAT FROM THE FOREGOING DISCUSSION, YOU CAN SEE THE DESPERATE NEED TO HOLD THE LINE ON ANY DECREASE IN ALLOWABLE CUT ON THE WALLOWA-WHITMAN. OUR NEED IS MARKETABLE SAWTIMBER, NOT THE OTHER USES WHICH ARE ALREADY OVER-ABUNDANTLY AVAILABLE

**FOREST SERVICE RESPONSE:**

We understand the residents of local counties being concerned about preventing further erosion of the economic base. This has had considerable influence in our changing the preferred alternative between the Draft EIS and the Final EIS to include more ponderosa pine in the first decade than was shown in the DEIS preferred alternative.

**COMMENT NO. 25** YOU RECEIVE 75% OF TIMBER SALE RECEIPTS THAT HELP FINANCE THE FOREST SERVICE OPERATIONS. WITH 25% OF FOREST RECEIPTS GOING TO FINANCE THE SCHOOLS AND ROADS IN WALLOWA COUNTY, WE ARE TALKING SURVIVAL IN ECONOMIC TERMS. REDUCE PONDEROSA PINE HARVEST (@\$141/M) OR SWITCH IT TO LODGEPOLE PINE (@\$9/M) AND YOU CHEAT YOURSELVES AND US OUT OF \$132/M GROSS RECEIPTS. FOR EVERY THOUSAND BOARD FEET OF TIMBER, THIS IS A REDUCTION OF \$99/M TO THE FOREST SERVICE AND \$33/M TO WALLOWA COUNTY SCHOOLS AND ROADS. HOW CAN MILL WORKERS PAY INCOME TAX TO UNCLE SAM FOR YOUR INCREASED BUDGET AND DECREASED RECEIPTS; PROPERTY TAX (DOUBLED?) TO KEEP WALLOWA COUNTY SCHOOLS AND ROADS OPEN; PROVIDE MORE ACRES FOR A PRIVILEGED FEW HIKERS WHO ALREADY HAVE MORE ACRES, SPACE AND WILDERNESS THAN THE MAJORITY OF AMERICANS CAN GAIN ACCESS TO.

**FOREST SERVICE RESPONSE:**

In light of your comments and those of many others, we have increased the level of ponderosa pine from the levels shown in the DEIS preferred alternative.

**COMMENT NO. 26:** IN THE ABSENCE OF ANY DETAILED INFORMATION, I BELIEVE THAT THE FLYERS USED TO PROMOTE THE "COMMUNITY STABILITY ALTERNATIVE" ARE VERY MISLEADING AND THAT THOSE RESPONDING TO THE FLYERS ARE RESPONDING TO PERCEIVED THREATS RATHER THAN GIVING THEIR CONSIDERED OPINION. WHO AMONG US WOULD CHOOSE TO LOSE THEIR JOB OR TO ACCEPT HIGHER TAXES?

**FOREST SERVICE RESPONSE:**

We recognize that both the Community Stability flier and the paper entitled "What Fate for the Wallowa-Whitman" were designed to influence as well as to provide information.

**COMMENT NO. 27:** 'COMMUNITY STABILITY ALTERNATIVE' IS AN INSULT TO OUR INTELLIGENCE. IT ISN'T GOOD FOR THE ECONOMY. IT IS TYPICAL OF THE MENTALITY OF COMMERCIAL INTERESTS WHICH CONSIDER ONLY SHORT TERM GAIN AND NOT OF THE FUTURE.

**FOREST SERVICE RESPONSE:**

Thank you for your opinion.

**COMMENT NO. 28:** PEOPLE LIVE IN NORTHEAST OREGON FOR MORE REASONS THAN A JOB IN THE TIMBER INDUSTRY. ONRC SUGGESTS THAT PEOPLE ARE INDEED CONCERNED WITH ECONOMY, BUT GIVEN A FULLY EXPLAINED SET OF CHOICES IN AN ABSENCE OF UNEXPLAINED JOB LOSS THREATS AND HIGHER TAXES, THEY MAY NOT HAVE CHOSEN THE TIMBER INDUSTRY CSA. PEOPLE MAY NOT CHOOSE THE ONRC ALT. EITHER, BUT THE CSA TACTICS ARE REPREHENSIBLE.

ONRC ALSO WISHES THE FOREST SERVICE AND THE PUBLIC TO EXAMINE THE EFFECTS ON A COMMUNITY AS A RESULT OF TIMBER INDUSTRY INTENSIVE MANAGEMENT OF THE WORLD'S MOST PRODUCTIVE FORESTLANDS, NEAR VALSETZ, OREGON

FEATURES OF ALTERNATIVE H AND ECONOMIC EFFICIENCY SHOULD BE INCLUDED TO GREATER EXTENT IN FINAL

**FOREST SERVICE RESPONSE:**

Additional economic information has been provided.

**COMMENT NO. 29** SERIOUS FLAWS IN THE DATA AND ASSUMPTIONS WHICH ARE USED IN THE FORMULATION OF ALL TEN ALTERNATIVES PREVENT ME FROM SUPPORTING THE ADOPTION OF ANY OF THEM OF SPECIAL CONCERN ARE THE FLAWED, UNSUBSTANTIABLE ASSUMPTIONS REGARDING POPULATION PROJECTIONS, LOGGING, AND MANAGEMENT COSTS AND OTHER ECONOMIC VALUES. IF THESE INADEQUACIES WERE CORRECTED, I BELIEVE THE POTENTIAL EXISTS TO CONSTRUCT A NEW ALTERNATIVE THAT THE STATE OF OREGON CAN ENDORSE. I THEREFORE REQUEST THAT THE WALLOWA-WHITMAN NATIONAL FOREST ISSUE A SUPPLEMENT TO THE EIS. WITHOUT CORRECTIONS, I BELIEVE THAT THE PLAN WILL SURELY BE APPEALED. THAT CONSEQUENCE WOULD BE COSTLY AND COUNTER-PRODUCTIVE FOR BOTH THE FOREST SERVICE AND THE STATE OF OREGON

**FOREST SERVICE RESPONSE:**

The revised comment from the State of Oregon did not recommend a supplement. The current administration recommended Alternative C with certain modifications, many of which were incorporated in the final version of the Forest Plan.

**COMMENT NO. 30:** WALLOWA-WHITMAN PROJECTED FOREST MANAGEMENT AND LOGGING COSTS ARE EXCESSIVE WHEN COMPARED TO ADJACENT NATIONAL FORESTS WITH SIMILAR CONDITIONS. FOR EXAMPLE, THE WALLOWA-WHITMAN MODEL USES A COST OF \$179/MCF FOR SALE PREPARATION AND ADMINISTRATION, WHILE THE UMATILLA USES \$104/MCF, AND THE OCHOCO MODELED A COST OF \$75/MCF.

**FOREST SERVICE RESPONSE**

The \$179 figure is identified as Sale Preparation cost per MCF in the FORPLAN model data set. It is a cost data field commonly used to reflect costs associated with timber harvesting other than simply sale preparation costs. The Wallowa-Whitman included other costs such as contract administration, engineering services, fire protection, property boundary location and maintenance, and rights-of-way acquisition insofar as they were caused by timber harvesting.

Different Forests have tracked the respective costs in different ways, some within FORPLAN, some outside FORPLAN. The decisions made as to how the individual cost centers should be tracked was left to the individual Forests. Differences necessarily resulted in the cases cited. The Umatilla tracked sale preparation, contract administration, and over a dozen other costs in the data field. In way of clarification, the figure they use is \$114, not \$104. The Ochoco figure averages about \$76 per MCF and tracks sale preparation and administration along with a shorter list of associated costs.

**COMMENT NO. 31:** THE ECONOMIC ANALYSIS CONDUCTED BY THE FOREST FAILS TO FULLY ADDRESS THE TIMBER SUPPLY SITUATION ON ADJACENT OWNERSHIPS AND DOES NOT RECOGNIZE THE EFFECT OF THE FOREST'S ACTIONS ON THE STATE'S ECONOMY.

**RECOMMENDATION -** THE ACTIONS OF ADJACENT FEDERAL AND PRIVATE TIMBER SUPPLIERS AND THE RESULTING EFFECT ON LOCAL AND STATE ECONOMIES SHOULD BE CONSIDERED IN THIS ANALYSIS. THE FOREST SHOULD ALSO MORE COMPLETELY DOCUMENT ITS ECONOMIC INFLUENCE OUTSIDE OF THE LOCAL THREE COUNTY AREA.

**FOREST SERVICE RESPONSE:**

The Regional Office coordinated a recently-released study (Timber Supply in the Pacific Northwest--Aggregate Implications of Forest Plans) to address the concerns voiced in this comment. Chapter II of the FEIS has also been amended to reflect these concerns.

**COMMENT NO. 32:** THE DP SHOULD INCLUDE VALUES FOR ALL RESOURCES AND NOT JUST TIMBER AND GRAZING. A MUCH MORE DETAILED ECONOMIC EVALUATION MUST BE PRESENTED USING A VARIETY OF EXISTING METHODS AND STUDIES TO GIVE EQUITABLE ANALYSIS AMONG ALL RESOURCES. WHY WAS SUCH AN ANALYSIS NOT DONE? ONRC URGES SUCH EVALUATIONS IN THE FINAL PLAN.

**FOREST SERVICE RESPONSE:**

As can be seen on Table II-5 on p. II-114 of the DEIS and in the corresponding FEIS passages, resources other than timber and grazing were valued. A discussion of benefits is contained on pages B-53 through B-57 of the DEIS Appendices. Recreation provided more dollar quantified benefits than did timber, for instance. We did use a variety of methods and studies during the conduct of the analysis including FORPLAN, IMPLAN, electronic spreadsheets, statistical analysis, and literature searches which are described in Appendix B of the FEIS.

**COMMENT NO. 33:** SKYLINE LOGGING COSTS ON THE WALLOWA-WHITMAN ARE \$130/MCF HIGHER THAN THE UMATILLA'S AND \$100/MCF HIGHER THAN THE MALHEUR'S. THESE SIGNIFICANTLY HIGHER COSTS RESULT IN MORE ACRES BEING REMOVED BY THE MODEL FOR ECONOMIC REASONS. HOWEVER, NO EVIDENCE HAS BEEN PRESENTED TO JUSTIFY THE USE OF HIGHER COSTS ON THE WALLOWA-WHITMAN FOR SIMILAR SITUATION.

THE CUMULATIVE EFFECT OF THESE COST DIFFERENCES IS REFLECTED IN THE BENCHMARK RUNS OF THE WALLOWA-WHITMAN AND UMATILLA NATIONAL FORESTS. FOR EXAMPLE, THE PNV OF THE MAXIMUM BIOLOGICAL POTENTIAL RUN FOR THE UMATILLA IS 3.1 TIMES GREATER THAN FOR THE WALLOWA-WHITMAN, EVEN THOUGH FIRST DECADE VOLUMES ARE ABOUT THE SAME. COMPARISONS OF MAXIMUM PNV RUN NO. 7 EXHIBIT THE SAME TREND. TIMBER MANAGEMENT ACRES ARE 51,000 ACRES HIGHER ON THE WALLOWA-WHITMAN, BUT FIRST DECADE HARVEST IS 70 MMBF LOWER AND PNV IS ONLY 42 PERCENT OF THE UMATILLA'S. WHAT CAUSES THESE EXTREME DIFFERENCES ON THE WALLOWA-WHITMAN?

THE DEPARTMENT OF FORESTRY RECOMMENDS THAT THE WALLOWA-WHITMAN REEVALUATE ITS TIMBER SALE AND MANAGEMENT COSTS TO INSURE THAT TIMBER AND OTHER RESOURCE PROGRAMS ARE OPERATED AT MAXIMUM EFFICIENCY. HAVE COSTS INCURRED BY UNRELATED PROGRAMS SUCH AS JOB TRAINING AND RETRAINING BEEN INCORRECTLY INCLUDED. COSTS SHOULD NOT BE SIGNIFICANTLY HIGHER THAN ON ADJACENT NATIONAL FORESTS WHEN SIMILAR SITES ARE COMPARED. SENSITIVITY TESTING SHOULD BE EXPANDED TO DETERMINE THE EFFECT OF USING REASONABLE COSTS ON PRESENT NET VALUE AND TIMBER HARVEST LEVELS.

### FOREST SERVICE RESPONSE

During the analysis process, the Wallowa-Whitman generated literally hundreds of logging cost estimates for the shortspan cable logging system apart from those generated for longspan cable logging, tractor logging, and helicopter logging. These logging cost estimates are a function of species, height, diameter, stand rotation age, harvest method, slash treatment, and volumes per acre.

Because the comment is expressed on an MCF basis rather than an MBF basis, it is particularly difficult to address. Within the wide range of silvicultural regimens considered, the Wallowa-Whitman itself spanned logging cost differentials greater than \$130/MCF. A figure of \$130/MCF amounts to \$52/MBF with a board foot cubic foot conversion ratio of 2.5 as might be appropriate with small diameter lodgepole stands; \$24/MBF with a conversion ratio of 5.4 as might be appropriate with an existing, mature, mixed-conifer stand.

During the lengthy course of Forest planning, many changes have occurred in the processes used and the data presented on the various Forests.

Discussions with personnel from the Malheur and the Umatilla National Forests disclosed that the Malheur was adopting basically a twin-tiered approach for reflecting costs (slopes greater or lesser than 35 percent); whereas the Umatilla had developed different logging costs for tractor, skyline, and helicopter logging. The slope breakpoint for the Umatilla is 30 percent and their model also discriminates on the basis of diameter, harvest type, and plant community. In short, each of the systems developed on the Forests mentioned in the comment reflect Forest-respective conditions. That there are differences in the information as well as in the way the information is portrayed is to be expected.

The cost category cited, viz. skyline logging, is not generic. The Malheur designation of "greater than 35 percent" would generally include that category; whereas skyline logging on the Wallowa-Whitman might generally be construed as cable yarding with yarding distances not-to-exceed 2,000 feet. The Umatilla would include as skyline logging all logging on slopes over 30 percent which was not helicopter logged. These definition problems would have to be overcome before a valid comparison could be made.

Sensitivity tests conducted during the analyses, and summarized in Appendix B of the FEIS, show that a 50 percent reduction in planting costs or a 20 percent reduction in sale prep costs did not affect the number of acres in timber management.

It is also important to note that the preferred alternative had a harvest floor set as a function of the maximum amount of timber that could be produced in the first decade -- not as a function of maximum efficiency. Costs did not affect the timber harvest level selection on any alternative except Alternative G

The Umatilla's ASQ for the referenced benchmark stands at 213 MMBF annually for decades 1, 2, and 5 (Umatilla DEIS Appendices, p B-81). Comparable ASQ figures for the Wallowa-Whitman are 193, 192, and 185 respectively. The Wallowa-Whitman's ASQ, based on first and second decade average figures, are about 10 percent less than the Umatilla's assuming the Umatilla data does not change

The Wallowa-Whitman has more steep or difficult-to-access lands than does the Umatilla. The extra costs of logging that land contribute to a lower present net value on the Wallowa-Whitman. In the past, these sorts of cost differentials have combined to yield lower stumpage values on the Wallowa-Whitman than on the Umatilla. The Hayes-Barranco weighted average basic stumpage values for the Wallowa-Whitman are some 7 percent lower than those of the Umatilla. These sorts of differences are expected to be noticed increasingly in the future as the Wallowa-Whitman logs those difficult-to-access lands more aggressively

The commenter has spotted some of the problems faced by the Wallowa-Whitman. They note that in Benchmark 7, some 51,000 more acres are logged on the Wallowa-Whitman, but the first decade harvest is 70 MMBF lower than the Umatilla. The Wallowa-Whitman has to "work harder" to get the harvest out and this is reflected in its lower PNV.

The greatest part of the difference in PNV between the Forests would appear to be attributable to differences in estimated recreation use shown below rather than to differences in costs associated with timber production.

	Decade 1	MRVD's/Year Decade 2	Decade 5
Wallowa-Whitman NF	1,647	1,901	2,594
Umatilla NF	3,012	2,884	2,773

Recreation contributes far more to Present Net Value on both Forests than does timber or any other Forest activity. See "Differences in Economic Values Among Alternatives," Chapter II, FEIS.

**COMMENT NO. 34** THE DEIS HAS FAILED TO FULLY ADDRESS THE CHANGING TIMBER SUPPLY SITUATION IN OREGON. INVENTORIES ON PRIVATE INDUSTRY LANDS ARE FALLING AND PONDEROSA PINE AVAILABILITY ON ALL OWNERSHIPS IS DECREASING. IN LIGHT OF THESE TRENDS, IT IS UNREALISTIC TO ASSUME THAT THE WALLOWA-WHITMAN NATIONAL FOREST FACES A HORIZONTAL DEMAND CURVE FOR TIMBER AND THAT THE NUMBER OF JOBS, PERSONAL INCOME, AND PAYMENTS TO COUNTIES WILL NOT BE AFFECTED BY ECONOMIC INFLUENCES OUTSIDE THE NATIONAL FOREST BOUNDARIES. THE ECONOMIC ANALYSIS FOR THE DEIS SHOULD TAKE INTO ACCOUNT THE DYNAMIC SOCIAL AND ECONOMIC ENVIRONMENT IN WHICH THE FOREST OPERATES INSTEAD OF MAINTAINING THE FALSE PREMISE THAT THE WALLOWA-WHITMAN IS AN ISOLATED, INDEPENDENT ENTITY

**FOREST SERVICE RESPONSE.**

Fully addressing the changing timber supply situation in the State of Oregon is beyond the scope of our planning process. The timber supply situation in northeastern Oregon was addressed during the Analysis of the Management Situation. Duplication of that material (by placing it in the DEIS Appendices, or Proposed Plan) was deemed inadvisable because of the summary nature of the documents.

In light of this comment and others like it, the Pacific Northwest Regional Office of the Forest Service has completed a study of the aggregate implications of the Forest Plans.

Regional Office direction stipulates that we use a horizontal demand curve for timber (Regional Office letter to Forest Supervisors dated April 27, 1984; 1920 Land and Resource Management Planning; Subject: Economic Analysis Revision of November 10, 1983, Regional Direction Package, page 87)

"a. In keeping with FSM 1971 direction, horizontal demand curves for timber from individual National Forests will be used for assessment of alternatives for the Forest Plan EIS. Downward-sloping demand curves for timber from an individual Forest will not be developed or used for assessment of alternatives."

Beyond that direction there are other good reasons for assuming a horizontal demand function for timber which are summarized in "Economic Efficiency Analysis," FEIS Appendix B.

We recognize that jobs, personal income, and payments to counties will be affected by economic influences outside the National Forest boundaries. No contention is made that the Forest is an isolated, independent entity. Our understanding is reflected in our evaluation of alternative future scenarios for timber prices and costs (DEIS Appendices, page B-47). Uncertainty in the Analysis (DEIS Appendices, pages B-106 through B-110); and tiering of the analysis process (DEIS, pages I-2 through I-4) to the Regional and National plans. Many of the commenter's concerns would be better addressed at the Regional level now that other Forest Plans have been developed.

**COMMENT NO. 35:** SINCE 1977, THERE HAVE BEEN DRAMATIC INCREASES IN THE PRODUCTIVITY OF LABOR IN THE FOREST PRODUCTS INDUSTRY. THIS WILL REDUCE THE NUMBER OF JOBS PER MMBF OF HARVESTED TIMBER.

**FOREST SERVICE RESPONSE:**

Unless further processing of the material is done locally, we share your prediction.

**COMMENT NO. 36:** YOU HAVE ESTIMATED THE CURRENT SAWMILL CAPACITY AT 250 MMBF A YEAR. WALLOWA, BAKER, AND UNION COUNTIES HAVE AN INSTALLED MILL CAPACITY OF APPROXIMATELY 315 MMBF. AN ADDITIONAL 20 MMBF TO 30 MMBF IS DRAWN BY MILLS IN SURROUNDING COUNTIES. THE INSTALLED MILL CAPACITY IS WAY IN EXCESS OF THE 250 MMBF WHICH YOU HAVE FORECASTED. THE HISTORIC TIMBER HARVEST LEVEL IS SIGNIFICANTLY BELOW THE PRESENT INSTALLED MILL CAPACITY. WE HAVE LIVED WITH THIS LEVEL, BUT IT IS REALLY PUTTING A STRAIN ON MANY OF OUR SAWMILL'S ABILITY TO GATHER SAWLOGS. SOME SHIFT CLOSURES HAVE ALREADY TAKEN PLACE. IF YOU FURTHER REDUCE THE ALLOWABLE TIMBER HARVEST, SAWMILLS WILL CLOSE AND LOCAL ECONOMIES WILL SUFFER.



**FOREST SERVICE RESPONSE:**

The figures shown in "Resource Supply and Demand Projections," Chapter 2, of the Proposed Forest Plan are indicative of the supply-demand situation for the Wallowa-Whitman National Forest only. The figures thus exclude off-Forest supply and demand components. (The Wallowa-Whitman provides about half the timber processed locally.)

**COMMENT NO. 37** ECONOMIC MODELS ARE AVAILABLE FOR USE TO ASSESS FISHERIES, HUNTING, AND VARIOUS RECREATIONAL ACTIVITIES IN A COMPREHENSIVE MANNER IN REGARD TO LOCAL ECONOMY. THEY INCLUDE STATISTICAL EVALUATION WITH DOLLAR VALUES ON TRAVEL, FOOD, LODGING, SERVICES, AND ETC. YET WALLOWA-WHITMAN DEIS DID NOT UTILIZE THESE ECONOMIC TOOLS TO ASSESS "AMENITY" DOLLAR VALUES IN A THOROUGH MANNER. IT SHOULD BE EMPHASIZED THAT, ALTHOUGH THESE AMENITY DOLLAR VALUES HAVE NOT BEEN FAIRLY REPRESENTED IN THE DEIS, THE FISHING, HUNTING, FOOD GATHERING, RECREATIONAL USE, AND CULTURAL VALUES DEPENDENT UPON THESE NATURAL RESOURCES WITHIN THE FOREST HAVE A VERY TANGIBLE AND PERHAPS MORE LONG-LASTING POSITIVE IMPACT ON THE QUALITY OF LIFE FOR BOTH THE CONFEDERATED TRIBES AND ALL OTHER CITIZENS UTILIZING WALLOWA-WHITMAN NATIONAL FOREST.

**FOREST SERVICE RESPONSE**

We did value recreation in our economic analyses. As shown in Chapter II of the FEIS, its value easily exceeds that of any other Forest resource. The local economic impacts of recreation were also included in the study (see Appendix B). We have included these considerations quantitatively and qualitatively.

**COMMENT NO. 38: A** THE WALLOWA-WHITMAN HAS SIGNIFICANT REFORESTATION COSTS ADDED ONTO THE FOREST-WIDE AVERAGE COSTS ON THOSE AREAS IDENTIFIED AS HIGH ELEVATION AND THOSE AREAS WITH POTENTIAL FOR NINEBARK COMPETITION. THE PLANNING STAFF HAS NOT JUSTIFIED THESE HIGHER COSTS, NOR CAN THEY, DUE TO THE LIMITED EXPERIENCE OF OPERATING IN THIS TYPE.

**FOREST SERVICE RESPONSE.**

Estimates of extra costs associated with these types of work were constructed using input from Forest specialists. It is true that these costs have not been demonstrated empirically, but that fact does not affect the propriety of using a constructed cost estimate. It is standard practice to estimate one's costs in advance of performing work.

**COMMENT NO. 39: B** FOR THOSE ANALYSIS AREAS THAT FALL WITHIN THE HELLS CANYON NRA, AN ADDITIONAL HAUL COST OF \$11.53 IS ADDED TO EACH MBF. IT IS UNCLEAR WHY IT IS NECESSARY TO ATTEMPT TO DISPLAY HIGHER COSTS FOR THE NRA WHILE NOT DOING SO FOR THE OTHER HIGHER COST AREAS ON THE WALLOWA-WHITMAN, OR DISPLAYING LOWER COSTS OF THOSE AREAS WHERE COSTS DO NOT COME CLOSE TO THE FOREST AVERAGE.

**FOREST SERVICE RESPONSE:**

At the time the model was constructed, the decision on the HCNRA CMP (Comprehensive Management Plan) was being held in abeyance. There was reason to identify the HCNRA as a distinct unit so that if changes were made in the HCNRA CMP, they could be accommodated in the model. The difference in costs is real -- both in terms of empirical data and in terms of

costs for upcoming sales; \$5 90 of the \$11 53 is for extra road maintenance. We have provided unique cost information for the HCNRA because it is a separate geographic entity within the model and because its costs are significantly different.

It is true that there are other cost and benefit differentials which are not reflected in FORPLAN. As with any model, there are limits as to the amount of data which can be considered. Decisions had to be made as to what would be included and what would not.

**COMMENT NO. 40: C SALE PREPARATION AND ADMINISTRATION COSTS IN THE WALLOWA-WHITMAN FORPLAN MODEL ARE HIGHER THAN ON THE UMATILLA OR MALHEUR NATIONAL FORESTS BY A SUBSTANTIAL MARGIN THIS RESULTS FROM HAVING OVERHEAD AND FIXED COSTS ADDED TO THE VARIABLE TIMBER MANAGEMENT COSTS**

THIS HIGHER COST IS DUE IN PART TO THE PLANNING TEAM'S DECISION TO PLACE FIXED OVERHEAD COSTS IN THE MODEL AS PER ACRE VARIABLE COSTS IT IS INAPPROPRIATE TO PLACE FIXED COSTS IN THE MODEL AS VARIABLE PER ACRE COSTS DOING SO WILL RESULT IN OVERSTATING THE COST OF TIMBER MANAGEMENT ON A PER ACRE BASIS, MAKING TIMBER MANAGEMENT ON THE WALLOWA-WHITMAN APPEAR TO BE A LESS ATTRACTIVE INVESTMENT THAN ON THE OTHER ADJACENT NATIONAL MOUNTAIN FORESTS. IN REALITY, THE WALLOWA-WHITMAN MAY BE MORE ECONOMICAL FROM A TIMBER STANDPOINT

**FOREST SERVICE RESPONSE:**

The commenter's concern about sale preparation and administration costs are addressed elsewhere in detail. Briefly, the perception that the Wallowa-Whitman has higher costs in those areas arose from our use of the FORPLAN sale preparation data cell to include costs that other Forests track elsewhere.

In light of the fact that the analysis spanned 150 years, the costs cited are not fixed; they vary and therefore cannot accurately be portrayed as fixed costs Identification of such costs as land-line surveying as fixed would mean that the model would have accepted them at the same level every year for the next 150 years regardless of whether 70 million board feet or 270 million board feet of timber were offered Such a supposition is not valid The costs identified in that variable cost category are indeed variable costs

**COMMENT NO. 41: E. IN ADDITION TO OTHER EXCESS COSTS, THE WALLOWA-WHITMAN PLANNING TEAM HAS CHARGED OTHER RESOURCE AND TIMBER COORDINATION COSTS TO THE TIMBER SALE PROGRAM. OTHER FIXED COSTS SUCH AS 80% OF WATER RESOURCE COSTS AND 90% OF CULTURAL RESOURCE INVENTORY COSTS ARE CHARGED TO THE TIMBER SALE PROGRAM.**

WE FEEL THESE ADDED COSTS HEAVILY INFLUENCE THE TIMBER SALE PROGRAM ECONOMICS IN A NEGATIVE MANNER WE REQUEST THAT THE WALLOWA-WHITMAN REANALYZE ALL COSTS IN THEIR FORPLAN MODEL WITH THE INTENT TO FIND THE LEAST COSTLY ALTERNATIVES CONSISTENT WITH MEETING OTHER MULTIPLE USE OBJECTIVES THE DEIS CONTAINS NO DISCUSSION OF, OR REFERENCE TO, THE STEPS WHICH THE WALLOWA-WHITMAN WILL TAKE TO REDUCE TIMBER COSTS AND/OR ENHANCE REVENUES, WHILE MEETING OTHER MULTIPLE USE OBJECTIVES. THIS WAS MANDATED BY DEPUTY SECRETARY DOUGLAS MAC CLEERY IN A DECISION ON THE SAN JUAN NATIONAL FOREST, JULY 31, 1985.

\*ANOTHER SEPARATE BUT RELATED ISSUE IS THAT EVEN THOUGH THE BELOW-COST SALES ISSUE HAS BEEN RAISED BY THE PUBLIC FOR A NUMBER OF YEARS, THERE IS

LITTLE EVIDENCE IN THE RECORD OF THE EXTENT TO WHICH EITHER FOREST HAS PREVIOUSLY, IS NOW, OR WILL IN THE FUTURE EXPLORE WAYS TO SUBSTANTIALLY REDUCE TIMBER AND ROAD COSTS OR ENHANCE REVENUES WHILE ACHIEVING, AT THE SAME TIME, APPROPRIATE MULTIPLE USE OBJECTIVES AND PROVIDING ADEQUATE SUPPLIES OF TIMBER TO MEET THE EXISTING DEPENDENT PLANT CAPACITY AND JOB NEEDS OF THE COMMUNITY NEITHER DO THE PLANNING DOCUMENTS EVALUATE THE EFFECT ON THE OVERALL ECONOMICS OF THE TIMBER PROGRAM THAT COULD RESULT FROM EFFORTS TO REDUCE COSTS AND/OR ENHANCE REVENUES \* (EMPHASIS ADDED).

**FOREST SERVICE RESPONSE:**

All the costs "charged" to the timber program were verified by the respective program manager and by timber management. Information generated subsequent to that analysis has not indicated the need to restudy the question.

We too are very concerned about the costs experienced on the Forest and are working to better control them. To that end, the Forest has moved increasingly to more cost-effective management practices. We have seen the results of these activities in reduced levels of Forest employment, consolidation of similar duties into single units, elimination of some work altogether, contracting-out work where feasible, reduced real budgets, and so on.

Much of the analytical work needed to further heighten our level of efficiency must be accomplished at the project level where problems may be addressed on a site-specific basis.

**COMMENT NO. 42: MILL CAPACITY**

THE PLAN USES 250 MMBF AS THE PREDICTED ANNUAL DEMAND FOR TIMBER FROM THE WALLOWA-WHITMAN FROM 1986 THROUGH 2030. (DEIS TABLE II-I). THIS IS UNREALISTIC IN THAT THE MILL CAPACITY FIGURES USED WERE BASED ON THE EXISTING CAPACITY IN 1982. NO EVIDENCE IS GIVEN WHERE THE FOREST SERVICE CONSIDERED THAT THE DEMAND FOR TIMBER PRODUCTS WOULD INCREASE AS NORMAL POPULATION INCREASES TAKE PLACE.

THE WALLOWA-WHITMAN PLANNING STAFF SHOULD MAKE A REALISTIC PROJECTION OF THE FUTURE DEMANDS FOR TIMBER FROM THE WALLOWA-WHITMAN REMEMBERING THAT THE MARKET FOR THIS MATERIAL IS NATIONAL IN SCOPE.

**FOREST SERVICE RESPONSE.**

The primary purpose of looking at local mill capacity was to determine whether the analysis needed to be concerned about flooding the local market with timber. Early in the process it became apparent that that was not a realistic concern -- installed mill capacity in the area is substantial

The RPA program is designed to address the larger concerns of how the management of the individual Forest is to be coordinated with the needs and capabilities of the nation as a whole, both now and in the future. That analysis views timber as one part of the national economy -- a part whose importance is determined to large extent by its ability to compete with substitute goods. These various considerations are ultimately reflected in the analysis in the estimate of real price increases which reflect continuing pressures on the resource base.

**COMMENT NO. 43:** THROUGHOUT THE TEXT IN THIS SECTION YOU TOTALLY FAIL TO INCLUDE SO MANY ECONOMIC FACTORS THAT IT APPEARS TIMBER IS THE ONLY WAY TO SUSTAIN THE LOCAL ECONOMY. WHY IS IT THAT YOU DO NOT INCLUDE DOLLAR FIGURE OR THE NUMBER OF PEOPLE INVOLVED IN THE TOURIST AND RECREATION INDUSTRIES?

YOU ALSO FAIL TO LIST ANY OTHER BOTANICAL RESOURCES OR THE AMOUNT OF MONEY BROUGHT IN BY HUNTING, FISHING, AND OTHER SUSTAINABLE INCOMES

SURE TIMBER BRINGS OUT A LOT OF REVENUE, BUT WHEN YOU CONSIDER THAT THE AREA FROM WHICH YOU HAVE TAKEN THE RESOURCE WILL TAKE OVER ONE HUNDRED YEARS TO PRODUCE AGAIN, YOU HAVE TO DIVIDE THE REVENUE BY THE NUMBER OF YEARS UNTIL THE NEXT PRODUCTION. IF YOU DO THIS, YOU WILL FIND HOW MUCH AN AREA WILL REALLY PUT OUT ON A YEARLY BASIS, AND I THINK YOU WILL FIND THAT THE FACTORS I HAVE MENTIONED KEEP TO CHOOSE BETWEEN TIMBER AND INTACT ECOSYSTEMS.

#### **FOREST SERVICE RESPONSE**

The commenter's point is well taken. So much of the analysis deals with timber production that recreation may seem to have been overlooked. This was caused by our finding that there would be little difference among the alternatives in terms of recreation use. Accordingly, we spent more time studying those factors that seemed to have more potential for variation

We can point out that the Summary of the DEIS presents a great deal of information on recreation activities -- including the fact that recreation benefits account for more of the benefits resulting from Forest management than does any other Forest program. Appendix B of the DEIS shows the high level of employment we associate with Forest-based recreation

Our analysis reflects the fact that timber receipts may be very long in coming and that the payoff for investing in other activities is normally much quicker. We do this by estimating costs and benefits for both the near-term and the long-term and discounting future values to the present

**COMMENT NO. 44:** THERE ALSO IS NO COMPREHENSIVE LIST OF OTHER BOTANICAL RESOURCES IN THE FOREST (THINGS THAN CAN BE UTILIZED IN PERPETUITY AS OPPOSED TO THE 100+ YEARS THAT IT TAKES FOR A CLEARCUT TO PRODUCE REVENUE AGAIN).

#### **FOREST SERVICE RESPONSE**

Other botanical resources, normally available on a free-use basis, have been a minor part of our programs and were not identified as an issue in our scoping process. Therefore, we did not believe a listing was warranted. However, the value and amount of mushrooms gathered from the Forest in the spring of 1987 indicates this particular plant is more than a "minor" product in some years

**COMMENT NO. 45:** SENSITIVITY OF THE PREFERRED ALTERNATIVE TO PRICE TRENDS IS NOT SHOWN. THE ISSUE OF HOW INCREASING STUMPAGE PRICE TRENDS AFFECT THE ECONOMICS OF TIMBER PRODUCTION AND THE AMOUNT OF SUITABLE LAND WAS A CRITICAL ISSUE RAISED REGIONALLY. IN OUR DISCUSSION WITH THE REGION, THEY ASSURED US THAT FORESTS WHERE THE PRICE TREND ASSUMPTION HAD A SIGNIFICANT EFFECT WOULD PERFORM A SENSITIVITY ANALYSIS FOR THE ALTERNATIVES. THE DIRECTION MEMO FROM THE REGIONAL OFFICE (9-25-84) REQUIRED THAT THE FOREST SUPERVISOR "MUST BE ABLE TO EXPLAIN THE SELECTION OF MANAGEMENT INTENSITIES AND PRACTICES WHEN THIS

TIVITIES ON THE FOREST TO THE FOREST ZONE OF INFLUENCE AS A RESULT THE CALCULATIONS OF NET PRESENT VALUES ASSOCIATED WITH EACH OF THE MANAGEMENT ALTERNATIVES ARE SUBJECT TO SOME SYSTEMATIC BIASES. GENERALLY, THE MODELS USED TEND TO OVERSTATE THE VALUE OF COMMODITIES PRODUCED ON THE FOREST, THE CONTRIBUTION TO THE LOCAL ECONOMY IN THE FORM OF DIRECT AND INDIRECT EMPLOYMENT AND INCOME AND RECEIPTS FOR STATE AND LOCAL GOVERNMENT WHILE NEGLECTING THE ECONOMIC CONTRIBUTION OF ACTIVITIES SUCH AS RECREATION

THE PLANNING TEAM IS USING ESTIMATES OF SECTORAL ACTIVITY WHICH HAVE NOT BEEN UPDATED SINCE 1977 TO EVALUATE THE CONTRIBUTION TO THE ECONOMY IN THE ZONE OF INFLUENCE OF MANAGEMENT ALTERNATIVE. HOWEVER, THE STRUCTURE OF ECONOMIC ACTIVITY--PARTICULARLY IN THE EXTRACTIVE INDUSTRIES--HAS CHANGED DRAMATICALLY SINCE 1977.

CONTINUING BUDGET DEFICITS HAVE LET TO ERRATIC BUT GENERALLY RISING RATES OF INTEREST. THIS HAS DECREASED THE DEMAND FOR FOREST PRODUCTS. IN ADDITION, RISING INTEREST RATES HAVE MADE ADDITIONS TO CAPITAL IN THE EXTRACTIVE INDUSTRIES LESS ATTRACTIVE. MOST OF THE CAPITAL FORMATION THAT HAS OCCURRED HAS BEEN IN THE FORM OF LABOR SUBSTITUTIONS. TRADE DEFICITS HAVE FURTHER REDUCED THE DEMAND FOR FOREST PRODUCTS AS DOMESTIC PRODUCERS HAVE FACED INCREASED COMPETITION FROM IMPORTS. THESE IMPORTANT FACTORS ARE OVERLOOKED IN THE CALCULATION OF NET PRESENT VALUES ASSOCIATED WITH DIFFERENT HARVEST LEVELS. THERE IS EVERY REASON TO EXPECT THAT THESE NATIONAL AND INTERNATIONAL ECONOMIC FACTORS WILL CONTINUE TO INJURE THE ECONOMIC HEALTH OF THE LOCAL AREA REGARDLESS OF WHICH PLAN IS ADOPTED

THE OFFICE OF MANAGEMENT AND BUDGET HAS PREDICTED THAT THE LIABILITIES OF THE U S TREASURY WILL ROUGHLY DOUBLE BETWEEN NOW AND 1990 IN THE NEXT FEW YEARS THERE IS EVERY INDICATION THAT WE WILL BE FACING A TOTAL OUTSTANDING TREASURY INDEBTEDNESS OF APPROXIMATELY \$2.5 TRILLION. THIS IS EXPECTED TO INCREASE BY \$150 TO \$200 BILLION ANNUALLY. THE FINANCIAL COMMUNITY WILL UNDOUBTEDLY RENEGOTIATE THESE LIABILITIES AT HIGHER RATES OF INTEREST AND SHORTER TERMS TO MATURITY. THE ECONOMIC WILL BE DEADLY FOR THE EXTRACTIVE INDUSTRIES. IT WILL INCREASE THEIR COSTS SUBSTANTIALLY AND DECREASE REVENUES

GIVEN THIS PROSPECT, IT IS FOOLISH TO RELY ON THE EXTRACTIVE INDUSTRIES FOR ECONOMIC DEVELOPMENT AND, IN THE PRESENT CONTEXT, INAPPROPRIATE TO ADOPT A FRAMEWORK WHICH SYSTEMATICALLY OVERESTIMATES THE BENEFITS TO THE ECONOMY IN THE ZONE OF INFLUENCE OF COMMODITY PRODUCTION ON THE FOREST. IN CONTRAST, THE 'AMENITIES' PRODUCED ON THE FOREST AND THE ASSOCIATED CONTRIBUTION TO THE LOCAL ECONOMY APPEAR MUCH MORE RESILIENT THAN COMMODITY PRODUCTION. IT MAY WELL BE THE CASE THAT ACTIVITIES SUCH AS GUIDING AND PACKING AS WELL AND OTHER FORMS OF RECREATION ARE INSULATED FROM DOWNTURNS IN ECONOMIC ACTIVITY.

THESE INDUSTRIES CAN GENERATE A SIGNIFICANT CONTRIBUTION TO THE ZONE OF INFLUENCE WITH LITTLE DEMANDS ON THE RESOURCES. ONE SHORTCOMING OF THE PLAN IS IT FAILS TO SYSTEMATICALLY EVALUATE THE ECONOMIC CONTRIBUTION OF THESE ACTIVITIES. IN THE PUBLIC INFORMATION MEETING HELD IN LA GRANDE ON MAY 29, 1986, DALE PEKAR (FOREST ECONOMIST) SUGGESTED THAT ANALYTIC TECHNIQUES REQUIRED TO EVALUATE THE CONTRIBUTION OF THE RECREATION INDUSTRY TO THE LOCAL ECONOMY HAVE NOT BEEN DEVELOPED. HE CHARACTERIZED THEM AS 'TRYING TO PUT A VALUE ON SUNSETS'

I DISAGREE. THERE IS A LARGE LITERATURE IN ECONOMICS WHICH ADDRESSES THESE ISSUES AND THERE HAVE BEEN A NUMBER OF ATTEMPTS TO ESTIMATE THE VALUE OF SUCH

ACTIVITIES. FOR EXAMPLE, J. LANSCH, JR. (THE CONTRIBUTION OF OUTFITTING AND GUIDING TO THE IDAHO ECONOMY, MASTER OF BUSINESS ADMINISTRATION THESIS, IDAHO STATE UNIVERSITY, 1985), DEVELOPED A SERIES OF MODELS FOR ESTIMATING THE CONTRIBUTION OF BOATING AND HUNTING TO ECONOMIC ACTIVITY IN IDAHO. HIS ANALYSIS OF BOATING ON THE HELLS CANYON IN THE SNAKE RIVER DOCUMENTS A SUBSTANTIAL GENERATION OF REVENUE IN THE FORM OF CLIENT FEES AND LAYOVER EXPENDITURES. D. GORDON ET AL

D. EHRENFELD ("THE CONSERVATION OF NON-RESOURCES," AMERICAN SCIENTIST, VOLUME 64) ARGUES THAT THE CONSERVATION OF GENETIC RESOURCES CAN BE JUSTIFIED ON THE GROUNDS OF VALUE OF SPECIES AND COMMUNITIES IN ADDITION TO ECOLOGICAL AND ECONOMIC JUSTIFICATIONS. E. MICHALSON AND HAMILTON ("A METHODOLOGY FOR EVALUATING DEVELOPMENT-ENVIRONMENTAL CONFLICTS ON WILD AND SCENIC RIVERS," WATER RESOURCES BULLETIN, VOLUME 11, NO 6) DEVELOP A METHOD OF EVALUATING ENVIRONMENTAL AND DEVELOPMENTAL CONFLICTS INHERENT IN THE CLASSIFICATION PROCESS OF A WILD AND SCENIC RIVER. THE METHODOLOGIES DEVELOPED IN THESE AS WELL AS OTHER STUDIES CAN BE USED TO EVALUATE THE ECONOMIC CONTRIBUTION OF AMENITY PRODUCTION.

**FOREST SERVICE RESPONSE:**

Many of the commenter's points have been addressed in considerable detail elsewhere in this review. Others reflect the commenter's personal views on the national or global economy. We must concur with the observation that there has been no explicit consideration of many of these factors. Rather, their cumulative effects have been addressed in the National RPA process which seeks to meld the nation's capabilities with its perceived needs.

We do take exception to the intimation that recreation has been given short shrift in the analysis. It was considered both quantitatively and qualitatively in the Summary and Chapter II of the DEIS and in Appendix B of the DEIS Appendices. This includes efficiency and least-economic-impact considerations.

**COMMENT NO. 50:** I BELIEVE THE MANAGEMENT PRIORITIES OF THE WALLOWA-WHITMAN NATIONAL FOREST SHOULD BE MORE CLOSELY ALIGNED WITH PROJECTED NATIONAL NEEDS. ONCE THIS IS DONE, LOCAL COMMUNITY STABILITY WILL BE ACHIEVED AS WELL

**FOREST SERVICE RESPONSE:**

Alternative B was designed to meet the Forest's share of National Resource Planning Act (RPA) targets. The selected alternative also meets many of the targets, but gave more emphasis to resolving other issues identified in the scoping process.

**COMMENT NO. 51:** WHAT ABOUT ALL THE LODGEPOLE PINE IN THE NORTH FORK OF THE JOHN DAY THAT IS DOWN AND GOING TO WASTE. I HAVE BEEN ADVISED IT COULD BE HARVESTED AND DO THE GENERAL PUBLIC SOME GOOD PLEASE SEE OUR TAX DOLLARS ARE SPENT WISELY.

**FOREST SERVICE RESPONSE.**

Much of the timber in the North Fork John Day area was placed in wilderness by an Act of Congress. A great deal of the timber in that area that is not in wilderness has been, or is being salvaged.

**COMMENT NO. 52** SINCE 1963 ORCHARD WOOD PRODUCTS HAS USED A STEADY SUPPLY OF PINE LUMBER TRIMS FROM THE LOCAL MILL AND HAS EMPLOYED AN AVERAGE OF 15 YEAR-ROUND EMPLOYEES. THIS IS JUST A SAMPLE OF SMALL BUSINESS OPPORTUNITIES THAT WILL BE ENDED IF THE FOREST SERVICE CUTS FURTHER, THE TIMBER AVAILABILITY IN EASTERN OREGON

THERE IS, HOWEVER, A SHORTAGE OF INDUSTRY IN EASTERN OREGON WHICH SHOULD NOT BE CUT FURTHER.

**FOREST SERVICE RESPONSE:**

We expect that ponderosa pine will continue to make up a significant portion of the allowable harvest from the National Forest.

**COMMENT NO. 53.** TOURISM AND RECREATION MAY NOT COMPETE WITH LOGGING IN TERMS OF DOLLARS, BUT THEY CERTAINLY DON'T HAVE THE BAD SIDE EFFECTS.

**FOREST SERVICE RESPONSE:**

Others voiced similar sentiments

**COMMENT NO. 54** TO INSURE ECONOMIC STABILITY FOR NORTHEASTERN OREGON, PLEASE SUPPORT THE "COMMUNITY STABILITY ALTERNATIVE "

**FOREST SERVICE RESPONSE:**

The Community Stability Alternative was one of several new alternatives that were considered. The support this alternative received showed a strong desire by many people, especially those who depend on the wood products industry, for maintaining recent timber harvest levels. The key points of this alternative are reflected in the final decision in several ways as explained in Chapter II of the FEIS and the Record of Decision

**COMMENT NO. 55:** RECENT IMPACTS ON LOCAL ECONOMY DUE TO MAJOR DEPENDENCE ON TIMBER AND LIVESTOCK INDUSTRIES ARE EXCELLENT EXAMPLES OF THE FOLLY IN NOT HAVING A DIVERSIFIED ECONOMY. BAKER COUNTY MEDIAN IS RANKED AS 35TH OUT OF OREGON'S 36 COUNTIES; WALLOWA COUNTY RANKS 34TH; AND UNION RANKS 13TH. UNION COUNTY HAS THE MOST DIVERSIFIED ECONOMY OF THE TRI-COUNTY AREA AND IN MAINTAINING ITS YOUNGER AGED POPULATION, PRIMARILY BECAUSE OF EASTERN OREGON STATE COLLEGE, WHILE WALLOWA AND BAKER ARE INDICATING A LOSS OF YOUNGER AGED PEOPLE - THE EFFECTS OF A POOR LOCAL ECONOMY.

THE TIMBER AND WOOD PRODUCTS INDUSTRY WILL NOT MEASURABLY REVERSE THE GENERAL ECONOMY OF THE TRI-COUNTY AREA, PARTICULARLY WHEN TIMBER MARKET VALUES AND COMPETING BRITISH COLUMBIA AND SOUTHERN FOREST MARKETS CURRENTLY AND ARE FORECAST TO HAVE LONG-TERM NEGATIVE EFFECTS ON NORTHWEST TIMBER MARKETS. THE CONFEDERATED TRIBES SUPPORTS A FOREST MANAGEMENT PHILOSOPHY WHICH PRODUCES AND ENCOURAGES A MORE DIVERSIFIED ECONOMY ARISING FROM AN OVERALL OPTIMIZATION OF ALL NATURAL RESOURCE VALUES

**FOREST SERVICE RESPONSE:**

Thank you for your view.

**COMMENT NO. 56:** IF WE CAN'T HARVEST THE TREES, OUR MILLS CAN'T OPERATE AND THAT WILL DRASTICALLY AFFECT THE WHOLE ECONOMY OF THIS REGION AND WE CAN'T AFFORD THAT.

**FOREST SERVICE RESPONSE:**

There is no question that mills are dependent on tree harvesting, and there is no intention to eliminate timber harvest from the Wallowa-Whitman. As pointed out in the Draft Environmental Impact Statement, the Wallowa-Whitman provides approximately half of the timber to the local mills, so theoretically the elimination of harvest from the Forest could eliminate half of the mills. But even the management alternative with the lowest level of timber harvest would harvest substantial amounts of timber.

**COMMENT NO. 57:** THE WHOLE ECONOMY OF THIS REGION AND THE STATE HAS SUFFERED IN THE PAST FEW YEARS BECAUSE LUMBER SALES WERE WAY DOWN. NOW, WHEN PEOPLE ARE BUILDING HOMES AND THE INDUSTRY IS PICKING UP, WE ARE ABOUT TO GET SLAPPED DOWN AGAIN BECAUSE THERE WON'T BE AS MUCH TIMBER TO CUT. THE COMMUNITY STABILITY ALTERNATIVE ONLY ALLOWS FOR HARVESTING WHAT THE FOREST CAN PRODUCE, AND WE NEED THE JOBS BADLY.

**FOREST SERVICE RESPONSE:**

Thank you for your comment.

**COMMENT NO. 58:** ALTERNATIVE G IS PROBABLY THE BEST OF THE WHOLE GROUP OF MISERABLE MISSES. THIS ALTERNATIVE, WITH CERTAIN GLARING EXCEPTIONS, PROBABLY COMES THE CLOSEST TO THE WISHES OF THE PUBLIC WHO ARE, AFTER ALL, WHAT THE FOREST IS TO BE MANAGED FOR.

**FOREST SERVICE RESPONSE:**

Several respondents expressed similar opinions.

**COMMENT NO. 59:** I HAVE THE SENSE THAT THE PLAN HAS BEEN PUT TOGETHER FROM THE RATHER NARROW PERSPECTIVE OF THE FOREST SERVICE. THE LOCAL ECONOMY AND ACTIVITIES ARE ASSUMED TO GO ALONG MUCH AS IN THE PAST, IN SPITE OF POTENTIAL MAJOR CHANGES DUE TO ACTIVITIES ON THE FOREST. THERE IS ALSO AN ASSUMPTION THAT PAST TRENDS IN RECREATIONAL USE WILL CONTINUE INTO THE FUTURE AND FORM A BASIS ON WHICH TO JUDGE THE PLAN. IT SEEMS TO ME THAT CURRENT LITERATURE WOULD INDICATE THAT RECREATIONAL USE IS IN THE PROCESS OF MAJOR EXPANSION AND INVOLVEMENT OF A MUCH LARGER PROPORTION OF THE PUBLIC. THIS FACTOR MUST BE CONSIDERED IN MAKING A VIABLE PLAN FOR THE FUTURE.



**FOREST SERVICE RESPONSE:**

There are disparate views as to the future level of recreation in the United States. Decades ago, researchers at MIT predicted massive increases in recreation due to increases in labor productivity. The researchers overlooked one thing -- the concept of an acceptable living standard changed over with time so that people worked less to pay for life's essentials, but more for what was then considered to be nonessential. Thus, while output per man-hour increased at a rate of 3.1% per year from 1947 to 1970 (U S Department of Commerce, Historical Statistics of the United States Colonial Times to 1970, Part 2, p. 949); workers still worked a 40-hour week (same source, page 169). People didn't work less and recreate more. Rather, they defined more "wants" as "necessities."

Certainly we can all reflect on sports and other recreational activities which have been through booms and busts. We can reflect on how our own lifestyles have changed over the years -- how we divide up the hours in a day, a week, a year. Television, video games, VCR's, and foreign travel have all become significant consumers of our time. Without these things we could have worked less and recreated more.

One thing we do know about this concern as it pertains to the Wallowa-Whitman is this. This National Forest has lots of unused recreational capacity.

**COMMENT NO. 60:** I THINK IT IS TIME TO GIVE THE ONES INVOLVED MORE SAY AND LESS TO THE GOVERNMENT, SIERRA CLUB AND ISSAC WALTON LEAGUE

**FOREST SERVICE RESPONSE:**

We have tried to consider the views of all who participated.

**COMMENT NO. 61:** PLEASE UTILIZE OUR RESOURCE. DO NOT BOW TO A VOCAL MINORITY THAT REPRESENTS A PLATFORM OF MISGUIDED GOALS THAT THEY PURSUE WITH A FANATICISM THAT IS MUCH LIKE CULTISM. SUCH PEOPLE WILL BE THE RUIN OF THAT WHICH THEY ARE TRYING TO PRESERVE, AND IF THEIR WHIMS ARE ADOPTED BY THE FOREST SERVICE, WILL RESULT IN UNUSEABLE FORESTS, SHATTERED INDUSTRY, AND MANY DISPLACED FAMILIES.

**FOREST SERVICE RESPONSE:**

A popular opinion shared by many reviewers.

**COMMENT NO. 62:** NOBODY EXPECTS TO GET RICH, THEY JUST WANT TO HAVE JOBS AND MAINTAIN THE HIGH QUALITY OF LIFE WE ARE USED TO. BY THIS I MEAN A GOOD, HEALTHY FAMILY, HARDWORKING ATMOSPHERE IN A BEAUTIFUL SCENIC LAND.

**FOREST SERVICE RESPONSE:**

Many letters from local residents reflect similar thoughts.

**COMMENT NO. 63** I FEEL MY LIVELIHOOD IS MORE IMPORTANT THAN THE ANIMALS.

**FOREST SERVICE RESPONSE:**

Many people share your view. Fortunately there are not serious conflicts between providing habitat for most animal species and being responsive to local economic concerns. Our responsibility and challenge is to find the acceptable balance for the conflicts that do exist.

**COMMENT NO. 64** HOW IS DECREASING THE ALLOWABLE TIMBER HARVEST GOING TO INCREASE THE QUALITY OF LIFE FOR ANYBODY EXCEPT THOSE FROM OUT OF COUNTY AND STATE WHO SPEND A WEEK OR TWO AND SPEND VERY LITTLE MONEY IN OUR COMMUNITY MOST PEOPLE HERE FEEL THEY ARE BEING ASKED TO PAY A VERY HIGH PRICE FOR THE PLEASURES OF SPECIAL INTEREST GROUPS WHO HAVE NO INVESTMENT IN THIS AREA WHICH IS OUR HOME.

**FOREST SERVICE RESPONSE**

We recognize that yours is a concern shared by many. The National Forests, however, also belong to people from outside the local counties and the state. We believe we can provide for their desires to a considerable degree, and still keep relatively high timber harvest levels.

**COMMENT NO. 65:** THE AFFECT YOUR ALTERNATIVE C PROPOSES IS DRASTICALLY NEGATIVE TOWARDS THE CITIZENS OF OUR AREA. IT LIMITS ECONOMIC GROWTH AND STABILITY THROUGH LIMITING THE HARVEST OF PONDEROSA PINE WELL PLANNED, FORECASTED, AND MANAGED TIMBER SALES SHOULD ALLOW FOR PINE TO BE HARVESTED, WHICH WILL, IN TURN, INFLUENCE OUR ECONOMY, OUR INDUSTRY, AND OBVIOUSLY OUR FAMILIES' WAY OF LIFE. TIMBER-RELATED JOBS PLAY A LARGE AND IMPORTANT ROLE IN ALL OF EASTERN OREGON YOUR PLAN WILL ELIMINATE MANY OF THOSE JOBS AND MANY OF THE COMMUNITY PROGRAMS ASSOCIATED WITH THEM. YOU NEED TO CONSIDER PEOPLE WE NEED PROTECTION TOO.

**FOREST SERVICE RESPONSE:**

Ponderosa pine has been favored for harvesting for a long time This is why its inventory has been drawn down faster than other species. The need to reduce harvesting levels of ponderosa pine is not really a matter of choice at this time. It simply is no longer present in its previous quantities. The local economy was an important issue considered in the planning process

**COMMENT NO. 66:** ONE OF THE MOST IMPORTANT AREAS OF THIS COUNTY, THE NATIONAL FOREST, IS AN AREA THAT THE PEOPLE OF THIS COUNTY HAVE VERY LITTLE CONTROL OVER.

**FOREST SERVICE RESPONSE:**

We suspect that because of their proximity and interest, local citizens have more influence on National Forest management than many of them realize. Certainly they have participated much more than nonlocals in the review of the DEIS and in the entire planning process.

**COMMENT NO. 67. I FULL HEARTEDLY SUPPORT THE COMMUNITY STABILITY ALTERNATIVE AND SUGGEST STRONGLY THE FOREST SERVICE ACCEPT THIS PLAN.**

THE MOST IMPORTANT REASONS I CAN THINK OF ARE MY THREE SMALL CHILDREN, MY WIFE AND HOME, AND SEVEN FAMILIES THAT DERIVE THEIR LIVELIHOOD FROM OUR SMALL BUSINESS. AS A HEAVY EQUIPMENT AND TRUCK MAINTENANCE FACILITY, 85-90% OF OUR BUSINESS COMES DIRECTLY FROM THE TIMBER INDUSTRY.

**FOREST SERVICE RESPONSE:**

Because every alternative being considered includes sizeable timber harvests, we are confident that the local timber industry will be around for a long time. You are correct in your assumption that, other things remaining constant, your business would move in the same direction as the Forest's harvest levels. Something else to consider is that about half the timber processed locally comes from sources other than the Wallowa-Whitman.

**COMMENT NO. 68 IT SEEMS TO ME THAT THE ENVIRONMENTALIST, WHO WANTS NO MORE ENCROACHMENT ON GAME LANDS, AND THE PERMITTEE, WHO WANTS NO MORE DEMANDS MADE ON HIS CONSIDERED USE OF THE LANDS, CAN CO-EXIST. BUT IT DOES SEEM ONLY FAIR THAT THE LANDOWNER BE GIVEN EQUAL VOICE IN THE MATTER; EVEN GIVEN AN OVER-ATTENTIVE HEARING SINCE HE IS THE ONE WHO LIVES WITH, MAINTAINS, DERIVES HIS LIVING, SEES THAT THE LANDS PRODUCE, AND TRIES IN ALL WAYS POSSIBLE TO MAKE THAT PRODUCTION AS ECONOMICAL AND ABUNDANT AS IS POSSIBLE. HE CAN'T SURVIVE WITHOUT IT. AND HE CERTAINLY IS MORE KNOWLEDGEABLE ABOUT THE PROBLEMS AND THEIR POSSIBLE SOLUTIONS THAN THE CITY DWELLER ENVIRONMENTALISTS OR EVEN THE DEDICATED WHO VISITS THE 'OUTBACK' FROM TIME TO TIME**

**LISTEN TO THE WALLOWA COUNTY RANCHER - IT BEHOOVES HIM TO MAKE THE BEST POSSIBLE USE OF THE LANDS - AND HE KNOWS MORE ABOUT IT BECAUSE HE'S LIVED WITH IT AND LOVES IT**

**FOREST SERVICE RESPONSE**

Ranchers certainly have a knowledge and perspective of land management that is not shared by many others

**COMMENT NO. 69: THE CURRENT DRAFT PLAN SEEMS TO HAVE BEEN WRITTEN FOR THE SHORT-TERM BENEFIT OF TIMBER COMPANIES AND WINNEBAGO MANUFACTURERS, NOT TO MENTION CATTLE RANCHERS. THE FOREST AND ITS INHABITANTS ARE VIEWED BY THE PLAN EITHER AS RESOURCES FOR HUMAN CONSUMPTION OR NUISANCES, RATHER THAN AS LIFE WORTHY OF RESPECT IN ITS OWN RIGHT**

**FOREST SERVICE RESPONSE.**

Thank you for your point of view.

**COMMENT NO. 70:** PLEASE REMEMBER THAT THE WALLOWA-WHITMAN IS A NATIONAL FOREST OWNED BY ALL THE PEOPLE OF AMERICA. WE MUST NOT ONLY CONSIDER THE WANTS OF THE LOCAL POPULATION.

**FOREST SERVICE RESPONSE:**

We agree

**COMMENT NO. 71:** NATIONAL FOREST LANDS SHOULD BE MANAGED FOR OPTIMUM BENEFIT OF NON-GAME, NATIVE WILDLIFE, AND THE RESTORATION AND PRESERVATION OF THE LAND TO THE CONDITION IT WAS IN BEFORE NON-NATIVE AMERICANS ALTERED IT FOR COMMERCIAL AND OTHER EXPLOITATION. I BELIEVE THAT SUCH A RESTORATIVE, NON-COMSUMPTIVE POLICY ON THE WALLOWA-WHITMAN NATIONAL FOREST WOULD, IN THE LONG RUN, BENEFIT THE VAST MAJORITY OF AMERICANS, AND IS FAR MORE IMPORTANT THAN SHORT-TERM, LOCAL ECONOMIC CONSIDERATIONS

**FOREST SERVICE RESPONSE**

Thank you for your point of view.

**COMMENT NO. 72.** THE WALLOWA-WHITMAN NATIONAL FOREST IS IMPORTANT TO MY ECONOMIC NEEDS I AM A LOGGER AND EXTRACT TIMBER FROM IT FOR MY MATERIAL NEEDS, BUT IT IS ALSO AN AESTHETIC SOURCE FOR MY EMOTIONAL AND SPIRITUAL NEEDS. I GROW DAILY FROM MY INTERACTION WITH THE MAJESTY OF THIS FOREST AND I NEED BALANCE OF RESOURCE EXTRACTION AND A QUALITY FOREST ENVIRONMENT FOR MY POSITIVE GROWTH AS A HUMAN BEING

**FOREST SERVICE RESPONSE:**

Certainly there are others who work in the Forest and share your feelings.

**COMMENT NO. 73.** WE DO BELIEVE, HOWEVER, THAT YOUR PLANNING TEAM CAN DEVELOP AN ACCEPTABLE PLAN USING THE MAX TIMBER W/MMR BENCH MARK, ALTERNATIVE B, AND THE COMMUNITY STABILITY ALTERNATIVE.

**FOREST SERVICE RESPONSE**

We agree that such a plan would be acceptable to many people.

**COMMENT NO. 74·** (PAGE IV-53) "SOCIAL EFFECTS OF ALTERNATIVES" YOU MAKE SOME STATEMENTS IN THE SECOND PARAGRAPH, BUT NOWHERE IN THE TEXT DO YOU ELABORATE ON THE POTENTIAL OF TOURISM EITHER WITH \$\$ FIGURES OR NUMBER OF PEOPLE EMPLOYED. ALSO, YOU DO NOT ANYWHERE IN THE TEXT ELABORATE ON THE LOSS OF JOBS DUE TO MECHANIZATION OR LOW TIMBER PRICES BECAUSE OF THE CANADIAN LUMBER INFLUX.

**FOREST SERVICE RESPONSE**

Appendix B shows our estimates of jobs and personal income associated with recreation. The Forest Plan shows that the Forest has a great deal of unutilized recreation capacity. Both information sets have been updated in the final documents.

Timber-related jobs have been lost due to mechanization as have innumerable jobs in other forms of manufacturing, agriculture, mining, fishing, and so on. Put simply, it is frequently cheaper to substitute capital for labor. This is a process that is not unique to timber processing and which has been demonstrated empirically. In brief, we are guilty of not stating the obvious.

Canadian imports are an important consideration in national matters. They, along with the whole array of market forces are wrapped up in our assumption of 1 percent per annum real price increases.

**COMMENT NO. 75. SOCIAL AND ECONOMIC OVERVIEW - (APPENDIX, PAGE B-63) MOST OF THE INTRODUCTORY DISCUSSION OF THIS TOPIC CONSISTS OF VALUE JUDGEMENTS AND CONCLUSIONS WHICH ARE NOT SUPPORTED WITH DATA; THEREFORE, THE VALIDITY OF THESE STATEMENTS CANNOT BE DETERMINED. FOR EXAMPLE, STATEMENTS SUCH AS "THERE IS A MARKED AMBIVALENCE TOWARD GROWTH IN THE AREA" AND "THE GROWTH POTENTIAL OF BAKER COUNTY IS DIMMED BY THE CYCLICAL NATURE OF THE LUMBER AND WOOD PRODUCTS INDUSTRY AND A LACK OF ECONOMIC DIVERSIFICATION" ARE INAPPROPRIATE WITHOUT ACCOMPANYING DOCUMENTATION. IN ADDITION, DATA PROVIDED ON PERSONAL INCOME AND POVERTY LEVELS ARE OUTDATED AND DO NOT REFLECT THE CURRENT ECONOMIC DOWNTURN IN NORTHEAST OREGON. THIS SECTION SHOULD BE REWRITTEN TO PRESENT A MORE CURRENT, FACTUAL OVERVIEW OF THE SUBJECT.**

**FOREST SERVICE RESPONSE.**

A documenting footnote has been added to the following statement: "There is, in fact, a marked ambivalence toward growth in the area." It refers to Section 1 of Chapter V of A Social Appraisal of Oregon's Northeast Counties. Information specifically relating to Public Attitudes and Values on pages B-68 through B-71 are noted as to their source.

Accompanying documentation for "the cyclical nature of the lumber and wood products industry ..." is not needed. It is commonly held knowledge. The "lack of economic diversification ..." is addressed in the DEIS' following pages as well as in the above-referenced document.

Referring to older sources for climatological information seems to us to be appropriate, as does the use of older material to provide a frame of reference for recent changes in population. Data on personal income and poverty were taken from a 1984 source.

**COMMENT NO. 76: WE AGREE WITH THE WALLOWA-WHITMAN CONCLUSION THAT THE POTENTIAL FOR ATTRACTING ADDITIONAL DIVERSIFIED EMPLOYMENT OPPORTUNITIES TO NORTHEAST OREGON IS EXTREMELY LIMITED. THIS FACT, COUPLED WITH STATISTICS ON HIGH UNEMPLOYMENT AND POVERTY RATES IN THIS AREA, EMPHASIZES THE POINT THAT ANY GROWTH OR DECLINE OF THE TIMBER INDUSTRY IN BAKER, UNION, AND WALLOWA COUNTIES WILL SIGNIFICANTLY AFFECT THESE LOCAL ECONOMIES. PAST PREDICTIONS THAT WILDERNESS ADDITIONS AND THE HELLS CANYON NRA WOULD GENERATE NEW RECREATION-ORIENTED EMPLOYMENT HAVE NOT BEEN FULFILLED. THEREFORE, TO MAXIMIZE NET PUBLIC BENEFITS THE WALLOWA-WHITMAN'S PREFERRED ALTERNATIVE SHOULD ATTEMPT TO INCREASE THE ECONOMIC VITALITY OF THESE THREE COUNTIES BY ENCOURAGING TIMBER**

MANAGEMENT AND WOOD PRODUCTS MANUFACTURING RATHER THAN PROPOSING ADDITIONAL REDUCTIONS IN JOBS AND PERSONAL INCOME DERIVED FROM THIS RESOURCE

**FOREST SERVICE RESPONSE:**

We recognize that limited development has occurred in the area, but disagree that opportunities for further development are "extremely limited." Recent vertical developments in the local timber industry (in the form of further processing of the raw material) and in food processing, coupled with the underutilized recreation sector, paint a picture of solid if not golden opportunities.

**COMMENT NO. 77.** THOSE OF US WHO LIVE IN THE PORTLAND--VANCOUVER METROPOLITAN AREA CONSIDER THE WALLOWA-WHITMAN NATIONAL FOREST OUR WILDERNESS HOME. THOUSANDS OF US SPEND TIME IN THIS REMOTE AREA EACH YEAR: VACATIONING, HIKING, HUNTING, SKIING, FISHING. THE WALLOWA-WHITMAN FOREST IS A VITAL PART OF OUR LIFESTYLE IT OFFERS US A NECESSARY BALANCE TO OUR URBAN LIVES

**FOREST SERVICE RESPONSE.**

Your comments represent the view of many Forest users.

**COMMENT NO. 78:** HOW MANY OF OUR KIDS ARE STAYING IN N E OREGON AFTER GRADUATION? THE JOBS AREN'T HERE, AND THERE IS A DRAIN OF TALENT LEAVING THE AREA

**FOREST SERVICE RESPONSE:**

This is a problem with most small communities in Eastern Oregon and has been for a long time. This problem was not caused by the Forest Plan which is yet to be implemented

**COMMENT NO. 79:** IT'S DIFFICULT TO ATTACK AN INDUSTRY THAT IS THE LIVELIHOOD OF SO MANY PEOPLE IN THIS AREA. BUT THE EFFECT IS WHEN IT'S GONE IT'S GONE. THERE WILL BE NO TIMBER-RELATED JOBS FOR FUTURE GENERATIONS IF WE TAKE IT ALL NOW. THEREFORE, REDUCE TIMBER HARVEST, DON'T INCREASE IT. I WANT MY GRANDCHILDREN TO SEE WHAT A FOREST IS SUPPOSED TO LOOK LIKE.

**FOREST SERVICE RESPONSE.**

Thank you for your view.

**COMMENT NO. 80.** I LOOK TO THE FOREST SERVICE TO PROTECT WHAT I FEEL IS A VERY PRECIOUS NATURAL RESOURCE FOR FUTURE GENERATIONS TO EXPERIENCE. FOR ME, A WALK IN THE FOREST IS AS MUCH FOOD FOR THE SOUL AS A WALK ON A LONELY OCEAN BEACH. I PERSONALLY ENJOY SHORTER DAY HIKES IN CLOSER MORE ACCESSIBLE AREAS -- PREFERABLY ROADLESS AT LOWER ELEVATIONS.

**FOREST SERVICE RESPONSE.**

Many forest users share your views

**COMMENT NO. 81.** FOREST PLANNERS, SPECIALISTS, AND MANAGERS HAVE THE RESPONSIBILITY TO MANAGE FORESTS FOR "MULTIPLE USE". IT DOESN'T SAY, "USE ALL THE BIG TIMBER, NAMELY PONDEROSA PINE, NOW FOR THE BENEFIT OF THE LOCAL ECONOMY " I TRUST YOU WILL CONSIDER FUTURE GENERATIONS' NEED FOR OLD-GROWTH TIMBER AND SALMON A HIGH PRIORITY -- AND A PRIMARY MULTIPLE USE TO CONSIDER IN THE NEW FOREST PLAN

**FOREST SERVICE RESPONSE:**

We agree

**COMMENT NO. 82:** TO INSURE ECONOMIC STABILITY FOR NORTHEASTERN OREGON, PLEASE SUPPORT THE "COMMUNITY STABILITY ALTERNATIVE."

**FOREST SERVICE RESPONSE:**

The Community Stability Alternative was one of several new alternatives that were considered. The support this alternative received showed a strong desire by many people, especially those who depend on the wood products industry, for maintaining recent timber harvest levels. Many of those who are employed in the industry supported this alternative due to fear of job loss. The key points of this alternative are reflected in the final decision in several ways as explained in Chapter II of the FEIS and the Record of Decision.

**COMMENT NO. 83:** I FEEL IT'S IMPROPER TO EXPRESS PAYMENTS TO LOCAL GOVERNMENTS IN 1982 DOLLARS WHEN THE HISTORICAL PERIOD IS 1979-1983 BECAUSE 1979-1981 ARE INCREASED, 1983 IS DECREASED. I FEEL THAT ESTIMATES OF PAYMENTS TO LOCAL GOVERNMENT ARE TOO HIGH AND DO NOT TRACK WITH HISTORICAL RECORDS.

**FOREST SERVICE RESPONSE.**

Many have expressed similar sentiments -- namely that projections of payments to local governments are too high. Certainly stumpage values to date have not behaved as predicted in the DEIS. Whether the projections are vindicated over the space of the first decade of the Forest Plan remains to be seen.

**COMMENT NO. 84:** THE BOARD OF DIRECTORS OF JOSEPH ADMINISTRATIVE SCHOOL DISTRICT NO. 6, AT THE JULY MEETING UNANIMOUSLY PASSED THE FOLLOWING MOTION "THE JOSEPH SCHOOL BOARD SEND A LETTER TO THE APPROPRIATE PERSONS, STATING THAT THE BOARD WAS OPPOSED TO ANY FOREST MANAGEMENT PLAN THAT WILL REDUCE REVENUES TO THE JOSEPH SCHOOL DISTRICT.

**FOREST SERVICE RESPONSE:**

The Board's resolution was considered along with those of several others who raised like concerns.

**COMMENT NO. 85:** DURING THE PAST TEN (10) YEARS, DRASTIC FLUCTUATIONS [IN COUNTY RECEIPTS] HAVE OCCURRED IN THE RESOURCES RECEIVED FROM FOREST PRODUCTION RESOURCES RECEIVED HAVE RANGED FROM \$70,720.00 TO \$360,408 00 DURING THIS PERIOD OF TIME THE AVERAGE FOR THE PAST TEN (10) YEARS HAD BEEN \$177,790 00. DRASTIC FLUCTUATIONS OF THIS NATURE IMPEDES THE EDUCATION PLANNING PROCESS, AND GENERALLY CREATES NEGATIVISM IN THE COMMUNITY WHEN ADDITIONAL BURDENS ARE PLACED UPON OTHER RESOURCES

ALL SUBTRACTIONS MADE FROM TIMBER SALES, WHICH REDUCE REVENUES TO THE COUNTY AND SCHOOLS, MUST BE SCRUTINIZED CAREFULLY ARE THESE SUBTRACTIONS NECESSARY? IF SO, ARE THEY BEING ACCOMPLISHED IN THE MOST EFFECTIVE AND ECONOMIC MANNER, SO AS TO HAVE AS LITTLE EFFECT AS POSSIBLE ON THE INCOME TO LOCAL ENTITIES

**FOREST SERVICE RESPONSE:**

We agree with the need to carefully consider changes in timber sale offerings. However, the fluctuation in county receipts occurred while timber offerings were relatively constant. Even though Forest timber sale offerings are constant, the timber harvest level varies significantly -- depending on how timber purchasers respond to market conditions. This serves to illustrate that the overall health of the economy is a more important factor than the changes this plan may bring about.

**COMMENT NO. 86** THE WALLOWA-WHITMAN SHOULD RETURN MORE DOLLARS TO THE COUNTIES TO SUPPORT OUR SCHOOLS AND ROADS AND KEEP OUR TAXES DOWN.

**FOREST SERVICE RESPONSE:**

Many people shared your opinion.

**COMMENT NO. 87:** THE WALLOWA-WHITMAN SHOULD NOT RETURN MORE DOLLARS TO THE COUNTIES TO SUPPORT OUR SCHOOLS AND ROADS AND KEEP OUR TAXES DOWN.

**FOREST SERVICE RESPONSE.**

Other people share this opinion.

**COMMENT NO. 88:** PAYMENTS TO COUNTIES ARE SHOWN TO INCREASE UNDER THE PREFERRED ALTERNATIVE AS COMPARED WITH RECENT RECEIPTS WHILE THE FOREST SERVICE IS RECOMMENDING LOWERING OF VOLUME CUT, IT ASSUMES INCREASED PRICES IN TIMBER SUFFICIENT TO INCREASE THE REVENUES TO COUNTIES FROM TIMBER SALES. THIS IS BASED ON GUESSWORK CONCERNING FUTURE PRICES. THE COUNTIES SHOULD EXPECT DECLINES IN THE TIMBER SALES PAYMENTS THEY RECEIVE FROM THE FEDERAL GOVERNMENT COMMENSURATE WITH REDUCTIONS IN THE TIMBER HARVEST.

**FOREST SERVICE RESPONSE:**

A concern often raised during the review process related to the estimates presented for payments to local governments resulting from management of the Wallowa-Whitman National Forest. In particular, respondents wanted to know how the alternatives could show increased payments to local governments even with reductions in timber offerings. The explanation has



many facets -- facets which help provide a greater overall understanding of the processes involved in generating payments to local governments

Payments to local governments are based on gross receipts. In the case of the Wallowa-Whitman, they are derived overwhelmingly from the sale of timber. Payments accrue on the basis of timber cut (and removed) -- not on the basis of timber offered or sold. Timber is routinely sold under multi-year contracts. The successful bidder is free to juggle the timing of the harvest (within certain contractual limits) to better take advantage of market conditions. Thus, timber offerings, and the amount harvested in a one or two year period, may vary considerably.

During the historical time period used in the analysis (1979-1983), total timber offerings were 203 MMBF (159 MMBF sawtimber); harvests were 168 MMBF (an estimated 150 MMBF of sawtimber). In the analysis conducted for the Forest Plan, volumes offered were equated with sales and harvests. Historical payments to local governments are reflective of the estimated 150 MMBF of sawtimber removed from the Forest rather than the 159 MMBF offered.

Timber sale contract provisions on the Forest include a price adjustment clause. This clause provides for a dollar-for-dollar downward adjustment in the price of timber in the face of falling prices. If prices increase, the stumpage prices are increased by one-half the amount of the increase. Thus, if the material increases in value by \$10, the bidder is required to pay \$5 more than he bid. If the material decreases in value by \$10, the price paid the government declines \$10. Because these estimates are made for individual species, the successful bidder can use the price adjustment clause to his advantage. Because information on the relationship between sold values (bid values) and harvest values (bid values adjusted according to market conditions at the time of removal) is not available, bid values were used in the analysis. Insofar as successful bidders are able to use the clause to reduce the prices they pay for stumpage, the estimate of future payments to local governments will be overstated, and vice versa.

Some changes in Forest practices are called for in the Forest Plan which will tend to increase the efficiency of the timber sale program compared to the historical base period of 1979-1983. These changes are expected to result in increases in stumpage values in and of themselves. One such change is the projected increase in volume harvested per acre. This reflects a decreasing reliance on partial harvesting and a greater emphasis on regeneration harvests than in the historical base period. In the past, "commercial thins" were frequently, if not commonly, noncommercial thins -- they sold only because they were blended in with higher dollar-valued stands. The overall sale was still merchantable even though its overall dollar value was actually reduced by including the "commercial thin". This practice is to be reduced under the Forest Plan and estimates of volumes harvested per acre show substantial increases.

Having the road system in place on most of the Forest will also have a bearing on the bid values for timber.

During the historical base period, there was no requirement to do a true cost-benefit analysis in the development of timber sales. The closest approximation came in the desire on the part of management to offer merchantable sales. The problem with that approach was that it made no difference to the manager whether a sale sold for \$100,000 or \$1,000,000. Under current regulations (FSM 2430) we must complete an economic analysis on all sizable or unusual-requirement sales; to analyze timber sale alternatives for cost efficiency and activities within alternatives for least-cost objectives, and to ensure that the sale area design meets the intent of economic direction. This same sense of concern for economics was contained in the Forest planning model and necessarily results in increased Forest receipts and payments to local governments.

About 5 percent of the estimated payments to local governments accrues from the assumption of 1 percent per year real price increase in timber stumpage values (Payments to local governments are projected for the midpoint of the first decades.) This assumption is common to all Forests in the Pacific Northwest Region.

Figures presented for payments to local governments are best used in comparing the alternatives with one another. Our best estimate is that, due to a heightened level of efficiency in operations, we will be able to increase our returns to local governments per unit of timber harvested.

**COMMENT NO. 89.** I AM WRITING IN RESPONSE TO PREFERRED FOREST SERVICE PLAN. SINCE I AM A RETIRED PERSON, ON A FIXED INCOME, I CAN'T HELP BUT THINK THAT IT COULD ONLY MEAN HIGHER PROPERTY TAXES FOR ALL IN THE COUNTY, AND ALSO LOSS OF JOBS, SCHOOL TAXES, AND THE WHOLE GAMBIT OF TAXES.

**FOREST SERVICE RESPONSE:**

Many expressed similar views

**COMMENT NO. 90** WHEREAS, THE FOREST SERVICE HAS PROJECTED REVENUES FOR COUNTIES AT \$3 9 MILLION, AND

WHEREAS, CURRENT PRICES PER THOUSAND BOARD FEET ARE: PONDEROSA PINE \$147.03, OTHER SAWTIMBER \$15 02; AVERAGE SAWTIMBER \$41 42; AND CULL AND POLES \$2 11; AND

WHEREAS, THE COMMUNITY STABILITY ALTERNATIVE COMMITTEE PROJECTS THE AVERAGE STUMPAGE PRICE WOULD HAVE TO INCREASE 2.6 TIMES ABOVE THE CURRENT LEVEL TO \$110.00 PER THOUSAND BOARD FEET FOR ALL SPECIES IN ORDER TO MEET THE FOREST SERVICE PROJECTION, AND

WHEREAS, THE COMMUNITY STABILITY ALTERNATIVE COMMITTEE PROJECTS THE ABOVE ALLOWABLE CUTS WOULD CAUSE THE REVENUES TO UNION, WALLOWA, AND BAKER COUNTIES TO DECLINE FROM \$2,642,493 IN 1985 TO \$1,518,817, AND

IT IS HEREBY RESOLVED THAT THE UNION COUNTY COURT THEREFORE CALLS ON THE U. S. FOREST SERVICE TO REJECT THEIR FOREST MANAGEMENT PROPOSALS AND ADOPT THE COMMUNITY STABILITY ALTERNATIVE MANAGEMENT PLAN. WE WILL ALSO NOTIFY OUR REPRESENTATIVES AND SENATORS IN THE U. S. CONGRESS TO LEND THEIR WEIGHT AND SUPPORT TO THE ADOPTION OF THE COMMUNITY STABILITY ALTERNATIVE.

**FOREST SERVICE RESPONSE:**

The concerns of government bodies such as yours, as well as similar comments from many other local people, had much to do with the formulation of the final plan.

**COMMENT NO. 91:** DETERIORATING COUNTY ROADS AND WIDESPREAD SCHOOL BUDGET LEVY FAILURES THROUGHOUT THE AREA EMPHASIZE THE NEED TO MAINTAIN OR INCREASE FOREST RECEIPTS THIS CAN ONLY BE DONE THROUGH SKILLFUL MANAGEMENT TO MAINTAIN CUTTING OF MERCHANTABLE SAW-TIMBER AT OR ABOVE HISTORIC LEVELS THE BIOLOGICAL POTENTIAL OF THE FOREST IS AVAILABLE TO DO SO IF THE PROPER MANAGEMENT IS APPLIED

OVER BURDENED TAXPAYERS CANNOT COMPENSATE FOR LOSSES OF FOREST RECEIPTS BROUGHT ON BY LOWER TIMBER CUTS.

**FOREST SERVICE RESPONSE:**

Many expressed similar points of view.

**COMMENT NO. 92:** EITHER OUR TAXES WILL RISE, OR OUR SERVICES WILL GO DOWN, IF TIMBER SALES ARE RESTRICTED BECAUSE THE MONEY THAT'S USED TO GO TO THE COUNTY FOR SCHOOLS AND ROADS JUST WON'T BE THERE. PLEASE USE THE COMMUNITY STABILITY ALTERNATIVE SO THAT WON'T HAPPEN.

**FOREST SERVICE RESPONSE.**

We agree with the relationships the commentor identified in a general sense and have shown such relationships within the range of management alternatives displayed. Other factors such as the price of timber and the overall health of the economy can play a significant role in returns to local governments also. The timber supply from other sources must also be considered.

**COMMENT NO. 93:** INSUFFICIENT DATA HAS BEEN PRESENTED TO SUPPORT THE WALLOWA-WHITMAN'S CONCLUSION THAT LOWER HARVEST LEVELS WILL MAINTAIN OR INCREASE PAYMENTS TO COUNTIES. THIS ASSUMPTION IS BASED ON PREDICTIONS THAT INCREASED TIMBER PRICES WILL OFFSET LOWER TIMBER HARVEST LEVELS.

**FOREST SERVICE RESPONSE**

See Response to Comment No. 88.

**COMMENT NO. 94:** ACCORDING TO FOREST SERVICE ESTIMATES, LOCAL GOVERNMENTS WOULD RECEIVE MORE REVENUES UNDER BOTH ALTERNATIVE C AND ALTERNATIVE B IN THE FUTURE COMPARED TO RECENT LEVELS. HIGHER VALUED HARVESTS PER ACRE WERE GIVEN AS THE REASON FOR THE INCREASE. ONE LOCAL GOVERNMENT OFFICIAL NOTED, HOWEVER, THAT THESE REVENUES ARE DEPENDENT ON THE TIMING OF THE SALES AND WHETHER THE FOREST SERVICE'S ASSUMPTION OF A ONE PERCENT REAL PRICE INCREASE IS ACCURATE. IT IS QUESTIONABLE WHETHER LOCAL GOVERNMENTS WILL REALLY SEE THESE INCREASES IN REVENUES SINCE HARVESTS WILL BE LOWER THAN PRIOR YEARS AND LESS OF THE HIGHLY VALUED SPECIES, PONDEROSA PINE, WILL BE CUT.

**FOREST SERVICE RESPONSE:**

See Response to Comment No. 88.

**COMMENT NO. 95:** REFORESTATION COSTS ARE OUT OF LINE WITH BOTH OTHER NATIONAL FORESTS AND THOSE EXPERIENCED ON PRIVATE TIMBER LANDS. IF YOUR COSTS ARE THIS HIGH, POLICY SHOULD BE CHANGED AND MANAGEMENT DIRECTION IMPROVED TO ADDRESS THESE HIGH COST PROBLEM AREAS. BY IGNORING YOUR HIGH COSTS, YOU PREJUDICE THE ECONOMICS OF THE PLAN AND THE OUTCOME OF THE PLANNING PROCESS.

**FOREST SERVICE RESPONSE:**

We are very concerned about the high cost of reforestation and have moved to correct it. Perhaps the most visible indication of our resolve is the Plan's high degree of reliance on natural reforestation. Under natural reforestation, the logging system, the harvest method, slash treatment, and all the silvicultural considerations are adjusted to increase the likelihood of successful natural reforestation.

**COMMENT NO. 96: COUNTY RECEIPTS:**

THE WALLOWA-WHITMAN DEIS CORRECTION PORTRAYS THE PROJECTED FIRST-DECADE PAYMENTS TO LOCAL GOVERNMENTS AS \$3,970,000 FOR THEIR PREFERRED ALTERNATIVE. THIS IS A SERIOUS OVER-ESTIMATE BASED ON THE HIGHEST EVER RETURNED.

THIS MISREPRESENTATION TENDS TO MISLEAD THE PUBLIC AS TO THE REAL IMPACTS OF ALTERNATIVE "C".

THE WALLOWA-WHITMAN SHOULD REANALYZE THE PROJECTED PAYMENTS BASED ON THE ESTIMATED SPECIES MIX AND VOLUME FROM THEIR ALTERNATIVE, USING CURRENT STUMPAGE PRICES.

**FOREST SERVICE RESPONSE:**

See response to Comment No 88.

**COMMENT NO. 97:** I AM SURE THAT YOU CAN APPRECIATE THE HARDSHIP WHICH WOULD OCCUR IF THE ELLINGSON OPERATIONS WERE TO CEASE; THE RESULTS WOULD BE THE SAME FOR LA GRANDE IF BOISE CASCADE WERE TO SHUT DOWN THE JOBS LOST WOULD NEVER BE REPLACED BY RECREATION RELATED JOBS.

**FOREST SERVICE RESPONSE:**

Many expressed similar points of view.

**COMMENT NO. 98** RECREATION BASED JOBS DO FOR THE MOST PART PAY LESS THAN CURRENT MILL WAGES, BUT THEY GIVE A MUCH GREATER OPPORTUNITY FOR FULFILLING THE AMERICAN DREAM OF SELF EMPLOYMENT.

**FOREST SERVICE RESPONSE:**

An interesting thought

**COMMENT NO. 99:** OUR NATIONAL FORESTS SHOULD PROVIDE AS MANY JOBS AND AS MUCH WOOD PRODUCTS AS POSSIBLE. MATURE TREES THAT ARE NOT CUT WILL BECOME A LOSS IN BOTH JOBS AND WOOD PRODUCTS.

**FOREST SERVICE RESPONSE**

*Many people share your view. But the Forest Service is responsible for managing the variety of National Forest resources in a manner that best serves the greatest number in the long run. This may or may not mean providing the most jobs*

**COMMENT NO. 100:** ANY PLAN PROPOSED WHICH REDUCES EMPLOYMENT WILL HAVE AN ADDITIONAL EFFECT UPON THE FINANCIAL RESOURCES OF OUR SCHOOL DISTRICT AS EMPLOYMENT DECREASES, SO DOES THE NUMBER OF STUDENTS ATTENDING OUR SCHOOLS. BASIC SCHOOL SUPPORT FROM THE STATE OF OREGON IS BASED UPON THE NUMBER OF STUDENTS IN ATTENDANCE. ALTHOUGH THE FUNDS BECOME LESS, MANY OPERATIONAL COSTS REMAIN THE SAME OR INCREASE, CAUSING REDUCTIONS OF SERVICES TO YOUNG PEOPLE AND ADULTS IN THE COMMUNITY

**FOREST SERVICE RESPONSE:**

*We are aware of these relationships. They were a consideration in identifying the local economy as one of the major issues to be considered in the planning effort.*

**COMMENT NO. 101.** CONCERNED THAT PERSONAL INCOME TABLES DON'T REFLECT FAMILY INCOME DROP.

**FOREST SERVICE RESPONSE:**

*Personal income figures presented in the documents do relate to wages and salaries and thus do reflect the main sources of National Forest-related family income*

**COMMENT NO. 102** YOU SAY THERE WILL BE A LOSS OF 214 JOBS, BUT THAT ALL OF THEM BUT APPROXIMATELY 50 WILL BE REPLACED BY RECREATION-TYPE JOBS. THIS IS ABSOLUTELY THE MOST UNREALISTIC THING THAT WE HAVE HEARD FOR QUITE SOME TIME. WE DEFY YOU TO PROVE HOW YOU CAN FIGURE THAT 164 RECREATION-TYPE JOBS THAT PAY \$3.35 PER HOUR CAN REPLACE 214 SAWMILL JOBS THAT PAY \$12.00 PER HOUR. WE MAINTAIN THAT THE RECREATION JOBS YOU SAY WILL BE CREATED ARE A FIGMENT OF SOMEONE'S VIVID IMAGINATION. SHOW US HOW MANY JOBS WERE CREATED BY THE HCNRA OR THE OREGON WILDERNESS BILL. NONE! JOBS WERE LOST AND THEY ARE STILL GONE!

**FOREST SERVICE RESPONSE:**

*We did not imply that timber-related jobs would be replaced by jobs in the recreation industry -- only that recreation jobs were likely to come about over time as the population increases and more people use the Forest for recreational purposes. These would be service-related jobs, part time as well as full time, and not of the pay level provided by timber industry jobs. They would be expected to occur regardless of which alternative is selected.*

**COMMENT NO. 103.** HOW LONG BEFORE THERE IS NO REASON FOR US TO INVEST OUR TIME AND OUR MONEY INTO A BUSINESS THAT IN THE FUTURE WILL NO LONGER BE PROFITABLE BECAUSE OF YOUR PROPOSAL? WHAT KIND OF FUTURE IN THIS STATE DO MY FOUR DAUGHTERS AND THEIR FUTURE HUSBANDS HAVE AS FAR AS ECONOMY AND JOBS?

**FOREST SERVICE RESPONSE.**

Jobs related to the Wallowa-Whitman National Forest are important to the local economy (see page B-83 of the DEIS Appendices) and are expected to remain so in all the alternatives considered in the Forest Plan. History has shown us that logging and manufacturing have, over time, required lower amounts of labor input per unit of output. There is no reason to expect that that process will not continue. One thing that can be stated with a high degree of certainty is this: forces outside the Wallowa-Whitman National Forest will affect future employment levels much more than will the activities of the Wallowa-Whitman.

**COMMENT NO. 104:** THE FOREST SERVICE IS PLANNING ON MANAGING THE FOREST LANDS FOR A VERY ELITE GROUP; THE PHYSICALLY FIT WHO HAVE THE TIME TO USE THE FOREST LANDS, AND THE RICH WHO HAVE THE FINANCIAL MEANS TO HIRE GUIDES AND EQUIPMENT. THIS SMALL GROUP OF PACKERS AND HUNTERS ARE DEPRIVING THE LOCAL PEOPLE OF A LIVING THAT THEY HAVE ENJOYED FOR GENERATIONS. THE TOURIST INDUSTRY WILL NEVER REPLACE THE PRESENT LOGGING INDUSTRY IN EASTERN OREGON, BECAUSE THE TOURIST SEASON IS TOO SHORT AND MOST OF THE TOURISTS THAT USE THE FOREST LANDS BRING IN THEIR OWN SUPPLIES FROM OUTSIDE THE AREA.

**FOREST SERVICE RESPONSE**

The Forest Service preferred alternative proposes no new wilderness, and proposes to develop many currently roadless areas. Therefore, we find it difficult to understand a perception that it is favoring an "elite" group of physically fit and rich. Our mail, however, indicates many local people feel this way.

We expect the level of employment associated with tourism and recreation in general to be quite similar in every alternative -- we have not portrayed timber harvesting and recreation use as being mutually exclusive enterprises. Tourism is a powerful part of the local economy today and we expect it to be more so in the future. An unquantified aspect of that tourism impact is the fact that people favorably impressed by the area may one day buy local property or settle here.

**COMMENT NO. 105:** ALTERNATIVE C WILL REDUCE OUR JOBS BY 200, PLUS THE REST OF THE NON-TIMBER JOBS BY 150. IT SAYS IT WILL INCREASE TOURIST JOBS BY 143. PEOPLE WHO ARE USED TO HAVING \$25,000 OR MORE PER YEAR INCOME ARE NOT GOING TO BE ABLE TO LIVE ON THE WAGES THEY WILL EARN IN A TOURIST TYPE JOB. BESIDES, THE TOURISTS THAT COME INTO THIS AREA DON'T SPEND VERY MUCH MONEY HERE.

**FOREST SERVICE RESPONSE:**

Our actual DEIS figures on jobs are shown in the following table. As can be seen, there is little difference shown in recreation-related employment. These figures have been updated in the FEIS, Chapter II.

## JOBS 1/

	Sawlogs	Round-wood	Forage	Recr. Disp.	Recr. Dev.	Total
A	1467	177	99	1353	431	3526
B	1669	200	110	1347	431	3757
B-dep	1890	226	120	1338	431	4005 2/
C (DEIS)	1511	178	110	1350	431	3580
C (Final)	1583	189	110	1350	431	3663
C-dep	1878	229	110	1344	431	3991
D	1576	190	112	1348	431	3657
E	1531	183	96	1349	431	3590
F	1057	135	84	1358	431	3064
G	1345	160	99	1347	431	3381
H	1307	158	94	1350	431	3339
Recent Average 1979 - 1983	1685	218	98	1236	396	3633

1/ Includes part time and full time, temporary and permanent, seasonal and nonseasonal with no differentiation Includes direct, indirect, and induced employment

2/ DEIS shows 3,995.

We see recreation use increasing as a function of population growth -- not as a result of selection of any one of the alternatives

The concerns the commenter expressed regarding relatively good-paying jobs are valid and have been given consideration in the selection of the Final Forest Plan Preferred Alternative

**COMMENT NO. 106:** I WORK AT A SAWMILL IN JOSEPH. IF YOUR PREFERRED ALTERNATIVE C GOES IN, OUR MILL WILL PROBABLY CLOSE DOWN BECAUSE OF THE REDUCTION IN TIMBER VOLUME AND THE TYPE OF TIMBER YOU WILL ALLOW US TO REMOVE

**FOREST SERVICE RESPONSE:**

Large ponderosa pine will continue to be available for many years under any plan, but at decreasing levels Whether or not any particular mill were to close would depend on many factors, but would ultimately be dependant on company management and market conditions.

**COMMENT NO. 107.** THE LOSS OF JOBS FROM PEOPLE WHO PATRONIZE US OR THOSE INDIRECTLY AFFECTED CAUSE US GREAT CONCERN. WALLOWA COUNTY NEEDS ADDITIONAL JOBS FOR THEIR UNEMPLOYED. WE BELIEVE THE PROPOSED 10-YEAR PLAN WAS PUT TOGETHER WITH TOTAL DISREGARD FOR THE LOCAL ECONOMY WAS AN ECONOMIC IMPACT STUDY EVEN CONSIDERED? WE WILL ONLY CONTINUE TO SURVIVE IF CURRENT TIMBER HARVEST LEVELS ARE LEFT INTACT SO THOSE EMPLOYED WILL STAY EMPLOYED

**FOREST SERVICE RESPONSE:**

The local economy was a key issue in the planning effort (see EIS, Chapter 1) and was instrumental in the relatively high timber harvest levels proposed. The DEIS Appendices (pp. B-63 through B-84) summarize what we believe is a rather thorough local economic analysis.

**COMMENT NO. 108:** THE PROPOSED PLAN WILL RESULT IN LOSS OF LOCAL JOBS ON THE AVERAGE EACH MILLION BOARD FEET OF TIMBER HARVESTED PRODUCES 11 LOCAL JOBS UNDER THE PROPOSED PLAN THERE WILL BE A DROP OF 21 MILLION BOARD FEET OF SAW TIMBER RESULTING IN A LOSS OF 232 LOCAL JOBS.

THE 232 JOBS LOST WILL HAVE NOT ONLY A DIRECT IMPACT ON THE AFFECTED WORKERS BUT WILL ALSO RESULT IN A LOSS OF INDIRECT AND INDUCED JOBS IN THE LOCAL COMMUNITY. WITH THE REDUCTION IN TIMBER HARVEST, IT IS LOGICAL TO ASSUME THERE SHOULD BE A CONCURRENT REDUCTION IN FOREST SERVICE PERSONNEL. THE PLAN DOES NOT ADDRESS THE REDUCTION OF FOREST SERVICE STAFF NOR THE IMPACTS THESE REDUCTIONS WILL HAVE ON THE COMMUNITY

**FOREST SERVICE RESPONSE:**

Table B-17 on p. B-82 of the DEIS Appendices displays our estimates of direct, indirect, and induced job numbers associated with timber harvesting. In total that effect amounts to some 11 jobs per thousand board feet. Those figures have been updated in the FEIS.

**COMMENT NO. 109:** THE PREFERRED OPTION OF THE FOREST SERVICE, OPTION C, WILL CAUSE A DIRECT REDUCTION IN TOTAL JOBS WHILE THE FOREST SERVICE ASSUMES THAT RECREATION JOBS IN REAL NUMBERS WILL REPLACE THE LOSS OF TIMBER WORKERS, THE IMPACT IS NOT IN REAL NUMBERS. RECREATIONAL JOBS ARE SEASONAL AT BEST, WHETHER WINTER OR SUMMER PAY SCALES FOR TIMBER OR MILL WORKERS VS. RECREATIONAL/RETAIL JOBS ARE SUBSTANTIALLY DIFFERENT. LOOKING AT PAST STATISTICS PRODUCED BY THE EMPLOYMENT DIVISION, TIMBER RELATED JOBS RANGE BETWEEN \$15,000-\$25,000 RECREATIONAL JOBS BASED ON 6 MONTHS AT \$4/HOUR CAN ONLY ACCOUNT FOR \$4,176/YEAR. THE POINT IS THAT REAL NUMBER REPLACEMENT WILL NOT MAKE UP THE INCOME LOSS WHICH PROVIDES THE PURCHASING POWER AND ABILITY TO PAY TAXES, WHICH SUPPORT THE LOCAL ECONOMIES, COUNTIES, AND CITIES. THUS, WE QUESTION WHETHER THE LOSS OF INCOME UNDER ALTERNATIVE C WILL ONLY BE \$2.3 MILLION TO THE LOCAL ECONOMY

**FOREST SERVICE RESPONSE:**

Information relating to this personal income effect is displayed in Appendix B.

**COMMENT NO. 110:** ACCORDING TO BOB MESSINGER OF BOISE CASCADE CORPORATION, THE FOREST SERVICE'S PROPOSAL TO OFFER MORE LOW-VALUE LODGEPOLE PINE AND LESS HIGH-VALUE PONDEROSA PINE WILL REDUCE EMPLOYMENT AT THE BOISE CASCADE MILLS. MR. MESSINGER, A TIMBER LAND MANAGER FOR BOISE CASCADE, STATES THAT 354 TIMBER-RELATED JOBS IN THREE NORTHEAST OREGON COUNTIES ARE THREATENED BY THE FOREST SERVICE'S PROPOSED PLAN. BOTH THE LA GRANDE AND JOSEPH BOISE CASCADE SAWMILLS USE PONDEROSA PINE "EXCLUSIVELY." THE JOSEPH MILL IS DOWN TO TWO SHIFTS AT PRESENT; ANY FURTHER REDUCTION IN WORK WILL RESULT IN CLOSURE OF THIS FACILITY.



TO ASSURE SHORT-TERM ECONOMIC STABILITY, THE FOREST SERVICE NEEDS TO MAINTAIN CURRENT LEVELS OF AVAILABLE PONDEROSA PINE. ALTERNATIVE C CALLS FOR REDUCING THE AMOUNT OF AVAILABLE SAWTIMBER INCLUDING PONDEROSA PINE, BY ABOUT 16 MMBF A YEAR

THE FOREST SERVICE'S MODEL OF THE LOCAL ECONOMY ESTIMATES THAT 10 6 LOCAL JOBS ARE LOST WITH EVERY 1 MMBF REDUCTION IN AVAILABLE SAWTIMBER. THE 16 MMBF REDUCTION WOULD REPRESENT 170 LOCAL JOBS THE FOREST SERVICE ESTIMATES ANOTHER 45 JOBS WILL BE LOST DUE TO THE CHANGES IN THE MIX OF THE ALLOWABLE CUT, AS SHOWN IN THE TABLE ABOVE.

INDICATIONS FROM THE INDUSTRY SUGGEST THAT THIS ESTIMATE IS LOW. HOWEVER, AN ALTERNATIVE ESTIMATE HAS NOT BEEN GIVEN IN AN AREA AS SPARSELY POPULATED AS THE WALLOWA-WHITMAN AREA, THIS IS A SUBSTANTIAL REDUCTION IN EMPLOYMENT

THE PROPOSED PLAN SHOWS AN ESTIMATED JOB LOSS OF ONLY 55. THIS IS BECAUSE THE LOSS OF 215 JOBS DUE TO TIMBER REDUCTIONS IS PROJECTED TO BE OFFSET BY AN ADDITIONAL 150 JOBS FROM INCREASED RECREATION USE AND 10 JOBS FROM INCREASED LEVELS OF LIVESTOCK GRAZING

WHETHER THESE NEW JOBS WILL MATERIALIZE IS UNCLEAR AS MENTIONED BELOW ON PAGE 5, THE POPULATION PROJECTION OF 2 0% PER YEAR, USED IN THE FOREST SERVICE MODEL, IS TOO HIGH. THE POPULATION PROJECTION DETERMINES THE DEMAND FOR RECREATION IN THE MODEL IF THE POPULATION PROJECTION IS TOO HIGH, AS ECONOMIC DEVELOPMENT DEPARTMENT CONTENDS, MANY OF THESE 150 JOBS WILL NOT BE CREATED.

**FOREST SERVICE RESPONSE:**

Ponderosa pine has long been prized for its merchantability That very merchantability has led to its widespread harvest over the years The Forest is simply getting to the point at which it becomes physically impossible to harvest as much ponderosa pine as it did in the past because the material is no longer there.

We see no reason to suggest that our jobs coefficients for sawtimber or roundwood processing are too low Recent figures widely reported in the press indicate that large volumes of timber are being processed with far less manpower than was the case ten years ago. That observation is borne out in the recently-released Regional Office publication, Timber Supply in the Pacific Northwest--Aggregate Implications of Forest Plans.

The population projections used were those contained in the 1980 OBERS series for the State of Oregon They are contained in Volume 1, Methodology, Concepts and State Data, BEA Regional Projections prepared by the U. S. Department of Commerce. Published in July 1981, they supplanted the preceding 1972 series

There were numerous other population projections available at the time the planning documents were being drafted. The OBERS series was used because they provided a single set of projections encompassing both the near and the far term and because they are widely used by federal land management planning agencies Using a single series ensures a certain consistency in the projections which is not possible when two or more population projection sets are used Likewise, there is a benefit to be gained in using the same projections as those used by other federal agencies Selecting a particular projection series from the market basket available might be viewed by some as selecting the population projection which best corresponds to a desired answer -- it would lay the agency open to charges of bias

The OBERS series used contained the following decade-respective projections for the State of Oregon

1980's	1.8%
1990's	1.5%
2000's	1.2%
2010's	0.9%
2020's	0.6%

Whether they prove accurate in the long-term remains to be seen. Certainly the results for the 1980's have been desultory. The population projections were used only to project future recreation use on the Forest. They figure in the analysis in no other way. No alternative would have been re-ranked in terms of economic efficiency; no timber harvest levels would have changed had another professionally-acceptable series of population projections been used.

**COMMENT NO. 111:** I WOULD ALSO LIKE TO ADDRESS THE IDEA THAT RECREATION-TYPE JOBS ARE GOING TO BE A REPLACEMENT FOR THE LOSS OF TIMBER-RELATED JOBS. LET'S BE REALISTIC. ALTHOUGH OUR PART OF THE WORLD HERE IN NORTHEAST OREGON IS ATTRACTIVE FROM A SCENIC POINT OF VIEW, IT DEFINITELY DOES NOT HAVE THE ATTRACTION OR MAJESTIC BEAUTY OF A YELLOWSTONE, JACKSON HOLE, OR GLACIER PARK. THERE IS NO WAY THAT THIS AREA IS EVER GOING TO BECOME A BIG TOURIST AREA.

**FOREST SERVICE RESPONSE:**

We have not projected any remarkable increase in tourist use -- only that which would reasonably be expected with an increase in area population.

**COMMENT NO. 112.** REGARDING THE 200-300 JOBS INDUSTRY SPEAKS OF - IT SEEMS ODD TO BE BUYING EQUIPMENT TO ELIMINATE JOBS IF THAT'S A BIG WORRY TO THE TIMBER BOSSES

**FOREST SERVICE RESPONSE.**

Modernization of wood products manufacturing plants is certainly a key factor in employment levels.

**COMMENT NO. 113:** I BELIEVE THAT THE FUTURE OF PINE VALLEY, IN TERMS OF JOBS AND EMPLOYMENT, LIES IN A BALANCE BETWEEN TIMBER AND RECREATION. TIMBER EMPLOYMENT HAS ALREADY REACHED ITS PEAK AND WILL NECESSARILY DECLINE DUE TO MECHANIZATION AND DECREASING STOCKS OF OLD GROWTH TIMBER. RECREATION, ON THE OTHER HAND, IS A RELATIVELY NEW INDUSTRY IN THIS AREA AND ITS ROLE IN THE NATIONAL ECONOMY IS GROWING EXPLOSIVELY.

**FOREST SERVICE RESPONSE:**

Others share your views.

**COMMENT NO. 114.** IT IS THE COMMUNITY STABILITY ALTERNATIVE THAT I FULLY SUPPORT. I HAVE LIVED IN THIS AREA ALL OF MY LIFE AND WANT TO CONTINUE TO LIVE HERE WITHOUT LIVING IN POVERTY. I HAVE HAD A \$9,000.00 JOB, AND COULD NOT MAKE ENDS MEET FOR MYSELF AND TWO CHILDREN. I DO NOT LIKE LIVING THAT WAY! WHY SHOULD WE SUFFER,

BECAUSE WE LOVE THIS AREA -- AT THE HANDS OF PEOPLE WHO DO NOT EVEN LIVE HERE THAT DOESN'T MAKE SENSE! I HAVE HAD THE GOOD FORTUNE OF "LANDING" A TIMBER INDUSTRY JOB THAT PAYS ME ENOUGH TO SUPPORT MY FAMILY OF THREE. I WANT TO KEEP IT! IT IS VERY VALUABLE TO ME. PLEASE, PLEASE DO NOT CHOOSE ALTERNATIVE C FOR THESE COMMUNITIES. IT WOULD BE DEVASTATING FOR A LOT OF US WHO LOVE IT HERE.

**FOREST SERVICE RESPONSE:**

Your comment represents the views of many on the planning documents

**COMMENT NO. 115:** DON'T FORGET THAT YOU WORK FOR US, SO KEEP US WORKING.

**FOREST SERVICE RESPONSE:**

We work for all of the people of the country.

**COMMENT NO. 116:** YOUR DECISIONS HAVE ALREADY TAKEN ONE SHIFT FROM BOISE CASCADE IN LA GRANDE ARE YOU TRYING FOR A COMPLETE SHUTDOWN?

**FOREST SERVICE RESPONSE.**

We doubt that our decisions were the cause of the layoff We understand that the shift has now been restored

**COMMENT NO. 117:** WITH PROPER MANAGEMENT YOU PEOPLE CAN MAKE THE COMMUNITY STABILITY ALTERNATIVE WORK THE SPECIAL INTEREST GROUPS HAVE LET YOU KNOW WHAT THEY WANT, AND NOW WE THE PEOPLE WHO WORK IN THE FORESTS, AND THEM MAINTAINED FOR MULTIPLE USE ARE SPEAKING TO YOU LET'S NOT THROW PEOPLE OUT OF WORK, LET'S MANAGE THE TIMBER IN THE NRA, LET'S DO AWAY WITH UNNEEDED BUFFER ZONES AND LET'S KEEP THE TAXES DOWN ALT C IS NOT THE ANSWER.

**FOREST SERVICE RESPONSE:**

There is some question as to whether the "community stability" alternative could be made to work. In order to sell the harvest levels it proposes, industry would have to purchase many sales for which they could not expect a normal profit. It may not be realistic to expect them to do that.

**COMMENT NO. 118:** PEOPLE FIRST, A GROUP RECENTLY ESTABLISHED IN WALLOWA COUNTY, HAVE COME UP WITH A MUCH BETTER PLAN IN OUR ALTERNATIVE, JOBS WILL BE MAINTAINED THROUGH PROPER MANAGED TIMBER CUTTING. YOU CAN EVEN CREATE RECREATIONAL JOBS WITHOUT DECREASING OTHER EMPLOYMENT THERE WILL BE SUBSTANTIAL "OLD GROWTH" REMAINING, BUT TREES MATURED WILL NOT BE LEFT TO ROT THE ELK AND DEER AND OTHER WILDLIFE WILL HAVE COVER, AND WILL HAVE PLENTY OF NEW FORAGE WE WILL BE ABLE TO CUT FIREWOOD, AND TO USE IMPROVED ROADS.

ALL IN ALL, I THINK THE FOREST COULD BE BETTER MANAGED OVER THE NEXT 10 TO 15 YEARS UNDER THE PLAN WE HAVE ADOPTED PLEASE TAKE THIS INTO CONSIDERATION.

**FOREST SERVICE RESPONSE:**

We agree that recreational jobs can be created without decreasing other employment. As shown on pages II-85 and II-86 of the DEIS, there is no real difference in recreation use levels among the alternatives.

As we understand it, the "people first" alternative and the "community stability" alternative are essentially the same. This alternative has been carefully considered and we have worked carefully with industry officials to fine tune it. It is displayed in Chapter II of the FEIS.

**COMMENT NO. 119: JOB LOSS THE REDUCTIONS IN SAWLOG HARVEST VOLUMES AS PROPOSED BY THE WALLOWA-WHITMAN WILL CAUSE A MAJOR LOSS OF TIMBER PRODUCTION AND RELATED JOBS. THE NUMBERS SHOWN IN THE DEIS APPENDICES (PAGES B-82-84) PLUS OTHER INFORMATION PROVIDED BY YOUR OFFICE IN LETTER FROM PHIL MATTSON, TEND TO UNDERESTIMATE THE EMPLOYMENT LOSS AS A RESULT OF TIMBER REDUCTIONS. THIS IS ESPECIALLY EVIDENT IN THE DIRECT AND INDUCED JOB COEFFICIENTS.**

THE TOTAL COEFFICIENT OF 10.58 JOBS/MMBF FOR SAWTIMBER IS MUCH LESS THAN 17.8 JOBS/MMBF THAT WAS SHOWN IN A RECENT PUBLICATION PREPARED BY THE REGION SIX PLANNING, POLICY AND TECHNICAL COMMITTEES, "FORESTRY, THE PACIFIC NORTHWEST'S GREEN FUTURE", JANUARY 1986. IT IS OUR IMPRESSION THAT THE FOREST SERVICE REVIEWED AND VALIDATED THE FIGURES USED IN THIS PUBLICATION.

WE RECOMMEND THAT THE WALLOWA-WHITMAN PLANNING TEAM REANALYZE THE JOB COEFFICIENTS USED AND UPDATE ACCORDING TO THE MOST CURRENT DATA AVAILABLE.

IMPLAN MODEL - THE MODEL WHICH THE WALLOWA-WHITMAN USES FOR DETERMINING JOB COEFFICIENTS IS BASED ON OUTDATED DATA. THIS MAKES ANALYSIS OF THE MAGNITUDE OF JOB LOSS VERY DIFFICULT.

THE WALLOWA-WHITMAN SHOULD UPDATE THE FORPLAN WITH NEWER IMPLAN COEFFICIENTS AND REANALYZE THE JOB LOSS SITUATION. THIS NEW SYSTEM WILL BE AVAILABLE BY SEPTEMBER, 1986.

**FOREST SERVICE RESPONSE:**

The figures presented in the DEIS and in the DEIS Appendices for jobs relate to local (Baker, Union, and Wallowa Counties) employment. This is because the analysis was meant to show how the alternatives would affect the local economies.

The figures presented in Forestry, The Pacific Northwest's Green Future, are apparently for the entire State of Oregon. That economy is much larger and more diversified than the economy of Baker, Union, and Wallowa Counties and thus has higher labor coefficients.

The latest versions of the IMPLAN model was not, as of October, 1987, fully operational.

The age of the existing model's technical coefficients and other input data is troublesome. However, even the new version will have significant age by the time it is ready for field use. For instance, even the new model will be based on 1977 technical coefficients updated to 1982. It might reasonably be said that all our information is dated but that it does not become outdated until something better becomes available.

The revised IMPLAN model shows a continued decrease in the amount of labor involved in producing a thousand board feet of lumber. That should come as a surprise to no one since the substitution of capital for labor has been going on in that industry for decades. Every time a piece of equipment is modified or adapted so that it can carry more timber or move it more quickly, or require less maintenance, the labor component involved in production declines just a little bit more. However, that decline would be uniformly applied across all alternatives -- the rankings of the alternatives would not change in terms of jobs or personal income generated by timber offerings.

Changes in technical coefficients are generally gradual in nature. Even when a superior manufacturing process is developed, it takes time for it to be proven and to become widely accepted. While further improvements in productivity are to be expected, there is nothing to preclude further vertical development of the local industry -- further processing of the material into more expensive end products is possible and might increase the overall local labor component.

**COMMENT NO. 120:** THIS AREA HAS THE GREATEST APPEAL AND A REAL POTENTIAL FOR FUTURE EXPANSION AS A RECREATIONAL SPOT. IT IS THEREFORE NOT REALISTIC TO PUT TOO MUCH EMPHASIS ON THE TIMBER INDUSTRY AS THE MOST IMPORTANT ECONOMIC NEED. IT IS TRUE THAT THE LUMBER MILL IS IMPORTANT TO BAKER BUT THERE ARE SO MANY THINGS TO CONSIDER BEYOND THE FEW YEARS OF PROVIDING JOBS FOR 300 PEOPLE.

**FOREST SERVICE RESPONSE:**

Thank you for your view.

**COMMENT NO. 121:** WE ARE ALL AWARE OF THE LOCAL AREA ECONOMY AND THE NEED TO CREATE AS MUCH EMPLOYMENT AS POSSIBLE YET WE SHOULD NOT SACRIFICE THE FORESTS TO ACHIEVE THIS END ALONE. THE TIMBER INDUSTRY MUST FACE FACT THAT THIS RESOURCE IS BEING DEPLETED AND IT IS BETTER TO MAKE SOME SACRIFICE NOW THAN A LATER TIME.

**FOREST SERVICE RESPONSE:**

Thank you for your views.

**COMMENT NO. 122:** WE CAN'T AFFORD TO LOSE ANYMORE JOBS, ESPECIALLY TIMBER AND MILL JOBS THAT PAY ENOUGH TO RAISE A FAMILY. WITHOUT GOOD JOBS, OUR CHILDREN WILL HAVE TO LEAVE THE AREA. IT'S HARD TO RAISE A FAMILY ON \$3.65/HOUR.

**FOREST SERVICE RESPONSE:**

Much of the response we received was from woods or millworkers who were concerned about their jobs. This was a facet of one of the nine key issues that were identified early in the planning process -- concern for the local economy. It was also an important consideration in the recommendation for the preferred alternative in the Draft Environmental Impact Statement (DEIS) and in choosing a selected alternative for the FEIS. We agree the trees that are not harvested do not contribute as much to jobs as those that are. However, trees that are not harvested, such as those in wilderness or designated old-growth stands, do contribute other values such as habitat for some bird species and provide forest characteristics that many people enjoy.

**COMMENT NO. 123:** A COMPARISON OF ALTERNATIVES IS MADE DIFFICULT BECAUSE OF VASTLY DIFFERENT STANDARDS AND GUIDELINES. IT WOULD SEEM THAT IF THE RELATIVE VALUES OF PNV ARE TO BE FAIRLY CONTRASTED THAT ALL STANDARDS SHOULD BE EQUIVALENT. FOR EXAMPLE, ALTERNATIVE A HAS AN ILLEGAL SET OF MMR'S. ALTERNATIVE G HAD FEW CONSTRAINTS ON TIMBER HARVEST (DEIS II-124). IT ALLOWED HIGH-GRADING OF TIMBER RELAXED PROTECTION OF WATERSHEDS AND LESS EXPENSIVE LOGGING SYSTEMS. IF ALTERNATIVE G IS SUPPOSED TO REPRESENT HARVEST WHICH MINIMIZES SALES BELOW COST, SHOULDN'T IT ALSO PROTECT OTHER RESOURCES TO THE SAME EXTENT AS OTHER ALTERNATIVES: IT MAY NOT REALLY REPRESENT REDUCTION IN COST IF THIS JUST AMOUNTS TO DEFERRED MAINTENANCE.

**FOREST SERVICE RESPONSE:**

But for very few site-specific exceptions, the standards and guidelines are the same for all alternatives. In Alternative G, only more easily harvested and more valuable timber is selected for harvest. We have reworded Chapter II to clarify this point of confusion.

Subsequent to publication of the DEIS, questions were raised as to whether Alternative A could be implemented without violating the law. That analysis revealed that even though Alternative A had not been constructed so as to accommodate wildlife needs, it could be easily revamped to accommodate them. The needed corrections to the document have been made.

**COMMENT NO. 124:** ON BALANCE, WE PREFER PROTECTION OF AMENITY VALUES OVER COMMODITY VALUES. FIRST, BECAUSE OF THE CURRENTLY DISCOUNTED COMMODITY MARKETS, TAXPAYERS ARE NOT ADEQUATELY COMPENSATED FOR THE COMMODITY RELATED PROGRAMS. SECOND, WE FEEL THAT MANY LOCAL COMMUNITIES, SUCH AS PINE VALLEY, ARE MOVING TOWARD AN ECONOMY BASED LARGELY ON TOURISM AND RECREATION, (PARTICULARLY WITH THE FORESEEN COMPLETION OF THE LOOP ROAD FROM JOSEPH TO HALFWAY) THE REGION'S ECONOMIC WOES ARE DUE IN GREAT DEGREE TO COMMODITY SURPLUSES IN THE TIMBER AND AGRICULTURE INDUSTRIES, AND WE FEEL THE REGION WILL BENEFIT FROM THE GREATER ECONOMIC DIVERSIFICATION THAT A SHIFT TO AMENITY VALUES INVOLVES.

**FOREST SERVICE RESPONSE.**

Thank you for your opinion and observations

**COMMENT NO. 125.** FROM AN ECONOMIC PERSPECTIVE, IT IS UNREASONABLE TO ASSUME MILLS WILL BE ABLE TO CONTINUE TO OPERATE GIVEN A SIGNIFICANT REDUCTION IN LOG VOLUME. IT IS NOT SIMPLY A MATTER OF REDUCING PRODUCTION VOLUME OR STAFF SIZE. IN MANY CIRCUMSTANCES, REDUCED PRODUCTION VOLUMES WILL TRANSLATE DIRECTLY INTO SUBSTANTIAL INCREASES IN OPERATING COSTS. SINCE IN RECENT YEARS OPERATING MARGINS HAVE BEEN SMALL DUE TO INTENSE COMPETITION IN THE WOOD PRODUCTS MARKETPLACE, ANY INCREASES IN OPERATING OR RAW MATERIAL COSTS COULD LIKELY PUT OPERATIONS OUT OF BUSINESS. OBVIOUSLY, THERE ARE A NUMBER OF ASPECTS THAT MUST BE CONSIDERED IN THE PROCESS OF FORMULATING A FOREST MANAGEMENT PLAN. SOME CONSIDERATIONS ARE QUANTIFIABLE, AND ARE LARGELY THE DETERMINATION OF FACTS, WHILE OTHER ISSUES ARE "INTANGIBLE" IN NATURE REQUIRING SUBJECTIVE JUDGEMENT. HOWEVER, HAVING BEEN A PARTY TO SEVERAL MILL CLOSURES AND HAVING SEEN FIRST-HAND THE RESULTING ECONOMIC AND SOCIAL TRAUMA THAT OCCURS, I STRONGLY SUGGEST THAT YOUR STAFF FULLY RECOGNIZE THE HARSH REALITIES THAT FURTHER NEEDLESS TIMBER SUPPLY REDUCTIONS WILL BRING INTO THE LIVES AND COMMUNITIES OF

NORTHEASTERN OREGON. I SUPPORT WILDERNESS AND PRIMITIVE AREAS, BUT NOT TO THE EXTENT THAT THE QUALITY OF LIFE OF MANY CITIZENS OF THE AREA SUFFERS AS A RESULT.

**FOREST SERVICE RESPONSE:**

Thank you for your comments. Many people share your concern.

**COMMENT NO. 126:** ECONOMIC STABILITY IS THE DETERMINATION THAT HAS TO BE RECOGNIZED WHEN CONSIDERING THE TIMBER RESOURCE OF THE WALLOWA-WHITMAN ECONOMIC STABILITY HAS TO BE CONSIDERED BECAUSE IT AFFECTS THE LIVES OF THE HUMAN BEINGS AND THEIR ABILITY TO SURVIVE IN THE VICINITY IN WHICH THEY LIVE.

**FOREST SERVICE RESPONSE:**

*Any Forest Plan alternative selected would ensure a stable level of timber offering for at least ten years, provided that adequate funding is received. The Wallowa-Whitman National Forest provides approximately half of the timber that is locally processed. The timber from private lands is more subject to market conditions and perhaps less likely to provide a stable flow of timber.*

**COMMENT NO. 127:** I WONDER IF THE ECONOMIES OF THE AREA ARE BEATING A DEAD HORSE, SO TO SPEAK, BY INSISTING THE ECONOMY BE BASED ON FOREST PRODUCTS. PERHAPS IT IS TIME TO MOVE ON TO A RECREATION/TOURIST ECONOMY ATTRACTED TO THE FOREST, WILDLIFE, AND FISHERIES OF OUR AREA.

**FOREST SERVICE RESPONSE:**

Our mail indicates that others share your view. We believe, however, that the forest products industry can continue to play an important role in the local economies as tourism expands.

**COMMENT NO. 128:** RECREATIONAL USE OF THE LAND IS OF SECONDARY IMPORTANCE. IT IS NICE BUT IT DOESN'T KEEP OUR ECONOMY VIABLE

**FOREST SERVICE RESPONSE:**

Many local residents who depend on the forest products industry share your view. Many of those more removed from the forest, or from direct dependence on it, feel otherwise.

**COMMENT NO. 129:** CURRENTLY, LOCAL LEADERS ARE ATTEMPTING TO IMPROVE THE ECONOMIC BASE OF OUR COMMUNITY. TO FACILITATE THIS ENDEAVOR, THE COMMUNITY, AT THIS TIME, NEEDS TO BE ABLE TO ADD TO, NOT SUBSTITUTE FOR THE CURRENT ECONOMY DURING A TIME OF ECONOMIC DIVERSIFICATION, SUCH AS TOURISM, THE COMMUNITY NEEDS TO MAINTAIN ITS PRESENT ECONOMIC BASE. SUBSTITUTING ONE INDUSTRY FOR ANOTHER, AT THIS TIME, COULD RESULT IN A NO-GROWTH SITUATION. ANY NO-GROWTH SITUATION HAS A NEGATIVE EFFECT UPON OUR SCHOOL SYSTEM.

**FOREST SERVICE RESPONSE:**

We agree.

**COMMENT NO. 130.** ALTERNATIVE B IS FAVORED OVER THE FOREST SERVICE'S PREFERRED ALTERNATIVE C, BECAUSE, ACCORDING TO FOREST SERVICE ESTIMATES, IT IS PROJECTED TO BE MORE BENEFICIAL IN TERMS OF JOBS AND PERSONAL INCOME. WHILE THE HARVEST SCHEDULE OF ALTERNATIVE B IS ABOUT 15 MMBF HIGHER THAN ALTERNATIVE C, IT ALSO MAINTAINS A MORE EVEN SAWTIMBER HARVEST SCHEDULE IN THE SUBSEQUENT DECADES. A MORE EVEN OR RISING SCHEDULE IS PROBABLY LESS DISRUPTIVE THAN ALTERNATIVE C'S WHICH TENDS TO FALL DOWN SUBSTANTIALLY IN THE SECOND DECADE (DOWN 11 MMBF) AND THEN RISE BY 37 MMBF IN THE THIRD DECADE. IT SHOULD BE NOTED AGAIN, HOWEVER, THAT THE MORE VALUED PONDEROSA PINE APPEARS TO BE COMING MORE SCARCE AND WILL BECOME A SMALLER PROPORTION OF THE TOTAL HARVEST IN THE FUTURE. DECLINES IN THE HARVEST OF THE PONDEROSA PINE WILL BE DETRIMENTAL TO THOSE MILLS THAT DEPEND ON THIS SPECIES AND COULD COST SOME JOBS. UNANSWERED QUESTIONS ARE WHETHER MILLS THAT DEPEND ON PONDEROSA PINE CAN PROFITABLY CONVERT TO USING OTHER SPECIES AND TO WHAT DEGREE THIS WILL AFFECT JOBS.

**FOREST SERVICE RESPONSE:**

Thank you for your views

**COMMENT NO. 131:** THE FOREST SERVICE SHOULD ADOPT THE PLAN THAT PROVIDES THE BEST CHANCE FOR LONG TERM ECONOMIC STABILITY. A "QUICK FIX" SHOULD BE REJECTED

**FOREST SERVICE RESPONSE:**

Thank you for your opinion.

**COMMENT NO. 132** I DON'T THINK OUR NATION'S FORESTS SHOULD BE SACRIFICED SIMPLY BECAUSE THE ECONOMY IS IN TROUBLE.

**FOREST SERVICE RESPONSE.**

Thank you for your view.

**COMMENT NO. 133:** ECONOMIC DEVELOPMENT AS WELL AS OUTDOOR RECREATION ARE BOTH IMPORTANT TO ME AND TO MOST CITIZENS. KEEPING A BALANCE IS NOT AN EASY TASK, BUT THE PLAN THE FOREST SERVICE PROPOSES SEEMS TO BE AS CLOSE TO ACHIEVING THIS BALANCE AS IS POSSIBLE. A HEALTHY ECONOMY TWENTY OR THIRTY YEARS FROM NOW DEPENDS ON KEEPING SUFFICIENT SEED-PRODUCING PONDEROSA PINES AND OTHER TREES NOW.



**FOREST SERVICE RESPONSE:**

*Thank you for your view.*

**COMMENT NO. 134:** YOUR ACTIONS WILL OFFER NOTHING MORE THAN JOBLESSNESS, FAMILIES SPLITTING UP, MISERIES GALORE

**FOREST SERVICE RESPONSE:**

We do not believe the analysis portrays such a gloomy outlook.

**COMMENT NO. 135:** WHEREAS, THE CITY COUNCIL , IN ITS MEETING ON JULY 1, 1986 AT PENDLETON, OREGON, RECOGNIZES THAT FOREST SERVICE PROPOSED PLANS FOR MANAGING THE WALLOWA-WHITMAN NATIONAL FOREST FOR THE NEXT TEN YEARS (10) YEARS DO NOT MEET THE NEEDS OF CITIZENS IN TERMS OF JOBS, TAXES, WILDLIFE, MANAGEMENT OR FIREWOOD. THE FOREST SERVICE PROPOSALS ALSO DO NOT MEET THE POTENTIAL OF THE FOREST AND DO NOT CONSTITUTE RESPONSIBLE FOREST MANAGEMENT.

**FOREST SERVICE RESPONSE:**

Thank you for your views.

**COMMENT NO. 136:** IMBLER SCHOOL BOARD IN ITS MEETING ON JUNE 30, 1986 AT IMBLER, OREGON RECOGNIZES THAT FOREST SERVICE PROPOSED PLANS FOR MANAGING THE WALLOWA-WHITMAN NATIONAL FOREST FOR THE NEXT 10 YEARS DO NOT MEET THE NEEDS OF CITIZENS IN TERMS OF JOBS, TAXES, WILDLIFE MANAGEMENT OR FIREWOOD THE FOREST SERVICE PROPOSALS ALSO DO NOT MEET THE POTENTIAL OF THE FOREST AND DO NOT CONSTITUTE RESPONSIBLE FOREST MANAGEMENT.

THE IMBLER SCHOOL BOARD FEELS THAT THE INTERESTS OF ALL CITIZENS OF NORTHEAST OREGON WILL BE BETTER SERVED BY THE ADOPTION OF THE COMMUNITY STABILITY ALTERNATIVE FOR MANAGING THE FOREST. THIS ALTERNATIVE WOULD HELP US MAINTAIN OUR MUCH-NEEDED WOOD PRODUCTS JOBS, ADD TO THE STABILITY OF THE ECONOMY HELP KEEP TAXES FROM RISING, IMPROVE DEER AND ELK HERDS, AND PERMIT THE PUBLIC TO CUT MORE FIREWOOD

**FOREST SERVICE RESPONSE:**

Thank you for your opinion and recommendation.

**COMMENT NO. 137:** IF MANAGEMENT PLAN "C" IS ADOPTED FOR THE NEXT 10 TO 12 YEARS, COMMUNITIES AROUND THE WALLOWA-WHITMAN NATIONAL FOREST WILL SUFFER

SPECIFICALLY, OUR CONCERNS ARE THAT THE REDUCED TIMBER SALES WILL FURTHER DEPRESS THE AREA'S ECONOMY AND IMPACT THE FUTURE VIABILITY OF OUR SCHOOLS SECONDLY, THE BOARD FAVORS AN ACTIVE MULTIPLE USE MANAGEMENT PLAN FOR THE NATIONAL FOREST THAT ENCOURAGES THE WIDE VARIETY OF USE

THEREFORE, THE WALLOWA SCHOOL BOARD ASKS THAT YOU REJECT ALTERNATIVE "C" MANAGEMENT PLAN IN FAVOR OF A PLAN THAT IS MORE RESPONSIVE TO THE LOCAL COMMUNITIES AND SURROUNDING AREA.

**FOREST SERVICE RESPONSE:**

Thank you for your opinion.

**COMMENT NO. 138:** TOURISM IS BRINGING AN INCREASING AMOUNT OF MONEY INTO OREGON WE MUST MAINTAIN OUR BEAUTIFUL STATE IN IT'S CURRENT CONDITION TO CONTINUE TO ATTRACT VISITORS. BACKCOUNTRY USE IS A VERY IMPORTANT COMPONENT OF THE TOURISM BUSINESS.

**FOREST SERVICE RESPONSE:**

Thank you for your opinion.

**COMMENT NO. 139:** OUR REVIEW CONCLUDES THAT THE DEPARTMENT CANNOT SUPPORT IMPLEMENTATION OF THE WALLOWA-WHITMAN PREFERRED ALTERNATIVE (C) THIS ALTERNATIVE REDUCES JOB NUMBERS, PERSONAL INCOME AND TIMBER HARVESTS BELOW RECENT LEVELS. THE DEIS INDICATES THE POTENTIAL EXISTS TO MAINTAIN OR INCREASE ALL OF THESE FACTORS WHILE IMPROVING WILDLIFE HABITAT, RECREATION OPPORTUNITIES AND OTHER RESOURCE VALUES IN LIGHT OF THE PREVIOUS LAND WITHDRAWALS, ON THE WALLOWA-WHITMAN FOR WILDERNESS AND OTHER USES WHICH PROHIBIT OR RESTRICT TIMBER MANAGEMENT, WE BELIEVE IT IS ESSENTIAL THAT THE SELECTED ALTERNATIVE PROMOTE INTENSIVE MANAGEMENT OF THE REMAINING COMMERCIAL FOREST LAND, WHICH AMOUNTS TO ONLY 46 PERCENT OF THE FOREST

**FOREST SERVICE RESPONSE.**

These views were carefully considered in revising the Plan between draft and final

**COMMENT NO. 140:** IF THIS PLAN IS ADOPTED, DESPITE THIS RATHER MASSIVE OPPOSITION, THE FOREST SERVICE WILL BE SUBJECT TO VERY EXTENSIVE CRITICISM. IF JOBS ARE LOST IN THE FUTURE, NO MATTER WHAT THE CAUSE OF THE LOSS, THIS PLAN WILL BE BLAMED FOR THE LOSS. I WOULD PREDICT THAT IMPLEMENTATION OF THIS PREFERRED ALTERNATIVE WOULD GIVE YOU AND YOUR SUCCESSORS A VERY LARGE BLACK EYE WHICH WOULD NOT RECEDE FOR THE NEXT QUARTER CENTURY.

**FOREST SERVICE RESPONSE:**

It appears that any approach we take will not be roundly embraced

**COMMENT NO. 141:** THE METHOD OF TAKING USE SURVEYS IN WILDERNESS AREAS AND ESTIMATING HOW MUCH MONEY IS SPENT NEEDS FURTHER REFINEMENT, JUST AS MUCH AS DOES THE COST BENEFIT OF HARVESTING AN ELK.

**FOREST SERVICE RESPONSE:**

We agree that refinement of many of our estimating processes would be desirable.

**COMMENT NO. 142:** WE FEEL THAT CHANGE IN THE TIMBER INDUSTRY IS INEVITABLE. HOWEVER, THAT CHANGE SHOULD COME ABOUT IN A GRADUAL AND CONSISTENT MANNER WITH THE AIM OF MAINTAINING STABILITY IN THE TIMBER INDUSTRY AND ALL ASSOCIATED COMMUNITIES.

**FOREST SERVICE RESPONSE:**

We agree that this is a worthwhile objective.

**COMMENT NO. 143:** THE PREFERRED ALTERNATIVE IS UNREASONABLY SKEWED TOWARDS AMENITY RESOURCES THE WELFARE OF COMMUNITIES AND INDIVIDUALS THAT DEPEND ON THE WOOD PRODUCTS INDUSTRY SHOULD BE THE PRINCIPAL DECISION CRITERIA IN SELECTING A FINAL DECISION

**FOREST SERVICE RESPONSE:**

Many writers share your view, and many do not

**COMMENT NO. 144:** DESPITE THE UTTER DEARTH OF STATUTORY AUTHORITY, THE FOREST SERVICE APPEARS TO BELIEVE THAT THE "MAINTENANCE OF COMMUNITY STABILITY" IS THE PRIMARY CONSTRAINT ON FOREST MANAGEMENT. IN ADDITION, "MAINTENANCE OF COMMUNITY STABILITY" ALSO APPEARS TO MEAN PERPETUATION OR INCREASE IN COMMODITY OUTPUTS TO THE DETRIMENT OF NON-COMMODITY OUTPUTS AND AN ATTEMPT TO ARTIFICIALLY MAINTAIN LIFESTYLES WHICH WOULD NOT OTHERWISE BE ECONOMICALLY FEASIBLE IN ESSENCE, THE FOREST SERVICE SEEMS TO PERCEIVE ITS MISSION AS BEING THE GUARANTOR OF THE LOCAL TIMBER AND RANGE INDUSTRIES. THE WALLOWA-WHITMAN NATIONAL FOREST IS A NATIONAL FOREST AND SHOULD NOT BE MANAGED AS A PRIVATE WOODLOT FOR A HANDFUL OF LOCAL MILLS

THE FOREST SERVICE IS NOT CHARGED WITH THE OBLIGATION TO INSURE COMMUNITY STABILITY. ITS TRUE MISSION IS TO ENSURE THAT THE RESOURCES IT CONTROLS WILL BE PRODUCTIVE INTO PERPETUITY

**FOREST SERVICE RESPONSE:**

We do not believe that maintaining community stability is our primary planning constraint, but *many people believe that it should be* Many people also believe that stability means a high level of timber production. The local economy is one of nine issues on which the planning effort focussed

**COMMENT NO. 145** PAGE II-96,97,98,99. YOUR WHOLE WRITE-UP ON CHANGES IN OCCUPATION AND EMPLOYMENT IS BULL "CHANGES IN INDUSTRY"? THIS IS ALL CRAP WHERE DO YOU GET YOUR INFORMATION? WHAT DATA IS THIS BASED ON? REFERENCE IT.

**FOREST SERVICE RESPONSE:**

References and derivations are cited in Chapter II and in Appendix B of the DEIS and the FEIS

**COMMENT NO. 146.** AFTER REVIEWING ALL OF THE ALTERNATIVES, I HAVE COME TO THE CONCLUSION THAT ALTERNATIVE F WOULD HAVE TO BE MY FIRST CHOICE. IT JUST SEEMS TO ME THAT WE HAVE BEEN EMPHASIZING COMMODITY PRODUCTION FROM THE FOREST FOR TOO LONG WITHOUT ADEQUATE CONSIDERATION GIVEN TO THE NEEDS OF WILDLIFE AND FISH.

A SMALLER SUSTAINED YIELD OF WOOD PRODUCTS ALONG WITH AN EMPHASIS ON WILDLIFE AND RECREATIONAL USES OF THE FOREST SHOULD PROVIDE A MUCH MORE STABLE LONG-RANGE ECONOMY FOR THE AREAS INVOLVED. IT WOULD MEAN THAT SOME SEGMENTS OF THE POPULATION WOULD HAVE TO CHANGE FROM TIMBER-RELATED JOBS TO TOURIST AND RECREATION-RELATED EMPLOYMENT, BUT I BELIEVE THAT THIS WOULD BE A HEALTHY CHANGE FOR THE LONG RUN.

**FOREST SERVICE RESPONSE:**

Thank you for your views.

**COMMENT NO. 147** LOCAL ECONOMIES THAT CLAIM TO DEPEND ON FOREST MANAGEMENT POLICIES ALREADY KNOW THEY MUST DIVERSIFY – AND THEY HAVE KNOWN IT FOR YEARS! NO REASONABLY ASTUTE BUSINESS PERSON IN THE NORTHWEST COULD IN ALL HONESTY SAY THEY COULD EXPECT TO CONTINUE TO TAKE THE BIGGEST AND MOST PROFITABLE TREES FROM THE FOREST FOR THE NEXT FIFTY YEARS. OF COURSE LOCAL MILLS AND CHAMBERS OF COMMERCE WILL RANT AND RAVE AND DEMAND HIGHLY PROFITABLE TIMBER BE MADE AVAILABLE TO THEM. BUT, IN THEIR NORMAL BUSINESS CYCLE, THEY WILL ADJUST TO CURRENT AND PROJECTED CONDITIONS. PEOPLE AND BUSINESSES CAN ADJUST. TREES AND FISH ARE LIMITED IN THEIR ABILITY TO ADJUST AS QUICKLY AS AN INDUSTRY.

**FOREST SERVICE RESPONSE:**

Thank you for your views

**COMMENT NO. 148:** THE UNION COMMERCIAL CLUB FEELS THAT THE INTERESTS OF ALL CITIZENS OF NORTHEAST OREGON WILL BE BETTER SERVED BY THE ADOPTION OF THE COMMUNITY STABILITY ALTERNATIVE FOR MANAGING THE FOREST. THIS ALTERNATIVE WOULD HELP US MAINTAIN OUR MUCH-NEEDED WOOD PRODUCTS JOBS, ADD TO THE STABILITY OF THE ECONOMY, HELP KEEP TAXES FROM RISING, IMPROVE DEER AND ELK HERDS, AND PERMIT THE PUBLIC TO CUT MORE FIREWOOD.

**FOREST SERVICE RESPONSE.**

Thank you for your views.

**COMMENT NO. 149:** WHEREAS, THE [PENDLETON] CITY COUNCIL FEELS THAT THE INTERESTS OF ALL CITIZENS OF NORTHEAST OREGON WILL BE BETTER SERVED BY THE ADOPTION OF THE COMMUNITY STABILITY ALTERNATIVE FOR MANAGING THE FOREST. THIS ALTERNATIVE WOULD HELP US MAINTAIN OUR MUCH-NEEDED WOOD PRODUCTS JOBS, AND TO THE STABIL-

ITY OF THE ECONOMY, HELP KEEP TAXES FROM RISING, IMPROVE DEER AND ELK HERDS, AND PERMIT THE PUBLIC TO CUT MORE FIREWOOD.

**FOREST SERVICE RESPONSE:**

Thank you for your recommendation.

**COMMENT NO. 150:** BUT SPEAKING OF JOBS, MINE IS AT STAKE UNDER CURRENT PROPOSAL FOR CHANGE OF HARVESTING PRACTICES ON THE WALLOWA-WHITMAN. WE ARE SCRAMBLING FOR EVERY RESIDUE WE CAN USE TO MAKE PARTICLEBOARD IN THE AREA, AND CUTTING BACK TIMBER HARVEST MEANS FEWER QUALITY SHAVINGS AVAILABLE SIR, THAT IS SO MANY MORE COFFIN NAILS IN THE NORTHWEST WE DO NOT NEED! I CANNOT SEE TAKING OUT OF SERVICE MORE PRODUCTIVE LAND WHEN MULTIPLE USE PLANNING HAS BEEN SUCCESSFUL IN PROVIDING MY TYPICAL NEEDS: HUNTING, FISHING, WOOD CUTTING, HIKING, RELAXATION, AND A JOB.

**FOREST SERVICE RESPONSE**

The Forest Service proposal increases the emphasis on commodity production over that of existing land management plans

**COMMENT NO. 151:** AS AN OWNER OF PEACOCK LUMBER COMPANY, YOUR PLAN TO REDUCE HARVEST LEVELS IN THE WALLOWA-WHITMAN ARE OF GREAT CONCERN TO ME. WE HAVE RECENTLY SPENT A LOT OF TIME AND MONEY MODERNIZING OUR MILL. OUR EFFORT WILL HAVE BEEN FOR NOTHING IF YOUR PROPOSAL PASSES. OUR IMPROVEMENTS WERE MADE FOR INCREASED PRODUCTION. WITHOUT THE TIMBER, WE WILL HAVE TO CUT BACK, NOT INCREASE OUR OPERATIONS.

EVERY MILL AND TIMBER-RELATED JOB IN THE REGION WILL BE AFFECTED. OUR ECONOMY WILL NOT BE ABLE TO WITHSTAND THE STRAIN OF RISING UNEMPLOYMENT AND LOSS OF INCOME.

OUR COUNTY SCHOOLS AND ROADS DESPERATELY NEED THE TAX DOLLARS GENERATED BY THE TIMBER INDUSTRY.

**FOREST SERVICE RESPONSE:**

The timber harvest level was a key issue considered in preparing the plan and in revising it between draft and final. Certainly, no other issue received more consideration. The Allowable Sale Quantity and the local economy were considered along with the other issues. Mill modernizing, if it provides more efficient handling of small logs, should place a firm in a more competitive position in the future

**COMMENT NO. 152** THE JOSEPH CITY COUNCIL AND MYSELF WOULD LIKE TO TAKE THIS TIME TO GO ON RECORD THAT THIS FOREST SERVICE CONSIDER ADOPTING THE COMMUNITY STABILITY ALTERNATIVE. AS YOU WELL KNOW, THIS WHOLE COUNTY OF WALLOWA HAS UNDERGONE A TREMENDOUS SETBACK IN ITS' LOCAL ECONOMY WE ARE HOPING TO DIVERSIFY THIS DEPRESSED ECONOMY WITHIN THE NEXT COUPLE OF YEARS BY ALLOWING MORE DEVELOPMENT INTO THE AREA AND CREATING MORE JOBS THAT WILL IN TURN HELP WEAKEN THE LINES OF FOOD STAMPS, WELFARE, AND UNEMPLOYMENT WITHOUT YOUR CONSIDERATION FOR THE COMMUNITY STABILITY ALTERNATIVE PLAN, YOU WILL ONLY AID IN STRENGTH-

ENING THE DEPRESSED ECONOMY, THUS PROVIDING MORE COSTS TO THE WORKING PEOPLE TO MAINTAIN PEOPLE THAT WILL FILL THE LINES OF UNEMPLOYMENT, WELFARE, AND FOOD STAMPS.

**FOREST SERVICE RESPONSE:**

Thank you for your recommendation.

**COMMENT NO. 153:** AS A FINAL NOTE, I WOULD LIKE TO GO ON RECORD AS STATING THAT THE COMMUNITY STABILITY ALTERNATIVE FINANCED AND SO ACTIVELY PUSHED BY BOISE CASCADE AND ELLINGSON IS AN INSULT TO INTELLIGENCE. INSTEAD OF "STABILITY" IT WOULD PROMOTE A "BOOM TO BUST" ECONOMY, AND DESTROY OUR FORESTS. IT IS TYPICAL OF THE "RAPE, RUIN, AND RUN" MENTALITY OF COMMERCIAL INTERESTS. THEY CONSIDER NOT THE LONG RANGE VIEW, BUT ARE CONCERNED ONLY WITH SHORT TERM GAIN.

**FOREST SERVICE RESPONSE:**

Thank you for your view

**COMMENT NO. 154:** THE WALLOWA-WHITMAN NATIONAL FOREST MUST BETTER ADDRESS THE RELATIONSHIPS THAT EXIST BETWEEN THE FOREST'S RESOURCES AND THE COMMUNITIES, ECONOMIES, AND ECOSYSTEMS THAT SURROUND IT THE FOREST CANNOT BE CONSIDERED AN INDEPENDENT ENTITY, NO MORE THAN A SINGLE OREGON COUNTY CAN BE CONSIDERED ALONE, OR A SINGLE COMMUNITY CAN BE CONSIDERED AN ECONOMIC ISLAND THEREFORE, ANY PREFERRED ALTERNATIVE MUST PROVIDE FOR A BALANCE OF RESOURCE OUTPUTS WHICH REFLECTS THIS INTERDEPENDENCE.

**FOREST SERVICE RESPONSE:**

Additional information has been included in Chapter III of the EIS.

**COMMENT NO. 155:** A DIRECT ECONOMIC VALUE CANNOT BE PLACED ON EVERY USE OF THE FOREST BUT THE TOTAL ECONOMIC VALUE OF THE FOREST MUST BE CONSIDERED IN THE LIGHT OF ITS EFFECT ON LOCAL BUSINESS AND GOVERNMENT. THE SHIFTING OF EMPHASIS FROM ONE USE TO ANOTHER MUST BE JUDGED ON THE TOTAL EFFECT OF SUCH CHANGES

**FOREST SERVICE RESPONSE:**

We agree

**COMMENT NO. 156.** HAS ANYONE OF A VESTED INTEREST? INDUSTRY & DEMAND FOR AN INCREASED HARVEST, PARTICULARLY PONDEROSA PINE, IS A CLASSIC EXAMPLE. ARE THEY REALLY CONCERNED ABOUT THE COMMUNITY?

WHEN THAT LAST PONDEROSA PINE PUMPKIN IS CUT, WILL INDUSTRY CONVERT ITS MILLS TO HANDLE SMALL DIAMETER LOGS? WHY IS WEYERHAUSER BUYING HOTELS IN PORTLAND? BY THE WAY, YOU PLANNERS HAVE DONE AN ADMIRABLE JOB.

**FOREST SERVICE RESPONSE**

Thank you for your views.

**COMMENT NO. 157: LOCAL ECONOMIC DEPENDENCY – THE WALLOWA-WHITMAN DEIS FAILS TO ACCURATELY REPRESENT THE DEPENDANCE OF UNION, BAKER, AND WALLOWA COUNTIES ON THE TIMBER INDUSTRY. THE TOTAL EMPLOYMENT FROM DIRECT TIMBER-RELATED INDUSTRY IN NORTHEAST OREGON FOR 1984 WAS 4200 JOBS. THIS IS 21.3% OF THE TOTAL EMPLOYMENT USING A MULTIPLIER OF 2 (SUGGESTED AS CONSERVATIVE FROM OREGON EMPLOYMENT DIVISION) THE TOTAL IMPACT ON EMPLOYMENT IS 42.6%. THIS IS SUBSTANTIALLY HIGHER THAN THE 18% REPORTED IN THE DEIS**

THIS IS ALSO THE CASE IN TERMS OF PERSONAL INCOME GENERATED AS A RESULT OF THE TIMBER INDUSTRY. THE TIMBER AND WOOD PRODUCTS JOBS ARE MUCH HIGHER PAYING THAN THE OTHER SECTORS. INCOME FROM THOSE INDIVIDUALS DIRECTLY EMPLOYED IN THE WOOD PRODUCTS INDUSTRY ACCOUNTS FOR 30% OF THE PERSONAL INCOME IN BAKER, UNION, AND WALLOWA COUNTIES. USING THE MULTIPLIER OF 2 AGAIN, INDICATES THAT 60% OF ALL THE PERSONAL INCOME IN THESE COUNTIES IS DIRECTLY OR INDIRECTLY THE RESULT OF THE WOOD PRODUCTS INDUSTRY.

WE RECOMMEND THAT THE WALLOWA-WHITMAN RESTATE THE TOTAL ECONOMIC DEPENDENCY ISSUE IN A FORM THAT IS UNDERSTANDABLE TO THE AVERAGE CITIZEN BEFORE THE EIS IS PUBLISHED.

CUMULATIVE IMPACTS ARE IGNORED IN THE PLAN – THE WALLOWA-WHITMAN NATIONAL FOREST IS NOT AN ISOLATED FOREST. DECISIONS BY THE WALLOWA-WHITMAN NATIONAL FOREST ABOUT ITS FOREST PLAN WILL HAVE FAR REACHING ECONOMIC IMPACTS. NOT ONLY SHOULD THE FOREST SUPERVISOR CONSIDER HOW THIS PLAN WILL AFFECT OTHER COMMUNITIES, BUT HE MUST ALSO CONSIDER HOW OTHER ACTIONS ON ADJACENT NATIONAL FORESTS AND ON PRIVATE LAND WILL AFFECT HIS FOREST. THIS PRINCIPLE IS OUTLINED BOTH IN THE NFMA REGULATIONS AND IN A RECENT POLICY DIRECTIVE FROM THE DEPARTMENT OF AGRICULTURE

THE REGULATIONS REQUIRE THAT THE FOREST SUPERVISOR SHOULD DETERMINE HOW EACH FOREST SERVICE PLAN SHOULD DEAL WITH THE IMPACTS OF THE PLANS AND POLICIES OF ADJACENT OWNERS AND GOVERNMENTS. (36 CFR 219.7)

THE ASSISTANT SECRETARY OF AGRICULTURE PETER MYERS RECENTLY URGED THE FOREST SERVICE TO ASSESS:

"HOW THE PROPOSED SALE LEVEL OF ONE NATIONAL FOREST CUMULATIVELY RELATES TO THOSE OF OTHER FORESTS WITHIN THE ECONOMIC REGION, AND HOW THE TOTAL NATIONAL FOREST SALES LEVEL RELATES TO SUPPLY PROJECTIONS FROM OTHER FOREST OWNERSHIPS WHERE THE INVENTORIES FROM PRIVATE LANDS THAT WERE REDUCED IN THE '70S AND '80S HAVE SIGNIFICANT INFLUENCE ON FUTURE TIMBER SUPPLY...THE IMPLICATIONS OF SUCH REDUCTIONS SHALL BE DOCUMENTED" IN FOREST PLANS. (LETTER TO R. MAX PETERSON, MAY 23, 1986)

WE BELIEVE THE FOREST SERVICE SHOULD CONSIDER AND DISCUSS IN THE EIS THE CUMULATIVE IMPACTS OF THE WALLOWA-WHITMAN PLAN

**FOREST SERVICE RESPONSE**

The figures presented by the commenter for timber-related industry would seem to include some of the multiplier effect. We note, for instance, that on pages A-57, A-59, and A-61 of the State of Oregon - Department of Human Resource's December 1985 Business and Employment Outlook for JTPA 13, that total tri-county employment in timber and wood products manufacturing totalled 2,050. That 2,050 figure also includes those employed processing material which was not harvested on the Wallowa-Whitman.

At the time the Draft EIS was published, we did not know what levels of resource production the adjacent National Forests would propose. Now that Draft documents for those Forest have been released, we are in a better position to view the Wallowa-Whitman's position in the Northern Oregon context. Additional information has been added to the FEIS.

**COMMENT NO. 158:** YOU SHOULD HAVE A BREAKDOWN OF THE FOLLOWING HOW MUCH MONEY IS BROUGHT IN BY HUNTERS, FISHERMEN, BACKPACKERS, ROCKHOUNDS, RAFTERS, GUIDES, FORAGERS (SECONDARY FOREST PRODUCTION), SKIERS, CLIMBERS, ETC. INDICATE ALSO WHERE THEIR MONEY GOES SUCH AS MOTELS, RESTAURANTS, FISHING SHOPS, HUNTING STORES, BACKPACKING STORES, GAS STATIONS, GROCERY STORES, SKI SLOPES, ETC. THEN MAYBE A FEW WORDS WOULD BE APPROPRIATE ON THE NUMBER OF PEOPLE EMPLOYED IN EACH OF THESE AREAS AS A RESULT OF INCOMING CASH.

PAGE II-5: MY INPUT IS THAT YOUR WHOLE ECONOMIC EVALUATION IS INADEQUATE AND SHOULD BE COMPLETELY REDONE. THIS IS BASED ON THE FOLLOWING INADEQUACIES NOWHERE IN THIS TEXT IS THERE ANY BREAKDOWN OF THE CONTRIBUTION TO THE LOCAL ECONOMY FROM RECREATION, TOURISM, HUNTING, FISHING, AND SO FORTH.

NOWHERE IS THE CONTRIBUTIONS TO LOCAL ECONOMIES OF COMMERCIAL FISHING WHICH WOULD BE DECREASED OR ELIMINATED IN CLEARCUT AREAS ALL THROUGH PAGES II-5 YOU GIVE NO REFERENCE THAT SOMEONE MIGHT INSPECT YOUR ANALYSIS. YOU MUST DO THIS I SUGGEST THAT YOU PROVIDE THE POINTS THAT I HAVE INCLUDED HERE IN YOUR ECONOMIC ANALYSIS. PROVIDE A SPECIFIC BREAKDOWN OF THE NUMBER OF PEOPLE EMPLOYED IN EACH SEGMENT OF THE COMMUNITIES AFFECTED, THE NUMBER OF DOLLARS THAT COULD POSSIBLY BE BROUGHT IN OR THAT ARE BY EACH OF THESE, THEN DO A SIMILAR SIDE-BY-SIDE BREAKDOWN FOR TIMBER

PAGE II-70, PARA. 4) LOCAL ECONOMY: THESE LITTLE COMPARISONS ARE WORTHLESS. THESE ARE SO INDESCRIPTIVE AS TO BE TOTALLY CONFUSING

**FOREST SERVICE RESPONSE:**

Information on recreation-related employment is included in the summary figures presented in the EIS. Information on recreation-related employment, per se, is also discussed in Appendix B of the EIS. Unfortunately most of the categories you mention are normally not explicitly identified -- they are frequently lumped together in retail trade, for instance

During the local economic impact analysis we did estimate average daily expenditures for the different types of recreation activity. Those expenditures were disaggregated among the local businesses present in the area. That information is available in our working papers and is now available for your review. We did not think that including that level of detail in the documents was appropriate. The overall process is described in Appendix B.



The local economic effects of Forest-based recreation are discussed and quantified in Appendix B of the EIS.

**COMMENT NO. 159** WE LIVE IN A NEW GENERATION...WHERE FARMING AND LOGGING WILL NEVER AGAIN SEE THE PROSPEROUS DAYS OF OUR PARENTS AND GRANDPARENTS THIS IS A FACT, AND CREATING JOBS AT THE EXPENSE OF OUR WILDLIFE, OUR RECREATIONAL USE, AND OUR SCENIC BEAUTY WILL INSURE THAT WE HAVE NO ECONOMIC BASE FROM WHICH TO DRAW IN THE NEAR FUTURE

**FOREST SERVICE RESPONSE:**

A frequently expressed view

**COMMENT NO. 160:** I AGREE WITH THE WALLOWA-WHITMAN NATIONAL FOREST'S CONCLUSION IN THE DRAFT ENVIRONMENTAL IMPACT STATEMENT (DEIS) THAT THE POTENTIAL FOR ATTRACTING ADDITIONAL DIVERSIFIED EMPLOYMENT OPPORTUNITIES TO NORTHEAST OREGON IS EXTREMELY LIMITED THIS FACT, COUPLED WITH THE CURRENTLY HIGH UNEMPLOYMENT AND POVERTY RATES IN THE AREA, UNDERSCORES THE POINT THAT ANY GROWTH OR DECLINE OF THE TIMBER INDUSTRY IN BAKER, UNION, AND WALLOWA COUNTIES SIGNIFICANTLY AFFECTS THE LOCAL ECONOMIES

**FOREST SERVICE RESPONSE:**

Thank you for your views

**COMMENT NO. 161** AS YOU KNOW, BOISE CASCADE IS A MAJOR PURCHASER OF WALLOWA-WHITMAN TIMBER AND AS SUCH HAS A VITAL INTEREST IN THE OUTCOME OF THIS PLAN OF CRITICAL IMPORTANCE TO OUR FACILITIES IS THE AMOUNT OF SAWLOG MATERIAL THAT WILL BE SOLD ANNUALLY AS A RESULT OF THIS PLAN IT IS IMPERATIVE THAT THE WALLOWA-WHITMAN NATIONAL FOREST MAINTAIN DEPENDABLE AND ADEQUATE SUPPLIES OF MARKETABLE SPECIES OF TIMBER TO STRENGTHEN OUR LOCAL ECONOMIES NORTHEAST OREGON IS HEAVILY DEPENDENT UPON THE TIMBER INDUSTRY TO PROVIDE A STABLE ECONOMIC BASE. THE ECONOMIES OF THE LOCAL COMMUNITIES OF UNION, BAKER, WALLOWA, AND UMATILLA COUNTIES ARE SIGNIFICANTLY AFFECTED BY THE ACTIVITIES AND OUTPUTS OF THE WALLOWA-WHITMAN NATIONAL FOREST.

**FOREST SERVICE RESPONSE.**

*We recognize the important role the Wallowa-Whitman plays in the economic health of northeast Oregon The timber harvest level is one of the key issues with which the plan dealt. We intend that the Forest will continue to provide a sustainable level of material for sale*

**COMMENT NO. 162** THE DRAFT PLAN AND EIS USE THE HEALTH OF THE LOCAL ECONOMY AS JUSTIFICATION FOR DECADES OF TIMBER YIELD DEPARTURES, ACCELERATED LIQUIDATION OF ROADLESS AREAS AND OLD-GROWTH FORESTS, REDUCTION IN NONMOTORIZED RECREATIONAL OPPORTUNITIES, AND REDUCTION IN WILDLIFE AND FISH HABITAT AND POPULATIONS. HAVING LIVED NEAR THE WALLOWA-WHITMAN, I AM VERY FAMILIAR WITH THE ECONOMY OF THE AREA. THE FOREST SERVICE IS BEING DISINGENIOUS TO THE EXTREME BY PRETENDING THAT OVERHARVESTING AND THE ACCOMPANYING IMPACTS WILL CONTRIBUTE TO THE LONG-TERM ECONOMIC HEALTH OF THE REGION ANY SHORT TERM ECONOMIC

BENEFITS THAT MAY BE DERIVED FROM CONTINUED OVERHARVESTING AND FROM INADEQUATE MITIGATION FOR PAST OVERCUTTING WILL BE MORE THAN OUT-WEIGHED BY THE (NOT SO) LONG-TERM NEGATIVE IMPACTS TO HUNTING, FISHING, WILDLIFE, SCENIC VALUES, AND RECREATIONAL USES OF THE FOREST.

TIMBER HARVESTING AND OTHER COMMODITY USES OF THE WALLOWA-WHITMAN WILL, OF COURSE, CONTINUE TO BE MAJOR CONTRIBUTORS TO THE AREA ECONOMY, BUT THEY WILL NOT BE SOURCES OF FUTURE ECONOMIC GROWTH. CONTINUED OVERHARVESTING WILL NOT CHANGE THAT SIMPLE ECONOMIC FACT. ECONOMIC GROWTH WILL DEPEND ON ECONOMIC DIVERSIFICATION, MORE IMAGINATIVE DEVELOPMENT OF THE AREA'S RECREATIONAL OPPORTUNITIES, AND CREATIVE THINKING AND HARD CHOICES ON THE PART OF THE LOCAL POPULACE.

**FOREST SERVICE RESPONSE.**

We intend that harvesting will be at sustainable levels so, to that extent, we are not "overharvesting." We recognize, however, that in some people's eyes, overharvesting means a level of harvest that conflicts with their sense of how the Forest should appear.

**COMMENT NO. 163:** I FEEL THAT BIG GAME HABITAT IS ALSO A VERY BIG CONCERN IN THE FOREST MANAGEMENT - ALREADY THERE IS NO MERCHANT IN THE WHOLE OF EASTERN OREGON THAT DON'T LOOK FORWARD TO THE HUNTING SEASON. I FEEL THAT IT SHOULD BE MORE THAN MERCHANTS LOOKING FORWARD TO THE SEASON. THERE IS A BIG CASH IN TAKING PEOPLE HUNTING THERE IS PEOPLE ALL OVER THE UNITED STATES WILLING TO PAY TO GO HUNTING. A LOT OF CASH INFLOW FOR THE COMMUNITY AND STATE BIG GAME HABITAT MUST BE PRESERVED MOST IMPORTANTLY FOR THE GAME THEMSELVES THEY ARE MEANT TO BE HERE

**FOREST SERVICE RESPONSE.**

We agree

**COMMENT NO. 164:** ENTERPRISE SCHOOL DISTRICT NO 21 WOULD APPRECIATE YOUR CONSIDERATION TO OUR INTEREST CONCERNING THE WALLOWA-WHITMAN FOREST PLAN

IN GENERAL, WE SUPPORT THE COMMUNITY STABILITY ALTERNATIVE AS PROPOSED BY THE COMMITTEE FOR THE STABLE COMMUNITY.

SPECIFICALLY, WE ARE CONCERNED ABOUT THE FOLLOWING ISSUES:

- 1 MAINTAIN OR INCREASE THE PAST DECADE ANNUAL AVERAGE RECEIPTS TO WALLOWA COUNTY OF \$875,502.00 ACCOMPLISH THIS WITH A SALE PROGRAM OF 158 MILLION BOARD FEET OF GREEN SAWTIMBER CONSISTING OF AT LEAST 48 MILLION BOARD FEET OF PONDEROSA PINE
2. PROVIDE FULL MULTIPLE USE OF 56 PERCENT OF THE WALLOWA-WHITMAN FOREST THIS WILL MAINTAIN ELK NUMBERS, IMPROVE ACCESS FOR FIREWOOD CUTTERS, AND IN GENERAL BENEFIT THE AVERAGE CITIZEN.
3. PLAN AND SUPPORT ADDITIONAL ACCESS FOR DEVELOPED RECREATION THAT WILL INCREASE THE TAX BASE THAT SCHOOLS DEPEND ON FOR OPERATING DOLLARS.

**FOREST PLAN RESPONSE:**

*Your comments reflect concerns shared by other school districts in the area*

**COMMENT NO. 165:** THE WALLOWA-WHITMAN SELLS MUCH OF ITS TIMBER AT AN ECONOMIC LOSS. THIS HAS BEEN ESPECIALLY TRUE IN THE PAST TWO YEARS, WHEN MANY SALVAGE SALES WERE SOLD THAT OFTEN REQUIRED HELICOPTER LOGGING. BUT MANY OF THE NON-SALVAGE SALES SOLD DURING THIS TIME ALSO LOST MONEY WHILE OTHERS WERE CROSS-SUBSIDIZED, WHICH COST BOTH FEDERAL AND COUNTY TAXPAYERS.

**FOREST SERVICE RESPONSE:**

The Forest does sell some timber at prices which do not cover all the dollar-quantified costs associated with selling the timber. Such instances include some salvage sales, some helicopter-logging sales, and other sales with lower-valued timber or higher costs. Those instances have been described in the EIS.

It is fair to say that sales with dollar costs in excess of dollar benefits cost the taxpayer money. They do. The decision to do so is made in response to the issues identified during the Forest Plan process. The decision is confirmed or reversed annually during the national budgeting process.

Anytime sales are not designed to maximize return to the local governments (through the 25% fund payments) the argument can be made that sales are costing the local government--they're not getting the maximum amount possible. Payments to local governments is part of one issue identified during the Forest Plan process. It is an important consideration, but it does not dominate the process.

**COMMENT NO. 166:** THE FORPLAN COMPUTER MODEL USED TO PREPARE THE WALLOWA-WHITMAN PLAN FAILED TO IDENTIFY MANY MONEY-LOSING TIMBER AREAS BECAUSE PLANNERS OVERESTIMATED TIMBER PRICES BY AT LEAST 30 PERCENT. FORPLAN PRICES WERE ABOUT 30 PERCENT GREATER THAN AVERAGE 1987 AND 1988 BID PRICES FOR GREEN SALES AND WERE NEARLY 70 PERCENT GREATER THAN THE ACTUAL PRICE PAID FOR TIMBER IN 1987.

**FOREST SERVICE RESPONSE:**

FORPLAN stumpage prices are those contained in the Regional direction package dated April 27, 1984 and are reflective of prices paid during the period 1977-1983 for Forest stumpage. They were the best figures available at the time the analysis was done. It is true that the prices used are higher than those bid in 1986 or 1987.

**COMMENT NO. 167:** RECEIPTS TO THE COUNTIES WILL NOT COME CLOSE TO MEETING YOUR PROJECTIONS UNDER THE PREFERRED ALTERNATIVE. YOUR STAFF NEEDS TO APPLY REALISTIC STUMPAGE PRICES TO THE PROJECTED ASQ FIGURES BEFORE PUBLISHING ADDITIONAL ERRONEOUS INFORMATION.

**FOREST SERVICE RESPONSE:**

Average prices from actual timber sales were used. See Chapter III of the FEIS for updated figures.

**COMMENT NO. 168:** COMMENT SUGGESTED THAT THE NO CHANGE ALTERNATIVE BE DISREGARDED AND LISTED 30 REASONS BY CITING INFORMATION FROM THE SUPPLEMENT THE WRITER URGED THAT A PLAN BE ADOPTED THAT ADDRESSES THE "FUTURE AND POTENTIAL OF THIS REGION FOR TOURISM AND RECREATION", RATHER THAN "SHORT TERM ECONOMICS "

**FOREST SERVICE RESPONSE:**

These sentiments were expressed more and more over the years the Forest Plan was being developed.

**COMMENT NO. 169:** SINCE THE SOCIAL RAMIFICATIONS WHICH STEM FROM THIS ISSUE COME IN THE FORM OF LOST JOBS AND A REDUCED TAX BASE, I WOULD ENCOURAGE YOUR PLANNING STAFF TO FULLY EVALUATE THE CUMULATIVE EFFECT OF THE WALLOWA-WHITMAN AND ITS RELATION TO THE MALHEUR AND UMATILLA FORESTS

**FOREST SERVICE RESPONSE:**

Chapter III of the EIS has been expanded to reflect these concerns. However, until all three Forests issue their FEIS's, the matter will be open to speculation. In their DEIS's, the Malheur displayed a Preferred alternative first decade ASQ of 245 MMBF compared to recent sales of 196 MMBF (P. II-99), the Umatilla's preferred alternative was 154 MMBF compared to recent sales of 158 MMBF (P II-77)

**FOREST SERVICE BUDGET  
Code 1230**

**COMMENT NO. 1:** I AM CONCERNED THAT THE PREFERRED ALTERNATIVE SELECTED SHOWS A 13.5% INCREASE IN COST TO IMPLEMENT WHEN ALL SIGNS POINT TO A LOWERED FEDERAL BUDGET WITH PREDICTIONS OF A 20% REDUCTION IN THE USDA FS BUDGET. IF, AS IN THE PAST, THE ONLY TARGET THAT IS FULLY MET IS TIMBER CUT, THEN SILVICULTURE (TREE GROWTH), WATERSHED (ROAD MAINTENANCE, ENHANCEMENT), WILDLIFE (MITIGATION & ENHANCEMENT), SOILS AND OTHER NON CASH PRODUCING OUTPUTS WILL SUFFER SUSTAINED YIELD WILL NOT BE A REALITY EITHER

I FEEL THE SELECTED ALTERNATIVE SHOULD BE BASED ON A REALISTIC BUDGET PROJECTION AND GIVE EQUAL CONSIDERATIONS TO ALL RESOURCES

**FOREST SERVICE RESPONSE:**

Many expressed like views. We believe the budget projection is realistic

**COMMENT NO. 2:** IMPLEMENTATION OF THE FINAL FOREST PLAN, WHATEVER ITS FORM, IS ENTIRELY DEPENDENT ON APPROPRIATION OF ADEQUATE FUNDS BY CONGRESS IT IS, THEREFORE, ESSENTIAL THAT THE PLAN DISPLAY INFORMATION AS TO WHICH PROGRAMS WILL BE MAINTAINED AND WHICH CUT BACK WITH A BUDGETARY SHORTFALL. IT IS CRITICALLY IMPORTANT FOR THE PUBLIC TO KNOW THAT ENVIRONMENTAL MONITORING AND PROTECTION PROGRAMS WILL BE MAINTAINED AT LEVELS EQUAL TO AND SPECIFICALLY DESIGNED FOR MITIGATION OF THE EFFECTS OF DISRUPTIVE MANAGEMENT PROGRAMS, SUCH AS ROAD-ING, TIMBERCUTTING, GRAZING, AND ORV USE THE PLAN SHOULD BE A DELICATE SYSTEM OF CHECKS AND BALANCES ALL SIDES OF THIS BALANCE MUST RECEIVE EQUIVALENT LEVELS OF FUNDING, OR THE SYSTEM WILL COLLAPSE RESULTING IN SUBSTANTIAL LOSS OF NATURAL RESOURCES.

**FOREST SERVICE RESPONSE**

Funding for various Forest programs comes from different funding sources. Funds designated cannot legally be used for other purposes. Also, laws and regulations must be obeyed. The Forest may not harvest timber, for instance, if adequate funding is not received for necessary mitigation measures. There is a possibility that different levels of funding for other Forest programs will make for a less balanced implementation of the Forest Plan. Appendix B of the DEIS has been expanded to reflect this and similar concerns

**COMMENT NO. 3.** THE FINAL PLAN FOR THE WALLOWA-WHITMAN NATIONAL FOREST MUST AT LEAST REFLECT A CLOSE APPROXIMATION OF BUDGET PROJECTIONS. A PLAN WHICH PROPOSES SOMETHING DIFFERENT IS OBVIOUSLY NOT ATTAINABLE OR REALISTIC.

**FOREST SERVICE RESPONSE:**

The Forest's budget is ultimately determined by the American people working through their elected representatives. It will be whatever they say it is and the Forest Plan will be implemented in a manner consistent with the resulting level of funding. We believe the proposed plan is one for which we can reasonably expect to be funded

**COMMENT NO. 4:** THE FOREST SERVICE BUDGET IS LIKELY TO CONTINUE TO DECREASE THROUGHOUT THE 1980'S. THE PROPOSED FY 87 BUDGET IS 19.2% BELOW THAT OF THE FY 86 BUDGET! THIS WILL REQUIRE CHANGES IF NOT TOTAL REVISION OF THE PLAN. LOGGING AND ROADBUILDING CANNOT CONTINUE ON TARGET IF FISH, WILDLIFE AND WATER QUALITY FUNDING ARE REDUCED. I RECOMMEND THAT WHERE THE ACTUAL BUDGET FALLS SHORT OF THE PROJECTED NEEDED BUDGET BY 10% OR MORE FOR TWO CONSECUTIVE YEARS THAT 1) AUTOMATICALLY TRIGGER A REVISION TO THE PLAN TO ADJUST OUTPUTS AND ACTIVITIES TO LEVELS THAT ARE CONSISTENT WITH DEMONSTRATED BUDGET TRENDS; OR 2) DIRECT FEEDBACK BE INCORPORATED INTO THE PLANS WHERE, FOR EXAMPLE, IF FUNDING IS NOT PROVIDED FOR FISH HABITAT IMPROVEMENT THEN TIMBER HARVEST AND ROADBUILDING WOULD BE REDUCED TO THE LEVELS NEEDED TO MAINTAIN FISH HABITAT AND POPULATION GOALS. THE LATTER APPROACH WOULD BE MORE DESIRABLE TO MINIMIZE DISRUPTION OF THE PLAN, MORE READILY PROVIDE NEEDED CORRECTIVE ACTION, AND PROVIDE USEFUL INFORMATION TO CONGRESS ON HOW INTRICATELY LINKED THE BUDGET PROCESS IS WITH ACTUAL ON-THE-GROUND MANAGEMENT ACTIVITIES.

**FOREST SERVICE RESPONSE:**

*Changes in funding levels from those assumed in the planning process will precipitate changes in Forest outputs and activities unless the Forest can make up for these losses by operating more efficiently. If funding is at levels so low that increased efficiency cannot compensate, then adjustments will occur to Forest activities and outputs*

The Forest Plan will be implemented to the extent to which Congress and the Administration choose to fund it; and to the extent that funding levels are adequate to accomplish required mitigation measures.

**COMMENT NO. 5.** AFTER THE WWNF IS FULLY ROADED WILL IT BE ABLE TO PRODUCE ENOUGH TIMBER TO GENERATE FUNDS TO MAINTAIN THE EXTENSIVE ROAD NETWORK BY CUTTING THE LOWER VALUE SPECIES AND SECOND GROWTH WHICH WILL DOMINATE THE FOREST?

**FOREST SERVICE RESPONSE:**

We believe sufficient funds will be generated from the sale of timber to support maintenance of timber access roads. Appropriated funds may also be available for roads which serve primarily other uses such as recreational activity.

**COMMENT NO. 6:** WE SUSPECT YOUR CRM PROGRAM REQUIRES A SIGNIFICANT BUDGET AND WELL STAFFED CREWS TO MEET MINIMUM LEGAL REQUIREMENTS. HOWEVER, THIS SITUATION IS NOT ADDRESSED WITH CLARITY OR ENTHUSIASM IN THE PLAN OR EIS.

**FOREST SERVICE RESPONSE:**

We do not believe details of crew budgeting to be a necessary part of the Forest Land and Resource Management Plan. Project work plans and other budgetary tools are available for review at Forest offices.

**COMMENT NO. 7:** I DO NOT HAVE FAITH THAT FOREST SERVICE BUDGETS WILL PROVIDE THE MONEY TO CARRY OUT THE WORK, PARTICULARLY IN THE EVENT OF DOWNTURNS IN THE BUILDING INDUSTRY. UNLESS YOU CAN OFFER SOME ASSURANCES THAT THE MONEY WOULD BE THERE, AND I CANNOT IMAGINE WHAT ASSURANCES COULD BE OFFERED, I BELIEVE THE

PLAN SHOULD INCORPORATE PROVISIONS TO TERMINATE OR SLOW CUTTING TO KEEP PACE WITH REFORESTATION EFFORTS OR LACK OF SAME.

**FOREST SERVICE RESPONSE:**

The Ten-Year Timber Sale Action Plan (within the Forest Plan) lists several items that may trigger an adjustment in the allowable sale quantity. The effects of inadequate funding is one of the items. The Forest has not generally experienced difficulties in getting funding for reforestation.

**COMMENT NO. 8: THE DESIRE OF THE ADMINISTRATION IN WASHINGTON D.C. TO BALANCE ITS ABSURD BUDGET WITH OUR PRECIOUS RESOURCES BY INCREASING LOGGING AND GRAZING SHOULD BE IGNORED**

**FOREST SERVICE RESPONSE:**

The administration has encouraged that the natural resources be managed in a business-like manner. We expect that anything that would help to balance the budget is encouraged, but it has not been a primary thrust of this planning effort

**COMMENT NO. 9 THROUGHOUT THE FLRMP IT IS STATED THAT PROPOSED ACTIONS WILL REQUIRE CONSIDERABLE INVESTMENT AND/OR FUNDING. HOWEVER, THE PLAN FAILS TO CLEARLY STATE WHAT, IF ANY, ACTION WILL BE TAKEN IF FUNDING IS NOT AVAILABLE TO IMPLEMENT A PROPOSED ACTION. CONSIDERING THE UNCERTAINTY OF FUTURE FEDERAL FUNDING, THE PLAN SHOULD ADDRESS HOW ACTIONS AFFECTING FISH AND WILDLIFE, ESPECIALLY MITIGATION MEASURES, WILL BE INFLUENCED IF FUNDS ARE SIGNIFICANTLY REDUCED**

**FOREST SERVICE RESPONSE:**

The work will be accomplished in proportion to the funding that is provided. The Plan provides a means of showing what is needed. Normally, a lack of funds for mitigation can be foreseen prior to carrying out a project and the project can be cancelled or adjusted accordingly. Required mitigation measures will be accomplished.

**COMMENT NO. 10: I WOULD NOT BE IN FAVOR OF PLAN C UNLESS EXTENSIVE FEDERAL FUNDS COULD BE ALLOCATED TO STIMULATE AND ENHANCE MARKETING AND DEVELOPMENT EFFORTS FOR RECREATIONAL FACILITIES**

**FOREST SERVICE RESPONSE**

Marketing of local recreational attractions, we believe, is primarily a responsibility of the private sector. Alternative C does plan for expansion of developed recreation facilities, particularly in the Hells Canyon National Recreation Area.

**COMMENT NO. 11: NEITHER THE PLAN NOR THE DEIS EXPLAIN THE ROLE OF BONNEVILLE POWER ADMINISTRATION FUNDING OF FISH AND WILDLIFE PROGRAM MEASURES ON THE WALLOWA-WHITMAN NATIONAL FOREST. WITHOUT A THOROUGH DISCUSSION OF BPA FUNDING, THE PUBLIC MAY SUSPECT THAT BPA DOLLARS ARE BEING USED TO DISPLACE HABITAT PROTECTION ACTIVITIES FOR WHICH THE FOREST SERVICE IS RESPONSIBLE**

**FOREST SERVICE RESPONSE:**

Chapter III of the DEIS devotes considerable discussion to these activities and there is further mention in the Summary of the Analysis of the Management Situation in the Forest Plan. We have called for increases in this work independent of that funded by BPA.

**COMMENT NO. 12: ISSUE** THE PREFERRED ALTERNATIVE IS BASED UPON A CERTAIN LEVEL OF BUDGET APPROPRIATIONS THAT FINANCE VARIOUS PROGRAMS INCLUDING THE ABILITY OF THE FOREST SERVICE TO MEET ITS ALLOWABLE SALE QUANTITY (ASQ) THROUGH INTENSIVE FOREST MANAGEMENT.

**PROBLEM** THE FOREST SERVICE'S ALLOWABLE SALE QUANTITY (ASQ) IS BASED IN PART ON THE FOREST SERVICE'S ABILITY TO ACHIEVE INTENSIVE FORESTRY PRACTICES. SUBSTANTIAL INVESTMENTS IN PRECOMMERCIAL THINNING ARE REQUIRED TO PRODUCE THE ASQ. IF FUNDING IS REDUCED DUE TO BUDGET (APPROPRIATIONS) CONSTRAINTS, THEN THE ASQ WILL BE ADJUSTED ACCORDINGLY **SOLUTION** THE FOREST SERVICE MUST MAINTAIN FULL FUNDING TO PROVIDE ITS ALLOWABLE SALE QUANTITY. THOSE RESPONSIBLE FOR SETTING BUDGET LEVELS MUST ACCURATELY AND PERSUASIVELY INFORM THOSE RESPONSIBLE FOR APPROPRIATIONS OF THE FOREST SERVICE'S FUNDING NEEDS TO ACHIEVE INTENSIVE FORESTRY PRACTICES AND ULTIMATELY THE ALLOWABLE SALE QUANTITY.

**FOREST SERVICE RESPONSE:**

We agree, but in the competition for federal funds we may not always be successful in getting the needed financing, regardless of persuasion or accuracy of projections.

**COMMENT NO. 13. HISTORICALLY, THE FOREST HAS ONLY RECEIVED ENOUGH FUNDING TO DO FIVE ACRES/YEAR OF WATERSHED IMPROVEMENTS** ID ON WHAT BASIS DOES THE FOREST PREDICT THAT IT WILL RECEIVE 200 TIMES THE NORMAL LEVEL OF WATERSHED IMPROVEMENT FUNDING IN THE GRAMM-RUDMAN ERA? THE WALLOWA-WHITMAN WOULD BE WISE TO INITIATE PLANNING THAT WOULD ANTICIPATE SUBSTANTIAL BUDGET CUTBACKS

**FOREST SERVICE RESPONSE:**

The watershed work is an identified need. Depending on funding availability, it may or may not be accomplished We would be remiss not to identify the need. The Forest has recently experienced large increases in funding for this work.

**COMMENT NO. 14: WHAT GRAZING PLAN WOULD BE FOLLOWED IF THE GRAMM-RUDMAN BUDGET CUTS ARISE? WILL RANGE INVESTMENT BE REDUCED OR DELETED? HOW WILL THIS REDUCE THE PERMITTED AUM'S?**

**FOREST SERVICE RESPONSE:**

*We do not know that the Gramm-Rudman Act will affect the grazing program. Depending on the degree of funding reduction, should it occur, it could result in decreases in grazing permits This would depend on many factors including the possibility of the permittees contributing more to the program*



**TREATY RIGHTS**  
**Code 1275**

**COMMENT NO. 1:** IT IS OF PRIMARY IMPORTANCE THAT THE ADMINISTRATION OF THE WALLOWA-WHITMAN NATIONAL FOREST RECOGNIZE THE CO-MANAGEMENT AUTHORITY OF THE CONFEDERATED TRIBES OF THE UMATILLA INDIAN RESERVATION IN MANAGING THE NATURAL RESOURCE VALUES IN THE 1855 TREATY CEDED AREA, AND USUAL AND ACCUSTOMED AREAS. MANAGEMENT IMPLEMENTATION OF THE CONFEDERATED TRIBES RECOMMENDATIONS SHOULD REFLECT THIS COOPERATIVE STATURE AND AUTHORITY.

**FOREST SERVICE RESPONSE:**

While the Forest Service recognizes its responsibility in managing the lands ceded to the United States by the Confederated Tribes of the Umatilla Indian Reservation and the resources of Tribal interest on those lands, Congress has assigned that authority directly to the agency and requires the Forest Service to be solely responsible for its actions in managing all the National Forest Lands. It is further understood that the 1855 Treaty ceded lands are unique and different from other National Forest Lands and that there is a cooperative requirement for actions taken. There is a requirement for consultation for significant actions and consideration must be given to tribal recommendations for these actions

**COMMENT NO. 2.** THE CONFEDERATED TRIBES WOULD LIKE TO REMIND THE WALLOWA-WHITMAN NATIONAL FOREST OF ITS FEDERAL TRUST RESPONSIBILITY TO PROTECT THE TREATY RIGHT WHICH HAS BEEN INTERPRETED IN THE CASE, U.S. VS. WASHINGTON TO INCLUDE FISHERIES HABITAT PROTECTED FROM MAN-MADE DESPOILATION. THE CONFEDERATED TRIBES FEEL CURRENT FOREST MANAGEMENT PRACTICES HAVE NOT PROTECTED FISHERIES HABITAT SUFFICIENTLY AND THEREFORE ARE AN ABROGATION TO THE TREATY RIGHT.

**FOREST SERVICE RESPONSE:**

Each Forest management activity meets at least the minimum standards for riparian/fishery habitat. Examination of tribal concerns and concerns expressed by other Forest users over this issue has caused the Forest to make some adjustments in the management practices for managing these areas. Changes include.

- (1) Adding measurable standards for stream channel stability, stream shade, and stream substrate sedimentation applicable to all fish-producing streams,
- (2) Adding measurable grazing utilization standards for forage and brush species present in riparian areas,
- (3) Adding specific requirements for riparian rehabilitation following disturbance by mining activities, and
- (4) Adding a guideline for protection of the groundwater resource.

**COMMENT NO. 3:** THE RELIGION OF THE CONFEDERATED TRIBES IS AND HAS BEEN IN JEOPARDY DUE TO A LACK OF OPPORTUNITY TO PHYSICALLY COLLECT AND UTILIZE FISH, ROOTS, MEDICINAL PLANTS, AND ENABLE TRIBAL MEMBERS TO LEARN THE RELIGIOUS SIGNIFICANCE

OF EACH TYPE OF FOOD OR CEREMONY DEPENDENT UPON FOREST RESOURCE. AN EXCELLENT EXAMPLE IS TRIBAL IMPOSED CONSERVATION CLOSURES TO FISH IN MOST OF THE USUAL AND ACCUSTOMED FISHING RIVERS OF THE WALLOWA-WHITMAN NATIONAL FOREST DUE TO BOTH OFF-FOREST AND ON-FOREST IMPACTS. THE DETRIMENTAL ON-FOREST IMPACT CAN BE NEGATED BY WALLOWA-WHITMAN NATIONAL FOREST PLANS IF SO CHOSEN

**FOREST SERVICE RESPONSE:**

Wallowa-Whitman Forest Managers understand and appreciate the religious significance of articles and resources required for Tribal ceremonies. They intend to work closely with the tribes to help assure continued opportunity to collect and utilize those resources required for religious ceremonies.

**COMMENT NO. 4:** THE CONFEDERATED TRIBES SUGGEST THAT ALL MANAGEMENT PRACTICES OF THE WALLOWA-WHITMAN FOREST CONTINUE TO BE CORRELATED WITH THE FOREST ARCHAEOLOGIST TO DETERMINE EXTENT OF IMPACTS ON SPECIAL ECOLOGICAL AREAS CONTAINING THESE RESOURCES. CLOSE CORRELATION WITH THE DEPARTMENT OF NATURAL RESOURCES OF THE CONFEDERATED TRIBES IS ALSO NECESSARY TO INSURE ADEQUATE PROTECTION. THE CONFEDERATED TRIBES SUPPORT THE DEVELOPMENT OF A CORE TEAM CONSISTING OF TRIBAL AND USDA FS STAFF TO ESTABLISH A CLOSER WORKING RELATIONSHIP WITH REGARD TO ARCHAEOLOGICAL AND CULTURAL CONCERNS OF THE TRIBE. THE EMPHASIS OF THE CORE TEAM SHOULD BE TO ESTABLISH AND CORRELATE CRITERIA, GUIDELINES AND STANDARDS TO PROTECT THE CULTURAL AND ARCHAEOLOGICAL RESOURCE WITHIN WALLOWA-WHITMAN NATIONAL FOREST. IT IS IMPERATIVE TO UNDERSTAND THAT ROOTS, BERRIES, MEDICINAL PLANTS, FISH, AND BOTH BIG AND SMALL GAME FOOD ARE AN INTEGRAL PART OF THE RELIGION OF THE CONFEDERATED TRIBES AND NOT SIMPLY SUBSISTENCE ISSUANCES.

**FOREST SERVICE RESPONSE:**

The Forest Service acknowledges Tribal concerns with regard to archaeological and cultural resources. It is our intent to continue the team comprised of Tribal and Forest Service Staffs with the objective of identifying and protecting the archaeological and cultural resources of interest to the Confederated Tribes on the Wallowa-Whitman National Forest

**COMMENT NO. 5:** IT IS IMPORTANT TO THE MEMBERS OF THE CONFEDERATED TRIBES THAT THEY HAVE AMPLE OPPORTUNITY TO GATHER TEEPEE POLES AND FIREWOOD FOR SUBSISTENCE AND CULTURAL USE. MEMBERS OF THE CONFEDERATED TRIBES DESIRE TO UTILIZE THESE RESOURCES WHILE SIMULTANEOUSLY PROTECTING OTHER NATURAL RESOURCES OF THE FOREST.

**FOREST SERVICE RESPONSE:**

*Forest material suitable for teepee poles and firewood in adequate supply are assured under plans for management of the Forest.*

**COMMENT NO. 6** THE MESSAGE IN KITTITAS IS CLEAR FEDERAL AGENCIES ARE OBLIGATED TO EXERCISE THEIR AUTHORITIES IN A MANNER THAT WILL PROTECT -- NOT DEGRADE -- THE HABITAT NEEDED TO SUPPORT ANADROMOUS FISH IN ADDITION, WHEN ADDRESSING ANADROMOUS FISH HABITAT NEEDS, VARIOUS MEASURES MAY BE UTILIZED, BUT THE FINAL

**CHOICE TURNS NOT TO TRADITIONAL NOTIONS OF AGENCY EXPERTISE, BUT ON THE BIOLOGICAL NEEDS OF THE FISH**

**FOREST SERVICE RESPONSE:**

Plans for future management of the Forest are based on the biological needs of the fish. Planning now addresses anadromous fisheries, indeed all fisheries, to the extent required for the biological needs of the fishery. Through monitoring of fish numbers and habitat conditions during the planning period, the Forest will be able to adjust management activities to achieve the desired condition as required not only by the Treaty with the Confederated Tribes, but by the National Forest Management Act and the Federal Water Pollution Control Act, as amended.

**COMMENT NO. 7.** THE SUPREME COURT HAS HELD THAT BOTH INDIAN AND NON-INDIAN FISHERMEN POSSESS A RIGHT, "SECURED BY TREATY, TO TAKE A FAIR SHARE OF THE AVAILABLE FISH." PASSENGER FISHING VESSEL, 443 U.S. AT 684-85. THE COURT DETERMINED THAT INDIAN HARVEST ALLOCATION SHOULD NOT EXCEED 50% OF THE HARVESTABLE FISH. ID. AT 685-86. THE COURT THEN DECLARED:

IT BEARS REPEATING, HOWEVER, THAT THE 50% FIGURE IMPOSES A MAXIMUM BUT NOT A MINIMUM ALLOCATION . . . (T)HE CENTRAL PRINCIPLE HERE MUST BE THAT INDIAN TREATY RIGHTS TO A NATURAL RESOURCE, THAT ONCE WAS THOROUGHLY EXCLUSIVELY EXPLOITED BY THE INDIANS, SECURES SO MUCH AS, BUT NO MORE THAN, IS NECESSARY TO PROVIDE THE INDIANS WITH A LIVELIHOOD -- THAT IS TO SAY, A MODERATE LIVING.

**FOREST SERVICE RESPONSE.**

The Forest Service acknowledges the Supreme Court decision holding that Columbia River Tribes are allotted up to one-half of the available fish and that the Confederated Tribes of the Umatilla Indian Reservation are part of the Columbia River Tribes.

**COMMENT NO. 8:** FEDERAL AGENCIES OWE A DUTY TO REFRAIN FROM ACTIVITIES THAT WILL INTERFERE WITH THE FULFILLMENT OF TREATY RIGHTS. MOREOVER, THIS DUTY CANNOT BE PERFORMED BY ENGAGING IN AN "ACCOMMODATION" OR "BALANCING" PROCESS BETWEEN INDIAN TREATY RIGHTS AND A COMPETING ECONOMIC INTEREST SUCH AS TIMBER HARVEST. ANY SUCH "ACCOMMODATION" REACHED BY THE FOREST SERVICE WOULD AMOUNT TO A DE FACTO ABROGATION OF INDIAN TREATY RIGHTS. IN THE CONTEXT OF FOREST MANAGEMENT, UNLESS THE FOREST SERVICE CAN DEMONSTRATE THAT THE TRIBES' TREATY RIGHTS ARE PRESENTLY BEING FULFILLED, IT CANNOT JUSTIFY APPROVING ACTIVITIES IN THE FORESTS THAT WILL CAUSE FURTHER DEGRADATION OF ANADROMOUS FISH HABITAT.

**FOREST SERVICE RESPONSE**

It is the Forest Service position that multiple activities can be conducted within many areas of the Forest. Further it is the purpose of Forest Planning to identify what activities can occur, to what extent, and their timing. Tribal treaty rights are being given full consideration in management of the Forest and those resources these rights depend upon.

**COMMENT NO. 9:** AS THE PACIFIC NORTHWEST HAS COME TO REALIZE, THE ANADROMOUS FISH RUNS CAN ONLY BE RESTORED IF STATE, FEDERAL, AND TRIBAL LAND, WATER, AND WILDLIFE MANAGERS ADOPT A COORDINATED "GRAVEL-TO-GRAVEL" MANAGEMENT APPROACH TO THIS VALUABLE AND MOBILE RENEWABLE RESOURCE.

## FOREST SERVICE RESPONSE

The survival and enhancement of anadromous fish runs within the Columbia River and tributaries requires coordination of and cooperation by State, Federal, and Tribal agencies and managers. The Forest Service fully supports this statement. As evidence of its commitment to this principal, the Forest Service has invested monies from its own appropriated funds in providing its share of support to the goals of the Northwest Power Council.

**COMMENT NO. 10:** THE SUCCESS OF BOTH THE SALMON INTERCEPTION TREATY AND THE FISH AND WILDLIFE PROGRAM TURN UPON MAXIMIZING UTILIZATION OF THE ANADROMOUS FISH HABITAT IN COLUMBIA RIVER TRIBUTARIES. A LARGE PERCENTAGE OF THESE TRIBUTARIES RUN THROUGH NATIONAL FORESTS. THE FOREST SERVICE MUST ACKNOWLEDGE ITS RESPONSIBILITIES TO ACT IN CONCERT WITH THESE POLICIES. THE FOREST SERVICE CANNOT MAKE A REASONED DECISION WITH RESPECT TO ANADROMOUS FISH HABITAT IF IT DOES NOT FACTOR THESE ACTIVITIES INTO ITS DECISION-MAKING PROCESS. THE PACIFIC NORTHWEST CANNOT AFFORD TO SPEND MONEY ENHANCING FISHERIES THAT ARE SIMULTANEOUSLY BEING DEGRADED BY TIMBER HARVEST, ROAD-BUILDING, AND GRAZING. FOREST SERVICE COORDINATION WITH PACIFIC NORTHWEST FISHERIES ENHANCEMENT ACTIVITIES IS NOT ONLY SOUND POLICY, IT IS ALSO REQUIRED BY LAW. FOREST SERVICE REGULATIONS DECLARE THAT A REVIEW OF STATE, FEDERAL, AND TRIBAL PLANNING AND LAND USE ACTIVITIES SHALL BE INCLUDED IN THE FOREST PLAN EIS. SEE 36 C.F.R. SECTION 219.7 (A)-(C) (1984). IN ADDITION, THE REGULATIONS PROVIDE THAT THIS REVIEW SHALL CONSIDER THE OBJECTIVES OF FEDERAL, STATE, LOCAL, AND TRIBAL GOVERNMENTS, INTER-RELATED IMPACTS OF THESE PLANS, AND A DECISION BY THE FOREST SERVICE ON HOW EACH FOREST PLAN SHALL ADDRESS THESE INTER-RELATED IMPACTS. ID. AT (C)(1)-(4).

AMONG THE OBJECTIVES OF FEDERAL, STATE, AND TRIBAL GOVERNMENTS ARE THE FISH PRODUCTION PLANS CURRENTLY BEING FORMULATED UNDER THE AUSPICES OF UNITED STATES V. OREGON, THE FISH AND WILDLIFE PROGRAM, AND THE SALMON INTERCEPTION TREATY. THE WALLOWA-WHITMAN NATIONAL FOREST DEIS AND PROPOSED PLAN DO NOT REFLECT THE CONSIDERATION OF THESE PROCESSES REQUIRED BY THE NFMA.

## FOREST SERVICE RESPONSE:

Table III-8 has been revised as more accurate data became available after publishing the DEIS. Coordination of Forest planning with and consideration of other affected agencies' and tribes' plans is required by the National Forest Management Act (NFMA). As a means of ensuring understanding of tribal plans, policies, and concerns, the Forest Supervisor and members of his staff met on several occasions with tribal leaders and staff. The Umatilla Confederated Tribes were also represented on a Forest Citizens Panel which met periodically to review the development of the Forest Plan. The various programs and processes cited by the reviewer have been considered and we believe the Forest Plan is in accord with them.

**COMMENT NO. 11:** UNFORTUNATELY, THE FOREST SERVICE DOES NOT SEEM TO REALIZE THAT EACH FOREST IS AN IMPORTANT COG IN THE MACHINE THAT WILL EITHER REVIVE THE FISH RUNS OR SLOWLY LOG, ROAD, GRAZE, OR MINE THEM INTO OBLIVION. TO ADEQUATELY ASSESS THE ENVIRONMENTAL IMPACTS OF ITS ACTIONS AS REQUIRED BY NEPA, THE FOREST SERVICE MUST STUDY AND DISCLOSE THE CUMULATIVE IMPACTS OF ALL 17 FOREST PLANS LISTED ABOVE ON THE COLUMBIA RIVER TREATY TRIBES. IT IS SIMPLY NOT ADEQUATE FOR EACH FOREST TO MERELY LOOK AT THE IMPACTS OF ITS ACTIVITIES WITHIN THE BORDERS OF THE FOREST OR IN THE SURROUNDING COMMUNITIES AND COUNTIES. NOR IS IT ADEQUATE FOR THE FOREST SERVICE TO BALDLY ASSERT THAT IT HAS ASSESSED CUMULATIVE IMPACTS.

WHILE OFFERING ABSOLUTELY NO EVIDENCE THAT IT HAS MADE ANY SUCH CONSIDERATION. FISH PRODUCTION PRECLUDED BY ACTIVITIES WITHIN EACH FOREST AND IN CONJUNCTION WITH OTHER FORESTS AFFECTS NOT ONLY SURROUNDING COMMUNITIES, BUT ALSO DOWN-STREAM INDIAN TRIBES AND OTHER FISHERS BOTH IN RIVER AND IN THE OCEAN.

**FOREST SERVICE RESPONSE:**

The Environmental Consequences chapter of the DEIS displays the cumulative effects analysis on fisheries and other resources on the Forest. This section also shows the effects on and from other Forests, agencies and landholders affected by or effects on the Forest

**COMMENT NO. 12:** THE WALLOWA-WHITMAN DEIS APPEARS TO PROVIDE EVERY ASSURANCE THAT THE FOREST SERVICE WILL CONTINUE TO NOT COORDINATE ITS ACTIONS WITH OTHER MANAGEMENT ENTITIES IN ADDITION, IT APPEARS THAT THE FOREST EITHER DOES NOT KNOW WHERE THE IMPORTANT NATURAL FISH PRODUCTION AREAS ARE OR, IF IT DOES, THAT IT WILL FAIL TO PROVIDE ADEQUATE PROTECTION AND MONITORING. MOREOVER, THERE IS NO EVIDENCE THAT THE FOREST HAS TAKEN INTO ACCOUNT CRITICAL FISHERY WATERSHEDS NAMED BY THE UMATILLA TRIBE AND SUBMITTED TO THE FOREST IN JULY 1985.

**FOREST SERVICE RESPONSE**

The Wallowa-Whitman Forest Plan has reviewed and considered the mentioned input made by the tribe This and other inventory information was used to develop habitat improvement project work and identify areas requiring protection.

**COMMENT NO. 13.** ACCORDING TO THE INFORMATION CONTAINED IN THE DEIS AT TABLE III-8, HABITAT, NOT PASSAGE OR HARVEST, IS THE LIMITING FACTOR ON NATURALLY SPAWNING SPRING CHINOOK AND SUMMER STEELHEAD IN THE NORTH FORK JOHN DAY. THE JOHN DAY IS ONE OF THE VERY FEW DRAINAGES IN THE COLUMBIA BASIN THAT STILL RELIES EXCLUSIVELY ON NATURAL ANADROMOUS FISH PRODUCTION. THIS TABLE ALSO INDICATES THAT HABITAT IS THE LIMITING FACTOR FOR SUMMER STEELHEAD IN JOSEPH CREEK AND THE UPPER GRANDE RONDE ARE ALL SLATED FOR TIMBER MANAGEMENT IN THE PLAN. MANAGEMENT THAT WILL ADVERSELY AFFECT EXISTING NATURAL FISH PRODUCTION DIRECTLY CONFLICTS WITH THE TRIBES' TREATY RIGHTS.

**FOREST SERVICE RESPONSE:**

Table III-8 in the EIS has been substantially revised and updated from new information supplied by the Oregon Department of Fish and Wildlife (ODF&W). The new table shows an estimated increase of about 28,000 spring chinook and 3,000 steelhead smolts between full habitat seeding and full habitat seeding with habitat enhancement. Increases are also projected for Joseph Creek for steelhead and the Upper Grande Ronde for both species.

We still agree, however, with the ODF&W and other agencies and tribes that the primary limiting factor for anadromous fish production in the Columbia River system is not habitat, but fish passage in the lower rivers

There are many streams on the Forest where habitat conditions are less than optimum for fish spawning and rearing. While we are actively pursuing their improvement, we do not believe that habitat condition is the primary limiting factor.

We certainly agree on the importance of the North Fork John Day Management Area 18, where much of the natural spawning occurs, requires maintaining anadromous fish habitat at or near the maximum potential of the watershed. This area requires maintaining smolt habitat capability index at not less than 90 percent of potential, provides a reduced rate of timber harvest (largely because the area was heavily harvested during the recent lodgepole pine salvage program), and a reduced open-road density (1.5 miles per square mile). We feel this will meet the Tribes objectives.

Although trees are to be managed for wood fiber production in the Joseph Creek, Grande Ronde River, and other drainages, this management will be carried out in such a manner that fish habitat will be protected. Standards and guidelines for managing riparian areas and fish habitat have been substantially strengthened in the final plan (see response to Comment No. 2)

**COMMENT NO. 14:** THE FOREST SERVICE HAS OFTEN INFORMED CRITFC AND TRIBAL STAFF THAT THE FOREST SERVICE IS ONLY RESPONSIBLE FOR SUPPLYING SMOLT HABITAT CAPABILITY AND THAT THERE IS FAR MORE CAPABLE HABITAT THAN THERE ARE SMOLTS. THE FOREST SERVICE'S RESPONSIBILITIES INCLUDE MORE THAN MERELY FURNISHING A GIVEN AMOUNT OF HABITAT. THE FOREST SERVICE MUST IDENTIFY THAT WHICH IS BEING UTILIZED BY FISH AND, TO THE INTENT IT CAN, THAT WHICH WILL BE UTILIZED THROUGH EITHER UNITED STATES V. OREGON OR FISH AND WILDLIFE PROGRAM ENHANCEMENT. PART OF THE CONCERN BEHIND PROTECTION OF NATURALLY SPAWNING STOCKS IS THE DESIRE TO PROTECT UNIQUE GENE POOLS THAT WILL BE NEEDED TO RESTORE THE BASIN'S FISHERIES.

**FOREST SERVICE RESPONSE:**

While it is the primary responsibility of the Forest Service to furnish habitat, it can go beyond this by working cooperatively with Tribal, State, and other Federal fisheries personnel to achieve all parties' objectives resulting in stronger fish runs in the Columbia River Basin. Specifically, population trends of salmon and steelhead will be monitored cooperatively with the Oregon Department of Fish and Wildlife and the Tribes. Monitoring will be done to gauge conformance with Standards and Guidelines and the general efficiency of Best Management Practices. Since we are interested in the efficient utilization of habitat, the Forest Service will certainly share information and coordinate in identifying opportunities to best meet fisheries production objectives.

**COMMENT NO. 15:** FOREST SERVICE MUST NOT ALLOW ITS OBLIGATIONS TO THE COLUMBIA RIVER TREATY TRIBES TO BECOME LOST IN ITS CONCERN FOR THE LOCAL CITIZENRY. IT MUST ACCORD THE TREATY RIGHT SPECIAL CONSIDERATION AND SCRUPULOUS SAFEGUARDS. UNFORTUNATELY, THE DEIS DID NOT DEVOTE THIS CONSIDERATION TO THE TRIBES' INTERESTS.

**FOREST SERVICE RESPONSE:**

We understand our obligations to the Umatilla and other Columbia River treaty tribes as well as our responsibilities to other interests. Treaty obligations were recognized and given scrupulous attention both at the Forest level and at Regional level review. We look forward to working closely with the tribes during implementation of the plan to further ensure tribal interests are properly considered.

**COMMENT NO. 16:** THE NEZ PERCE TRIBE AS A CO-MANAGER OF TREATY RIGHT RESOURCES IS ACTIVELY INVOLVED IN FISH AND WILDLIFE POPULATION MANAGEMENT WITH THE THREE STATES OCCUPYING THE CEDED AREA AND OTHER ENTITIES EXERCISING HARVEST REGULATION AUTHORITY SUCH AS THE U. S. FISH AND WILDLIFE SERVICE.

THE FOREST PLANNING PROCESS IS AN OPPORTUNITY TO BECOME AS ACTIVELY INVOLVED IN HABITAT MANAGEMENT AS WE ARE IN HARVEST MANAGEMENT ONLY THROUGH A CLOSER TRIBAL INVOLVEMENT IN THE PLANNING PROCESS WILL YOU AND YOUR STAFF BE PREPARED TO ACT ON YOUR LEGAL RESPONSIBILITIES EMBODIED IN THE TREATIES.

**FOREST SERVICE RESPONSE:**

We are eager to work closely with the Nez Perce tribe in order to fulfill our role in protecting treaty rights. Our contacts with Indian Tribes involving planning have included The Nez Perce Tribal Executive Committee.

**COMMENT NO. 17:** IT IS OUR IMPRESSION THAT ISSUES IDENTIFIED IN THE DEIS SUCH AS "COMMUNITY STABILITY" HAVE TAKEN PRECEDENCE OVER THE LEGAL OBLIGATIONS OF THE USDA FOREST SERVICE TO UPHOLD THE TREATIES BETWEEN THE NEZ PERCE TRIBE AND THE FEDERAL GOVERNMENT.

**FOREST SERVICE RESPONSE:**

We regret the impression. Such an implication was not our intent.

**COMMENT NO. 18:** THE "NO CHANGE ALTERNATIVE," LOWERING MANAGEMENT REQUIREMENTS, AND PROPOSED HARVEST OF THE BEAVER CREEK AND UPPER GRANDE RONDE ROADLESS AREAS WOULD NEGATIVELY IMPACT WATER, FISH, WILDLIFE, AND CULTURAL VALUES-EACH OF WHICH ARE PROTECTED BY THE TREATY RIGHTS OF THE CTUIR.

**FOREST SERVICE RESPONSE:**

We agree that the "No Change alternative" provides a higher risk of resource damage than do the other alternatives.

**COMMENT NO. 19:** THE LANDS WITHIN THE LEGAL BOUNDARIES OF THE WALLOWA-WHITMAN NATIONAL FOREST HAVE BEEN UTILIZED BY THE WALLA WALLA, CAYUSE, AND UMATILLA TRIBES FOR FISHING, HUNTING, ROOT GATHERING, MEDICINAL AND RELIGIOUS USES SINCE TIME IMMEMORIAL. THESE LANDS PROVIDE THEIR HOME AS WELL AS A WAY OF LIFE, AND RETAINMENT OF THESE RIGHTS HAS BEEN FEDERALLY RECOGNIZED AND UPHELD BY TREATY SINCE 1855. PROTECTION AND ENHANCEMENT OF THESE FINITE NATURAL RESOURCES ARE ABSOLUTELY CRITICAL TO SUSTAINING THESE TREATY RIGHTS; HOWEVER, VARIOUS MANAGEMENT POLICIES HAVE QUALITATIVELY AND QUANTITATIVELY REDUCED AND COMPROMISED TO A HIGH DEGREE ALMOST EVERY ONE OF THESE NATURAL RESOURCES. PAST MANAGEMENT PRACTICES OF THE WALLOWA-WHITMAN NATIONAL FOREST HAVE CAUSED SIGNIFICANT DEGRADATION OF ANADROMOUS FISHERIES HABITAT, WATER QUALITY AND BIG GAME WINTER AND SUMMER RANGES. THE CONFEDERATED TRIBES ARE DETERMINED TO PROTECT THESE NATURAL RESOURCES AND DESIRE TO COOPERATIVELY ADDRESS FOREST MANAGEMENT POLICY AND PROVIDE INPUT THAT WILL BE UTILIZED.

THE CONFEDERATED TRIBES WOULD LIKE TO COMMEND THE WALLOWA-WHITMAN NATIONAL FOREST IN ITS EFFORTS TO PLAN IN A COMPREHENSIVE MANNER WITH SPECIFIC MANAGEMENT AREAS ALLOCATED TO PARTICULAR GEOGRAPHICAL AREAS. THE WILLINGNESS TO ENHANCE AND MAINTAIN A HIGH QUALITY LEVEL OF COMMUNICATION BETWEEN THE FOREST SERVICE AND TRIBES IS ALSO VERY MUCH APPRECIATED.

THE LARGEST AND MOST PAINFULLY OBVIOUS COMPROMISE OF TREATY RIGHTS HAS RESULTED FROM PAST FOREST MANAGEMENT POLICIES OF HEAVILY BIASING WHAT HAVE BEEN LABELED AS "COMMODITY" VALUES SUCH AS TIMBER, GRAZING, AND MINING. THOSE VALUES TERMED AS "AMENITIES" INCLUDING ANADROMOUS FISHERIES, RESIDENT TROUT, BIG GAME AND RECREATION HAVE BEEN MANAGED IN A SUBSERVIENT MANNER AROUND THE PRIORITIZED "COMMODITIES". THE D.E.I.S. SUGGESTS THE PREFERRED ALTERNATIVE TO BE A BALANCED ALTERNATIVE, BUT TO THE CONTRARY IT IS CLASSICALLY BIASED TOWARD "COMMODITY" INTERESTS. ON PAGE II-114 BENEFIT/COST RATIOS FOR RECREATION ARE HIGHEST FOR ALL ALTERNATIVES WHILE B/C RATIOS FOR TIMBER ARE QUITE LOW, YET RECREATION AND OTHER AMENITY VALUES ARE SACRIFICED IN THE "PREFERRED" AND SUPPOSEDLY BALANCED ALTERNATIVE C. AN EXAMPLE IS ALLOCATION OF 656,355 ACRES (ONE FOURTH OF ENTIRE FOREST) TO MANAGEMENT AREA 1 WHICH IS EMPHASIZED FOR TIMBER AND FORAGE PRODUCTION AND SUBSEQUENT SIGNIFICANT INCREASE IN ROADS AND ACTIVITY LEVELS WHICH ARE DELETERIOUS TO ELK HABITAT, FISHERIES HABITAT AND DECLINE IN SEMIPRIVATE RECREATION AREAS, ALL OF WHICH HAVE DEMANDS GREATER THAN PRESENT CAPABILITIES. WHAT IS THE AMOUNT OF SUBSIDIES GIVEN TO TIMBER SALES AND ASSOCIATED ROADS AS COMPARED WITH SUBSIDIES AND REVENUES IN BEHALF OF FISHERIES ENHANCEMENT.

**FOREST SERVICE RESPONSE:**

Certainly the selection of a preferred alternative is a contentious process. Some see Alternative C as being a capitulation to environmental concerns, others that it reflects principally timber and livestock interests. No single concern predominated in the selection of Alternative C. The question of subsidies is an involved one. Some describe a subsidy as occurring whenever cash expenditures are made in excess of cash receipts. Others include expenditures and receipts in kind. Some include intangibles in the equation. We have tried to address this question in the context of the efficiency analysis and the analysis of below cost sales in Chapter III of the FEIS. Also, see "Differences in Economic Values Among Alternatives" in Chapter II. Fishery costs and benefits are included under recreation. In way of clarification, the Forest's anadromous fishery was treated as a commodity producer in the analysis. That designation is arguable.



**MULTIPLE USE AND MISCELLANEOUS  
Code 1300**

**COMMENT NO. 1:** TO HAVE ALL OLD-GROWTH FORESTS TO HAVE ALL ROADLESS AREAS. TO OBLITERATE ROADS TO END LOGGING WITH NO MINING OR MINERAL ACTIVITIES. TO RETURN THIS NATIONAL FOREST TO A NECESSARY PRISTINE NATURAL ENVIRONMENT SO AS TO SIMPLY HAVE THIS WALLOWA-WHITMAN NATIONAL FOREST. TO GUARANTEE THE BIOLOGICAL SURVIVAL OF THIS AREA AS A NORMAL BIOLOGICAL SANCTUARY TO ESTABLISH THIS NATIONAL FOREST AS A PERMANENT DEDICATED NATIONAL WILDERNESS WILDLIFE BIOLOGICAL PRESERVE

**FOREST SERVICE RESPONSE:**

We believe such an approach to be outside the range of reasonable alternatives, considering the identified issues the plan attempts to resolve.

**COMMENT NO. 2:** I FAVOR PRESERVING THE MAXIMUM UNTOUCHED FOREST LAND. ALTERNATIVES A THROUGH H ARE ALL BASED ON ASSUMPTIONS THAT I DON'T ACCEPT. YOU'RE NOT REALLY OFFERING A CHOICE OF WHAT TREES WILL BE SAVED, BUT HOW MANY YEARS UNTIL THEY'RE CUT.

**FOREST SERVICE RESPONSE.**

Over 580,000 acres of forested land have no scheduled timber harvest - approximately 40% of all forested lands.

**COMMENT NO. 3:** ADDITIONAL MANAGEMENT DIRECTION NEEDS TO BE GIVEN TO THE OLD GROWTH ISSUE SUCH THAT THE SYSTEM OF OLD GROWTH RESERVES WILL HAVE SOUND ECOLOGICAL TIES TO THE ENTIRE FOREST LANDSCAPE. WE ARE OF THE OPINION THAT THIS COULD BEST BE ACCOMPLISHED BY INCORPORATING A CERTAIN PORTION OF THE TIMBER LAND BASE INTO LONG ROTATION SCHEDULES SUCH THAT TOTAL ACREAGES OF OLD GROWTH WILL ACTUALLY INCREASE OVER TIME

**FOREST SERVICE RESPONSE:**

We agree that this could be accomplished, but with corresponding reductions in timber production. We have chosen to not designate additional lands for future old growth in this planning effort. It can be considered in the next plan.

**COMMENT NO. 4:** MULTIPLE USE SEEMS THE MOST APPROPRIATE ANSWER FOR THE PRESERVATION OF ALL OUR FORESTS AND WATER RESOURCES. GIFFORD PINCHOT SAID "TRUE CONSERVATION IS THE INTELLIGENT USE BY MAN OF ALL EARTH'S NATURAL RESOURCES." THE ONE WORD, INTELLIGENT, IS, OF COURSE, THE KEY AND IT DOESN'T SEEM INTELLIGENT TO WASTE TREES EITHER BY ATTRITION OR BY WASTEFUL USE

**FOREST SERVICE RESPONSE.**

The point can be made that a tree is not wasted just because it is not harvested and converted into products for human use. Trees which are not harvested provide homes and feeding areas

for a variety of forest creatures and the wood mass may eventually be incorporated into the soil, thereby contributing to its fertility.

**COMMENT NO. 5. CERTAIN SPECIES ATTRACT HUNTING AND FISHING INTEREST, SUCH AS THE ELK AND DEER POPULATION. ANADROMOUS FISH NEED TO BE INSURED HABITAT, NOT CARELESSLY DESTROYED BY LARGE MACHINES, EROSION OF HILLSIDES, AND THE LACK OF CURRENT PROTECTIVE MEASURES FOR THE WATERSHEDS. ANOTHER VALUE IS FOR THE RECREATIONAL USE OF CITIZENS WHO VISIT UNDISTURBED NATURAL AREAS TO HIKE AND CAMP.**

**FOREST SERVICE RESPONSE:**

We agree for the most part. We believe there are many protective measures for watersheds, however, and that they have been successful in preventing damage.

**COMMENT NO. 6: IT IS ESSENTIAL TO NOTE THAT DEIS ALTERNATIVES, WHICH GO FROM A TO H, ARE LIMITED IN NUMBER AND SCOPE. THE ALTERNATIVES PRESENTED ARE HEAVILY WEIGHTED TOWARD TIMBER AND GRAZING INTERESTS. THERE ARE NO REAL ALTERNATIVES FOR PRESERVING THE HEALTH AND DIVERSITY OF THE FOREST AND THE DIVERSITY OF BIOTA AND ECOSYSTEMS. IN PARTICULAR, THERE ARE NO SPECIFIC ALTERNATIVES DIRECTED TOWARDS RECOVERY OF STREAM AND LAKE RIPARIAN DAMAGE, MODERATIONS OF EXCESSIVE RUN-OFF, AND EROSION WHICH ARE PERTINENT TO FISHERIES.**

**FOREST SERVICE RESPONSE.**

We believe the recovery to which you refer could be accomplished with several of the alternatives, including the one selected for implementation.

**COMMENT NO. 7: PAGE II-106, TABLE II-3B - THE DISCUSSION CONCERNING WETLANDS AND FLOODPLAINS SHOULD INCLUDE PROVISIONS FOR MITIGATING UNAVOIDABLE WETLAND IMPACTS. A GENERAL DISCUSSION EXPLAINING HOW THIS MITIGATION WILL BE ACCOMPLISHED SHOULD ALSO BE INCLUDED.**

**FOREST SERVICE RESPONSE:**

Mitigation measures for wetlands and floodplains are found in the Forest Plan Standards and Guidelines.

**COMMENT NO. 8: I FIND IT HARD TO SWALLOW THAT THE PLAN INCLUDES ESSENTIALLY ONE OPTION. ALTERNATIVES A-H ARE ALL HEAVILY ORIENTED TO LOGGING, WITH MINOR VARIATIONS IN ALLOWABLE CUT OR WILDLIFE PROTECTIONS.**

THE ALTERNATIVES ARE COMPLETELY DEFICIENT IN THAT THERE ARE NO ALTERNATIVES FOR NO LOGGING, OR FOR MANAGEMENT BASED LARGELY ON WILDLIFE VALUES OR BASED MOSTLY ON RECREATION VALUES.

**FOREST SERVICE RESPONSE.**

We attempted to provide a reasonable range of alternatives for full development in the Draft Environmental Impact Statement. Other alternatives were examined through benchmark analysis.

**COMMENT NO. 9:** OUR PRIMARY CONCERNS (ARE) THAT THE DEIS AND PLAN DID NOT CLEARLY PROVIDE THE NECESSARY PROTECTION FOR WATER QUALITY AND SENSITIVE BENEFICIAL USES GIVEN THE MAJOR GRAZING AND TIMBER HARVESTING OUTPUTS PROPOSED, THE MAJOR REASONS FOR THIS ARE:

1. INSUFFICIENT PRESENTATION OF EXISTING CONDITIONS;
2. STANDARDS RELATING TO FISH HABITAT AND RIPARIAN AREAS THAT ARE TOO GENERAL TO ASSURE ADEQUATE PROTECTION OF THESE IMPORTANT RESOURCES;
3. AN UNCLEAR COMMITMENT THAT ACTIVITIES UNABLE TO MEET THE STANDARDS ADOPTED WOULD NOT BE ALLOWED TO OCCUR UNMODIFIED;
4. INSUFFICIENT ANALYSIS OF RISKS TO WATER QUALITY AND BENEFICIAL USES FROM SEDIMENTATION FROM PLANNED ACTIVITIES

**FOREST SERVICE RESPONSE:**

In response to these and other concerns, standards and guidelines relating to fish habitat and riparian areas have been made more specific. We do not agree that the plan provides an unclear commitment to protect these resource values. To the contrary, we believe that the statement "management and enhancement of water quality and protection of watercourses and streamside management units (SMU's) will have priority over uses described or implied in all other management standards or guidelines," as found in the Forest Plan Chapter 4, clearly expresses our commitment. While it is not possible to assess the effects of individual activities on water quality and beneficial uses at the Forest planning level, we believe that the plan provides sufficient direction to assure that the analysis is made during the design of individual projects.

**COMMENT NO. 10:** RESEARCH - (LMRP, PAGE 2-39) THE FORESTRY PROGRAM FOR OREGON ENCOURAGES RESEARCH TO IMPROVE FOREST PRODUCTIVITY, THE ECONOMICS OF INTENSIVE MANAGEMENT PRACTICES, AND TO IDENTIFY THE HABITAT NEEDS OF OLD-GROWTH PREFERRING WILDLIFE. THEREFORE, THE DEPARTMENT SUPPORTS THE RESEARCH PROGRAM OUTLINED BY THE FOREST .

IN ADDITION TO THE RESEARCH NEEDS IDENTIFIED BY THE WALLOWA-WHITMAN, WE BELIEVE MORE RESEARCH IS NEEDED TO:

1. DEVELOP NEW TECHNOLOGY TO RETURN SOME OF THE 77,349 ACRES REMOVED FROM THE SUITABLE LANDBASE FOR REGENERATION DIFFICULTY OR RESOURCE DAMAGE POTENTIAL TO TIMBER MANAGEMENT STATUS.
2. IMPROVE KNOWLEDGE OF ELK/CATTLE COMPETITION.
3. GAIN BETTER SILVICULTURAL KNOWLEDGE ON UNDERSTORY MANAGEMENT AND UNEVEN-AGED MANAGEMENT

**FOREST SERVICE RESPONSE:**

We agree. Research is currently underway on your points 2 and 3

**COMMENT NO. 11:** ANY ONE OF THREE ALTERNATIVES SEEM TO PROVIDE A BALANCE BETWEEN PRESENT NEEDS AND FUTURE USES. ALTERNATIVES B, C (THE PREFERRED ALTERNATIVE), AND D, APPEAR TO PROVIDE FOR A BALANCED APPROACH BETWEEN CONFLICTING PRESENT USES AND POTENTIAL FUTURE USES. ALTERNATIVE B IS MORE LUMBER ORIENTED THAN D, AND D IS MORE COMMODITY ORIENTED THAN C ALL THREE WILL DECREASE THE AMOUNT OF PONDEROSA PINE AVAILABLE FOR HARVEST.

**FOREST SERVICE RESPONSE.**

We appreciate your views. What constitutes balance can be the subject of arguments

**COMMENT NO. 12** YOU HAVE TO STICK TO YOUR MULTIPLE USE FORMULA THAT YOU STARTED MANY, MANY YEARS AGO AND KEEP GOING YOU MUST THINK MORE ABOUT THE LOCAL PEOPLE THAT YOU ARE PUT HERE TO SERVE. THEY WANT TO LIVE AND WORK HERE TOO YOU ARE NOT DOING THAT BY REDUCING THE CUT AND ADDING SANCTUARIES FOR MANKIND AND ANIMALS THAT DO NOT NEED THEM

**FOREST SERVICE RESPONSE·**

Multiple use tends to be interpreted many ways. Yours represents a popular view, especially with local residents. See following two comments.

**COMMENT NO. 13** I BELIEVE IT'S TIME FOR THE FOREST SERVICE TO STOP MANAGING OUR FORESTS AS FEED LOTS AND TREE FARMS AND BEGIN TO MANAGE THEM UNDER THE MANDATED CONCEPT OF MULTIPLE USE. AFTER DECADES OF OVERHARVESTING TREES AND OVERGRAZING THE FORAGE, YOUR MANAGEMENT DIRECTION NEEDS TO TAKE A 180 DEGREE TURN

**FOREST SERVICE RESPONSE·**

Your's represents a view expressed by many who wrote in response to the Draft EIS See previous comment and following comment.

**COMMENT NO. 14:** MULTIPLE USE IS LONG-ESTABLISHED AS THE LAW OF THE LAND, EVEN IF ITS APPLICATION HAS BEEN SLOW IN COMING WE UNDERSTAND THE NEED FOR TIMBER TO SUPPORT JOBS IN THE LOCAL ECONOMY AND FEEL THAT THIS CONCERN IS COVERED IN MOST OF THE ALTERNATIVES.

**FOREST SERVICE RESPONSE·**

Your's and the previous two comments represent divergent points of view of the Forest Plan based on interpretation of the intent of the Multiple Use Sustained Yield Act of 1960. The Act sets out a sound principle, but does not attempt to define resource use levels; only that they be maintained in perpetuity. The following is taken from Section 4 of the Act:

As used in this Act, the following terms shall have the following meanings.

- (a) "Multiple use" means the management of all the various renewable surface resources of the national forests so that they are utilized in the combination that will best meet the needs of the American people; making the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use to conform to changing needs and conditions, that some land will be used for less than all of the resources, and harmonious and coordinated management of the various resources, each with the other, without impairment of the productivity of the land, with consideration being given to the relative values of the various resources, and not necessarily the combination of uses that will give the greatest dollar return or the greatest unit output
- (b) "Sustained yield of the several products and services" means the achievement and maintenance in perpetuity of high-level annual or regular periodic output of the various renewable resources of the National Forests without impairment of the productivity of the lands. (16 USC 531)

**COMMENT NO. 15. CONCERN THAT PLAN PRESENTS PRECISE FIGURES THAT MAY NOT BE CORRECT**

**FOREST SERVICE RESPONSE:**

Most figures are estimates based on models of the future and, as such, are certainly subject to error. This is one of the reasons for monitoring the plan and periodically revising it.

**COMMENT NO. 16. CONCERN FOR LAND--STABILITY, INTEGRITY, DIVERSITY--CRITICAL; NOT OUTPUTS.**

**FOREST SERVICE RESPONSE:**

Land stewardship is certainly important. As indicated by the volume and content of comments we have received, output levels are also considered highly important.

**COMMENT NO. 17: NEED WATERSHED MANAGEMENT AREA.**

**FOREST SERVICE RESPONSE:**

Each management area includes watershed management direction. In addition, special management direction is provided to assure that domestic-supply watershed values are protected.

**COMMENT NO. 18. THE FOREST SERVICE WAS CREATING UNNECESSARY JOBS.**

**FOREST SERVICE RESPONSE:**

Several writers felt our concern for forest-related jobs was causing us to sacrifice good land stewardship. We don't believe this to be true, but we realize that it may appear that way, depending on one's perspective.

**COMMENT NO. 19** CONCERNS JOB LOSS, SUPPLY VS. DEMAND OF TIMBER, OLD GROWTH, TOO MANY SET-ASIDES FOR GAME, HELLS CANYON RECREATION AREA AND THE AMOUNT OF TIMBER COMING OFF OF IT, RECREATION, FIREWOOD AVAILABILITY, REDUCED RECEIPTS TO THE COUNTIES, TOURIST TYPE JOBS, THE ROAD TO HAT POINT AND DUG BAR AND SOME RESORT AT HAT POINT, TIMBER SALES AND SPECIES MIX, ACRES IN INTENSIVE MANAGEMENT, AND FINALLY THE VAST REDUCTION IN PINE AVAILABLE FOR HARVEST. PLEASE CONSIDER THESE CONCERNS IN COMING UP WITH A VIABLE FOREST PLAN. THANK YOU.

**FOREST SERVICE RESPONSE:**

We believe these concerns have been adequately considered in this Plan

**COMMENT NO. 20** WE HAVE A GREAT RESPONSIBILITY TO PRESERVE AND PROTECT UNIQUE AND BEAUTIFUL AREAS LIKE THIS FOREST SO THAT CURRENT AND FUTURE GENERATIONS ARE ABLE TO PARTICIPATE IN EXPERIENCES WHICH ARE ONLY POSSIBLE IN A DIMINISHING NUMBER OF AREAS LIKE THE WALLOWA-WHITMAN.

**FOREST SERVICE RESPONSE.**

We agree

**COMMENT NO. 21:** WE NEED YOU, THE FOREST SERVICE

**FOREST SERVICE RESPONSE**

We appreciate your thought Our mail has been mixed on this subject

**COMMENT NO. 22:** WE ARE FAST APPROACHING AN AGE WHERE OUR TRULY WILD AREAS WILL BE A THING OF THE PAST UNLESS WE ACT NOW TO PROTECT OUR NATURAL RESOURCES.

**FOREST SERVICE RESPONSE:**

In our judgement, most of the truly wild areas in the Wallowa-Whitman have been incorporated into the wilderness system and the Hells Canyon NRA. The few that remain are dealt with in this plan.

**COMMENT NO. 23:** COMMERCIAL COLLECTION OF NATIVE PLANTS AND THEIR SEEDS AND PARTS IS RAPIDLY BECOMING A MATTER OF RESOURCE CONCERN ON THE WALLOWA-WHITMAN NATIONAL FOREST, AS COMMERCIAL SEED COMPANIES NOW OFFER HIGH PRICES FOR WILD-COLLECTED PLANTS AND SEEDS. NETWORKS OF PLANT AND SEED COLLECTORS EVEN PUBLISH NEWSLETTERS AND PRICE LISTS FOR MANY SPECIES. YET THE DRAFT DOCUMENTS DO NOT EVEN MENTION THIS GROWING COMMERCIAL EXPLOITATION OF PUBLIC RESOURCES THE FINAL FOREST PLAN AND EIS SHOULD CONTAIN A DISCUSSION OF THIS PRESENTLY UNREGULATED TRADE AND AN ANALYSIS OF ITS EFFECTS ON NATIVE PLANT COMMUNITIES AND ON SENSITIVE SPECIES IN PARTICULAR.

THE PLAN SHOULD ALSO PROPOSE A CLEAR AND SPECIFIC SET OF PRESCRIPTIONS FOR MONITORING AND REGULATING THESE COMMERCIAL VENTURES ON PUBLIC LANDS.

**FOREST SERVICE RESPONSE:**

Persons collecting plants from National Forest land for commercial purposes are required to have permits. With the exception of commercial mushroom pickers, there is little activity on the Forest at present. We have no evidence that commercial plant collection is having a deleterious effect on plant communities or any sensitive species. However, we have direction in the Standards and Guidelines on this subject.

**COMMENT NO. 24:** THE F S. SHOULD MAKE AN EFFORT TO CURB LITTERING BY LOGGERS AND ELK HUNTERS - THE WORST OFFENDERS ELK CAMPS ARE EASILY RECOGNIZABLE YEAR AFTER YEAR BY PLASTIC PRIVIES AND GARBAGE LEFT BEHIND. LOGGERS LEAVE LITTER STREWN OVER THEIR WORK AREAS AND CAMPS AND OFTEN TAKE GREAT PAINS TO UNNECESSARILY DESTROY VEGETATION AND SPRINGS AND TEAR UP THE SOIL. MORE CONSIDERATION SHOULD BE GIVEN TO PRESERVING SPRINGS AT BUCKHORN SPRINGS THE F.S BUILT A CAMPGROUND COMPLETE WITH TOILETS AND UNLOADING AREA FOR HORSES ABOVE THE SPRING. AFTER ELK SEASON THE AREA IS A BARNYARD - SEEPING INTO ONE OF THE BEST SPRINGS IN THE CHESNIMNUS AREA. LOGGERS DESTROYED TWO CAMP AREAS AT SPRINGS NEAR MCGRAW LOOKOUT.

**FOREST SERVICE RESPONSE:**

We do make an effort to curb littering by all Forest users, including loggers and elk hunters. We make regular contacts with elk hunters and in most cases, find that they are cooperative. However, in the rush to break camp and leave for home, some hunters leave trash and camp equipment behind, perhaps buried under snow.

Our timber sale administrators also do their best to work with loggers in cleaning up their camps, protecting springs and taking care of the ground in general. Most loggers are cooperative.

Buckhorn Springs Campground was designed and built above a spring at a time when few people questioned this as an important factor in campground location. As an alternative to closing the campground, we have designed a spring development and some diversion ditches to keep upstream pollutants from affecting the water quality. We expect funding for the project soon.

The two camp areas at springs near McGraw Lookout are within closed timber sale areas. We believe the littering that has occurred is from wood cutters and campers, but regardless, the campsites are still useable.

**COMMENT NO. 25:** NO ALTERNATIVES ARE DESIGNED TO EMPHASIZE WILDERNESS, ROADLESS AREAS, BIRD AND ANIMAL POPULATIONS, FISHERIES, AND VISUAL PLEASURES IN THE DEIS, ALL OF THE PRECEDING ARE APPARENTLY SECONDARY TO LOGGING.

**FOREST SERVICE RESPONSE:**

We believe Alternative F emphasizes the values you list while staying within a reasonable range of alternatives.

**COMMENT NO. 26:** I TAKE ISSUE WITH THE TERMS COMMODITY AND AMENITY AND THE APPLICATION OF THESE TERMS TO THE VALUES WHICH WE SEE IN THE NATURAL FORESTS.

WHO IS TO SAY THAT THE CARBON DIOXIDE-OXYGEN CYCLE IS NOT OF GREAT VALUE? WHO IS TO SAY THAT THE DIVERSITY OF PLANTS AND ANIMALS IS NOT OF GREAT VALUE? WHY IS RECREATION IN THE FOREST NOT OF GREAT VALUE? IF CUTTING UP A TREE FOR A SECOND HOME, A GARAGE, OR A CLUB HOUSE IS A COMMODITY VALUE, DOES THAT SUGGEST THAT OXYGEN AND VARIOUS RELATIVELY UNSTUDIED PLANTS ARE MERELY AMENITIES? THE DEIS' HEAVY EMPHASIS ON TRADITIONAL ECONOMIC COMMODITIES FLAWS THE PLAN'S ECONOMIC ANALYSIS.

**FOREST SERVICE RESPONSE:**

As we've used the terms, commodities are those items that can be purchased and sold at the market place. It is not to say that this makes them more important than those values (amenities) that are not so easily valued.

**COMMENT NO. 27:** I FIRMLY BELIEVE THAT THE DRAFT PLAN AND DEIS SHOULD BE REWRITTEN AND RESUBMITTED TO THE PUBLIC THE COMPLETE RANGE OF ALTERNATIVES SHOULD BE EXAMINED AND INCLUDED FOR COMMENT. THE CURRENT DOCUMENTS COMPLETELY OVER-EMPHASIZE TIMBER AS THE PREDOMINANT RESOURCE AND VALUE WHILE UNDER ESTIMATING ALL OTHERS IN THE FUTURE, WATER, RECREATION AND WILDERNESS VALUES WILL COMPLETELY OVERSHADOW TIMBER HARVEST.

**FOREST SERVICE RESPONSE:**

We recognize that the future may bring many changes in resources and public needs and desires. This is a reason the plan will be reconsidered and revised as necessary every 10 to 15 years.

**COMMENT NO. 28:** IT IS UNCLEAR HOW LAND WAS ALLOTTED TO MANAGEMENT AREA 18, WHICH WOULD MAINTAIN STREAM SHADING TO HELP OPTIMIZE ANADROMOUS FISH HABITAT OVER 60,000 ACRES ARE ALLOTTED UNDER THE PREFERRED ALTERNATIVE, WHILE NEARLY 700,000 ACRES WOULD BE INCLUDED UNDER ALTERNATIVE F. WHY DO OTHER AREAS NOT INCLUDE ANY SHADE STANDARD, AND WHY IS THERE SUCH A LARGE DIFFERENCE BETWEEN THE TWO ALTERNATIVES THAT DO? DOES THE PREFERRED ALTERNATIVE PROTECT THE MOST IMPORTANT ONES? HOW WAS THE DELINEATION MADE?

IT WOULD APPEAR THAT THE MANAGEMENT DIRECTION GIVEN IN AREA 18 MAY BE OVER THE W-WNF AS A WHOLE.

IT PROVIDES SOME PROTECTION FOR FISH HABITAT AND WATER QUALITY WITHOUT ENTIRELY PRECLUDING ANY TYPE OF ACTIVITY, EVEN IN RIPARIAN AREAS.

**FOREST SERVICE RESPONSE.**

In the preferred alternative, Area 18 is applied to the lands within the North Fork John Day drainage that are not in wilderness. This is in response to language in the May 14, 1984 report from the Senate Committee on Energy and Natural Resources on the establishment of the North Fork John Day Wilderness. This language is as follows:

"In developing its recommendation for this area, the Committee has given high priority to protection of fisheries habitat. The North Fork John Day is an extremely important native fishery habitat for Columbia River salmon. The Committee notes that it has excluded nearly 100,000 acres which was included in the House proposal. In doing so, the Committee wishes to



emphasize that its action does not reflect lack of concern for protection of fisheries in the excluded areas. Rather, the Committee feels that in the development of forest plans for these areas, the Forest Service can and should afford recognition of the importance of this habitat. Development activities should be undertaken in a manner which minimizes impacts upon this important resource."

We believe all alternatives protect the anadromous fish habitat through overriding standards and guidelines. Management Areas 1 and 3 have been revised to include more detailed standards. Area 18 takes a more conservative approach than the other areas.

**COMMENT NO. 29:** CURRENT DIRECTION (DEIS, PAGE II-26) THE DEIS GLOSSARY DEFINES CURRENT DIRECTION AS "THE COMBINATION OF ACTIVITIES DICTATED BY LAWS, REGULATIONS, THE FOREST SERVICE MANUAL, AND EXISTING UNIT PLANS" (PAGE VIII-7). THEREFORE, IT IS NOT CLEAR WHY THE CURRENT DIRECTION ALTERNATIVE (ALTERNATIVE A) IS MODELED USING NEW YIELD TABLES, A NEW LAND SUITABILITY ANALYSIS, AND A NEW TIMBER INVENTORY WHICH ARE PART OF THE PRESENT PLANNING PROCESS. THE DIFFERENCES BETWEEN THE "EXISTING PLAN" PROCESS AND THE PROPOSED, NEW PROCESS ARE ENORMOUS

THE RESULTING TIMBER OUTPUTS FOR THIS ALTERNATIVE SHOW A FIRST DECADE ALLOWABLE SALE QUANTITY WHICH IS 38 PERCENT LOWER THAN THE EXISTING TIMBER MANAGEMENT PLAN, IN TERMS OF CUBIC FEET. TO LABEL ALTERNATIVE A AS A "NO ACTION" ALTERNATIVE GROSSLY MISSTATES THE FACTS AND MAY THEREFORE NOT MEET NEPA REQUIREMENTS.

THE DEPARTMENT APPRECIATES THE WALLOWA-WHITMAN'S APPROACH WHICH COMPARES ALTERNATIVE OUTPUTS TO "RECENT LEVELS" IN ADDITION TO CURRENT DIRECTION. WE FOUND THIS COMPARISON WITH HISTORICAL OUTPUT LEVELS VERY HELPFUL AND ILLUSTRATES THAT ALTERNATIVE A IS ACTUALLY A NEW MANAGEMENT DIRECTION RATHER THAN CURRENT DIRECTION.

**FOREST SERVICE RESPONSE:**

The current direction alternative, Alternative A, incorporated the direction from the Unit Plans under which we are currently managing, as well as other laws. In recognition that the current direction can be interpreted otherwise, we have included a "No Change" alternative by supplementing the Draft EIS and have included it in the Final EIS

**COMMENT NO. 30.** ALTHOUGH YOU STATE THAT ALTERNATIVE A IS AN ILLEGAL ALTERNATIVE SINCE IT HAS NO PROVISION FOR WILDLIFE HABITAT, ISN'T IT POSSIBLE TO "FIX" THESE UNIT PLANS SO THAT THE WORK AND \$'S THAT WENT INTO THEM WON'T BE WASTED. MUST PLANNING THE FOREST'S FUTURE BECOME A FULL TIME PROPOSITION WITH A NEW PLAN EVERY DECADE?

**FOREST SERVICE RESPONSE.**

The DEIS contained a correction notice which explained that Alternative A was not in fact illegal and could be implemented with some adjustment of the old-growth allocation. The old-growth distribution requirement has since been relaxed. Therefore, the current direction alternative can be considered legal as described.

**COMMENT NO. 31: ALTERNATIVE B OR THE COMMUNITY STABILIZATION ALTERNATIVE WOULD BE MORE SUPPORTABLE BY THIS ORGANIZATION**

**FOREST SERVICE RESPONSE:**

Your opinion has been considered

**COMMENT NO. 32. ALTERNATIVE B PROVIDES LOCAL BENEFIT AT THE EXPENSE OF THE NATIONAL INTEREST.**

**FOREST SERVICE RESPONSE:**

Your opinion has been considered

**COMMENT NO. 33 ALTERNATIVE "B-DEP" IS A RAPE OF THE FOREST AND A DEPARTURE FROM ECONOMIC AND ECOLOGICAL RATIONALITY**

**FOREST SERVICE RESPONSE.**

Your opinion has been considered

**COMMENT NO. 34: THE FOREST SERVICE PREFERRED ALTERNATIVE SEEMS TO BE SENSIBLE AND BALANCED.**

**FOREST SERVICE RESPONSE.**

Your opinion has been considered

**COMMENT NO. 35: I CAN SEE THAT THIS STUDY HAS ENTAILED A TREMENDOUS AMOUNT OF WORK, STUDY AND EFFORT. I HOPE YOUR ALTERNATIVE PASSES AS IT SEEMS TO BE THE FINEST MIX OF ENVIRONMENTAL AND ECONOMIC MIXES THANKS AGAIN.**

**FOREST SERVICE RESPONSE:**

Your opinion has been considered.

**COMMENT NO. 36 I PREFER THE WALLOWA-WHITMAN NATIONAL FOREST BE MANAGED UNDER THE COMMUNITY STABILITY ALTERNATIVE**

**FOREST SERVICE RESPONSE**

Many people share your preference

**COMMENT NO. 37: YOU PEOPLE SHOULD KNOW WHAT IS BEST YOU DO THE SURVEYS, YOU HAVE (OR SHOULD HAVE) THE EDUCATION AND EXPERIENCE TO MAKE THE BEST DECISIONS DON'T LET THE LOCAL 'GOOD OLE BOYS' MAKE THEM FOR YOU. BECAUSE AFTER THE WOODS ARE TORN APART AND DECIMATED - THEY WILL BLAME YOU FOR THAT TO!**

**FOREST SERVICE RESPONSE**

Thank you for your view.

**COMMENT NO. 38:** THE WALLOWA-WHITMAN (WW) NATIONAL FOREST PLAN IS IN SOME WAYS CONSERVATIVE IN ITS ESTIMATES AS TO THE AMOUNT OF MATERIAL WHICH CAN BE HARVESTED. THIS ERROR BUILDS IN A MARGIN FOR SAFETY. BY BEING CAUTIOUS, THE PLAN IS ATTEMPTING TO PRESERVE OPTIONS FOR FUTURE GENERATIONS OF OREGONIANS WHICH THE PRESENT GENERATION WERE NOT OFFERED. BECAUSE FOR THE MOST PART, OVERHARVESTING OCCURRED, WHEN IT WAS PROFITABLE TO DO SO, THIS GENERATION WILL SUFFER EMPLOYMENT HARDSHIPS GREATER THAN PREVIOUS. HOPEFULLY, THE WW PLAN WILL PREVENT FUTURE GENERATIONS FROM HAVING TO ADDRESS THESE DIFFICULT PROBLEMS.

**FOREST SERVICE RESPONSE.**

We made no attempt to be conservative or liberal in our calculations. We too hope that the plan adequately considers future, as well as present, generations.

**COMMENT NO. 39.** THE GOAL OF THE WW PLAN IS TO BALANCE THE PUBLIC GOOD. IT IS CLEAR THEY HAVE ATTEMPTED TO ACHIEVE THIS GOAL. IT SEEMS EXTREMELY ARROGANT, TO SAY THE LEAST, TO HOLD MANAGERS OF THE PUBLIC GOOD TO THE SAME STANDARD AS MANAGERS OF PRIVATE RESOURCES. IF THE SAME FOR-PROFIT MANAGEMENT STANDARD HAD BEEN APPLIED IN THE PAST TO THE PUBLIC SECTOR RESOURCE THERE WOULD BE NO DEBATE TODAY WITHOUT OPTIONS SINCE THERE WOULD BE NO PUBLIC TIMBER RESOURCE TO FIGHT OVER. THE PLAN AND THE PREFERRED ALTERNATIVE DO BALANCE THE CONFLICTING POLITICAL GROUPS. IT IS A TRUE COMPROMISE SINCE NEITHER INDUSTRY OFFICIALS NOR ENVIRONMENTAL GROUPS ARE SATISFIED. YET, EITHER B OR D ALTERNATIVES WOULD ALSO OFFER FUTURE CHOICES, ALTHOUGH NOT TO THE SAME DEGREE AS C.

**FOREST SERVICE RESPONSE**

Several respondents expressed this general point of view.

**COMMENT NO. 40:** WHAT BOTHERS ME MOST IS THE FACT THAT MEMBERS OF THE ENVIRONMENT MOVEMENT ARE ALLOWED TO ENGAGE IN INDUSTRIAL SABOTAGE (THE EAGLE CAP LOGGING CO SUFFERED \$27,000.00 DAMAGES IN SABOTAGED MOTORS LAST SEASON. MR. JIM HENDERSON'S WHEEL SKIDDER WAS DAMAGED ON HAT POINT, AND ZACHARIAS LOGGING CO LOST A D9 TO THIS TYPE OF TERRORISM) I THINK THE FOREST SERVICE IS BEING VERY LAX, AS ARE THE OTHER LAW ENFORCEMENT AGENCIES, IN CATCHING AND PUNISHING THESE CRIMINALS.

**FOREST SERVICE RESPONSE**

Vandalism to equipment, Forest Service or private, left out in the forest is common, particularly during hunting season. Most of the vandalism is not done by environmental groups. The Forest Service has no authority to investigate vandalism to private equipment although we assist the local law enforcement people if requested. In Eastern Oregon, the local law enforcement agencies with primary jurisdiction (Oregon State Police or the County Sheriff) are understaffed. Most of the local Sheriff's offices have a sheriff and two or three deputies. This does not allow them to spend much time on nonviolent crimes. Generally, the Forest must pay through

cooperative funding for work done on National Forest land. This is limited to recreation-related activities and drug-related investigations

**COMMENT NO. 41:** I BELIEVE YOUR PROPOSED FOREST SERVICE PLAN FOR THE WALLOWA-WHITMAN NATIONAL FOREST IS IN VIOLATION OF GOD'S CREATIVE PURPOSE. YOUR PLAN DENIES MAN A RIGHTFUL AND HEALTHY USE OF THE FOREST FOR HIS PROPER NEEDS, AND PERMITS THE FOREST TO WASTE AND ROT IN UNHEALTHY WAYS - IN WAYS NOT EVEN GOOD FOR SUSTAINING WILDLIFE.

I URGE YOU NOT TO INSIST ON A PLAN THAT WILL PROVE DETRIMENTAL TO BOTH THE WELFARE OF MAN AND THE HEALTH OF THE FORESTS AND WILDLIFE. IN SHORT, I AM ASKING YOU TO ACT RESPONSIBLY BEFORE GOD.

**FOREST SERVICE RESPONSE:**

Thank you for your point of view

**COMMENT NO. 42.** YOU ARE NOT AWARE OF THE LONG TERM EFFECTS -- ONLY THE SHORT-LIVED ECONOMIC MOTIVES, CONSCIOUSLY MAKING THIS PLAN MANIFEST WILL CAUSE DISASTROUS CONSEQUENCES NOT APPARENT TO INTERESTS WEARING ECONOMIC BLINDERS. ALSO -- SIMPLY BECAUSE WE HAVE THE ABILITY TO CHANGE OUR ENVIRONMENT DOESN'T GIVE US THE GOD-GIVEN RIGHT TO DESTROY OTHER FORMS OF LIFE WHO DON'T SHARE THIS ABILITY (AND MOST ESPECIALLY FOR GREED)

**FOREST SERVICE RESPONSE**

Thank you for your opinion.

**COMMENT NO. 43:** THE MANAGEMENT AREAS (MA) PRESENTED ARE NOT CONDUCTIVE TO BALANCED, PRODUCTIVE STEWARDSHIP OF THE FOREST. WE RECOMMEND THAT MA-2, MA-3, MA-6, MA-7, AND MA-18 BE ELIMINATED FROM THE PLAN AS UNJUSTIFIED AND INAPPROPRIATE MANAGEMENT DIRECTIONS. WE ARE PARTICULARLY CONCERNED ABOUT THE CERTAIN DECLINE IN FOREST PRODUCTIVITY WHICH WOULD TAKE PLACE UNDER THE REGIMES OF MA-3, MA-6, AND MA-18. ACCORDING TO THE DEIS, THE GAME COVER REQUIREMENTS OF MA-3 WILL DELAY COMMERCIAL TIMBER HARVEST OF "SOME" TIMBER STANDS 1 TO 7 DECADES. ALSO, MA-3 AND MA-18 ARE REFERRED TO IN THE PLAN (P 4-14) AS INVOLVING "MANY LANDS SUITABLE FOR TIMBER PRODUCTION" THAT "WILL NOT HAVE BEEN ENTERED BY THE YEAR 2030 " THERE ARE CLUES THROUGHOUT THE PLAN DOCUMENTS, BUT NO FORTHRIGHT PRESENTATION OF HOW EXTENSIVE THESE CONSTRAINTS ARE AND THE COST IN BENEFITS FOREGONE.

**FOREST SERVICE RESPONSE.**

We believe the benefits foregone are adequately displayed within the DEIS. Particularly Chapters II and IV and in Appendix B A comparison of the timber outputs between alternatives is also a way of evaluating the tradeoffs.

**COMMENT NO. 44** THE DRAFT PLAN MAKES IT CLEAR THAT ITS VISION OF FOREST MANAGEMENT IS BASED ON TREE FARMING, AN AREA THAT TREATS THE FOREST AS THE COMMODITY BASE OF A HANDFUL OF INDUSTRIES IT NEGLECTS ALL THE OTHER NATURAL VALUES AND CONCENTRATES ON THE PROFITS AND PAYCHECKS OF A SMALL NUMBER OF AMERICANS

THE NATIONAL FOREST BELONGS TO ALL AMERICANS AND SHOULD NOT BE MANAGED FOR THE EXCLUSIVE GAIN OF THE FEW THAT HAPPEN TO LIVE AROUND IT AND THE PRIVATE COMPANIES THAT PROFIT FROM ITS COMMODITIES.

**FOREST SERVICE RESPONSE.**

We disagree that we have concentrated on profits and paychecks, but realize that it could appear so, depending on a particular point of view. We have tried to fairly address each of the issues. The local economy was one of the issues

**COMMENT NO. 45:** THE SPECIAL INTEREST MANAGEMENT AREAS 2, 3, 6, 7, 18 ARE AN UNNECESSARY RESTRICTION ON TRUE MULTIPLE-USE MANAGEMENT. THE ACRES ALLOCATED TO THESE AREAS SHOULD BE RETURNED TO MANAGEMENT AREA 1.

**FOREST SERVICE RESPONSE:**

See response to Comment No 12, this section.

**COMMENT NO. 46.** WHEREAS, THE UNION COUNTY COURT IN ITS MEETING ON JULY 2, 1986 AT LA GRANDE, OREGON, RECOGNIZED THAT FOREST SERVICE PROPOSED PLANS FOR MANAGING THE WALLOWA-WHITMAN NATIONAL FOREST FOR THE NEXT 10 YEARS DO NOT MEET THE NEEDS OF CITIZENS IN TERMS OF JOBS, TAXES, WILDLIFE, MANAGEMENT, OR FIREWOOD THE FOREST SERVICE PROPOSALS ALSO DO NOT MEET THE POTENTIAL OF THE FOREST AND DO NOT CONSTITUTE RESPONSIBLE FOREST MANAGEMENT, AND

WHEREAS THE FOREST SERVICE DIRECTIVES FOR MULTIPLE USE MANAGEMENT ARE BEING VIOLATED BY REMOVING FROM MULTIPLE USE A VERY LARGE PORTION OF PRESENT MULTIPLE USE LAND FOR NEEDS OF A VOCAL FEW, AND THE POTENTIAL OF THE FOREST WOULD BE WASTED.

**FOREST SERVICE RESPONSE:**

See response to Comment No. 14, this section.

**COMMENT NO. 47 :** PAGE 4-23, WETLANDS - THE NEED TO MITIGATE UNAVOIDABLE WETLAND IMPACTS SHOULD BE DISCUSSED.

**FOREST SERVICE RESPONSE:**

Such language has been added to the text.

**COMMENT NO. 48:** I THINK OVERALL THIS PLAN IS TOO INFLUENCED BY NUMBERS AND QUANTIFIABLE COMMODITY PRODUCTION WITHOUT ENOUGH WEIGHT GIVEN TO AMENITIES, WHICH ARE MORE DIFFICULT TO QUANTIFY I REALIZE THE PLAN MUST INCLUDE SOME COMPROMISE TO ALL THE VARIOUS USES AND INTERESTS INVOLVED, BUT I HOPE YOU LOOK AT MORE THAN FIGURES MY PERSONAL BELIEF IS THAT THE NATIONAL FOREST SHOULD BE MANAGED MORE FOR MULTIPLE USE OVERALL AND NOT DESIGNATE ONE AREA FOR USE X AND ANOTHER FOR USE Y, ETC. THANK YOU FOR THE OPPORTUNITY TO VOICE MY OPINION.

**FOREST SERVICE RESPONSE:**

We have tried to consider all values in arriving at a preferred alternative, whether or not they could be monetarily quantified. As explained in Chapter II, page 65 of the DEIS, although certain renewable resources are emphasized, each management area provides for a combination of Forest uses. All management areas provide water, wildlife, forage, protection of riparian habitat and many forms of recreation; many provide timber yields. Management direction identifies the renewable resource use which has highest priority and therefore tends to limit the output levels of other resources which may be competing on the same land. But other uses are seldom totally eliminated.

**COMMENT NO. 49.** EVERYONE APPRECIATES A WELL-WRITTEN LETTER WHICH IS ADDRESSED TO THE ISSUES, BUT NOT EVERYONE CAN DO THAT. THE QUALITY AND QUANTITY OF THE EDUCATION OF OUR EMPLOYEES PROBABLY DOESN'T MATCH UP TO SOME PHD WHO HAS PENNED THE RESPONSE DIRECTED AT SAVING THE LAST BAKER'S RED TROUT, BUT THAT DOES NOT MEAN THAT THE EMPLOYEE HAS LESS FEELINGS FOR THE ISSUE OR THAT IT WILL AFFECT THEM ANY LESS. THEY JUST HAVE A HARD TIME PUTTING IT ON PAPER. SHOULD CONSIDERATION OF THAT RESPONSE BE ANY DIFFERENT? I THINK NOT

**FOREST SERVICE RESPONSE:**

We agree. A personal value statement is valid regardless of phraseology or syntax.

**COMMENT NO. 50:** I AM GREATLY DISTURBED THAT YOU ALLOWED THE POWDER RIVER SPORTSMAN CLUB AND THE OREGON NATURAL RESOURCES COUNCIL SPACE FOR COMMENT. IF YOU ALLOW THEM, YOU SHOULD ALLOW OTHERS, INCLUDING INDUSTRY. THAT WAS A MISTAKE THAT YOU MADE AND THAT WAS GROSSLY UNFAIR

**FOREST SERVICE RESPONSE:**

Those two organizations provided written alternatives prior to the draft documents being published. Any other organization could have done likewise.

**COMMENT NO. 51.** THE GRANGE IS VERY CONCERNED ABOUT THE COMMUNITY, AND SO IS THE COMMUNITY STABILITY ALTERNATIVE. PLEASE USE THE COMMUNITY STABILITY ALTERNATIVE AS YOUR MANAGEMENT PLAN

**FOREST SERVICE RESPONSE:**

Your recommendation has been considered

**COMMENT NO. 52:** I DISAPPROVE OF THE FOREST SERVICE PREFERRED ALTERNATIVE PLAN. I REALIZE THERE ARE TWO SIDES TO EVERY STORY, AND IT SURE LOOKS LIKE THE ENVIRONMENTALIST WISHES ARE FAVORED VERY STRONGLY IN THIS ALTERNATIVE

**FOREST SERVICE RESPONSE:**

As you say, there are usually two sides, and both are well represented in the comments we have received. See following comment.

**COMMENT NO. 53:** ALTERNATIVE C (PREFERRED ALTERNATIVE)· GIVEN THE IMPORTANCE OF VALUES SUCH AS VISUAL QUALITY, PREMIUM HABITAT FOR FISH AND GAME AND NON-GAME WILDLIFE, PRISTINE WATER, SEMIPRIMITIVE AND A PRIMITIVE RECREATION, BIG TREES FOR AESTHETIC, SPIRITUAL, AND WILDLIFE NEEDS, COUGAR, FALCON, SALMON, TROUT, PILEATED WOODPECKER, QUALITY WILDERNESS VISITS, AND OVERALL FOREST-WIDE ECOSYSTEM DIVERSITY (PRESERVING LARGE BLOCKS OF UNMODIFIED LANDS REPRESENTATIVE OF ALL THE FOREST'S TYPES): GIVEN THE IMPORTANCE OF LIMITING THE IRREVERSIBLE AND IRRETRIEVABLE COMMITMENTS OF RESOURCES SO THAT OUR DESCENDANTS WILL HAVE THEM TO ENJOY; GIVEN A DESIRE FOR FISCAL RESPONSIBILITY AND THE BELOW-COST NATURE OF SOME OF THE TIMBER SALES IN ALTERNATIVE C, AND GIVEN THAT THIS IS A NATIONAL FOREST WHICH SHOULD SERVE THE INTERESTS OF ALL OF OREGON AND THE OTHER 49 STATES, THE SIERRA CLUB BELIEVES THAT THE PREFERRED ALTERNATIVE (C) GIVES FAR TOO MUCH EMPHASIS TO THE LOCAL ECONOMY AND TIMBER HARVESTING TO THE DETRIMENT OF THE FORMER VALUES

**FOREST SERVICE RESPONSE:**

Your opinion has been considered

**COMMENT NO. 54:** THE STATE DEPARTMENT OF FORESTRY HAS ALSO CONCLUDED THAT THE FOREST'S PREFERRED ALTERNATIVE FAILS TO MAXIMIZE PUBLIC NET BENEFITS OR TO SATISFY STATE OBJECTIVES FOR NATIONAL FOREST MANAGEMENT, DESPITE THE POTENTIAL TO DO SO.

**FOREST SERVICE RESPONSE.**

It is difficult to achieve a consensus of what mix of allocations, activities, and outputs will result in maximization of net public benefits. Net public benefits (see Glossary) signify the overall long-term value to the nation of all outputs and positive effects (benefits) less all associated inputs and negative effects (costs) whether they can be quantitatively valued or not. To maximize net public benefits requires subjectively comparing quantifiable benefits and costs (such as timber or forage) along with those which cannot be quantified (such as visual quality or solitude). Consequently, there are many ideas as to what type of Forest management will maximize net public benefits.

We believe that the preferred alternative, as modified in the DEIS, maximizes net public benefits. We also recognize that there are other opinions.

**COMMENT NO. 55:** WE RESPECTFULLY SUGGEST THAT AN AREA BE CREATED FOR ONE-QUARTER MILE WIDE AROUND THE SOUTH AND EAST BOUNDARIES OF THE CITY OF GREENHORN AND BE DESIGNATED AS MANAGEMENT AREA NO. 16. THIS WE BELIEVE WOULD PROVIDE A BUFFER ZONE AROUND THIS SUMMER HOME AREA. SINCE THE CITY OF GREENHORN WAS INCORPORATED BEFORE THE ADVENT OF THE FOREST SERVICE, AND THAT TWO GENERATIONS BEYOND THE PRESENT OWNERSHIPS ARE WAITING IN THE WINGS, GREENHORN WILL NOT JUST GO AWAY. THE AREA REFERRED TO IN OUR COVER LETTER TO BE DEEDED TO THE FOREST SERVICE FOR A MINIMUM USE CAMPGROUND, WOULD ALSO BE INCLUDED IN THIS MANAGEMENT AREA. WE ARE ALSO REQUESTING THIS SAME MANAGEMENT AREA FROM THE UMATILLA FOREST, FOR THE NORTH AND WEST BOUNDARIES OF THE CITY (MAP ATTACHED TO ORIGINAL )

**FOREST SERVICE RESPONSE:**

Your suggestion has been carefully considered. We believe the visual resource management prescriptions for the vicinity of Greenhorn will protect the scenic values with which you are concerned. We will ensure that you have the opportunity to be involved in Forest Service projects in that area.

**COMMENT NO. 56** THE FINAL PLAN SHOULD INCLUDE SPECIFIC STANDARDS AND GUIDELINES FOR PROTECTING AND PRESERVING THE DIVERSITY OF NATIVE PLANT COMMUNITIES EXISTING ON THE WALLOWA-WHITMAN.

**FOREST SERVICE RESPONSE:**

We believe the present standards and guidelines adequately protect plant diversity.

**COMMENT NO. 57:** WE WOULD LIKE TO EXPRESS OUR OBJECTIONS TO PART OF THE MANAGEMENT PRESCRIPTIONS FOR THESE LANDS [MANAGEMENT AREA 6]. THE FOLLOWING POINTS SHOULD BE DELETED OR MODIFIED IN THE FINAL PLAN. ALL ARE CONTRARY TO THE INTENT AND PURPOSE OF NON-MOTORIZED ROADLESS AREA DESIGNATIONS

1. THERE SHOULD BE NO MOTORIZED USE OF THESE AREAS AT ANY TIME, INCLUDING THE USE OF SNOW MACHINES IN SPRING AND WINTER OR THE USE OF MECHANIZED TRAIL MAINTENANCE EQUIPMENT. ALL ROADING SHOULD BE PROHIBITED.
2. LIVESTOCK GRAZING SHOULD BE EXCLUDED FROM THESE AREAS TO PROTECT SENSITIVE HABITATS, WILDLIFE FORAGE AND THE QUALITY OF THE PRIMITIVE RECREATION EXPERIENCE.
3. SANITATION AND SALVAGE TIMBER HARVESTS SHOULD NOT OCCUR. CRITERIA FOR SUCH HARVESTS IN THE DRAFT PLAN ARE SO LOOSE THAT MOST LANDS IN THIS CATEGORY COULD BE HARVESTED ON ONE PRETEXT OR ANOTHER. THIS IS UNACCEPTABLE.

**FOREST SERVICE RESPONSE:**

We recognize that there are many ways this area could be described. We attempted to find a point between wilderness and Management Area 3 (i.e., areas with backcountry values, but without the rigid restriction of wilderness). We believe Management Area 6 comes close. To adopt your suggestions would, in our opinion, move it closer to a wilderness concept.

**COMMENT NO. 58:** WOULD LIKE TO SEE THE AREA DESCRIPTION BE MORE ACCOUNTABLE, THAT IS MORE SPECIFIC. WOULD PREFER NOT TO SEE DESCRIPTORS SUCH AS "LITTLE OR NONE," "AS MUCH AS POSSIBLE," ETC., AS IS FOUND IN AREA 18 WATERSHED STANDARDS AND GUIDELINES NEED TO BE MORE SPECIFIC, E.G., "SNAG CUTTING MAY BE RESTRICTED."

**FOREST SERVICE RESPONSE:**

Our review revealed that few of the qualifiers you suggest are there, but we have attempted to reduce these few as much as possible. It may not be necessary to restrict snag cutting in all parts of the management area in order to achieve adequate numbers. Therefore, we have not changed this direction.



**COMMENT NO. 59:** PAGE 3-3 OF THE DEIS STATE "OF THE 107,000 FORESTED ACRES OF ROADLESS AREA OUTSIDE THE HELLS CANYON NATIONAL RECREATION AREA, 74% ARE CONSIDERED TECHNICALLY OR ECONOMICALLY UNSUITED FOR TIMBER PRODUCTION" THIS LEAVES ONLY 26% OF THAT FORESTED ROADLESS AREA OUTSIDE THE HCNRA OR ONLY 27,820 ACRES SUITABLE FOR HARVEST. ALL OF THESE ACRES ARE SCHEDULED FOR HARVEST. MOST OF WHICH WILL OCCUR DURING THE NEXT 3 DECADES THIS PROPOSED FURTHER REDUCTION OF FORESTED SEMIPRIMITIVE ROADLESS AREA LEAVES INADEQUATE AREAS FOR REFUGE FOR ELK IN BOTH WINTER AND SUMMER RANGE AND DECREASES QUALITY RECREATIONAL OPPORTUNITIES IN SEMIPRIVATE AREAS. THE CONFEDERATED TRIBES THEREFORE ADVOCATE ONLY MANAGEMENT AREAS 3, 3A, OR 18 BE CONSIDERED IN THESE AREAS TO BE ENTERED AND ROADS ONLY BE LEFT OPEN TEMPORARILY DURING HARVESTING AND TREATMENT, ACCORDING TO STRICT TIME CONSTRAINT GUIDELINES WITH SUBSEQUENT GATED ROAD CLOSURES. THIS WILL HELP PROTECT THE VERY LIMITED ROADLESS NATURAL AREA LEFT ON THE WALLOWA-WHITMAN NATIONAL FOREST

**FOREST SERVICE RESPONSE:**

The 107,000 acre figure was shown on page 3-3 of the Forest Plan and therefore referred to the forested portions of roadless areas that would remain undeveloped in Alternative C. We disagree that this means there will be inadequate areas for elk refuge since they can use roaded as well as unroaded areas for refuge. Many of the roadless areas to be entered will have a low level of open roads between timber harvest entries.

**COMMENT NO. 60:** THE INTRODUCTION TO CHAPTER IV OF THE DEIS STATES THAT THE INTENT OF THIS DOCUMENT IS TO PROVIDE ANALYSIS AT A PROGRAMMATIC LEVEL, AND THAT CUMULATIVE EFFECTS WILL BE ADDRESSED AT THE LEVEL OF INDIVIDUAL PROJECTS. WHILE WE WOULD AGREE THAT CUMULATIVE EFFECTS NEED TO BE ADDRESSED AT THE PROJECT LEVEL, IT IS ALSO CLEAR THAT CUMULATIVE EFFECTS MUST BE ADEQUATELY DEALT WITH IN THE FOREST PLAN IN ORDER TO PROVIDE A FRAMEWORK FOR THE PROJECT LEVEL ANALYSIS. FOR EXAMPLE, REDUCTIONS IN OLD-GROWTH FOREST MUST BE VIEWED IN THE BROADER CONTEXT OF LANDS OF ALL OWNERSHIPS IN THE REGION. THE VERY LIMITED EXTENT OF OLD GROWTH ON PRIVATE LANDS HEIGHTENS THE IMPORTANCE OF THIS HABITAT ON NATIONAL FOREST LANDS

**FOREST SERVICE RESPONSE:**

We did not count on any old growth remaining on private lands in the long run.

**COMMENT NO. 61:** TO QUOTE FROM THE GLOSSARY OF THE PROPOSED FOREST PLAN, A STANDARD IS "A PRINCIPAL REQUIRING A SPECIFIC LEVEL OF ATTAINMENT, A RULE AGAINST WHICH TO MEASURE." ALMOST WITHOUT EXCEPTION, THE PROPOSED "STANDARDS" FALL FAR SHORT OF THIS DEFINITION, AND MIGHT MORE APPROPRIATELY BE REFERRED TO AS OBJECTIVES OR GOALS. THE STANDARDS NEED TO BE REVISED TO PROVIDE MEASURABLE CRITERIA AGAINST WHICH PERFORMANCE CAN BE MEASURED IF LAND MANAGERS ARE TO BE HELD ACCOUNTABLE FOR THEIR ACTIONS.

**FOREST SERVICE RESPONSE:**

Some of the "standards and guidelines" are more guidelines than standards. However, there are many standards where specific levels are specified, and we have added more to the final plan.

**COMMENT NO. 62. WATER QUALITY ANOTHER EXAMPLE OF A "STANDARD" THAT IS NOT REALLY A STANDARD. THE STANDARD SHOULD STATE THAT STATE WATER QUALITY STANDARDS WILL BE MET - BEST MANAGEMENT PRACTICES ARE NOT NECESSARILY SUFFICIENT**

**FOREST SERVICE RESPONSE:**

Most water quality standards were developed as a means of controlling point sources of pollution (such as from industrial discharge). Often they are not well suited for application to nonpoint sources typical of land management activities because it is impractical to determine if they are being met (natural variation in water quality necessitates an extremely large sample size). Best management practices (BMP's) are based on research and experience and are intended to provide the degree of protection or mitigation needed to protect watershed values and meet water quality standards. They are improved as more is learned. BMP's are not intended as a substitute for water quality standards -- they are a tool for use in applying the standards.

**COMMENT NO. 63: PAGE 5-9, TABLE 5-1 - WE SUGGEST THAT THE PROPOSED MONITORING PROGRAM INCLUDE AN ANNUAL ANALYSIS OF WETLAND AND FLOODPLAIN ACREAGE LOSSES**

**FOREST SERVICE RESPONSE:**

This would, for practical purposes, be the areas occupied by roads where they cross streams. Most of this has already occurred. We disagree that starting to monitor this loss now would be useful.

**COMMENT NO. 64: RIPARIAN AREA MANAGEMENT STANDARDS SHOULD BE SEPARATELY PRESENTED IN THE FINAL PLAN. GENERAL MEASURES THAT WOULD APPLY TO ALL RIPARIAN AREAS SHOULD BE GIVEN FIRST, FOLLOWED BY SPECIFIC STANDARDS FOR DIFFERENT TYPES OF ACTIVITIES OR INDIVIDUAL PROBLEM AREAS OR TYPES. GUIDELINES FOR DETERMINING COMPATIBILITY OF ACTIVITIES WITH THE VALUES AND FUNCTIONS OF INDIVIDUAL RIPARIAN AREAS, AND STANDARDS FOR MEASURING THE SIGNIFICANCE OF IMPACTS, ARE BOTH NECESSARY AS DISCUSSED ABOVE UNDER GRAZING FOR EXAMPLE, LIVESTOCK USE MAY BE INCOMPATIBLE WITH RIPARIAN VALUES IN STEEP CANYONS SUPPORTING ANADROMOUS FISH SPAWNING AND REARING HABITAT OR DOMESTIC WATER SUPPLIES.**

**FOREST SERVICE RESPONSE.**

There are numerous ways in which standards and guidelines can be displayed. Since direction for riparian areas, floodplains, and wetlands overlap, their standards and guidelines are presented in the same section

**COMMENT NO. 65: INDIVIDUAL MANAGEMENT AREA AREAS SHOULD INCLUDE, AS PART OF THE DESCRIPTION SUBSECTION, THE TOTAL NUMBER OF ACRES ALLOCATED TO THEM AND THE OUTPUT TARGETS THAT HAVE BEEN ASSIGNED (THIS WOULD MAKE THE DESCRIPTIONS MORE COMPLETE AND AVOID THE NECESSITY OF JUMPING BACK AND FORTH BETWEEN DOCUMENTS.) EACH AREA SHOULD ALSO RESTATE THE ASSUMPTIONS THAT APPLICABLE STATE AND FEDERAL STANDARDS WILL BE MET, INCLUDING THE PROTECTION OF THE BENEFICIAL USES OF WATER FROM NONPOINT SOURCE ACTIVITIES**

**FOREST SERVICE RESPONSE:**

We have added the acreages as suggested. Many output targets are not available on a management area basis and some, such as grazing lands, will change over time. Timber outputs by management area are available, and are shown in Appendix E of the Plan.

**COMMENT NO. 66: MANAGEMENT AREA 1 WHEN CLOSED OR TEMPORARY ROADS ARE INCLUDED, TOTAL ROAD DENSITY WILL AT TIMES REACH OR EXCEED FIVE MILES PER SQUARE MILE. THIS IS A VERY HIGH LEVEL REQUIRING MORE SPECIFIC AND DETAILED EVALUATION IN THE EIS RELATIVE TO EROSION, MASS WASTING, WATER QUALITY IMPACTS, AND RIPARIAN RESOURCES. GRAZING, NON-USE, AND FENCING ARE MENTIONED AS POSSIBLE MEANS OF PROTECTING EROSION SEEDING AND TREE PLANTATIONS FROM LIVESTOCK DAMAGE, OTHER RESOURCES SHOULD RECEIVE CONSIDERATION OF THE SAME MEASURES FOR THEIR PROTECTION HERE AND UNDER OTHER AREAS.**

**FOREST SERVICE RESPONSE**

By adhering to best management practices, serious effects such as mass wasting, etc , will be avoided The standards and guidelines apply to Management Area 1 as well as other areas, and provide consideration for all resources.

**COMMENT NO. 67: MANAGEMENT AREA 3 WHAT TOTAL ROAD DENSITIES MAY OCCUR UNDER THIS MANAGEMENT PRESCRIPTION?**

**FOREST SERVICE RESPONSE:**

Total road densities will be determined by site-specific access needs. In most instances, this will not exceed four to six miles per square mile. The open-road density guideline for Management Area 3 is 1.5 miles per square mile

**COMMENT NO. 68. MANAGEMENT AREA 18 IN MOST CASES GENERAL GUIDELINES ARE PRESENTED WITH NO MEASURABLE STANDARDS APPARENT. ALL OF THE FOLLOWING QUESTIONS COULD BE ADDRESSED BY SPECIFIC STANDARDS:**

- WILDLIFE--HOW WILL OPTIMUM CONDITIONS BE MANAGED FOR AND MEASURED? ANADROMOUS FISH WOULD BE PROVIDED AT 90 PERCENT OF THE SMOLT HABITAT CAPABILITY INDEX HOW IS THIS MEASURED AND HOW MUCH LOWER CAN THE INDEX GO UNDER OTHER AREAS? HOW MANY TREES, OF WHAT SIZE AND TYPE, WOULD BE RETAINED ALONG PERENNIAL STREAMS? HOW IS THIS DETERMINED?
- TIMBER--HARVEST MUST MEET FISHERIES AND BIG GAME OBJECTIVES, BUT HOW IS IT TO BE DETERMINED THAT THIS HAS OCCURRED GIVEN THE LACK OF MEASURABLE STANDARDS?
- TRANSPORTATION--WHAT WILL THE POTENTIAL TOTAL ROAD DENSITY BE, AND HOW IS THIS DETERMINED TO BE COMPATIBLE WITH THE OVERALL GOAL OF FISH AND WILDLIFE HABITAT OPTIMIZATION?
- RANGE--HOW WILL RANGE BE MANAGED TO PROTECT AND IMPROVE RIPARIAN VEGETATION AND FISH HABITAT?

- MINERALS--HOW WILL FISH HABITAT INVESTMENTS BE PROTECTED? WHAT ABOUT FISH HABITAT NOT ASSOCIATED WITH IMPROVEMENT PROJECTS (INVESTMENTS), AND RIPARIAN AREAS GENERALLY?
- PLANNING ASSUMPTIONS--WHAT DEFINES A HEAVILY HARVESTED WATERSHED? WHAT STANDARDS AND MONITORING WILL DETERMINE THAT SUFFICIENT WATERSHED RECOVERY HAS OCCURRED? MORE TO THE POINT, WHAT WILL ENSURE THAT OVER-HARVESTING IN OTHER WATERSHEDS WILL NOT OCCUR IN THE FUTURE? (PLEASE SEE COMMENTS REGARDING CUMULATIVE EFFECTS.) HOW WILL STREAMFLOW INCREASES AND STREAM CHANNEL STABILITY BE MEASURED AND MONITORED? WHAT WILL ENSURE THAT LIVESTOCK UTILIZATION AND DISTRIBUTION PROBLEMS WILL BE SOLVED AS STATED, GIVEN THE APPARENT POSSIBILITY THAT IMPORTANT ALLOTMENT PLAN REVISIONS MAY BE DEFERRED INDEFINITELY (P.4-23)?

OVERALL, THE INTENT OF THE DIRECTION IN MANAGEMENT AREA 18 APPEARS APPROPRIATE FOR THE W-WNF AS A WHOLE. THIS AREA EMBODIES WELL THE CONCEPT OF MULTIPLE USE. MANY OF THE OTHER AREAS APPEAR TO OVER-EMPHASIZE THE CURRENT OR HISTORIC PATTERNS OF LAND USE ON THE W-WNF. CONSIDERATION SHOULD BE GIVEN TO GREATLY EXPANDING THE LANDS TO WHICH THE DIRECTION INTENDED IN MANAGEMENT AREA 18 IS APPLIED IN THE FINAL PLAN. (THIS IS IN ADDITION TO DEVELOPING A NEW, MORE PROTECTIVE AREA FOR OPTIMIZING CONDITIONS IN THE MOST IMPORTANT ANADROMOUS FISH HABITATS--SEE COMMENTS UNDER FISH AND FISH HABITAT, ABOVE )

#### **FOREST SERVICE RESPONSE.**

In response to these concerns, more specific standards for riparian areas have been added to the standards and guidelines applicable to all management areas (Chapter 4 of the Forest Plan). Road density, stream stability, and stream shading guidelines are provided for each management area. Planning for individual watersheds, including identification of monitoring needs and site-specific management objectives, will occur during project level analysis. This is intended to assure that over-harvesting does not occur.

The standards and guidelines require prioritization of range allotment management planning. This is to assure that allotments with the worst problems are corrected first. It would be ideal if all range allotment plans could be updated immediately, however, funding will not likely permit this. As a way of promoting riparian improvement in the meantime, riparian utilization standards have been added which can be implemented immediately.

**COMMENT NO. 69.** WHAT ARE "PROJECT REVIEWS" REGARDING WETLANDS AND FLOOD PLAINS? AVOIDANCE OR MITIGATION OF IMPACTS TO THESE AREAS REQUIRES AN UNDERSTANDING OF THEIR FUNCTIONS AND VALUES. TOOLS FOR MAKING THESE DETERMINATIONS MAY INCLUDE THE "HEP" OR "ADAMUS" TECHNIQUES, FOR EXAMPLE. WE CAN PROVIDE INFORMATION ON THE USE OF THESE TECHNIQUES, IF THEY OR SOMETHING SIMILAR ARE NOT A PART OF ROUTINE PROJECT REVIEWS. ONCE AGAIN, THE REPORTING PERIOD SEEMS TO BE TOO LONG TO ALLOW EFFICIENT REVISION OF PROJECTS FOUND TO HAVE UNDESIRABLE IMPACTS.

FOR WATER QUALITY, OUR PRIMARY CONCERN IS THE PROTECTION OF BENEFICIAL USES. STANDARDS AND GUIDELINES, AND BMP'S, ARE MEANT TO PROVIDE THIS PROTECTION, BUT THEY MAY NOT ALWAYS BE SUFFICIENT. MONITORING MUST THEREFORE BE DIRECTED AT THE BENEFICIAL USES, AS WELL AS TO DETERMINING THAT BMP'S ETC., WERE APPLIED. THE ROLE OF PROJECT SAMPLING, AS WELL AS MONITORING - NOT TIED TO ANY ONE PROJECT, SHOULD BE OUTLINED IN THIS SECTION. TREND MONITORING NEED NOT BE REPORTED ANY MORE

OFTEN THAN THE THREE TO FIVE YEARS MENTIONED HOWEVER, IF AT ANY TIME STANDARDS OR GUIDELINES ARE BEING VIOLATED OR BENEFICIAL USES BEING SIGNIFICANTLY AFFECTED, PROJECT OR PLAN REVISIONS/EVALUATIONS SHOULD BE TRIGGERED.

**FOREST SERVICE RESPONSE:**

In project reviews, a sample of Forest activities (timber sales, range allotments, recreation developments) are studied to determine whether or not standards and guidelines were designed into the project and implemented correctly. Although the report period for these reviews is three years, changes needed in individual projects reviewed will be made immediately. We agree with your understanding of BMP's. The monitoring plan provides an overview of the items to be monitored. It is not intended to be a detailed description of methodologies.

**COMMENT NO. 70** I BELIEVE IT IS HIGH TIME TO TREAT RECREATION, FISH AND WILDLIFE AS RESOURCES JUST AS IMPORTANT AS TIMBER AND GRAZING. WHILE THE LAW AND FOREST SERVICE RHETORIC ESPOUSE THIS PRINCIPAL, UNFORTUNATELY THE ACTUAL ON-THE-GROUND PRACTICE IS THAT TIMBER IS FIRST AND EVERYTHING ELSE IS SECOND.

**FOREST SERVICE RESPONSE:**

We recognize that it often appears that timber production has higher priority than other resource values. For certain areas, such as those in Management Area 1, this is a fair conclusion. If we are to achieve the timber harvest levels predicted, it will require many acres where timber growth is emphasized. But this is not to say that everything else is secondary. Soil and riparian habitat are protected in all management areas. Air quality is maintained within certain standards as is scenic quality, and on many areas of the Forest, regulated timber harvest is not permitted. Examples are wilderness, old-growth allocations, and roadless recreation areas, plus most of the Hells Canyon National Recreation Area.

**COMMENT NO. 71:** I SUPPORT PLAN E BECAUSE I BELIEVE IT IS FARSIGHTED ENOUGH TO REALIZE THAT THE FORESTS MUST NOT ONLY BE UTILIZED BY OUR PRESENT GENERATION BUT ALSO BY FUTURE GENERATIONS. THE PRESSURE AND TEMPTATION FOR SHORT-TERM GAINS SOMETIMES TENDS TO LOSE SIGHT OF OUR RESPONSIBILITY TO PLAN FOR THE FUTURE GENERATIONS. WE ALL HAVE MADE MANY MISTAKES IN THE PAST THROUGH LACK OF WISDOM, LET US USE THE KNOWLEDGE WE HAVE GAINED TO MAKE THE BEST DECISION POSSIBLE NOW. ALONG THESE LINES, HAVE YOU SEEN THE VIDEO DONE BY THE BLM HERE AT EOSC IN LA GRANDE LAST SPRING - "THE ECOLOGY OF THE FALLEN TREE." IF NOT, I URGE YOU TO SEE IT FOR IT IS EXCELLENT IT POINTS OUT HOW IMPORTANT OLD GROWTH IS TO THE HEALTH OF THE FOREST.

**FOREST SERVICE RESPONSE:**

Many people shared your view of Alternative E. Yes, we are familiar with the "Fallen Tree." Some of the recommendations from that study are currently being incorporated into our management practices.

**COMMENT NO. 72.** ALTERNATIVE E IS GOOD IN THAT IT ALLOCATES ALL ROADLESS LANDS TO ROADLESS MANAGEMENT, BUT WE DO NOT ENDORSE IT BECAUSE OF THE ABUSE OF THE REST OF THE FOREST DUE TO UNREALISTICALLY HIGH TIMBER HARVEST LEVELS (145 MMBF/YR COMPARED TO 143 MMBF/YR IN THE PREFERRED ALTERNATIVE). THE COST TO VISUAL QUALITY, OLD-GROWTH DISPERSAL IN ROADED AREAS, AND OTHER WILDLIFE HABITAT,

THE COST OF CLEARCUTTING INSTEAD OF SELECTION CUTTING, AND THE COST IN LESS CAREFUL FISHERIES MANAGEMENT, IS JUST TOO HIGH.

**FOREST SERVICE RESPONSE:**

Alternative E, though unsatisfactory to many for the views you give, demonstrates that it is possible to retain the roadless areas and still keep the allowable harvest level relatively high.

**COMMENT NO. 73.** HOW ABOUT ONE THAT FALLS BETWEEN C & F THAT RETAINS THE MORE POPULAR ROADLESS AREAS BUT MANAGES THE OTHER AREAS FOR TIMBER & GRAZING MANAGES SOME OF MOST PRODUCTIVE SITES WITH AREA I

**FOREST SERVICE RESPONSE.**

Alternative E would seem to accomplish your objectives.

**COMMENT NO. 74.** ON JUNE 25, 1986, THE BOARD OF TRUSTEES OF THE GRANDE RONDE HOSPITAL HELD ITS REGULAR MONTHLY MEETING ONE OF THE AGENDA ITEMS WAS THE WALLOWA-WHITMAN FOREST USE PLAN. A VOTE WAS TAKEN, AND IT WAS UNANIMOUSLY DECIDED TO SUPPORT THE COMMUNITY STABILITY ALTERNATIVE.

WE TRUST YOU WILL RECORD THE VOTE OF THE TRUSTEES OF THE GRANDE RONDE HOSPITAL, AND MODIFY THE WALLOWA-WHITMAN FOREST USE PLAN ACCORDINGLY.

**FOREST SERVICE RESPONSE**

Your comment has been considered

**COMMENT NO. 75:** ROUND-UP CITY DEVELOPMENT CORPORATION HAS AS ITS GOAL THE ECONOMIC WELL BEING OF THE PENDLETON, OREGON, AREA. RECENTLY REPRESENTATIVES OF OUR GROUP HAVE STUDIED THE ALTERNATIVE PLANS BEING CONSIDERED FOR THE WALLOWA-WHITMAN NATIONAL FOREST AFTER CONSIDERATION, OUR GROUP VOTED TO SUPPORT THE COMMUNITY STABILITY ALTERNATIVE

WE WRITE TO ADVISE YOU OF OUR DECISION AND URGE THAT THE UNITED STATES FOREST SERVICE ALSO ADOPT THE COMMUNITY STABILITY ALTERNATIVE AS ITS TEN-YEAR PLAN FOR THE WALLOWA-WHITMAN NATIONAL FOREST

**FOREST SERVICE RESPONSE.**

Your comment has been considered.

**COMMENT NO. 76:** WHEREAS, THE UNION COUNTY COURT FEELS THAT THE INTERESTS OF ALL CITIZENS OF NORTHEAST OREGON WILL BE BETTER SERVED BY THE ADOPTION OF THE COMMUNITY STABILITY ALTERNATIVE FOR MANAGING THE FOREST, THIS ALTERNATIVE WOULD HELP US MAINTAIN OUR MUCH-NEEDED WOOD PRODUCTS JOBS, ADD TO THE STABILITY OF THE ECONOMY, HELP KEEP TAXES FROM RISING, IMPROVE DEER AND ELK HERDS, AND PERMIT THE PUBLIC TO CUT MORE FIREWOOD,

WHEREAS, SPECIFICALLY, WE DO NOT BELIEVE THE FOREST SHOULD BE MANAGED FOR THE NEEDS OF A VOCAL FEW WHO WOULD LOCK UP MUCH LAND, LET TIMBER GO TO WASTE, AND DISREGARD THE POTENTIAL RESOURCES OF THE FOREST FOR A VARIETY OF TYPES OF RECREATION, AND WILDLIFE DEVELOPMENT.

**FOREST SERVICE RESPONSE:**

Your comments have been considered

**COMMENT NO. 77.** BE IT THEREFORE RESOLVED THAT THE BAKER COUNTY OVERALL ECONOMIC DEVELOPMENT PROGRAM COMMITTEE CALLS UPON THE U S FOREST SERVICE TO REJECT THEIR MANAGEMENT ALTERNATIVE FOR THE WALLOWA-WHITMAN NATIONAL FOREST AND ADOPT THE COMMUNITY STABILITY ALTERNATIVE MANAGEMENT PLAN.

**FOREST SERVICE RESPONSE:**

Your comments have been considered.

**COMMENT NO. 78:** THE CITY COUNCIL OF THE CITY OF BAKER, WHILE IN REGULAR SESSION TUESDAY JULY 8, 1986, PASSED ENCLOSED RESOLUTION NO. 2909 SUPPORTING THE 'COMMUNITY STABILITY ALTERNATIVE' PLAN FOR THE WALLOWA-WHITMAN NATIONAL FOREST. A POINT OF INTEREST MAY BE THAT THIS RESOLUTION IS DIFFERENT AND SEPARATE FROM THE ONE RECENTLY PASSED BY THE BAKER INDUSTRIAL DEVELOPMENT COMMISSION

THE CITY COUNCIL'S CONCERNS ARE VERY STRONG IN THIS MATTER, AND THEY WOULD URGE YOU TO GIVE YOUR UTMOST CONSIDERATION TO TAKING ACTION THAT WOULD BE IN THE BEST INTERESTS OF THIS COMMUNITY.

THANK YOU FOR ANY EFFORTS THAT YOU MAY MAKE ON BEHALF OF THE CITY OF BAKER

**FOREST SERVICE RESPONSE**

Your comments have been considered.

**COMMENT NO. 79:** WHEREAS, THE ABOVE COUNTIES AOC DISTRICT 1 FEEL THAT THE INTEREST OF ALL CITIZENS OF NORTHEAST OREGON WILL BE BETTER SERVED BY THE ADOPTION OF THE COMMUNITY STABILITY ALTERNATIVE FOR MANAGING THE FOREST.

**FOREST SERVICE RESPONSE**

Thank you for your comments.

**COMMENT NO. 80:** THE FOREST SERVICE MUST GO FAR BEYOND THEIR TRADITIONAL JURISDICTIONAL BOUNDARIES TO ANALYZE THE ECONOMIC NEEDS OF THE COMMUNITIES INVOLVED, NOT JUST THOSE OF THE FOREST SERVICE

**FOREST SERVICE RESPONSE**

This was the intent of our analysis

**COMMENT NO. 81.** THE COMMUNITY STABILITY ALTERNATIVE IS A SHORT-SIGHTED, SPECIAL INTEREST, POLITICAL MANEUVER INTENDED TO PRESSURE THE FOREST SERVICE INTO DISCARDING GOALS THAT WOULD PROMOTE THE HEALTH OF THE FOREST ECOLOGICAL SYSTEM IN FAVOR OF QUICK FIX ECONOMIC GOALS BASED ON DISTORTED VALUES.

**FOREST SERVICE RESPONSE:**

Thank you for your comment.

**COMMENT NO. 82:** PAGES II-14 THROUGH II-19; I SUPPORT THE OPTIONS LISTED BY O.N.R.C. AND BY POWDER RIVER SPORTSMEN'S CLUB, AND I THINK THAT THEY SHOULD BE INCLUDED AS AN ALTERNATIVE. ALTHOUGH YOU DO INCLUDE BITS AND PIECES OF WHAT THESE ORGANIZATIONS SAID IN THE VARIOUS ALTERNATIVES, THE EFFECTIVENESS OF THEIR PROPOSAL AS A WHOLE IS DESTROYED BY BEING BROKEN APART. EACH PROPOSAL THAT THEY MAKE IS EFFECTIVE ONLY AS LONG AS IT IS INCLUDED WITH ALL OF THE OTHER MEASURES THAT THEY'VE STATED. BESIDES, IS THIS NOT FOR PUBLIC INPUT WHETHER OR NOT THE PEOPLE DO OR DO NOT WANT THE PROPOSAL THESE TWO ORGANIZATIONS OFFERED? WILL THEY NOT SAY SO? NONE OF THE ALTERNATIVES THAT YOU OFFERED SO FAR ARE SATISFACTORY TO ME, NEITHER LEGALLY NOR ECOLOGICALLY

**FOREST SERVICE RESPONSE.**

These two alternatives were described in the DEIS, but were not included with those "considered in detail." There are distinct differences between them, and the PRSC alternative has been revised since the DEIS. While we have incorporated many of the features of each, there are certain facets which we do not think are practical Both alternatives were valuable in terms of the input they provided.

**COMMENT NO. 83:** THE SUPPLEMENT TO THE WALLOWA-WHITMAN EIS MUST ALLOW THE PUBLIC TO EXAMINE THE TRADE-OFFS THAT HAVE BEEN MADE BY PREVIOUS LAND ALLOCATION DECISIONS AND THE EROSION OF THE COMMERCIAL FOREST LAND BASE THAT IS CONTINUED IN THE PLANNING PROCESS. THIS IS A CRITICAL ISSUE ON THE WALLOWA-WHITMAN NATIONAL FOREST WHERE 42 PERCENT OF THE FOREST IS PRESENTLY SET-ASIDE IN FIXED LAND ALLOCATIONS AND THE PREFERRED ALTERNATIVE RECOMMENDS THAT ONLY 11 PERCENT OF THE FORESTED LAND BE MANAGED FOR FULL TIMBER YIELD.

**FOREST SERVICE RESPONSE:**

Through time, tradeoffs have been made for all resources A case could be made for accounting for past land allocations which "eroded" the wildlife land base, old-growth land base, etc. We believe the most practical solution is to assume the planning process begins with the land as it is today, and explores alternatives and effects of where we go from here A comparison of land management areas by alternative is provided in Table S-2 in the FEIS This gives an idea of the amount of land dedicated to timber management

By our calculations, some 76% of the land suitable for timber production is to be managed in a manner that will result in "full yield" in Alternative C as revised in the FEIS.



**COMMENT NO. 84:** OUR REVIEW CONCLUDES THAT THE DEPARTMENT CANNOT SUPPORT IMPLEMENTATION OF THE WALLOWA-WHITMAN PREFERRED ALTERNATIVE (C). ALTERNATIVE B-DEPARTURE HAS NOT BEEN PRESENTED IN A FORM THAT THE DEPARTMENT CAN SUPPORT. ALTERNATIVE B PROVIDES THE BEST OPPORTUNITY TO MAXIMIZE NET PUBLIC BENEFITS AND TO IMPROVE THE ECONOMY OF NORTHEAST OREGON. THE DEPARTMENT OF FORESTRY RECOMMENDS THAT THE WALLOWA-WHITMAN ISSUE A SUPPLEMENT TO THE DEIS WHICH PROVIDES ADDITIONAL INFORMATION NEEDED AND TO SPECIFICALLY ADDRESS THE ISSUES WE HAVE IDENTIFIED

**FOREST SERVICE RESPONSE.**

In a meeting with State agencies subsequent to the comment, it was agreed that a supplement to address these concerns would not be necessary, but that the concerns would be addressed. The Department of Forestry's recommendations have been considered. While we agree that Alternative B has certain advantages from the economic standpoint it is less desirable in resolving other issues. This has been pointed out by members of the public. Other State agencies have recommended other alternatives.

**COMMENT NO. 85:** ALTERNATIVE B PROVIDES THE BEST OPPORTUNITY TO MAXIMIZE NET PUBLIC BENEFITS AND TO IMPROVE THE ECONOMY OF NORTHEAST OREGON. ALTERNATIVE B-DEPARTURE WAS DEVELOPED BY THE WALLOWA-WHITMAN TO SPECIFICALLY ADDRESS THE DEPARTMENT'S FORESTRY PROGRAM FOR OREGON TIMBER HARVEST TARGETS. HOWEVER, THIS ALTERNATIVE CANNOT BE SUPPORTED DUE TO ITS POOR ECONOMIC PERFORMANCE AND UNACCEPTABLE MODELING ASSUMPTIONS. ADHERENCE TO STRICTLY FOLLOWING FPFO TARGETS WITHOUT MEETING OTHER IMPORTANT FPFO OBJECTIVES RESULTED IN A DISTORTED VIEW OF THE DESIRED RESULT OF OREGON'S FORESTRY PROGRAM.

**FOREST SERVICE RESPONSE:**

We expect that the FPFO targets were based on different assumptions including a different land base than used in the Forest Plan. Alternative B-departure may illustrate the need to revise the targets.

**COMMENT NO. 86:** WE OBJECT TO THE STATEMENT ON PAGE 5-3 OF THE DEIS THAT: "THE MAJOR ISSUES ARE THE DRIVING FORCE IN THE PROCESS." (PLANNING). ISSUES AND CONCERNS RAISED ON THE WALLOWA-WHITMAN FOREST DURING THE PLANNING PROCESS CAN ONLY BE RESPONSIVE TO THE EXTENT THAT THEY ARE NOT IN DEROGATION OF THE BODY OF LAW WHICH AUTHORIZES FOREST SERVICE PLANNING.

IT IS ALSO NOTED THAT THE FOREST SERVICE NO LONGER CITES (36 CFR 221) AS BEING PART OF THEIR AUTHORIZATION ALTHOUGH THESE REGULATIONS HAVE NOT BEEN SUPERSEDED AND SHOULD REMAIN IN FORCE. PERHAPS AN ACKNOWLEDGEMENT OF THESE REGULATIONS BY THE FOREST SERVICE WOULD STRENGTHEN THEIR EMPHASIS ON A CONTINUOUS SUPPLY OF TIMBER, STABILIZATION OF COMMUNITIES AND OPPORTUNITIES FOR EMPLOYMENT.

BASED UPON THE FOREGOING DISCUSSION OF AUTHORITIES, WE DETECT A SERIOUS OMISION IN THE DISCUSSION ON THE FORMULATION OF ALTERNATIVES. (DEIS S-5. ALTERNATIVES CANNOT BE FORMULATED MERELY TO ADDRESS AND HOPEFULLY RESOLVE "ISSUES" WHICH ARE OFTEN ILL-DEFINED AND OF WIDELY VARYING SIGNIFICANCE RELATIVE TO EACH OTHER AND THE MISSION OF THE FOREST SERVICE. RESOURCE AVAILABILITY, PUBLIC NEED, "MANAGEMENT AREAS", SCHEDULES, AND THE INTERRELATIONSHIP OF CAPABILITIES, ETC, "CONSISTENT WITH THE OBJECTIVES OF THE ALTERNATIVE" ARE ALL IMPORTANT

CONSIDERATIONS BUT WE CALL ATTENTION TO THE FACT THAT ALL THESE FACTORS ARE SUBORDINATE AND SUBJECT TO THE STATUTORY AND REGULATORY AUTHORITIES OF THE FOREST SERVICE.

**FOREST SERVICE RESPONSE.**

*We do not intend that our response to issues be in violation of law. Regulation 36 CFR 221 provides for timber management planning on National Forests. This activity has now been incorporated into the Forest Planning process under the direction of the National Forest Management Act, but the provisions for timber management planning still apply and we believe they have been followed. We know of no instances where our treatment of the issues has violated statutes or regulations.*

**COMMENT NO. 87: AGENCIES RECOMMEND URGING THE WALLOWA-WHITMAN TO ISSUE A SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT (SEIS) WHICH SPECIFICALLY ADDRESSES THE STATE'S CONCERNS. FOLLOWING THE REVIEW OF THE SEIS, THE STATE WILL RECOMMEND ITS PREFERRED ALTERNATIVES TO THE FOREST.**

**FOREST SERVICE RESPONSE:**

Forest Service personnel from the Forest Planning team and Regional Office met with State Representatives on four occasions. It was resolved that a supplement to address these concerns was not necessary.

**COMMENT NO. 88: A HIGH DEGREE OF DATA UNCERTAINTY EXISTS IN SEVERAL AREAS OF THE PLAN. THE FOREST HAS USED ASSUMPTIONS WHICH ARE SIGNIFICANTLY DIFFERENT THAN THOSE USED BY ADJACENT NATIONAL FORESTS.**

PRIOR TO THE CONSIDERATION OF ANY ALTERNATIVE THAT WILL REDUCE THE FOREST'S CONTRIBUTIONS TO LOCAL AND STATE ECONOMIES, THE WALLOWA-WHITMAN SHOULD REVIEW THE ASSUMPTIONS MADE ON THE FOLLOWING TOPICS AND REVISE AS NEEDED.

1. MMR FORMULATION
2. BIG GAME MANAGEMENT
3. MANAGEMENT COSTS
4. TIMBER INVENTORY AND YIELD TABLES
5. LAND SUITABILITY ANALYSIS
6. RECREATION BENEFITS

IN ADDITION, CURRENT MANAGEMENT DIRECTION SHOULD BE MAINTAINED IN THESE AREAS WHERE SIGNIFICANT DATA UNCERTAINTY PERSISTS WHERE MANAGEMENT AREAS, ASSUMPTIONS, AND COST ESTIMATES DIFFER SIGNIFICANTLY FROM ADJACENT NATIONAL FORESTS, THE WALLOWA-WHITMAN SHOULD ADDRESS THESE DIFFERENCES AND REVISE THE PLAN AS NEEDED TO ELIMINATE UNJUSTIFIED INCONSISTENCIES

THE DEPARTMENT OF FORESTRY RECOMMENDS THAT THE WALLOWA-WHITMAN ISSUE A SUPPLEMENT TO THE DEIS WHICH PROVIDES ADDITIONAL INFORMATION NEEDED AND WHICH SPECIFICALLY ADDRESSES THE ISSUES WE HAVE IDENTIFIED. THIS ACTION IS ESSENTIAL IF THE FOREST INTENDS TO PRODUCE A SOUND, SUPPORTABLE MANAGEMENT PLAN.

DATA UNCERTAINTY IN PLANNING - MANY OF THE DECISIONS MADE IN THE CURRENT PLANNING PROCESS ARE BASED ON DATA WHICH IS EITHER OUTDATED, OF UNKNOWN PRECISION,

CONFLICTING WITH DATA FROM OTHER RELIABLE SOURCES, OR DERIVED SOLELY FROM "BEST PROFESSIONAL JUDGEMENT". WILDLIFE MMR FORMULATION, PREDICTIONS OF FUTURE RECREATION DEMAND, TIMBER YIELD TABLES, TIMBER INVENTORY, AND THE DECISION CRITERIA USED IN THE NEW LAND SUITABILITY ANALYSES ARE ALL AREAS WHERE A HIGH DEGREE OF UNCERTAINTY EXISTS IN THE WALLOWA-WHITMAN DEIS. IN ADDITION, THESE DECISIONS AND ASSUMPTIONS HAVE BEEN FINALIZED AND INCORPORATED IN ALL ALTERNATIVES WITHOUT THE PROVISION OF ANY OPPORTUNITY FOR FULL PUBLIC REVIEW, AS REQUIRED BY BOTH NFMA AND NEPA

IT IS UNACCEPTABLE THAT LOCAL, STATE, AND REGIONAL ECONOMIES BE THREATENED BY CHANGES IN FOREST RESOURCE OUTPUTS RESULTING FROM DECISIONS WHICH ARE NOT FULLY SUPPORTED BY CURRENT SOUND DATA THEREFORE, WE RECOMMEND THAT THE EXISTING PLANNING DIRECTION BE CONTINUED FOR THOSE RESOURCES UNTIL UNCERTAINTIES IN THE DATA CAN BE ELIMINATED THROUGH RESEARCH AND ON-THE-GROUND VERIFICATION. VERY FEW IF ANY, RESOURCE MANAGEMENT OPPORTUNITIES WOULD BE THREATENED OR IRRETRIEVABLY LOST DURING THE TEN-YEAR LIFE OF THE PLAN IF MAJOR CHANGES IN OUTPUT LEVELS WERE POSTPONED UNTIL SUFFICIENT EVIDENCE TO JUSTIFY THEM IS OBTAINED. ADHERENCE TO A WELL DESIGNED MONITORING PROGRAM WOULD PROTECT ALL RESOURCES FROM UNFORESEEN RISKS AND COULD INCORPORATE NEW, RELIABLE INFORMATION INTO THE PLAN AS IT BECOMES AVAILABLE.

#### **FOREST SERVICE RESPONSE**

*The approach of retaining present resources output levels, especially timber, but emphasizing monitoring was suggested by several respondents including this State agency. The preferred alternative will, in fact, maintain close to the same total harvest offerings, but less ponderosa pine. We have reviewed the assumptions and have issued a supplement which deals with MR's and other matters.*

**COMMENT NO. 89:** BELIEVE THAT ECONOMIC VALUES FOR NON-MARKETABLE RESOURCES ARE AVAILABLE AND SHOULD BE USED

#### **FOREST SERVICE RESPONSE:**

Many such values were used. These included values for many forms of recreation, wildlife, and water.

**COMMENT NO. 90:** IS IT REALISTIC TO PREDICT AN ANNUAL POPULATION GROWTH RATE OF 1.7% FOR THE THREE COUNTIES INVOLVED, AND AT THE SAME TIME IS IT REALISTIC TO ELIMINATE 214 FOREST AND WOOD PRODUCT MANUFACTURING JOBS AND ANOTHER 50 SERVICE RELATED JOBS WHEN THESE COUNTIES' BASIC TAX FOUNDATION AND ECONOMIES HAVE HISTORICALLY BEEN DEPENDENT UPON THESE TYPES OF JOBS?

#### **FOREST SERVICE RESPONSE:**

*The population projections are those for the entire State of Oregon which were developed by the U S Department of Commerce and issued in 1981. (Note citing reference in "Costs Used for Economic Efficiency Analysis", Appendix B). As such, they could not reflect later-envisioned changes in Forest management. Their only use in the analysis was to project recreation use over time.*

**COMMENT NO. 91:** FORTHCOMING WAGE CONCESSIONS OF FOREST PRODUCT WORKERS ARE NOT ACCOUNTED FOR IN ECONOMIC ANALYSIS.

**FOREST SERVICE RESPONSE:**

The commenter is correct.

**COMMENT NO. 92:** TIMBER PRICES ARE ESTIMATED TO RISE (CPI + 1%), YET OTHER COSTS REMAIN CONSTANT. THIS DOESN'T MATCH HISTORY AND IS BASED ON THE MOST SPURIOUS LOGIC CONCEIVABLE.

**FOREST SERVICE RESPONSE:**

Certainly the projection of timber prices, or any other prices in the future, is difficult and there is no consensus of opinion. We were and are aware that distortions could be introduced into the modeling process by using a real price increase for timber and nothing else and did therefore conduct sensitivity tests as outlined in Appendix B. Those tests indicated little risk of decision error from reasonably anticipated variations in price trends.

It is important to note that timber was the only benefit tracked in FORPLAN in dollar terms--there was therefore no tradeoff of recreation, fishery production, livestock grazing, or other benefits because of an artificially high level of timber production.

**COMMENT NO. 93:** MANAGEMENT AREAS ARE SKEWED TO FAVOR TIMBER CUTTING IN BACK-COUNTRY, AN OBSTENSIBLY PROTECTIVE AREA, TIMBER HARVEST IS ALLOWED UNDER QUITE COMMON SCENARIOS -- FIRE, TUSsock Moth, PINE BEETLE, SPRUCE BUDWORM, LARCH CASEBEARER, ROOT ROT, BLOWDOWN, LANDSLIDE, EARTHQUAKE, HURRICANE, VOLCANIC ERUPTION, TIDAL WAVE, METEORITE BOMBARDMENT, COMET COLLISION, SUPER NOVA, OR BASIC APOCALYPSE. HOWEVER, IN THE TIMBER CUTTING ALTERNATIVES SUCH AS 1, 3, OR 18, A PROTECTIVE ALLOCATION IS NOT POSSIBLE UNDER ANY COMMON SCENARIO. EVEN IF A PONDEROSA SITE GETS CUT AND NEVER REGENERATES ANOTHER PONDEROSA, ROADS KEEP COMING AND SAWS KEEP RIPPING.

**FOREST SERVICE RESPONSE:**

We believe the rules under which "backcountry" (Management Area No. 6) can be entered for timber removal are quite restrictive. Essentially, the same management area has been in effect in Unit Plans for ten years and there has only been one minor instance of timber harvest occurring. This was because of severe insect infestation.

**COMMENT NO. 94:** THE ECONOMIC VERITY OF SUPPLY AND DEMAND IS IGNORED. IF TIMBER SUPPLY IS REDUCED BELOW DEMAND, PRICE WILL INCREASE. IF ALL NATIONAL FORESTS CUT SUPPLIES 50%, THEN PRICES FOR TIMBER WOULD INCREASE DRAMATICALLY. IN MANY COMMODITIES, A 5% - 10% REDUCTION IN SUPPLY CAUSES PRICE CHANGES FAR EXCEEDING 10%.

**FOREST SERVICE RESPONSE:**

The section of the DEIS Appendices entitled Demand Functions and Real Price Trends addresses this point. We have assumed constant prices (a horizontal demand function) because we have been unable to construct a reliable demand function and because attempts to that end have indicated that an assumption of a horizontal demand function is appropriate.

for an individual Forest. The question of price response to a 50 percent reduction in volume offerings by all the National Forests is outside the scope of this DEIS

**COMMENT NO. 95:** THE DEIS FAILS TO CONSIDER ONE OF THE VERY IMPORTANT DRIVING FORCES WITHIN THE FOREST SERVICE THAT DETERMINES THE FATE OF THE FOREST -- NAMELY EMPLOYMENT POSITIONS AND ASSIGNMENTS. IF AN ENTIRE FOREST ONLY HAS 2 OR 3 FISHERIES BIOLOGISTS, BUT A HUNDRED ROAD ENGINEERS, TIMBER MANAGERS AND TECHS, SILVICULTURISTS, TREE MARKERS, ETC;. THEN THAT FOREST IS AUTOMATICALLY SPENDING MORE TIME, MONEY, INTEREST, AND MANAGEMENT ON TIMBER HARVEST THAN ON WATER AND FISH

**FOREST SERVICE RESPONSE:**

You are correct in that we did not consider employment positions as driving forces. The number of engineering and timber related positions will vary with the alternative selected. It takes many people to prepare timber sales because of the production work involved. They can rely on the expertise and advice of relatively few other resource specialists.

**COMMENT NO. 96:** THE PLAN IS BIASED TOWARDS TIMBER HARVEST BECAUSE OF ITS APPROACH TO DESCRIBING LAND ALLOCATIONS. AS AN EXAMPLE, THE PLAN STATES AND GRAPHS THAT 42% OF THE FOREST IS ALREADY ALLOCATED TO WILDERNESS, HCNRA, RESEARCH AREAS, ETC THEREFORE, ONLY 58% IS AVAILABLE FOR OTHER ALLOCATIONS/ AREAS. WHY DOESN'T THE PLAN STATE HOW MUCH IS ALWAYS ALLOCATED TO ESSENTIALLY INTENSIVE TIMBER CUTTING (AREAS 1, 3, 18), AND THEN INDICATE HOW MUCH IS LEFT OVER FOR MAX USE OF OTHER ALLOCATIONS (E G RECREATION, FISHERIES, BIG GAME, OLD GROWTH, RESEARCH, WILDERNESS, AIR QUALITY, WATERSHEDS) WHAT PER CENT OF THE FOREST IS AVAILABLE FOR DECISIONS OTHER THAN AREAS 1, 3, and 18)?

THE PLAN FURTHER BIASES ITSELF TOWARDS TIMBER CUTTING BY NOT ALWAYS DIFFERENTIATING BETWEEN COMMERCIAL AND NON-COMMERCIAL FOREST. WHAT PER CENT OF THE COMMERCIAL FOREST (AND EVEN THE WORD "COMMERCIAL" PREJUDICES THE DISCUSSION) IS ALLOCATED TO USES OTHER THAN NO. 1, NO. 3, OR NO. 18? HOW MUCH OF THE GOOD AND CHOICE SOIL SITES ARE GIVEN TO USES BESIDES HARVEST?

**FOREST SERVICE RESPONSE:**

For the 42 percent referred to, the land allocation has been made. All of the remaining 58 percent is available for areas other than 1, 3, or 18. None is "essentially allocated" to "intensive timber cutting" unless the writer is assuming such is the case with lands that have roads and have experienced timber harvest. All of the remaining 58 percent is available for uses other than 1, 3, or 18. Approximately 24 percent of the land suitable for growing timber on a commercial basis is in allocations which do not provide regulated timber harvest.

**COMMENT NO. 97** TO BE FULLY INFORMATIVE, THE PLAN ALSO NEEDS TO APPROACH ALLOCATIONS FROM A LONG-TERM PERSPECTIVE AND FROM A POTENTIAL PERSPECTIVE. IN OTHER WORDS, GIVE US A TRUE PICTURE OF WHAT HAS REALLY HAPPENED TO THE POTENTIALS SINCE THE USDA FS STARTED MANIPULATING THE RESOURCES. AS EXAMPLES:

- A. IF 140 MMBF ARE TO BE CUT YEARLY, WHAT PER CENT OF FOREST POTENTIAL SUSTAINED YIELD) IS THAT OF 1985. WHAT PER CENT OF THE 1945 POTENTIAL? WHAT PER CENT OF THE 1905 POTENTIAL?

- B IF THE FOREST PROVIDES SPAWNING FOR 10,000 STEELHEAD, WHAT PERCENT IS THAT OF THE 1985 POTENTIAL? THE 1945 POTENTIAL? THE 1905 POTENTIAL?
- C IF THE FOREST PROVIDES 200,000 ACRES OF BACKCOUNTRY UNDER ALT. C, WHAT PERCENT OF THE 1985 POTENTIAL IS IT? OF THE 1945 POTENTIAL? OF THE 1905 POTENTIAL?

THE PLAN FAILS TO SHOW WHAT HAS BEEN HAPPENING HISTORICALLY (NOT LAST 10 YEARS) ON THE FOREST

**FOREST SERVICE RESPONSE:**

Given a certain land allocation, the potential long-term sustained yield of a resource is the same regardless of the point in time. Any amount of the Forest could be allocated to "back-country" at any time.

**COMMENT NO. 98:** CURRENT INTERNATIONAL RESEARCH OF PROFOUND IMPACT IS IGNORED. RESEARCH SHOWING THE ABSOLUTE IMPORTANCE OF FEEDER STREAMS AND THEIR ENERGY CYCLES DERIVED FROM STREAMSIDE VEGETATION IS MISSING. STREAMS ARE CATEGORIZED AS CLASS I, II, ETC., DEPENDING OF FISH, INSTEAD OF 1ST ORDER, 2ND ORDER, ... WHICH IS THE BASIS FOR SCIENTIFIC INQUIRY INTO THE WHOLE ECOLOGY OF STREAMS. NOTHING IS ALLOCATED ACCORDING TO RESEARCH WHICH INDICATES THAT TIMBER YIELDS DROP AFTER EACH CUT, AND THE FOURTH GROWTH IS VIRTUALLY NON-EXISTENT IN MANY PARTS OF THE WORLD.

**FOREST SERVICE RESPONSE:**

We recognize the importance of first and second order streams (most of which are ephemeral or Class IV under the Forest Service classification system) in the Forest Plan Standards and Guidelines. The Forest Service stream class system is based on providing water of a quality adequate for the beneficial uses made of the water. This is consistent with the approaches used by the States of Oregon and Washington.

We share your concern over long-term site productivity. As additional information becomes available, it will be incorporated into the Forest Service planning process.

**COMMENT NO. 99:** THE USDA FS STOPS THE ECONOMIC PRESENT NET VALUE ANALYSIS OF THE FOREST AT THE SALE OF STUMPAGE. THE REAL VALUE IS THE TOTAL ADDED VALUE OF THAT STUMPAGE AS IT IS PROCESSED THRU MILLS TO THE ULTIMATE CUSTOMER.

I FEEL THE USDA FS SHOULD VALUE ITS PRODUCT (STUMPAGE) FOR THEIR TOTAL IMPACT ON THE UNITED STATES ECONOMY.

**FOREST SERVICE RESPONSE**

Our purpose in doing local impact analysis is to see how the local economy will be affected by the management of the Forest. The Forest's timber output would be quite small viewed against a national backdrop and alternative harvest levels would hardly be noticeable. All the "value added" locally does contribute to local economic effects. To trace further "value added" after the processed material leaves the local area would be interesting but not particularly relevant to the issue of local economic effects.

**COMMENT NO. 100.** WE HAVE EXAMINED THE DEIS, THE PROPOSED PLAN, AND THE APPENDICES TO THE DEIS THOROUGHLY OVER THE PAST 80 DAYS WE HAVE ALSO ASKED FOR AND OBTAINED FROM YOUR STAFF MUCH ADDITIONAL RELATED INFORMATION FOR OUR ANALYSIS IT IS OUR OPINION THAT NONE OF THE ALTERNATIVES AS PRESENTED WOULD CONSTITUTE ADEQUATE AND RESPONSIBLE PROFESSIONAL MANAGEMENT OF THE WALLOWA-WHITMAN NATIONAL FOREST .

AS PRESENTED, THE PROPOSED PLAN AND DEIS ARE NARROW IN SCOPE. THEY FAIL TO ANALYZE A BROAD ARRAY OF ALTERNATIVES DESIGNED TO MAXIMIZE COMMODITY PRODUCTION, WHILE ACHIEVING HARMONIOUS USE OF OTHER RESOURCES. THE "DECISION SPACE" FOR THE ALTERNATIVES IS TOO NARROW.

ALL THE ALTERNATIVES ASSUME OR EVEN INSTIGATE CONFLICTS BETWEEN THE USES. NO ALTERNATIVES ARE DISPLAYED WHICH ARE DESIGNED TO RESOLVE CONFLICTS AS REQUIRED BY LAW.

**FOREST SERVICE RESPONSE:**

We developed what we believed to be a reasonable range of alternatives for full development in the DEIS Other alternatives were partially examined or examined through benchmark analysis. The primary basis of conflicts has to do with the levels of renewable resources that will be provided In this sense, every alternative resolves the conflicts by determining the *resource production levels*.

**COMMENT NO. 101** YOU MUST DO A SURVEY OF BOTANICAL RESOURCES FOR THIS FOREST (THERE IS A LOT OF MONEY IN SECONDARY FOREST PRODUCTION).

**FOREST SERVICE RESPONSE:**

Current demand has not justified special surveys for botanical resources

**COMMENT NO. 102** THROUGHOUT THE TEXT YOU MENTION MITIGATION OF THE PROBLEMS, BUT YOU DO NOT COMMIT YOURSELVES TO LISTING ANY SPECIFIC MITIGATION STEPS. IS IT BECAUSE YOU DO NOT PLAN ON ENACTING THEM? I BELIEVE NEPA STATES THAT YOU MUST LIST MITIGATION MEASURES WHERE THEY ARE INDICATED OR MENTIONED.

**FOREST SERVICE RESPONSE.**

The Standards and Guidelines include many mitigation measures Others are found in official handbooks and manuals NEPA requires that appropriate mitigation measures be included We believe we have satisfied this requirement

**COMMENT NO. 103:** PAGE 11-2, PARA.4) JUST BY GLANCING AT THIS PARAGRAPH 4 IT SEEMS TO ME THAT THERE SHOULD BE A REDEFINING OF WHAT AN AMENITY IS AND WHAT A COMMODITY IS IT SEEMS TO ME THAT RECREATION THAT EXISTS SOLELY BECAUSE OF THE BEAUTY OF THE AREA SHOULD BE CONSIDERED A COMMODITY BECAUSE THE COMBINATION OF AN AREA'S BEAUTY AND RECREATION BRINGS IN REVENUE

**FOREST SERVICE RESPONSE**

This could be a way of looking at it. It is not the approach we have taken in this planning effort

**COMMENT NO. 104** (PAGE IV-54,55) YOU PROVIDE NO REFERENCES YOU MUST FOR ANY OF YOUR AWKWARD STATEMENTS. WHERE DO YOU GET THESE INFERENCES?

**FOREST SERVICE RESPONSE.**

The basis for these statements is "A Social Appraisal of Oregon's Northeast Counties" (Pekar, 1978).

**COMMENT NO. 105.** THE DEIS DOES NOT CONTAIN A TRUE NO-ACTION ALTERNATIVE, A FUNDAMENTAL OF ANY EIS. SEE, 40 C.F.R. 1502.14(D). THE AGENCY EVIDENTLY BELIEVES THAT CONTINUATION OF THE "CURRENT DIRECTION" FULFILLS THIS OBLIGATION. WE SUGGEST THAT, TO THE CONTRARY, A TRUE NO-ACTION ALTERNATIVE IS INCONSISTENT WITH "REQUIREMENTS THAT THE FOREST BE MANAGED FOR MULTIPLE-USE..." DEIS AT II-11. YET, THE FOREST SERVICE HAS ARGUED IN NATIONAL WILDLIFE FEDERATION V. FOREST SERVICE (THE "MAPLETON" CASE) THAT MULTIPLE-USE "BREATHES DISCRETION AT EVERY PORE" AND CAN PROVIDE NO CAUSE OF ACTION BECAUSE THERE IS NO LAW TO APPLY. THE AGENCY CAN'T HAVE IT BOTH WAYS. EITHER MULTIPLE-USE LIMITS DISCRETION AND REQUIRES THE AGENCY TO UNDERTAKE CERTAIN LEGALLY ENFORCEABLE ACTIVITIES OR IT DOESN'T, IN WHICH CASE A NO-ACTION ALTERNATIVE IS PERFECTLY LEGAL AND, IN FACT, REQUIRED BY NEPA.

**FOREST SERVICE RESPONSE:**

The National Direction for land management planning makes it clear that the "no action alternative ... represents the most likely conditions expected to exist in the future if current management direction would continue unchanged" FSM 1920.85. This is based on 36 CFR 219.12(F)(7)

**COMMENT NO. 106:** THE DEIS FAILS TO CANDIDLY DISCLOSE IN PLAIN LANGUAGE MANY OF THE ANTICIPATED ENVIRONMENTAL CONSEQUENCES OF THE PROPOSAL. FOR EXAMPLE, A MEMO OF SEPTEMBER 12, 1985 FROM SUPERVISOR ALLEN TO THE REGIONAL FORESTER CANDIDLY DESCRIBES THE IMPACTS ON RECREATION. "BOTH THE PROPOSED ACTION AND THE RPA ALTERNATIVE WOULD LAUNCH THE FOREST ON A COURSE OF ACCESSING AND DEVELOPING MANY OF ITS REMAINING UNDEVELOPED AREAS. OLD-GROWTH FOREST WOULD BE REDUCED SIGNIFICANTLY IN THE CURRENT DIRECTION, THE PROPOSED ACTION, EVEN MORE SO IN THE RPA ALTERNATIVE." THIS KIND OF STRAIGHTFORWARD DISCUSSION IS ENTIRELY ABSENT IN THE DEIS. AN EIS IS INTENDED TO ILLUMINATE THE ENVIRONMENTAL CONSEQUENCES, NOT OBSERVE THEM AS THIS ONE HAS

**FOREST SERVICE RESPONSE:**

We find much of this sort of straight-forward language in Chapter IV of the DEIS. We have attempted to further improve it in the FEIS.

**COMMENT NO. 107:** FORPLAN AND COMPUTER MODELING  
AS A PROFESSIONAL IN THE AREA OF ENERGY PLANNING, I AM VERY FAMILIAR WITH THE RISK OF RELYING UPON COMPLEX COMPUTER MODELS FOR MAKING RESOURCE MANAGEMENT



DECISIONS GIVEN THE IMPORTANT ROLE OF FORPLAN AND OTHER COMPUTER MODELS IN EVALUATING FOREST MANAGEMENT ALTERNATIVES, A MORE DETAILED DESCRIPTION OF THE MODEL AND THE KEY ASSUMPTIONS MADE TO DRIVE IT WOULD BE HELPFUL FOR PLAN REVIEWERS. IN ADDITION, I AM SKEPTICAL OF ANY COMPUTER MODEL OUTPUT WHICH DOES NOT PROVIDE SENSITIVITY ANALYSIS FOR KEY ASSUMPTIONS AND AN ESTIMATE OF ERROR FOR THE OUTPUT SUCH SENSITIVITY AND ERROR ANALYSIS SHOULD BE INCLUDED IN THE FOREST PLAN SO THAT REVIEWERS CAN BETTER ACCESS THE RISK ASSOCIATED WITH THE ALTERNATIVES.

**FOREST SERVICE RESPONSE:**

FORPLAN is one of many tools used to evaluate the effects of various management areas and to help make management decisions. Resource management decisions are still made by the responsible official. Appendix B of the FEIS describes the model formulation for this Forest. Other sources on FORPLAN are described in "Genesis of FORPLAN" by Alston and Iverson and "FORPLAN: An Evaluation of a Forest Planning Tool," Nov 1986. Cost and price trend sensitivity analysis was done during the Analysis of the Management Situation to determine the potential for marginally efficient lands to be scheduled for harvest. This information is displayed in Appendix B. The price trends analyzed were 0, 1, 2, and 3 percent. A 1 percent price trend for timber, with a 0 percent trend assumed for other resources, was used in the alternative formulation based on Regional analysis and Washington Office recommendations. Sensitivity tests were made on sale preparation costs (20 percent reduction) and plant costs (50 percent reduction). Other sensitivity tests were done for minimum management requirements such as old growth, riparian, and harvest dispersion and at plus or minus 20 and 40 percent levels. These are described in Appendix M of the FEIS.

**COMMENT NO. 108:** A READING OF THE CITIZENS PANEL USED AS A SOUNDING BOARD IN THE PLANNING PROCESS REVEALS A LACK OF BALANCE OF FOREST USERS ALLOWING AN ENVIRONMENTAL GROUP WITH ONLY ONE MEMBER IN THE REGION TO PARTICIPATE WHILE LEAVING OUR REPRESENTATION FROM MOTORCYCLISTS, SNOWMOBILERS, FOUR-WHEEL DRIVERS, OR THE MINERALS INDUSTRY DOES NOT SEEM A GOOD USE OF THE PLANNING PROCESS

**FOREST SERVICE RESPONSE:**

The panel was devised primarily to provide communication with state and local agencies and Indian tribes. The Forest Supervisor then saw it as an opportunity to involve a cross section of the more significant local interest groups, so representatives from the Blue Mountain Resources Council, and the Grande Ronde Resources Council were invited to participate. Later the Wallowa Resources Council was added. There was never an intent to directly involve all special interest organizations on the panel.

**COMMENT NO. 109:** I MIGHT MENTION THAT IF THEY WOULD HAVE GIVEN US MORE TIME TO RESPOND THEY WOULD BE SURE TO GET MORE RESPONSE. THEY TOOK ABOUT THREE MONTHS TO DO THEIR THING SO WHY NOT BE FAIR ABOUT IT AND GIVE US THE EQUAL TIME THEY TOOK. I KNOW WHY THEY ONLY GIVE US A SHORT PERIOD OF TIME AND IT'S BECAUSE THEY THINK THEY ARE GOING TO WIN, BUT I CAN ASSURE YOU WE ARE GOING TO FIGHT TO THE BITTER END TO SAVE THE PLACE WE ALL LIVE FOR.

**FOREST SERVICE RESPONSE.**

We provided 120 days for response

**COMMENT NO. 110:** APPENDIX "A " STATES A "CITIZENS PANEL" WAS ESTABLISHED AND MET ON AN AS-NEEDED BASIS TO ADVISE THE FOREST SERVICE DURING THE PLANNING PROCESS HOWEVER, THE LIST OF FORMAL CONTACTS REVEAL THE "CITIZENS PANEL" NEVER MET WITH THE FOREST SERVICE STAFF.

**FOREST SERVICE RESPONSE**

The panel usually met with the Forest Supervisor, planning staff, and planning team Occasionally other Forest Staff members were present.

**COMMENT NO. 111:** IN ATTEMPT TO OBTAIN CITIZEN PARTICIPATION, THE FOREST SERVICE HAS ASKED THE PUBLIC TO VOTE ON THE ALTERNATIVES BY SUBMITTING THE BALLOT ENCLOSED WITH THE PLAN. FOREST MANAGEMENT SHOULD BE BASED ON SOUND PRINCIPLES OF LAND MANAGEMENT, NOT DECIDED BY A VOTE OF THE PEOPLE. THE DOCUMENT ENTITLED "WHAT FATE FOR THE WALLOWA-WHITMAN" DISTRIBUTED BY THE GRANDE RONDE RESOURCE COUNCIL, OREGON NATURAL RESOURCE COUNCIL, THE WILDERNESS SOCIETY, NATIONAL AUDOBON SOCIETY, ET AL., ILLUSTRATES THE ERROR IN LEAVING MANAGEMENT DECISIONS TO A VOTE. THE DOCUMENT MAKES SEVERAL STATEMENTS WHICH ARE INCORRECT AND NOT SUPPORTED BY THE PLAN OR DRAFT EIS WHEN VOTES ARE BASED ON MISINFORMATION IT SUBVERTS THE ENTIRE PLANNING PROCESS.

**FOREST SERVICE RESPONSE:**

Two brochures distributed by non-Forest Service groups were prominent In addition to the one you mention, another termed "How You Can Stop Wallowa-Whitman Forest Planning..." was distributed by the Committee for a Stable Economy. Each of these publications may have implied that the decision would be based on votes. This was not and is not now our intent The response form we included was intended to provide a convenient means of providing comments. In hindsight, we should probably not have included it because it could be interpreted to be a ballot and also because very few people used it

**COMMENT NO. 112:** SINCE I FOLLOW THE MEDIA CAREFULLY, I AM SURPRISED THAT I NEVER NOTICED A PRESS RELEASE ON THE WALLOWA-WHITMAN'S PLANNING PROCESS GIVEN THE LARGE NUMBER OF PEOPLE IN MY PART OF OREGON WHO USE THE WALLOWA-WHITMAN, I SUGGEST THAT AN EXTRA EFFORT BE MADE TO INVOLVE OTHER NORTHWESTERNERS DURING FUTURE PLANNING ACTIVITIES

**FOREST SERVICE RESPONSE:**

Our scrapbook of newsclippings indicates the planning effort was well publicized It is true, of course, the news media close to the Wallowa-Whitman were more inclined to use our press releases

**COMMENT NO. 113:** FROM THE STANDPOINT OF THE AVERAGE CITIZEN, THE PLAN IS INCOMPREHENSIBLE AND NO ONE WILL TAKE THE TIME, OR MAKE THE EFFORT TO READ IT EXCEPT THE FEW THAT ARE DIRECTLY INVOLVED LIKE ME NOR WILL THEY TAKE A FEW MOMENTS AND

COMMENT LIKE THEY SHOULD. PROVIDING YOU DO NOT THINK THE PLAN IS NOT BIZARRE, PLEASE HAVE YOUR WIFE OR ONE OF THE SECRETARIES READ ALOUD AN EXCERPT FROM PAGE B-100 OR B-101 FROM THE APPENDICES. IT IS A DIFFICULT SUBJECT AT BEST.

**FOREST SERVICE RESPONSE:**

A paragraph on the first page of the Appendix cautions the reader that some of the Appendix material may not be easily understood by all readers. The pages to which you refer describe benchmark computer analysis and are some of the more technical information presented.

**COMMENT NO. 114.** PAGE II-74, TABLES II-2 AND II-3A - THE RELATIONSHIP BETWEEN THE INFORMATION PRESENTED IN THESE TWO TABLES IS NOT CLEAR. A TABLE SIMILAR TO II-3A WHICH NUMERICALLY QUANTIFIES OUTPUTS AND ENVIRONMENTAL IMPACTS BY ALTERNATIVES SHOULD BE INCLUDED IN THE FINAL EIS.

**FOREST SERVICE RESPONSE:**

Table II-3A provides this information for alternatives, but it was obscured by the first four pages of the table which displayed benchmark information. We will attempt to make the alternative display more visible in the final document.

**COMMENT NO. 115.** THE GRANDE RONDE RESOURCE COUNCIL FEELS THE FOREST PLAN DOES NOT ADEQUATELY ADDRESS BIOLOGICAL DIVERSITY.

AN EXAMPLE OF YOUR DISREGARD FOR BIOLOGICAL DIVERSITY CAN BE FOUND BY LOOKING AT MAJOR TREE SPECIES OF THE AREA. IN 1958 PONDEROSA PINE COMPRISED 35 PERCENT OF THE TOTAL TIMBER VOLUME ON THE FOREST. BY 1979 THAT NUMBER HAD FALLEN TO 23 PERCENT. DURING THE SAME TIME THERE SEEMS TO BE AN INCREASE IN THE AMOUNT OF LODGEPOLE PINE. AREAS ARE CUT AND PLANTED WITH DOUGLAS-FIR, WESTERN LARCH, AND PONDEROSA PINE, BUT WHEN THE AREA EVENTUALLY BECOMES ESTABLISHED, THERE IS A PREPONDERANCE OF LODGEPOLE PINE.

THERE IS INADEQUATE DISCUSSION IN THE EIS ABOUT THE DAMAGE THE PROPOSED ACTION WOULD HAVE ON BIOLOGICAL DIVERSITY. IT'S APPARENT THAT PURSUING THE SAME HARVEST TECHNIQUES WOULD RESULT IN LESS PONDEROSA PINE AND A DECREASE IN DIVERSITY.

**FOREST SERVICE RESPONSE:**

As discussed in Chapter III of the DEIS, there is a high level of inherent diversity on the Wallowa-Whitman and management activities have further increased this diversity. The ponderosa pine volume has decreased through removal of large trees, but there are no fewer numbers of trees. Old-growth allocations, wilderness, and other areas where trees will not be harvested will maintain large numbers of old growth trees of all species.

**COMMENT NO. 116:** THE DEPARTMENT REQUESTS THAT THE FOREST INCLUDE THE TABLE (REQUIRED BY REGIONAL DIRECTION) WHICH COMPARES THE DEIS ALTERNATIVES WITH THE OBJECTIVES OF THE FPFO. AN EXAMPLE WHICH MAKES THIS COMPARISON FOR THE WALLOWA-WHITMAN ALTERNATIVES IS ATTACHED. ASSIGNMENT OF THE ALTERNATIVES TO THE PROPER LEVEL IS BASED ON COMPATIBILITY STANDARDS PROVIDED TO THE REGION JUST PRIOR TO THE WALLOWA-WHITMAN DEIS RELEASE. THE FPFO TIMBER HARVEST

TARGETS AND A DISCUSSION OF THE BASIC OBJECTIVES SHOULD ALSO BE PRESENTED IN THE DEIS

**FOREST SERVICE RESPONSE:**

This table has been included in the final EIS.

**COMMENT NO. 117:** IT IS DIFFICULT TO SEE HOW YOU HAVE MANAGED TO SHRINK THE SUITABLE FOREST LAND FOR TIMBER PRODUCTION FROM 1.4 TO 1.1 MILLION ACRES. NOR CAN I SEE HOW YOU ONLY PRODUCE 129 MILLION BOARD FEET OF GREEN SAW-TIMBER ANNUALLY, DISCOUNTING LODGEPOLE PINE, ON 1.1 MILLION ACRES.

**FOREST SERVICE RESPONSE:**

The land base shrank due to the variety of factors shown in Table III-4 of the DEIS. Harvest levels are based on a variety of factors including land base, standing volume, land management direction, age class distribution, etc

**COMMENT NO. 118:** IN ORDER TO DETERMINE WHETHER THE STANDARDS AND PLANNING FRAMEWORK IN THE PROPOSED PLAN WILL SUFFICIENTLY PROTECT ENVIRONMENTAL QUALITY, PUBLIC HEALTH, AND WELFARE, THE ASSOCIATED EIS SHOULD INCLUDE MORE DETAILED DESCRIPTIONS OF THE AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES. IN PARTICULAR, TOO LITTLE INFORMATION REGARDING EXISTING CONDITIONS OF FISH HABITAT AND RIPARIAN AREAS ON THE W-WNF IS PRESENTED WITHOUT THOROUGH DESCRIPTIONS OF EXISTING CONDITIONS (INCLUDING ANY CURRENT DEGRADATION) AN ADEQUATE ENVIRONMENTAL CONSEQUENCES ANALYSIS IS DIFFICULT TO PERFORM. SIMILARLY, IT IS DIFFICULT TO DETERMINE WHETHER THE LEVELS OF IMPACTS THAT ARE PREDICTED ARE ACCEPTABLE, OR WHETHER THE PROPOSED STANDARDS SUFFICIENTLY AVOID OR MINIMIZE IMPACTS

**FOREST SERVICE RESPONSE:**

Providing detailed information about the hundreds of miles of riparian areas would, we believe, be overwhelming. Analysis for site-specific implementation projects is intended to provide the degree of detail you suggest

**COMMENT NO. 119.** AS A GENERAL OBSERVATION, IT WOULD BE USEFUL TO SEPARATE STANDARDS FROM GUIDELINES IN THE FINAL PLAN. WE AGREE WITH THE DEFINITIONS PROVIDED IN THE GLOSSARY DIFFERENTIATING BETWEEN STANDARDS AND GUIDELINES; HAVING BOTH CLEARLY PRESENTED CAN MAKE THE PLAN MUCH MORE UNDERSTANDABLE AS WELL AS EASIER TO IMPLEMENT.

**FOREST SERVICE RESPONSE:**

An attempt to do this proved confusing (to ourselves) It was not always clear in which category a direction statement belonged so we abandoned the idea as a time consuming exercise of frustration It may be an idea worth considering for future plans

**COMMENT NO. 120:** CHAPTER IV OF THE DEIS STATES THE INTENT OF THE DEIS "IS TO FOCUS ANALYSIS AND DECISIONS AT A PROGRAMMATIC LEVEL, AND DEAL WITH SITE-SPECIFIC ACCUMULATED EFFECTS AT THE PROJECT LEVEL" (DEIS PG IV-2) THIS IS CONTRADICTORY TO THE

INTENT OF NEPA AND THE "FOREST PLANNING REGIONAL DIRECTION". AS STATED ABOVE, THE REGIONAL DIRECTION REQUIRES SITE-SPECIFIC ANALYSIS AT THE MINIMUM FOR ROADLESS AREAS. NEPA REQUIRES DEIS'S TO EVALUATE THE ENVIRONMENTAL IMPACTS OF A FEDERAL AGENCY'S PROPOSED ACTION AND PRESENT THAT INFORMATION TO THE PUBLIC IN AN UNDERSTANDABLE FORMAT SO THE PUBLIC CAN PROVIDE USEFUL COMMENTS TO THE AGENCY. SUCH INFORMATION MUST BE INCLUDED IN A REVISED OR SUPPLEMENTAL DEIS

**FOREST SERVICE RESPONSE:**

The site specific analysis for roadless areas is provided in Appendix C. Activities within the roadless areas will require further analysis.

**COMMENT NO. 121:** THE DEIS FAILS TO EXPLAIN WHY THE PREFERRED ALTERNATIVE WAS SELECTED, THE FOREST SERVICE HAS URGED THE PUBLIC TO RESPOND TO THE DEIS WITH DETAILED AND SPECIFIC COMMENTS. SUPPOSEDLY, A LETTER EXPLAINING WHAT A PERSON FEELS AND WHY THEY FEEL THAT WAY WILL BE OF GREAT VALUE TO THE FOREST SERVICE HOWEVER, THE DEIS IS NOT OF COMPARABLE VALUE BECAUSE IT FAILS TO EXPLAIN WHY THE FOREST SERVICE SELECTED THEIR PREFERRED ALTERNATIVE THIS FRUSTRATES ATTEMPTS TO MAKE INFORMED COMMENTS ON THE PLAN. IT ALSO VIOLATES THE SPIRIT OF THE COUNCIL ON ENVIRONMENTAL QUALITY REGULATIONS THAT REQUIRE THE AGENCY TO DISCUSS HOW ECONOMIC, TECHNICAL, AND POLICY FACTORS WERE CONSIDERED IN THE DECISION.

**FOREST SERVICE RESPONSE:**

The regulations for implementing the National Environmental Policy Act of 1969 (NEPA Process) provide for displaying the rationale for the selected alternative only in the Record of Decision which accompanies the Final Environmental Impact Statement.

**COMMENT NO. 122** THE USE OF THE FORPLAN COMPUTER MODEL INHIBITS PUBLIC PARTICIPATION .

ONE OF THE KEY ELEMENTS OF THE NATIONAL FOREST MANAGEMENT ACT INVOLVED INCREASING PUBLIC PARTICIPATION IN FOREST PLANNING. THE NFMA REGULATIONS SAY THE INTENT OF PUBLIC PARTICIPATION IS TO "BROADEN THE INFORMATION BASE UPON WHICH . PLANNING DECISIONS ARE MADE...(AND) ..PROVIDE THE PUBLIC WITH AN UNDERSTANDING OF FOREST SERVICE PROGRAMS AND PROPOSED ACTIONS " 36 CFR 219.6(a).

THE USE OF THE FORPLAN MODEL INHIBITS PUBLIC PARTICIPATION IN THE PROCESS THE PUBLIC MUST ACCEPT AT FACE VALUE FOREST SERVICE ASSERTIONS ABOUT THE LEVEL OF SUSTAINED YIELD, THE ECONOMICS OF TIMBER PRODUCTION, ETC. TO PROVIDE INFORMED COMMENT ON THESE IMPORTANT ISSUES REQUIRES A COMPUTER PROGRAMMING EXPERT TO INTERPRET THE PRINTOUTS WE DO NOT THINK NFMA WAS DESIGNED TO PUT THE PUBLIC AND LOCAL COMMUNITIES AT THE MERCY OF A COMPUTER PROGRAMMER.

**FOREST SERVICE RESPONSE:**

We agree that the details of the analysis are complicated. We are, however, faced with a complex set of forest interrelationships that can only be handled by computer analysis if we are to respond accurately and in a timely manner to the questions the law requires we answer, and to those for which the public needs answers. If we did not use FORPLAN, we would have to use some other computer model.

**COMMENT NO. 123:** THE WALLOWA-WHITMAN PLANNING DOCUMENTS WERE PRESENTED IN A VERY COMPLEX AND CONFUSING MANNER. THE CRITICAL POINTS WERE INTERSPERSED WITH MUCH PROSAIC JOURNALISM MAKING ANALYSIS VERY DIFFICULT AND TIME CONSUMING.

AN EXAMPLE OF THIS IS THE SPECIES TO BE HARVESTED UNDER THE VARIOUS ALTERNATIVES THE VOLUME WAS PRESENTED BY WORKING GROUPS RATHER THAN BY SPECIES TRYING TO ANALYZE THESE WORKING GROUPS TO ISOLATE THE PROPOSED HARVEST BY SPECIES PROVED TO BE A MAJOR UNDERTAKING. THIS INFORMATION IS CRITICAL TO THE TIMBER INDUSTRY OPERATION AND AS SUCH SHOULD HAVE BEEN PRESENTED IN A CLEAR, CONCISE AND UP-FRONT MANNER.

**FOREST SERVICE RESPONSE:**

We received a variety of comments on the quantity and readability of the documents. (See previous and following comments.) We agree it is difficult to isolate species, but we have worked with those who have asked and were able to provide what we believe are reasonable estimates. This particular problem is due to the information being gathered by working groups rather than individual species.

**COMMENT NO. 124:** THE WALLOWA-WHITMAN NATIONAL FOREST PROPOSED LAND AND RESOURCE MANAGEMENT PLAN AND DRAFT ENVIRONMENTAL IMPACT STATEMENT ARE THE MOST READABLE AND WELL PRESENTED DOCUMENTS THAT THE REGION HAS PRODUCED

**FOREST SERVICE RESPONSE:**

Thank you for your comment

**COMMENT NO. 125:** OF THE 2.67 MM ACRES OF TOTAL NATIONAL FOREST AREA, 318,746 ACRES ARE IN OTHER OWNERSHIP. WHAT IS THIS AREA AND HOW IS IT INCLUDED OR EXCLUDED IN ANY ANALYSIS AND PLANNING FOR THE FOREST AS A WHOLE?

**FOREST SERVICE RESPONSE:**

This refers to private, State, and other Federal lands that lie within the proclaimed National Forest Boundary. They are not included in the analysis.

**COMMENT NO. 126:** FINES AND SENTENCES FOR VIOLATION OF REGULATIONS REGARDING ROAD CLOSURES AND GAME VIOLATIONS, ETC., SHOULD BE DOUBLED, TRIPLED, OR MORE. THEY ARE NOT AT ALL STRICT ENOUGH OR SERIOUS ENOUGH TO ACT AS DETERRENTS AS THEY EXIST.

**FOREST SERVICE RESPONSE**

We will consider your opinion in recommendations to the courts

**COMMENT NO. 127:** I RESENT HAVING TO SPEND TIME ATTEMPTING TO STOP THE LOGGING INTERESTS FROM RUINING WHAT LITTLE REMAINS OF OREGON'S UN-CUT FORESTS. THE FOREST SERVICE IS SUPPOSED TO BE MANAGING THE LOCAL FOREST, NOT SELLING THEM TO THE

TIMBER COMPANIES. STEWARDSHIP MEANS PRESERVING AND CARING FOR, NOT TURNING A PROFIT.

I EXPECT YOU TO RECOGNIZE YOUR RESPONSIBILITY TO FUTURE GENERATIONS OF HIKERS, BACKPACKERS, HUNTERS, AND FISHERMAN.

**FOREST SERVICE RESPONSE:**

Selling timber from National Forests is an established purpose of the Forests. Determining how much should be sold, which lands it should be sold from, and which lands should be preserved in an undisturbed condition, are reasons for the purposes of this planning effort.

**COMMENT NO. 128.** THE MAXIMIZING PRODUCTION OF TIMBER FOR LOW COST DOMESTIC LUMBER, GRASS FOR LOW COST DOMESTIC CATTLE AND SHEEP, INCREASED RECREATIONAL USE, ACCESS FOR AS MANY PEOPLE AS POSSIBLE, AND FOR WILDLIFE WOULD BE THE GOAL BUT I HAVE TO QUESTION THE ABILITY OF THE FOREST SERVICE TO HANDLE THE JOB OF MANAGEMENT. THE APPROACH TO MANAGEMENT SEEMS TO BE SPEND MORE MONEY, HAVE MORE PEOPLE, BUILD MORE BUILDINGS, BUY MORE VEHICLES, EQUIPMENT, AND LAND, AND THEN LOCK UP OR RESTRICT THE USE OF THESE PUBLIC 'TAXPAYER-OWNED' PROPERTY AND PRODUCE LESS. IT IS LITTLE WONDER WITH THIS KIND OF RECORD AND APPROACH THAT THE WORDS 'FOREST SERVICE' ARE RARELY SPOKEN WITH ANY RESPECT FOR THE JOB BEING DONE THIS TOTAL LACK OF RESPECT COMES FROM ALL CIRCLES, FROM LOGGERS, MILL-WORKERS, RANCHERS, COWBOYS, BUSINESSMEN, TOURISTS, AND HUNTERS, THE MESSAGE IS THE SAME.

**FOREST SERVICE RESPONSE:**

We agree that some people share your perception. In this age, there is criticism of government in general and much of it is undoubtedly deserved. But our mail and day to day contacts suggest something other than "total lack of respect "

**COMMENT NO. 129.** ALL THESE COMMENTS, APPEALS, AND INTERVENTIONS ARE SO END-LESS AND POINTLESS THAT I THINK THE WHOLE PROCESS SHOULD BE ABANDONED. IN FACT, I THINK THE WHOLE FOREST SERVICE SHOULD BE ABANDONED

**FOREST SERVICE RESPONSE:**

The planning process provides for public review at several points including the final decision This does slow the process but we hope it results in a more suitable plan. We agree that it can be frustrating

**COMMENT NO. 130.** OUR WHOLE NATION NEEDS THE RESOURCES PROVIDED BY OUR FORESTS, INCLUDING THE WALLOWA-WHITMAN FOREST THE COMMUNITY STABILITY ALTERNATIVE GIVES US THE TIMBER WE NEED AND KEEPS THE FOREST HEALTHY AT THE SAME TIME

**FOREST SERVICE RESPONSE:**

We agree that the Wallowa-Whitman provides resources needed by our nation. We also agree that the Community Stability alternative would provide needed timber and that the forest could be managed in a relatively healthy condition However, as with other alternatives, we do not believe it would be possible to maintain historic levels of ponderosa pine.

**COMMENT NO. 131:** THE HELLS CANYON NATIONAL RECREATION AREA SHOULD BE REVIEWED AT THE SAME TIME AS THE REST OF THE PLAN. IF YOU DON'T DO THAT, THEN IT IS NOT POSSIBLE TO SEE THE TOTAL EFFECTS OF ALL THESE REDUCTIONS IN TIMBER HARVEST.

**FOREST SERVICE RESPONSE:**

As explained in the Draft Environmental Impact Statement (page II-13), there are several reasons why we chose not to revise the Hells Canyon Comprehensive Management Plan. The Hells Canyon National Recreation Area was considered along with the remainder of the Forest in determining timber harvest levels, but the land management direction for the NRA, in accordance with the Comprehensive Management Plan, was the same in each Forest Plan alternative.

**COMMENT NO. 132:** WE DON'T WANT THE GOVERNMENT AND SPECIAL INTEREST GROUPS CONTROLLING OUR LAND AND OUR LIVES.

**FOREST SERVICE RESPONSE:**

As an agency of the U. S. Department of Agriculture, the Forest Service has been given the responsibility for managing the National Forests. Those that utilize the National Forests and its resources are inevitably controlled to some degree by this administrative agency. According to our mail, who is and who is not a special interest is apparently a matter of opinion.

**COMMENT NO. 133:** IN DEVELOPING YOUR FOREST PLAN, YOU NEED TO CONSIDER THE IMPORTANCE OF TIMELY TIMBER SALVAGE IN CASES OF NATURAL DISASTERS SUCH AS THE TEPEE BUTTE WILDFIRE. AS IT IS NOW, IT WILL BE ALMOST 1 YEAR FROM THE TIME OF THE FIRE UNTIL A SALVAGE AND REFORESTING PROJECT CAN EVEN BEGIN. THIS IS JUST TOO LONG, AND IN THE MEANTIME SOME OF THE SALVAGEABLE TIMBER IS SPOILING.

**FOREST SERVICE RESPONSE:**

We agree this is a problem and we hope the Tepee Butte experience will be helpful in expediting future similar projects. However, we feel that ensuring that project proposals have adequate environmental analysis must be our foremost objective. This will sometimes mean the loss of timber value - especially in sensitive areas such as Hells Canyon NRA.

**COMMENT NO. 134:** CONCERNING ENVIRONMENTAL EFFECTS, THE DIFFERENCE BETWEEN THE PREFERRED PLAN AND THE COMMUNITY STABILITY PLAN IS BUT A FEW PERCENTAGE POINTS. REPEATED RUNS OF THE COMMUNITY STABILITY PLAN USING THE FOREST SERVICE'S FORPLAN, SHOW THE COMMUNITY STABILITY ALTERNATIVE IS A VERY WORKABLE PLAN THAT WILL GO FURTHER TO PROMOTE THE STABILITY OF ALL OUR PEOPLE.

**FOREST SERVICE RESPONSE:**

The Community Stability alternative is similar to Alternative B. The significance of the differences in effects between the two alternatives will vary with personal points of view.

**COMMENT NO. 135:** I HAVE STUDIED THE FRIENDS OF LAKE FORK REVISED MANAGEMENT AREA 20 AND I LIKE WHAT IT DOES FOR THE FOREST AS WELL AS FOR ALL OF THE USERS. THIS PLAN WAS FORMED BY A CROSS SECTION OF ALL USERS SUCH AS FORESTERS,



RANCHERS, SPORTSMEN, AND ENVIRONMENTAL PEOPLE. THIS PLAN HAS SOMETHING FOR EVERYONE

**FOREST SERVICE RESPONSE:**

This opinion was shared by many of those who responded to the draft documents

**COMMENT NO. 136:** A FULL RANGE OF ALTERNATIVES DOES NOT INDEED REQUIRE AN OPTION TO BE REVIEWED SUCH AS THE "NO CHANGE" ALTERNATIVE OUTLINED IN THE SUPPLEMENT HOWEVER, GRRC CAN NOT SUPPORT THIS ALTERNATIVE. WE FEEL THE "NO CHANGE" OPTION DOES NOT ALLOW FOR JUST CONSIDERATION OF RESOURCES BEYOND TIMBER PRODUCTION. THIS ALTERNATIVE WOULD RESULT IN UNREASONABLE AND UNNECESSARY DEGRADATION OF WATER, FISHERIES, WILDLIFE, AND SCENIC VALUES. OLD GROWTH ALLOCATIONS SO NECESSARY FOR HEALTHY AND VIABLE FOREST ECOSYSTEMS WOULD SUFFER UNDER THE NC OPTION. ALTERNATIVE NC WOULD ALSO NOT MEET THE REQUIREMENTS OF THE FOREST MANAGEMENT PRACTICES ACT (36 CFR) AS IT RELATES TO MANAGING CULTURAL RESOURCES, DISPERSED RECREATION, OR RANGELAND. THESE PROBLEMS ARE BROUGHT OUT IN THE SUPPLEMENT AND WE ENCOURAGE THAT THE NC ALTERNATIVE NOT BE ADOPTED.

**FOREST SERVICE RESPONSE:**

Many agreed with these thoughts.

**COMMENT NO. 137:** WE WOULD ALSO LIKE TO SEE THE PINE RD ALLOCATED AS IN THE CITIZENS CONSERVATION ALTERNATIVE BUT WITH AN ADDITIONAL OVERALL MANAGEMENT AREA THAT ESTABLISHES THE PINE RD AS A "MODEL RD" WITH PARTICULAR EMPHASIS ON WATERSHED MANAGEMENT VIA UNEVEN-AGE TIMBER MANAGEMENT AND A COMPREHENSIVE WATERSHED MONITORING SYSTEM AND EXPERIMENTAL LOGGING TO TRULY DETERMINE WATERSHED IMPACTS OF ANY GIVEN RESOURCE MANAGEMENT ACTIVITY

**FOREST SERVICE RESPONSE:**

Several respondents from the Pine Valley area expressed this view. The District Ranger and Forest Supervisor are continuing to work closely with the community with special emphasis on maintaining and improved watershed conditions

**COMMENT NO. 138:** NOW THAT THE FORPLAN ANALYSIS OF THE COMMUNITY STABILITY ALTERNATIVE HAVE BEEN COMPLETED AND SHOW THAT A HIGHER ASQ MAY BE IMPLEMENTED WHILE MEETING OTHER RESOURCE OBJECTIVES INCLUDING ALL MANAGEMENT REQUIREMENTS, THE FOREST SERVICE SHOULD ADD THE COMMUNITY STABILITY ALTERNATIVE AS ITS PREFERRED ALTERNATIVE IN THE FINAL ENVIRONMENTAL IMPACT STATEMENT. SINCE THE ELEMENTS GOING INTO THE MAKEUP OF THE COMMUNITY STABILITY ALTERNATIVE ARE REPRESENTED BY A COMBINATION OF THE NO CHANGE ALTERNATIVE, THE CURRENT DIRECTION ALTERNATIVE, AND ALTERNATIVE B-DEPARTURE (THE RPA ALTERNATIVE), THE COMMUNITY STABILITY ALTERNATIVE IS CLEARLY WITHIN THE SCOPE OF THE ALTERNATIVES PREVIOUSLY ANALYZED IN THE DEIS AND ITS SUPPLEMENT. THUS, THE SELECTION OF THE COMMUNITY STABILITY ALTERNATIVE AS THE PREFERRED ALTERNATIVE FOR THE FINAL PLAN AND FEIS WOULD NOT ONLY COMPLY WITH THE ENVIRONMENTAL ANALYSIS REQUIREMENTS OF NEPA, BUT WITH THE RESOURCE MANAGEMENT REQUIREMENTS OF THE ORGANIC ACT, THE MULTIPLE USE SUSTAINED YIELD ACT, AND NFMA

**FOREST SERVICE RESPONSE:**

This alternative was displayed in Chapter II as an alternative not developed in detail. Reasons for it not being fully developed are stated. Regardless, the alternative expressed a point of view that reflected the concerns of many people and weighed heavily in the decision making process

**COMMENT NO. 139:** AS IN THE EIS THROUGHOUT, THE SUPPLEMENT PRESENTS INFORMATION DERIVED FROM FORPLAN WITH ALL ITS FLAWS AND INADEQUACIES. FORPLAN NEEDS REVISION TO ACCOMMODATE ROADLESS AREAS TO ACCOUNT FOR EXCLUSION OF TIMBER SALES.

**FOREST SERVICE RESPONSE:**

Computer techniques will continue to be improved as future land management plans are prepared.

**COMMENT NO. 140:** IT SEEMS INAPPROPRIATE FOR THE WALLOWA-WHITMAN NATIONAL FOREST TO BE ADMINISTERED WITH THE SAME EMPHASIS ON TIMBER PRODUCTION AS THOSE FORESTS ON THE WEST SIDE WHICH COMPOSE THE BULK OF REGION 6. CLIMATE CONDITIONS ARE SO VASTLY DIFFERENT HERE THAN ON THE WEST SIDE, THAT REGENERATION MEASURED BY THE MEAN ANNUAL INCREMENT HERE, IS NOWHERE NEAR WHAT IT IS ELSEWHERE IN THE REGION. IS THERE ANY CHANCE THAT WE COULD BE SWITCHED FROM REGION 6 TO REGION 4, WITH A CORRESPONDING DEEMPHASIS ON TIMBER PRODUCTION?

**FOREST SERVICE RESPONSE:**

Not much chance. We doubt that timber emphasis would be less on the Wallowa-Whitman, were it in Region 4.

**COMMENT NO. 141:** NEED EXPLANATION OF WHY ALTERNATIVE F GETS SO MANY ACRES IN MA-18 AGAINST SO MANY O'S WITH OTHER ALTERNATIVES (SUPP. TABLE PAGE S-13).

**FOREST SERVICE RESPONSE:**

Alternative F was developed to emphasize wildlife, fishery, and dispersed recreation values. This accounts for a large acreage of MA 18

**COMMENT NO. 142:** NEED TO MAKE CLEAR AT BEGINNING THAT THERE WILL BE CAREFUL MANAGEMENT OF ALL RESOURCES IN ALL ALTERNATIVES--ONLY THE EMPHASIS CHANGES.

**FOREST SERVICE RESPONSE:**

Additional language has been added near the beginning of Chapter II of the FEIS which makes this point

**COMMENT NO. 143:** OUR RECORDS INDICATE THAT WE HAD NO SIGNIFICANT COMMENTS ON THE ORIGINAL DRAFT EIS FOR THIS PROJECT (ISSUED IN MARCH 1986). THIS SUPPLEMENT TO THE EIS DOCUMENT ADDS AN ADDITIONAL ALTERNATIVE, A NO CHANGE ALTERNATIVE TO THE

ORIGINAL PLAN. IN OUR JUDGEMENT, THIS NEW ALTERNATIVE DOES NOT PRESENT ANY ADDITIONAL HAZARDS TO PUBLIC HEALTH AND SAFETY FOR THE MANAGEMENT OF THE WALLOWA-WHITMAN NATIONAL FOREST.

**FOREST SERVICE RESPONSE:**

(Comment from U. S Department of Health and Human Services.)

**COMMENT NO. 144:** THE FOREST IS LIKE A GARDEN; YOU HAVE TO HARVEST AND CULTIVATE IT OR IT WILL DIE AND IT WILL BECOME A FIRE HAZARD. TREES ARE A RENEWABLE RESOURCE -- JOBS ARE NOT.

**FOREST SERVICE RESPONSE:**

A point of view shared by many.

**COMMENT NO. 145:** AS A SAWMILL WORKER, I REPRESENT THE "OTHER SIDE." I AM CONCERNED ABOUT THE FUTURE OF OUR FORESTS, OUR WILDLIFE, OUR HUNTING, AND OUR CHILDREN. IT IS GREED TO USE RESOURCES THAT ARE NOT READILY REPLENISHED FOR IMMEDIATE BENEFITS IGNORING LONG RANGE EFFECTS AND, YES, I AM WILLING TO SACRIFICE MY JOB IF NECESSARY MY VOTE IS WITH THE USDA FOREST SERVICE PROPOSED PLAN.

**FOREST SERVICE RESPONSE:**

Thank you for your viewpoint.

**COMMENT NO. 146:** THE NO CHANGE ALTERNATIVE DOES NOT REPRESENT THE HISTORICAL MANAGEMENT PRACTICES UNDER THE FOREST'S EXISTING LEGAL PLANS AND, THEREFORE, THE EFFECTS OF IMPLEMENTING THE TIMBER PLAN ARE NOT REPRESENTED CORRECTLY.

**FOREST SERVICE RESPONSE:**

As explained in Chapter II of the FEIS, the purpose of representing a No Change Alternative is not to represent "historical management practices" Instead, it represents the continuing implementation of the existing Timber Management Plan as amended but not modified by the NFMA regulations. Of course if this alternative were chosen as the selected alternative for the Forest Plan, either the NFMA regulations would need to be revised or the TM Plan would have to include NFMA regulations. In that case, this alternative would closely match the No Action Alternative in outputs and effects

The purpose of the No Action Alternative is to represent the integration of all existing plans including the Timber Management plans together with NFMA regulations.

**MONITORING  
Code 1400**

**COMMENT NO. 1:** YOUR SEDIMENT MODELS SHOULD BE TIED INTO THE MONITORING PLAN FOR IMPROVED ACCURACY OF THE MODELS. THE MONITORING PLAN SHOULD BE ELABORATED AS TO (1) HOW OFTEN STREAMS WILL BE SAMPLED, (2) HOW STREAMS WILL BE SAMPLED, (3) HOW INFORMATION WILL BE DISSEMINATED TO THE PUBLIC, AND (4) HOW THIS DATA WILL FEEDBACK INTO THE TIMBER MANAGEMENT GOALS OF THE PLAN.

**FOREST SERVICE RESPONSE**

Under ideal circumstances, monitoring could be used to verify or improve sediment prediction models. However, the sampling frequency and sophistication required to make this type of assessment are extremely expensive and most Forests, including the Wallowa-Whitman, are not funded for that type of work. Improvement of predictive models or new predictive models usually are the result of research activities by Forest Service researchers or researchers from other agencies or organizations.

The Monitoring Plan in the Forest Plan is not intended to provide the degree of specificity suggested by the respondent. Such things as the monitoring frequency, monitoring parameters, and the specific locations of monitoring activities will be determined in individual monitoring plans. In most cases, monitoring will concentrate on how well best management practices were implemented, rather than on monitoring in-stream parameters such as sediment or temperature.

**COMMENT NO. 2:** AN AGGRESSIVE MONITORING AND EVALUATION PROGRAM DOES NOT EXIST FOR MEASURING CHANGES IN WATER QUALITY AND QUANTITY, HARVEST LEVELS, MINING ACTIVITIES, EMPLOYMENT AND INCOME, FISH AND WILDLIFE HABITAT CONDITIONS, VARIATIONS IN PAYMENTS TO COUNTIES AND OTHER RESOURCE MANAGEMENT ACCOMPLISHMENTS.

**FOREST SERVICE RESPONSES:**

We think that the Monitoring Plan found in the Forest Plan sets the framework for implementation of the Forest Plan. Individual monitoring plans, to be developed under the guidelines of the parent monitoring plan, will provide an "aggressive monitoring and evaluation program".

**COMMENT NO. 3:** THE FOREST NEEDS TO ADEQUATELY MONITOR WATER QUALITY AND IMMEDIATELY MODIFY ANY FOREST MANAGEMENT PROGRAMS, ROAD BUILDING OR OTHER SOIL AND WATER DISTURBANCES WHENEVER WATER QUALITY OR FISH HABITAT IS ADVERSELY AFFECTED

**FOREST SERVICE RESPONSE:**

The policy of the Forest is to modify or stop any activities which do not meet watershed standards and guidelines, including compliance with water quality standards

**COMMENT NO. 4:** THROUGH THE MONITORING PROGRAM THERE IS A NEED TO DEVELOP SPECIFIC MEASURABLE STANDARDS TO MONITOR WHEN MONITORING DEMONSTRATES

THAT IMPACTS EXCEED PROJECTED AND ACCEPTABLE BOUNDS THAT SHOULD AUTOMATICALLY TRIGGER (FEEDBACK) CORRECTIVE ACTION IN PLAN IMPLEMENTATION. THE THRESHOLD OF VARIABILITY MEASUREMENTS ARE TOO OFTEN GENERAL AND LACK SPECIFIC MEASUREMENTS TO TRIGGER CHANGE, FOR EXAMPLE ON PAGE 5-4 YOU HAVE NO MEASURE FOR OFF-ROAD VEHICLES. I WOULD SUGGEST THAT WHERE YOU GET 10 COMPLAINTS OF CONFLICT IN AN AREA DURING ONE FIELD SEASON THAT TRIGGER A REVIEW OF RECLASSIFICATION OF THAT TRAIL TO NON-MOTORIZED USE

**FOREST SERVICE RESPONSE:**

We have attempted to set measurable standards for those items where it is practical to do so. In the case of trails open to motorized use, policy is reviewed annually and changed when warranted. Although no set number of complaints triggers a review or change, public input is an important part of the analysis process.

**COMMENT NO. 5:** THE THRESHOLD FOR FISH AND WILDLIFE IS A "SIGNIFICANT DOWNWARD TREND" WHAT IS SIGNIFICANT? WHY NOT A 10% CHANGE IN POPULATION OVER TWO YEARS YOUR TARGET OF ACCOMPLISHMENT OF LESS THAN 20% TARGETED FOR FISH HABITAT IMPROVEMENT IS TOO HIGH. I WOULD RECOMMEND 10%.

**FOREST SERVICE RESPONSE.**

This monitoring item has been changed in the final Plan

**COMMENT NO. 6** THE "ACTION INDICATED" IS TOO FREQUENTLY "CONSIDER" A PLAN REVISION OR AMENDMENT. THE FEEDBACK SHOULD BE AUTOMATICALLY CYCLED INTO THE PLAN WHERE OTHER ACTIVITIES THAT CAUSE THE IMPACTS TO EXCEED ACCEPTABLE LIMITS ARE CURTAILED OR DIRECTLY MODIFIED. THESE MORE SPECIFIC MEASURABLE STANDARDS WITH DIRECT FEEDBACK INTO THE PLAN ARE CRUCIAL SINCE DEVIATIONS FROM THE ANTICIPATED RESULTS ARE LIKELY TO BE FREQUENT. THE MONITORING PROGRAM IS THE ONLY MECHANISM CAPABLE OF IDENTIFYING AND ELIMINATING UNDESIRABLE RESULTS AND ACTIVITIES. IT IS ESSENTIAL THAT THIS COMPONENT BE MEASURABLE, VERIFIABLE, IMMEDIATELY IMPLEMENTABLE, AND ENFORCEABLE. THE CURRENT PROGRAM IS BADLY DEFICIENT IN ALL THESE CATEGORIES.

**FOREST SERVICE RESPONSE**

The monitoring plan has been changed in the Final Plan There are still situations where the action taken would be to "consider a plan amendment" or "consider in a plan revision". We do not want to automatically initiate a plan amendment or revision if there are other, more practical ways to achieve the desired objective Also see the response to Comment No 1

**COMMENT NO. 7:** THE FOREST'S PROPOSED SYSTEM FOR MONITORING AND EVALUATING THE PERFORMANCE OF THE PLAN IS INCOMPLETE. THE ECONOMIC EFFECTS OF THE PLAN ARE NOT FULLY CONSIDERED

RECOMMENDATION - CHANGES IN EMPLOYMENT, INCOME AND PAYMENTS TO COUNTIES WITHIN THE FOREST'S AREA OF ECONOMIC INFLUENCE SHOULD BE MONITORED ON AN ANNUAL BASIS. FOREST PLAN REVISIONS SHOULD BE CONSIDERED WHEN VARIABILITY FROM PREDICTED LEVELS EXCEED +/- 10 PERCENT THE ECONOMIC EFFICIENCY OF AND THE COSTS INVOLVED IN IMPLEMENTING SCHEDULED PRACTICES AND ACTIVITIES AS WELL AS THE

VALUES OF GOODS AND SERVICES PRODUCED BY THE FOREST SHOULD BE MONITORED ON AN ANNUAL BASIS WITH A +- 10 PERCENT ALLOWABLE VARIANCE TRIGGERING CONSIDERATION OF PLAN REVISIONS.

**FOREST SERVICE RESPONSE.**

Information presented in the Forest Plan and EIS relative to local economic impacts is designed to give the decisionmaker an idea as to the ranking of the alternatives and the magnitude of differences among the alternatives.

The Forest has no control over the actual local labor content of products manufactured from its raw materials, has no control over whether the raw material is processed locally, and has no control over the degree to which subsequent remanufacturing occurs locally.

Normal variations in market conditions can yield shifts in the unit cost and values by more than 10 percent. Actual production levels also vary significantly. Timber purchasers, for instance, have a good deal of latitude in deciding when to actually log a sale. Harvest levels can move markedly from one year to the next.

**COMMENT NO. 8: MONITORING - (LRMP, PAGE 5-2) THE MONITORING PROGRAM DESCRIBED IN THE LAND AND RESOURCE MANAGEMENT PLAN COULD BE IMPROVED IN SEVERAL AREAS. FIRST, THE VAGUE TERMS OF "ON-GOING" AND "CONTINUOUS" AS APPLIED TO MONITORING FREQUENCY SHOULD BE DEFINED, INCLUDING AN EXPLANATION OF THE DIFFERENCE BETWEEN THE TWO TERMS. ALSO, THE MONITORING PROGRAM NEEDS TO BETTER ADDRESS THE ECONOMIC EFFECTS OF THE PLAN**

**FOREST SERVICE RESPONSE:**

The monitoring plan has been revised since the Draft Plan was published. The terms "on-going" and "continuous" are no longer used.

**COMMENT NO. 9: FUNDING SHOULD NEVER BE AN EXCUSE FOR LACK OF PROPER MONITORING AND EVALUATION OF FOREST MANAGEMENT PRACTICES. THE CONFEDERATED TRIBES SEES MONITORING AS A HIGH PRIORITY ITEM, NOT AS AN EXTRA ITEM THAT MAY BE ADEQUATELY IMPLEMENTED IF FUNDING PERMITS. RESPONSIBLE MANAGEMENT DICTATES A HIGH QUALITY MONITORING SYSTEM THAT WILL EVALUATE IMPACTS ON THE NATURAL RESOURCES OF THE FOREST. AT A MINIMUM, MONITORING SHOULD INCLUDE ANALYSIS OF THE FOLLOWING TRENDS OR CHANGES IN EACH DISTINCT DRAINAGE AREA WHERE TIMBER HARVEST AND/OR LIVESTOCK GRAZING IS OCCURRING. COMPONENTS THAT SHOULD BE MONITORED AND ANALYZED ARE WATER QUANTITY AND FLOW REGIMES, WATER TEMPERATURES, COMPOSITION OF FINE SEDIMENTS IN STREAMBEDS, AND CONDITION OF RIPARIAN AREAS (BANK STABILITY AND VEGETATIVE QUANTITY/QUALITY). EXAMPLES OF DISTINCT DRAINAGES ARE CATHERINE CREEK, BIG SHEEP CREEK, UPPER IMNAHA BELOW THE WILDERNESS BOUNDARY, DARK CANYON AND SHEEP CREEKS, MEADOW CREEK, FIVE POINTS CREEK, BEAVER CREEK, FLY CREEK, UPPER NORTH FORK JOHN DAY RIVER, UPPER GRANDE RONDE RIVER, AND JOSEPH CREEK. LARGE AREAS SUCH AS THE LAST TWO LISTED SHOULD HAVE MONITORING IN SMALL TRIBUTARIES AND ALSO DOWNSTREAM IN THE LARGER ORDER STREAMS FOR ANALYSIS OF POTENTIAL CUMULATIVE EFFECTS. MONITORING OF EACH BASIN SHOULD FACTOR IN VARIABLES OF DIVERSE TIMBER MANAGEMENT TECHNIQUES AND HIGHLY HARVESTED TRIBUTARIES.**

## **FOREST SERVICE RESPONSE**

We agree that funding should not be an excuse for lack of proper monitoring. We believe, though, that in designing and implementing monitoring programs, it is necessary to emphasize those types of monitoring which are most cost-effective. In monitoring Forest Plan implementation, we will emphasize review of the Forest Plan standards and guidelines and how well they are implemented. We will take this approach because it enables us to review many projects and get a much broader view of Forest Plan implementation.

In some instances we will choose to monitor in greater detail. This monitoring will include such things as on-site or in-stream measurements of erosion, sediment, temperature, channel stability, bacteria, chemical water quality, and streamflow. This will occur where the resource values are particularly high or where there is concern over the suitability of the practices being employed. This monitoring, based on a site-specific monitoring plan tiered to the Forest Plan Monitoring Plan, will normally be designed to monitor the impacts of a project or group of projects.

It is not anticipated that any significant network of long-term baseline monitoring stations will be set up. This type of monitoring is generally the least cost-effective since management-related changes in water quality, if any occur, are frequently masked by natural variations in water quality and because, even if changes are detected, it is usually not possible to tie the change to a specific activity.

**COMMENT NO. 10: MANAGEMENT DIRECTION SPECIFIC TO INDIVIDUAL MANAGEMENT AREAS THIS SECTION IS ORGANIZED WELL. SEPARATING DESCRIPTION, DIRECTION (SPECIFIED STANDARDS AND GUIDELINES), AND ASSUMPTIONS WILL BE VALUABLE FOR DEVELOPING THE NEXT PLAN. TO THIS END, MONITORING OF THE ACCURACY OF THE ASSUMPTIONS SHOULD BE EXPRESSED IN CHAPTER V.**

### **FOREST SERVICE RESPONSE:**

We agree. Some of the items in the monitoring plan are designed to test the planning assumptions.

**COMMENT NO. 11: I SUGGEST RATHER THAN MONITORING THE NUMBER OF ACRES THINNED (I.E PAGE 5-8) WHICH ONLY CALCULATES ATTAINMENT OF THE OBJECTIVE THAT YOU INSTEAD MONITOR THE GROWTH INDUCING BENEFITS DISCUSSED ON PAGE E-20. THE MONITORING OF PLANTING GENETICALLY SUPERIOR STOCK FOR INCREASED GROWTH IS A LAUDABLE GOAL, THOUGH I THINK THE MONITORING WILL TAKE AS LONG AS THE SCHEDULED ROTATION TO EVALUATE WHETHER YOUR ALREADY PROGRAMMED 10% YIELD FACTOR IS WITHIN REASON**

### **FOREST SERVICE RESPONSE:**

The accomplishment report, which generates physical accomplishment or budget attainment, is based on post treatment exams on all sites treated. There are silvicultural exams that collect data and evaluate whether the work was accomplished in accordance with the prescription and that the silvicultural, including growth, and land management objectives have been met.

Although the actual final yield will not be known until the final harvest, research and operational programs in other areas have shown yield increases early in the stand age and these have been sustained through the life of the stand and this information forms the basis for our predictions.

**COMMENT NO. 12:** STEADY ANNUAL PROGRESS, OF COURSE, IS NEEDED BUT THE LEVELS OF FUNDING FOR MONITORING ARE ABSOLUTELY INADEQUATE TO GET ANY IDEA OF WHAT THE PRESENT STATE OF THE FOREST IS OR WHERE IT IS GOING. FOR SALMONIDS, \$2,700 IS ALLOTTED TO MONITOR POPULATION TRENDS THIS WILL BE DONE EVERY FIVE YEARS WITH A REPORT EVERY FIVE YEARS. A SIGNIFICANT DOWNWARD TREND MUST BE ESTABLISHED IN ORDER TO CONSIDER PLAN REVISION. IF A TREND IS ESTABLISHED ON TWO POINTS THIS WOULD REQUIRE 10 YEARS TO DETERMINE, DURING WHICH TIME THE DEGRADATION COULD BECOME IRREVERSIBLE WHAT IS CONSIDERED A SIGNIFICANT TREND? WHAT ACTIONS WOULD BE TAKEN TO CORRECT A PROBLEM?

WHAT IS THE ANNUAL BACKGROUND LEVEL OF VARIABILITY OF FISH NUMBERS ON WHICH TO ASSESS CHANGE? FOR WHICH RESOURCES (E.G., ALLOTMENT VEGETATION QUANTITY/QUALITY, RIPARIAN CONDITIONS, FISH HABITAT, NUMBERS AND SPECIES DISTRIBUTIONS) ARE DATA AVAILABLE, IN DETAIL ON BASELINE CONDITION? IF DATA ARE NOT AVAILABLE, HOW LONG WILL IT BE BEFORE BASELINES ARE ESTABLISHED FOR EVEN THE MAJOR STREAMS. WHY ARE FISH DATA NOT CONSIDERED AS AN ITEM NEEDING RESEARCH?

**FOREST SERVICE RESPONSE:**

The Monitoring Plan has been revised since publication for the draft Plan

**COMMENT NO. 13:** WE ARE INCLUDING IN OUR COMMENTS SOME IDEAS ABOUT MONITORING WHICH THE WWNF MAY WANT TO CONSIDER. THE BASIC IDEA EXPRESSED IS THAT A BROAD NETWORK OF MONITORING SITES NEEDS TO BE ESTABLISHED AND SAMPLED REGULARLY OVER A LONG PERIOD SITES SHOULD BE CHOSEN ACCORDING TO A WELL-DEVELOPED WATERSHED AND STREAM CLASSIFICATION. THIS SYSTEM COULD BECOME A FRAMEWORK FOR REGIONALIZING LAND BY HYDROLOGIC TYPE, TIMBER TYPE, SOIL BIOTIC ZONES, ETC. SUCH A SYSTEM WOULD BE A RATIONAL FRAMEWORK FOR SELECTING INDEX STREAMS TO ACT AS MONITORING POINTS FOR THE KINDS OF DATA WHICH ARE EXPENSIVE TO GATHER. OTHER TYPES OF DATA SHOULD BE COLLECTED MORE EXTENSIVELY. WITHOUT SUCH A SYSTEM, RANDOM SAMPLING WOULD PROVIDE AMBIGUOUS RESULTS.

**FOREST SERVICE RESPONSE:**

The ideas you have included will be carefully considered See response to Comment No. 9.

**COMMENT NO. 14:** THE PROPOSED PLAN WILL MONITOR THE ASQ BY LAND CLASS WORKING GROUPS THIS WILL NOT ALLOW THE TIMBER STAFF OFFICER TO KNOW WHAT SPECIES ARE BEING SOLD AND HOW TO ADJUST THE SALE PROGRAM

BOISE CASCADE RECOMMENDS THAT THE WALLOWA-WHITMAN SET AN ALLOWABLE SALES QUANTITY FOR EACH OF THE MAJOR SPECIES, E.G. PONDEROSA PINE, DOUGLAS-FIR, WESTERN LARCH, WHITE FIR, LODGEPOLE PINE. WE ALSO RECOMMEND THAT THE FOREST SERVICE MONITOR THE ASQ BASED ON SPECIES SOLD AND MAKE ADJUSTMENTS TO THE TIMBER SALE PROGRAM ACCORDINGLY.

**FOREST SERVICE RESPONSE:**

Allowable sale quantity (ASQ) is, by definition, the total of all species sold, so a separate ASQ for each species cannot be set up The monitoring plan does, however, call for monitoring sale offerings by working group, a parameter closely tied to species



**COMMENT NO. 15.** THE MONITORING OF RECREATION OPPORTUNITY SPECTRUM OBJECTIVES IS NOT INCLUDED IN THE FOREST PLAN. THE FOREST SERVICE MANUAL PROVIDES CLEAR DIRECTION TO INCORPORATE RECREATION MANAGEMENT INTO THE PLANNING PROCESS BY USING THE ROS FRAMEWORK. THE USE OF ROS FRAMEWORK IS THE MOST IMPORTANT TOOL FOR MONITORING IMPACTS TO THE RECREATION RESOURCE. THE ROS OBJECTIVES THAT ARE GIVEN TO THE LAND BASE MUST BE MONITORED TO ENSURE THAT THE APPROPRIATE ATTRIBUTES ARE IN PLACE

**FOREST SERVICE RESPONSE.**

We agree that the ROS is an important inventory and management tool. ROS will, of course, change as previously unroaded areas are entered for timber harvest. We will then update the ROS as appropriate.

**COMMENT NO. 16:** MONITORING IS THE ULTIMATE DETERMINATION IF LAND MANAGEMENT OBJECTIVES ARE BEING MET. A TABLE, SEVEN PAGES LONG, HARDLY CONSTITUTES A "MONITORING PLAN." WE FEEL THIS AREA IS SEVERELY LACKING AND WOULD LIKE TO SEE A FULL PLAN WHICH ADDRESSES VERY SPECIFICALLY HOW, WHERE, WHEN, AND BY WHOM MONITORING WILL TAKE PLACE ON THE WALLOWA-WHITMAN.

**FOREST SERVICE RESPONSE:**

The monitoring plan displayed in the Forest Plan is not intended to address these specific monitoring questions. Its purpose is to provide the monitoring framework within which detailed monitoring plans can be developed.

**COMMENT NO. 17:** WE FEEL THAT THE PROPOSED MONITORING PROGRAMS ARE INADEQUATE, MAINLY BECAUSE NO AGENCY CAN MONITOR ITSELF WITHOUT INTRODUCING SELF-INTEREST AND BIAS THAT MAY HAVE A DETRIMENTAL AFFECT ON THE RESOURCE. THE FOREST SHOULD SET MANAGEMENT GOALS AND THEN CONTRACT THE MONITORING OF ITS PERFORMANCE OUTSIDE THE ORGANIZATION.

**FOREST SERVICE RESPONSE**

Thank you for your comment. Although the Forest Service will retain responsibility for monitoring implementation of the Forest Plan, it is likely that certain aspects of the monitoring will be contracted to other agencies or organizations. Monitoring activities and results will be open to public scrutiny. We disagree with your statement concerning self-interest and bias.

**COMMENT NO. 18:** THE DISCUSSION OF MITIGATION AND MONITORING MEASURES WITH REGARD TO THE NO CHANGE ALTERNATIVE IS INADEQUATE. THE REQUIREMENT THAT ALL ALTERNATIVES RECEIVE THE SAME LEVEL OF ANALYSIS IMPLICITLY INCLUDES THE REQUIREMENT THAT THE SAME "HARD LOOK" AT MITIGATION MEASURES BE PERFORMED FOR ALL ALTERNATIVES CONSIDERED IN DETAIL WITHIN AN ENVIRONMENTAL IMPACT STATEMENT.

**FOREST SERVICE RESPONSE:**

Alternative NC is based on the 1962 Timber Management Plan for the Wallowa-Whitman National Forest. It is shown for comparative purposes and cannot be selected without a change in law or regulation. Alternative NC does not include the mitigation and monitoring requirements of the other alternatives. Where the effects of these shortcomings could be estimated, they are documented in Chapter IV. Alternative NC is described in detail and is compared to the other alternatives and to the issues driving the analysis. This constitutes equal analysis under NEPA.

# *APPENDIX N*

## *Chapter IV*

#### **IV. LETTERS FROM ENVIRONMENTAL AGENCIES, ELECTED OFFICIALS, AND INDIAN TRIBAL GOVERNMENTS**

Council on Environmental Quality Regulations, 40 CFR 1503.4(b), state that "all substantive comments received on the draft statement (or summaries thereof where the response has been exceptionally voluminous) should be attached to the final statement whether or not the comment is thought to merit individual discussion by the agency in the text of the statement."

Because response to the Draft Statement was voluminous, summaries or representative comments have been provided in Part III of this Appendix. Letters from governmental agencies, elected officials, and Indian tribes are included in their entirety in this portion of the Appendix (Part IV).

Many of the comments in these letters expressed opinions or offered information that has been considered in arriving at a Forest Plan Decision. In many instances, comments resulted in modification of alternatives, text corrections, or other changes in the documents. Where it appeared a separate response was needed, numbers in bold faced print on the left margin of the letters indicate the chapter of Part III where the concern is expressed and responded to by the Forest Service.

Comments in letters received after the prescribed comment periods for the DEIS or Supplement were considered and often resulted in changes to the documents or decision, but they were not necessarily responded to in Part III of this appendix.







UNITED STATES DEPARTMENT OF COMMERCE  
National Oceanic and Atmospheric Administration  
NATIONAL MARINE FISHERIES SERVICE

ENVIRONMENTAL & TECHNICAL SERVICES DIVISION  
847 NE 18th AVENUE SUITE 350  
PORTLAND OREGON 97232 2279  
(503) 230-9400

June 16, 1986 F/NWR5:169

Mr. Jerry G Allen  
Forest Supervisor  
Wallowa-Whitman National Forest  
Federal Building  
P.O. Box 907  
Baker, OR 97814

Re: Draft Environmental Impact Statement (DEIS) for the  
Wallowa-Whitman National Forest Proposed Land and Resource  
Management Plan

Dear Mr. Allen

The National Marine Fisheries Service has reviewed the Draft  
Environmental Impact Statement (DEIS) on the Wallowa-Whitman  
National Forest Proposed Land and Resource Management Plan. Our  
review has concentrated on the technical information as it relates  
to anadromous fish.

General Comments

The Wallowa-Whitman National Forest has dealt with an extremely  
complex task in an efficient and professional manner. Several  
concerns remain, however, with the present DEIS.

Anadromous fishery information presented in the DEIS was diffuse and  
from several identified and unidentified sources. Better  
documentation needs to be provided. Several of our specific  
comments deal with this issue. In general though, we are unable to  
verify the anadromous fish production and value figures used in the  
DEIS and thus are unable to comment on the impact and enhancement  
conclusions. The areas of specific concern are: 1) the ratio used  
to determine sport and commercial catch of chinook and steelhead; 2)  
calculation of 1950's chinook and steelhead escapements (the  
Forest's optimum escapement levels); 3) projected contributions of  
chinook and steelhead to the commercial and sport fishery; 4) the  
mixing of salmon and steelhead numbers when evaluating impacts  
and/or enhancement; and 5) insufficient detail, specific to Forest  
management areas and species of anadromous fish, upon which we can  
make a complete evaluation of impacts and/or benefits.

440 We are further concerned that the DEIS and proposed Forest Plan do  
not present a Forest specific and separate set of standards,  
guidelines and objectives for managing riparian habitat areas.  
There needs to be a separate monitoring program for Forest-specific  
management activities in riparian areas as well. Riparian habitats

need to be recognized as unique areas that are very sensitive to the  
variety of management activities that occur in the Forest.

440 The anadromous fish issues in the Wallowa-Whitman National Forest  
are complicated because of a diminished fishery resource and  
existing degraded habitat. The DEIS should define a clear  
difference between achievable levels of habitat quality (the best  
that can be expected given the degraded habitat) versus ideal levels  
(100 percent of undegraded or natural conditions). Without this  
information, we are unable to determine what are realistic and  
achievable levels of habitat quality and thus resource production.  
The concerns listed above makes our evaluation of the DEIS and its  
conclusions tentative.

With regard to fish production and habitat condition, there are  
several, different and opposing impressions obtained by NMFS from  
reading the DEIS. The initial message is that there is an abundance  
of habitat that is not being used because of heavy fish losses at  
Snake and Columbia River hydroelectric projects. We acknowledge  
that losses occur at mainstem projects. The DEIS correctly states  
that tremendous efforts are now underway by the states, Indian  
tribes and the U.S. Government to rectify that problem. Given that  
level of effort to restore fish runs in the Columbia and Snake  
Rivers, there will surely be an increase of salmon and steelhead on  
the Wallowa-Whitman Forest. The DEIS, and the Forest Plan need to  
address specific measures and management practices that will insure  
that high quality spawning and rearing habitat will continue to be  
available for gradually increasing fishery resources in the future.

The other, somewhat conflicting message in the document, is that  
definite habitat degradation problems do exist due to forest  
activities such as logging, road building and grazing that need  
treatment immediately. We support these activities strongly,  
especially those aimed at moderating low flow and high temperature  
summer conditions in streams used for rearing of juvenile anadromous  
fish. The estimates of "habitat capability" may, therefore, need to  
be revised based on present conditions or possibly displayed as a  
more complete range, by alternative, of existing and future fishery  
values.

To conclude our general comments, we would suggest that the Forest  
consider the following points as areas of improvement.

1. Develop a habitat management program designed to manage toward  
a level of achievable habitat quality, necessary to provide  
optimum habitat for chinook and steelhead.
2. Develop Forest specific separate standards and guidelines for  
riparian land areas. These should be based on better  
definition of riparian zones and quantitative goals for their  
condition.

3. Upgrade the fisheries data found in the DEIS, including sources of information, to the best available data. Indicate what the technical basis is for the data in the DEIS.

We believe the points listed above need to be addressed before a complete assessment of the plan's impact on anadromous fish can be performed. A number of the points listed above are concerns that are not exclusive to the Willowa-Whitman National Forest's planning effort, but are concerns that need to be addressed in many National Forest plans in the Pacific Northwest.

We offer the following specific comments on the DEIS for your consideration.

Specific Comments on the DEIS

- 440 Page II-79, Table IIJa. Please separate steelhead from chinook adults in this table. We are unable to determine what these values mean in terms of steelhead and chinook. A primary concern we have identified throughout the DEIS is the lumping of different species when discussing general impact and production estimates. The two species of anadromous fish have significantly different spawning and rearing habitat requirements and react differently to environmental impacts. Also, how is "full escapement" derived?

Page II-88. Same comment as above.

- 930 Page III-16, Table III-3b. The Sheep Creek hydroelectric facility has a total generating capacity of approximately 7.0 MW not 0.1 as indicated.

- 440 Page III-42, Table III-8. The DEIS and the appendix to the DEIS do not provide a clear description of the basis for these estimates. The mix of chinook and steelhead into a single value makes evaluation of the conclusions impossible. A listing of the potential spawning area (in square yards) by species and river/tributary would improve the product. Our general concerns with the values contained in the DEIS are expressed in the "General Comments" section of this evaluation. Also, we do not agree with the concept presented in the text and quantified here, that 96 percent of the loss to anadromous fisheries is due to mainstem hydroelectric projects. For example, sockeye salmon were extinct in the Grande Ronde system well before the 1950 benchmark date. On and off Forest water diversions, roadbuilding, logging, stock grazing and mining all have played a significant role in the decline of salmon and steelhead returning to the Forest.

Page III-67. The second paragraph discusses restoration efforts for anadromous fish. The last sentence should be changed to include dams on the mainstem of the Columbia River.

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- 450 Page IV-42. Please detail what the measures are that will protect stream corridors and riparian areas that are mentioned in the first paragraph.

Specific Comments on the Proposed Plan

Page 2-13, Table 2-7. See previous comments on Table III-8 in the DEIS.

Page 4-22. Watershed Goals and Standards. See our previous general comments on the need for more specific standards for riparian habitats. Please explain what type of cost and benefit analysis will be done on riparian improvement and protection projects.

Thank you for the opportunity to comment on the DEIS. If you have any further questions please contact Jim Esch at 230-5427.

Sincerely,

*Dale R. Evans*  
Dale R. Evans  
Division Chief

cc: EPA - Ross  
ODFW - Carlson  
USFWS - Wright  
CRITFC - Heindl  
Umatilla National Forest  
Malheur National Forest

Appendix N



IV - 6



U.S. ENVIRONMENTAL PROTECTION AGENCY  
REGION 10  
1200 SIXTH AVENUE  
SEATTLE WASHINGTON 98101

2573  
5

JUL 11 1986

REPLY TO  
ATTN OF M/S 443

Jerry G. Allen, Forest Supervisor  
Wallowa-Whitman National Forest  
P.O. Box 907  
Baker, Oregon 97814

Dear Mr. Allen:

The Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) and proposed Plan for the Wallowa-Whitman National Forest, Oregon, prepared by your staff. The DEIS presents several alternatives for management of the Forest's 2.3 million acres, while the proposed Plan expands on the DEIS preferred alternative. Our detailed comments concerning the combined DEIS and Plan are enclosed. Our review was conducted in accordance with the National Environmental Policy Act, and our responsibility under Section 309 of the Clean Air Act to determine whether the impacts of proposed federal actions are acceptable in terms of environmental quality, human health, and welfare.

We appreciate your taking the time to meet with us to go over the documents, and to answer questions over the phone during our review. The Forest Plan/EIS is a major planning document which deserves both the efforts put into its development by your staff and the close attention of the public and of other agencies.

The draft document raised some concerns and the proposed Plan, as written, does not clearly preclude the possibility of significant environmental impacts. We have, therefore, rated the DEIS and proposed Plan EO-2 (Environmental Objections-Insufficient Information). A summary of the EPA rating system for draft EISs is enclosed for your reference. This rating reflects our primary concerns that the DEIS and Plan did not clearly provide the necessary protection for water quality and sensitive beneficial uses given the major grazing and timber harvesting outputs proposed. The major reasons for this are:

1. insufficient presentation of existing conditions;
2. standards relating to fish habitat and riparian areas that are too general to assure adequate protection of these important resources;
3. an unclear commitment that activities unable to meet the standards adopted would not be allowed to occur unmodified;
4. insufficient analysis of risks to water quality and beneficial uses from sedimentation from planned activities.

We believe that much of the information and analyses that were not in the draft documents exist, and that the final EIS and Plan can adequately address our concerns. In doing so, some significant revisions to the outputs targeted under the various EIS alternatives may be necessary. Once you have had a chance to consider these comments, we will contact you to offer our assistance during the process of finalizing the documents. We are confident that we will be able to work together effectively so that the final EIS and Plan will provide the forward-looking planning guidance we all desire for the Wallowa-Whitman National Forest.

Thank you for the opportunity to review the DEIS and Plan. Continued coordination and any questions should be directed to Mr. Brian Ross of our EIS and Energy Review Section at (206) 442-8516 or FTS 399-8516.

Sincerely,

*Robert S. Burd*  
Robert S. Burd  
Director, Water Division

Enclosure

- cc: Office of the Governor, State of Oregon  
USFS (R-6)  
USFWS  
NMFS  
BLM  
CRITFC  
TWS  
SC

Appendix N  
2573

U.S. ENVIRONMENTAL PROTECTION AGENCY REVIEW REPORT:  
PROPOSED FOREST PLAN AND DRAFT ENVIRONMENTAL IMPACT STATEMENT  
FOR THE MALLONA-WHITMAN NATIONAL FOREST

Fish and Fish Habitat

General

The EIS describes the affected environment and analyzes the environmental consequences of implementing alternative schemes for managing the M-WNF's natural resources. It is meant to support the reasonableness of the selected Forest Plan. The Plan itself is designed to establish the framework for planning during the next 10 to 15 years. We recognize, however, that Forest Plans typically do not provide detailed planning for individual projects. Given the projected outputs of the EIS preferred alternative, the Plan describes how these outputs may be achieved. The key is that the outputs are targets. The standards and guidelines presented in the Plan (both forestwide and management area-specific) are interpreted as the primary "rules."

**1300** In order to determine whether the standards and planning framework in the proposed Plan will sufficiently protect environmental quality, public health, and welfare, the associated EIS should include more detailed descriptions of the affected environment and environmental consequences. In particular, too little information regarding existing conditions of fish habitat and riparian areas on the M-WNF is presented. Without thorough descriptions of existing conditions (including any current degradation) an adequate environmental consequences analysis is difficult to perform. Similarly, it is difficult to determine whether the levels of impacts that are predicted are acceptable, or whether the proposed standards sufficiently avoid or minimize impacts. Many of the following discussions should be read with this in mind.

Additional discussions of existing conditions and the processes the Forest Service will utilize during implementation of the Plan will help provide the necessary support for later specific planning decisions. We expect that much of what we suggest for inclusion in the final EIS and Plan is available or can be reasonably obtained. We are optimistic that the final documents will be adequate for decision making and for planning future activities on the M-WNF that are environmentally sound.

Domestic Water Supplies

**800** Domestic water supplies are dealt with well in the DEIS and Plan. Summarizing the management agreements with the cities of La Grange and Baker is appropriate for this tier of documents, and will help the public to understand the importance the Forest Service places on the protection of drinking water supplies.

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**440** Discussions of fish and fish habitat should be expanded in order for us to determine that impacts to fish as a beneficial use are minimized. The process that will be followed to protect fish habitat must start with consideration of the existing condition of the habitat. The adequacy of the standards designed to maintain habitat quality, and of the monitoring program used to determine that the standards are being achieved, relates directly to the current status of the fish populations and their habitat. The fish sections of both Chapters III and IV are appropriate places to summarize much of what we suggest be included elsewhere in the documents in terms of impacts from grazing, timber harvest, and roading in riparian areas, as well as sediment yields from upslope activities. (Also see Cumulative Impacts, below.)

It is noted that where fish habitat has declined it has been due to livestock damage to riparian areas, loss of stream shade, and increased sedimentation. Areas where this has occurred have not been identified, however. Figure III-B is useful, and could be made more so by inclusion of symbols denoting general areas where impacts have occurred.

We agree with emphasis being placed on undertaking fish habitat improvement projects. It should also be emphasized that fish habitat improvement work, while important and potentially very successful, does not take the place of avoiding impacts from the beginning.

**1300** It is unclear how land was allotted to Management Strategy 18, which would maintain stream shading to help optimize anadromous fish habitat. Over 60,000 acres are allotted under the Preferred Alternative, while nearly 700,000 acres would be included under Alternative F. Why do other strategies not include any shade standard, and why is there such a large difference between the two alternatives that do? Does Alternative F better protect all anadromous fish streams? Does the Preferred Alternative protect the most important ones? How was the delineation made?

It would appear that the management direction given in Strategy 18 may be appropriate over the M-WNF as a whole. It provides some protection for fish habitat and water quality without entirely precluding any type of activity, even in riparian areas. A new strategy may be warranted for lands adjacent to the more important anadromous fish streams, however, if the intent to optimize this habitat is to be realized. Such a strategy would provide highly protective standards not only for shading, but for sedimentation, for large woody debris (including its future recruitment), for bank stability, and perhaps for other vital components of the habitat. Guidelines for some of these exist in the proposed Plan, but measurable standards have not been developed or proposed. Exclusion of all timber harvesting or livestock grazing from streamside management zones (SMZs) in these areas could be the easiest means of managing for optimization of these conditions. (Also see Riparian Area Management, below.)

Appendix N

440 Coho are mentioned on DEIS page III-40, but do not appear in Table III-8 or subsequent discussions. Other than this oversight, Table III-8 was very useful (although we are aware there may be some dispute over some of the specific numbers). The method used of separating the various anadromous species should carry through to other areas of the document.

Additional comments on the standards and guidelines relating to fish habitat protection, and on monitoring of fish habitat, are given under Standards and Guidelines and Monitoring, below.

### Sediment

800 Sediment yield estimates are presented in Table II-3a. It is not clear that these estimates include the effects of both timber harvest activities and roads. (Are temporary roads also included?) We suggest the intermediate steps between Appendix F and Table II-3a be provided to clarify the assumptions used.

The discussions of sediment yields and impacts should be expanded in the final EIS. Information summarizing the extent and location of high hazard lands (relative to erosion and mass wasting potential) should be presented, and perhaps generally mapped. (You may wish to refer to the maps of erosion potential recently published by the Bureau of Land Management as part of their draft Baker Area Resource Management Plan/EIS. These cover M-HNF lands, as well.)

Erosion standards would be appropriate to develop, especially for the high hazard lands. For example, as shown in Appendix F, as much as a 76 percent increase in sediment yield can be expected following clearcutting and shelterwood harvests. This level of increase alone can translate into significant sedimentation of spawning and rearing areas for anadromous fish. Considering the additional input from other roads, and from other activities such as livestock grazing that may occur in the same basin, concern for fishery impacts becomes more significant. Ideally, sediment yield predictions, coupled with appropriate standards, could be used in planning as one screening tool to help determine allowable levels of activities within a basin over time. If such modeling is not now at a state where your staff feels it has a use as described, appropriate standards can still be set and more emphasis placed on monitoring.

In any case, the final EIS should summarize the knowledge regarding sedimentation and fishery impacts, and describe any mitigating factors that may exist on the M-HNF. For example, approximately 20 percent fines by depth appears to be a threshold above which survival to emergence of eggs and alevins decreases dramatically. How would the sediment yield increases predicted in Appendix F relate to instream sedimentation on the M-HNF?

Finally, forestwide averages as given in Table II-3a are useful for general comparison among alternatives, however, beneficial uses of water must be protected wherever they occur. High sediment yields in one basin averaged against no increases in another do not establish that beneficial uses are protected. (Statements on DEIS page IV-32 require revision along these lines.)

### Grazing

500 The M-HNF has provided more livestock grazing than any other national forest in the Pacific Northwest Region. It is not surprising, then, that even though many range management situations have improved, some problems persist. Several specific allotments are identified where range degradation must be reversed (DEIS page III-34). However, streamside damage to soil, vegetation, and water quality is also mentioned as occurring, without identifying specific problem areas other than to note that steep canyon areas are "particular problems."

The final EIS should identify the areas where grazing-related water quality or other riparian area problems exist. For the portions of these areas that support anadromous fish habitat or other highly sensitive beneficial uses, the final EIS should specifically evaluate whether steps (structural or non-structural) can be taken to reduce the risk of damage to acceptable levels. Domestic water supply watersheds and anadromous fish habitat should be managed for particularly low levels of impact. For anadromous fish, 90 percent of the Smolt Habitat Capability Index may be appropriate. Where it is concluded that impacts to beneficial uses would be unavoidable, as appears to be the case in steep canyon areas at present, grazing should be considered an incompatible use and livestock should be excluded.

Included in this evaluation should be estimates of the amount of land that would be unavailable for grazing should steep canyons (or other identified significant conflict areas) be excluded. The potential impacts to the local and regional economies should also be estimated. Even apparently large reductions in permissible AUMs may not seriously affect those economies, considering the M-HNF provides only 8 percent of the area's overall forage (DEIS page I-10). (Please see additional comments under Riparian Area Management, below.)

### Riparian Area Management

450 Riparian areas are designated in the proposed Plan for providing timber and other outputs, with the intent of allowing long-term maintenance or improvement of riparian area quality at the same time. In order to support that the proposed levels of these other outputs can be obtained without seriously damaging the functions and values of riparian areas, discussions dealing with them should be expanded. The relative importance of different riparian areas on the M-HNF, their existing conditions, and the impacts of grazing and timber harvesting activities on them should be more fully addressed.

The importance of riparian zones to water quality and fish and wildlife habitat quality greatly exceeds the actual area occupied by riparian vegetation. Any evaluation of the cost effectiveness of timber harvesting or grazing in these areas should reflect this fact. It is essential to carefully explain how activities such as timber harvesting and livestock grazing can be made compatible with other riparian area resource values (e.g., protecting and enhancing water quality and fish habitat potential), keeping in mind that it may not be possible to replace these other resource values elsewhere on the Forest.

**1300** As a first step, riparian area management standards should be separately presented in the final Plan (see Standards and Guidelines below). General measures that would apply to all riparian areas should be given first, followed by specific standards for different types of activities or individual problem areas or types. Guidelines for determining compatibility of activities with the values and functions of individual riparian areas, and standards for measuring the significance of impacts, are both necessary. As discussed above under Grazing for example, livestock use may be incompatible with riparian values in steep canyons supporting anadromous fish spawning and rearing habitat or domestic water supplies.

Next, it would be useful for the EIS to evaluate the effect on outputs of excluding or severely restricting activities in all versus only certain riparian areas. Answers to the questions below would help put the outputs and the other riparian values into better perspective.

- What percentage of the proposed timber harvest level would come from riparian areas? From the riparian areas most important to water quality and beneficial uses (especially salmon spawning/rearing areas)?
- What percentage of the proposed livestock grazing would be affected by exclusion from these same riparian areas?
- What percentage of these riparian areas have already been or continue to be adversely affected by roads, grazing, timber harvest, or other activities?
- What can be done short of total exclusion of activities in all riparian areas to minimize impacts on their functions and values (e.g., exclusion from only certain areas, reduction in intensity of use, etc.)?

The intent is to show that the final proposal for management of riparian areas is reasonable by first, describing their functions and values, second, describing their existing conditions, third, evaluating mechanisms for making activities compatible with their functions and values, and finally, from these, to develop output targets and standards and guidelines that are clearly consistent with protection necessary for these important areas.

Some of this was begun in the proposed Plan under the forestwide watershed direction, and particularly with development of Management Strategy 18 which is intended in part to optimize conditions for anadromous fish. In this prescription, 80 percent stream shading would be maintained and riparian areas would be managed "to achieve optimum conditions for fish and wildlife." Unfortunately no further direction is given for how to manage riparian areas to optimize these conditions. The forestwide management direction for watershed (page 4-23 to 4-24) apparently would require that objectives for riparian areas be determined only relative to future range allotment management plans.

**450** As proposed, timber harvest and grazing would be allowable in essentially all riparian areas, as long as a shading standard were maintained on a small percentage of those areas (Strategy 18 lands). Comparison with Alternative F indicates that over 10 times more of the riparian areas on the Forest could be considered as warranting extra protection. Even had Alternative F been proposed for implementation, however, we would not be able to determine the adequacy of that protection. Some national forests have proposed similar shading standards, plus more specific management of large woody debris and other components of fish habitat, for all streams. In at least one such case complete exclusion of timber harvesting in riparian areas around anadromous fish streams has been discussed. If there are reasons that riparian areas on the M-HNF do not require the degree of protection necessary in many other areas, the reasons should be explicitly discussed in the EIS.

### Cumulative Impacts

We have discussed the use of "area analyses" with other national forests and generally support their use. It would appear that much of the detailed analysis we believe to be necessary, but which the Forest Plan cannot provide and can be missed by individual project evaluations, would be included in this level of study. Area analyses would be the most appropriate vehicles for evaluating the cumulative effects of many similar activities, and the combined effects of different types of activities, occurring in a fairly large area and over a period of time. They would also be an appropriate focus for the "condition" monitoring we suggest be conducted (see Monitoring, below).

**800** Because detailed and specific analysis of cumulative impacts are extremely important, the final Plan should discuss in some detail the process for assessing them on the M-HNF. For example, for how large an area (2nd order drainages?) would such analyses be performed? What period of time between projects would be considered? Would all activities producing sediment in the area be included (e.g., timber harvests, plus roads, mines, grazing, etc.)? How will multiple ownership drainages fit into these analyses? Will documents be prepared and available for public review and comment?

There is potential for conflicts to occur over significant portions of the H-MNF especially between grazing and timber harvest activities and important aquatic resources. Also, relatively large acreages are proposed to be developed for the first time. We therefore believe that area analyses would be appropriate to perform for all watersheds in which development is planned near important aquatic resources. We further believe that such analyses should generally receive public review as draft EAs or EISs, depending upon the resource conflict potential of the projects.

### Standards and Guidelines

#### General

The standards and guidelines adopted in the Plan define the bounds within which individual activities on the Forest must be undertaken. The ultimate acceptability of activities depends on their being implemented under appropriate standards. It is with this in mind that we reviewed the standards and guidelines presented in Chapter IV of the proposed Plan. Along with the proposed monitoring program (which is intended in large part to ensure that standards are being met), we consider the adoption of adequate standards and guidelines to be the heart of the Plan.

- 1300** Provided below are specific comments on certain sections. As a general observation, it would be useful to separate standards from guidelines in the Final Plan. We agree with the definitions provided in the glossary differentiating between standards and guidelines, having both clearly presented can make the plan much more understandable as well as easier to implement.

#### Soils

- 800** The probable need for protection and mitigation measures for fragile soils is mentioned. This section should be expanded to describe what types of protection and mitigation measures may be used, and how their need will be triggered (i.e., standards for defining when impacts become undesirable). Erosion and mass wasting potential (which can have significant instream impacts) should be addressed as well.

- 800** It is proposed that transportation systems will not cause compaction to more than 20 percent of any activity area. This seems a high value when compared to the degree of roading generally thought to be related to significant erosion risk (i.e., over about 3 linear miles per square mile, which translates to less than 2 percent of an area). The EIS should provide arguments to justify any compaction standards proposed, and describe their relationship to the standards for road density.

This section should also provide guidance for overall soils management, including all activities which may affect stability, erosion, and compaction (i.e., provide cumulative standards for the combination of timber harvest roads, grazing, etc.) (Also see comments under Sediment above.)

#### Watershed

Much of this section presents general guidelines, more in the way of measurable standards are needed. Several specific instances are highlighted below.

- How are tree stands within SMZs to be managed to maintain the vegetative characteristics needed for water quality protection and to maintain or enhance stream channel stability?
- What amount of large woody debris is necessary to protect stream channel stability, enhance water quality, and provide structural fish habitat? (Without answering this, an adequate number of trees to provide a future supply can not be assured.)
- What does "less than full yield" mean regarding timber harvest in SMZs, and what assures that this level adequately protects "other riparian objectives"?

- 450** The bottom of page 4-22 states that "measurable objectives" will be set for cover or bank stability problem areas. Once the EIS describes problem areas that currently exist as we have suggested the Plan should set some measurable objectives for their recovery now. Similarly, page 4-23 states that objectives for riparian areas will be included in range allotment plans, and that for any riparian areas not currently meeting the objectives a schedule for improvement, and specific measures, will be identified. Again, we believe that standards and objectives must be outlined at the EIS/Plan stage, including identification of existing problem areas and general methods and targets for improvement.

Although we recognize budget constraints, we are concerned that there is no clear commitment to improvement of riparian areas that do not meet objectives. The statement, "allotment management plan revisions would occur on a priority basis under a schedule established by the Forest Supervisor" (page 4-23) leaves open the possibility that activities which have adversely affected riparian areas and related resources could continue unchanged indefinitely if budgets continue to shrink. It is very important that the Plan establish measurable standards, and that there be a commitment that if standards cannot be met by an activity, the activity is not compatible with other resources and therefore cannot occur as proposed.

### Air Quality

**830** The Oregon Department of Environmental Quality has noted that prescribed burning is the most significant source of Total Suspended Particulates (TSP) in northeastern Oregon. Also, the city of La Grange currently experiences problems with TSP. For these reasons we suggest the EIS more thoroughly evaluate air quality, and the Plan provide more guidance on minimizing air quality impacts. In particular, it is stated that personal fuelwood will be more difficult to obtain within 10 years, and that within 50 years will no longer be available as a major heat source for most area homes. This implies more slash burning. If such is true, air quality impacts from on-forest burning may become more significant. Even though TSP emissions are expected to be reduced overall, the timing of the emissions is the critical consideration. The Plan should describe the measures to be used to assure that air quality impacts do not become significant at any time, in addition to those resulting in reduced emissions overall.

(We assume the baseline mentioned on page 4-28 is 6,187 tons per year TSP )

### Minerals

**940** Definitions for "significant disturbance" should be provided relative to filling an operating plan. General mitigating measures that would be required should be outlined, such as reclamation and bonding. Also, the Forest Service role in monitoring and enforcement of operating plan requirements should be described.

### Transportation System

**1000** This section should reflect concern for instream impacts due to erosion from both permanent and temporary roads. Consideration should be given here (and under soils) to determining whether erosion is within the bounds predicted and determined to be acceptable in the EIS. Kinds of measures that would be applied to ensure erosion is not exceeding acceptable limits should be outlined.

### Wildlife

**450** A guideline is given that resources dependent upon riparian areas will be given preferential consideration. This would be done by meeting the objectives described in the 1979 report of the Riparian Habitat Subcommittee of the Oregon/Washington Interagency Committee, where practical. First, the objectives in this report should be outlined. Second, the phrase "where practical" should be defined or eliminated. If following these recommendations is necessary to protect riparian dependent resources, they should be standards which determine modifications to other activities. They should not be treated as guidelines to be followed only when doing so would not affect the other activities.

### Timber Harvest

**800** Methods for stabilization of disturbed areas to control soil erosion should be summarized. How will adequacy of control be determined? Inclusion of instream sedimentation standards under soils, and reference to it here, would be appropriate.

Capability to meet land management objective 'c' (page 4-42) would seem to require supporting standards and guidelines in other sections for the special conditions listed. In addition, a definition of critical soil conditions is needed.

**750** The emphasis on making harvest residue available for personal fuelwood gathering (p 4-43) appears to be at odds with the expectation that fuelwood gathering will diminish significantly.

**1120** Imminent danger from insect or disease attack is listed (p 4-45) as a circumstance under which commercial harvest on technically unsuited land may occur. Insect or disease attack should not be a problem, by itself, where trees are not slated for harvest. We suggest the following be added to the appropriate sentence: "and risk of spread to commercial stands is high."

### Livestock Grazing

**500** Considering the significance of grazing on the W-MNF and the potential for adverse impacts, this section is not sufficient. Please refer to our comment under Grazing, above. In particular, deferring objectives and standards and guidelines primarily to project level planning is inappropriate. Certainly, needs and measures that are highly site-specific cannot be identified here, but the blanketing direction (standards and guidelines) under which all allotments will be managed in the future should be presented in the final Plan.

### 1400 Management Direction Specific to Individual Management Areas

This section is organized well. Separating Description, Direction (specific standards and guidelines), and Assumptions was useful. We agree that an evaluation of the accuracy of the assumptions will be valuable for developing the next Plan. To this end, monitoring of the accuracy of the assumptions should be expressed in Chapter V.

**1300** Individual management area strategies should include, as part of the Description subsections, the total number of acres allocated to them and the output targets that have been assigned. (This would make the Descriptions more complete and avoid the necessity of jumping back and forth between documents.) Each strategy should also restate the assumptions that applicable state and federal standards will be met, including the protection of the beneficial uses of water from nonpoint source activities.

25

**1300** Management Strategy 1 When closed or temporary roads are included, total road density will at times reach or exceed five miles per square mile. This is a very high level requiring more specific and detailed evaluation in the EIS relative to erosion, mass wasting, water quality impacts, and riparian resources. Grazing non-use and fencing are mentioned as possible means of protecting erosion seeding and tree plantations from livestock damage, other resources should receive consideration of the same measures for their protection here and under other Strategies.

Management Strategy 3 What total road densities may occur under this management prescription?

Management Strategy 5 The management guidance provided in the documents cited (for Wildlife and Timber) should be briefly summarized.

Management Strategy 15 (Timber, p 4-87) How can an old-growth stand, by itself, cease over time to meet the criteria for old-growth (thus allowing it to be returned to the regulated timber base)?

Management Strategy 18 In most cases general guidelines are presented with no measurable standards apparent. All of the following questions could be addressed by specific standards.

- Wildlife How will optimum conditions be managed for and measured? Anadromous fish would be provided at 90 percent of the Smolt Habitat Capability Index. How is this measured and how much lower can the index go under other Strategies? How many trees, of what size and type, would be retained along perennial streams? How is this determined?
- Timber Harvest must meet fisheries and big game objectives, but how is it to be determined that this has occurred given the lack of measurable standards?
- Transportation What will the potential total road density be, and how is this determined to be compatible with the overall goal of fish and wildlife habitat optimization?
- Range How will range be managed to protect and improve riparian vegetation and fish habitat?
- Minerals How will fish habitat investments be protected? What about fish habitat not associated with improvement projects (investments), and riparian areas generally?

- Planning Assumptions What defines a heavily harvested watershed? What standards and monitoring will determine that sufficient watershed recovery has occurred? More to the point, what will ensure that over-harvesting in other watersheds will not occur in the future? (Please see comments regarding Cumulative Effects.) How will streamflow increases and stream channel stability be measured and monitored? What will ensure that livestock utilization and distribution problems will be solved as stated, given the apparent possibility that important allotment plan revisions may be deferred indefinitely (p 4-23)?

Overall, the intent of the direction in Management Strategy 18 appears appropriate for the M-MNF as a whole. This strategy embodies well the concept of multiple use. Many of the other strategies appear to overemphasize the current or historic patterns of land use on the M-MNF. Consideration should be given to greatly expanding the lands to which the direction intended in Management Strategy 18 is applied in the final Plan (This is in addition to developing a new, more protective strategy for optimizing conditions in the most important anadromous fish habitats--see comments under Fish and Fish Habitat, above.)

### Monitoring

The Monitoring Plan outlined in Table 5-1 should be modified in consideration of many of the above suggestions. Specific, measurable standards should generally be monitored, and we have suggested that standards be generally expanded in the final Plan. Beyond this, some specific comments follow on the Monitoring Plan as proposed.

#### Fish and Wildlife

- 440** Fish habitat improvements would be measured. This is appropriate. However, nowhere is fish habitat condition, away from improvement projects discussed. This is a significant omission. Not only should the Plan emphasize avoiding problems (i.e., avoiding the need for improvements), but without ambient condition monitoring new needs for improvement projects or management direction modification could not be easily identified or predicted. Also, the reporting period for habitat condition monitoring would need to be more frequent than every five years if individual projects are to be revised before significant damage has occurred.

#### Range

The same comment relative to condition monitoring applies to riparian areas under Range. Ideally, riparian areas would receive separate consideration in the Monitoring Plan, as they should in the Standards and Guidelines section.

Soils

800 Standards for compaction and puddling were given only relative to timber harvest activity. Compaction, etc., as a result of grazing and other uses should be tracked as well. As for Range, and Fish and Wildlife, some condition monitoring is needed in addition to monitoring improvement projects.

Watershed

1300 What are "project reviews" regarding wetlands and flood plains? Avoidance or mitigation of impacts to these areas requires an understanding of their functions and values. Tools for making these determinations may include the "HEP" or "Adams" techniques, for example. We can provide information on the use of these techniques, if they or something similar are not a part of routine project reviews. Once again, the reporting period seems to be too long to allow efficient revision of projects found to have undesirable impacts.

For water quality, our primary concern is the protection of beneficial uses. Standards and guidelines, and BMPs, are meant to provide this protection but they may not always be sufficient. Monitoring must therefore be directed at the beneficial uses, as well as to determining that BMPs etc., were applied. The role of project sampling, as well as monitoring not tied to any one project, should be outlined in this section. Trend monitoring need not be reported any more often than the three to five years mentioned. However, if at any time standards or guidelines are being violated or beneficial uses being significantly affected, project or Plan revisions/evaluations should be triggered.

Facilities

1000 Road condition monitoring to identify improvement/closure needs should be included. This is particularly important on the W-HNF, which already has more miles of roads than any other national forest in the Pacific Northwest Region.

SUMMARY OF THE EPA RATING SYSTEM FOR DRAFT ENVIRONMENTAL IMPACT STATEMENTS: DEFINITIONS AND FOLLOW-UP ACTION \*

Environmental Impact of the Action

LO--Lack of Objections

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities with no more than minor changes to the proposal.

EC- Environmental Concerns

The EPA review has identified environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EO- Environmental Objections

The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU -Environmentally Unsatisfactory

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the CEQ.

Adequacy of the Impact Statement

Category 1--Adequate

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2--Insufficient Information

The draft EIS does not contain sufficient information for EPA fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

Category 3--Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

\*From EPA Manual 1646 Policy and Procedures for the Review of Federal Actions Impacting the Environment





United States Department of the Interior

OFFICE OF THE SECRETARY  
 PACIFIC NORTHWEST REGION  
 500 NE Multnomah Street, Suite 1692 Portland, Oregon 97232

July 14, 1986

ER 86/658

Jerry G. Allen  
 Forest Supervisor  
 Wallowa-Whitman National Forest  
 P.O. Box 907  
 Baker, OR 97814

Dear Mr. Allen:

The Department of the Interior has reviewed the subject Draft Environmental Impact Statement (DEIS) and Proposed Land and Resource Management Plan (PLRMP) for the Wallowa-Whitman National Forest, Oregon and Idaho. The following comments are provided for use and consideration when preparing the final documents.

GENERAL COMMENTS

Fish and Wildlife Resources

**460** The DEIS and PLRMP make no clear statement as to which actions may or may not affect listed threatened and endangered species. In addition, conservation measures identified within the DEIS and PLRMP do not provide sufficient information (i.e. standards and guidelines for the management of bald eagles) to be able to enter into formal consultation at this time. Therefore, the following comments on threatened and endangered species are provided as part of informal consultation (1-7-86-1-120).

The DEIS and PLRMP make numerous references to FSM2670 and FSM1920. The inclusion of these documents within the DEIS, its appendices, or PLRMP would have facilitated review of the Forest Plan's impacts on threatened and endangered species. However, it appears that the DEIS and PLRMP contain adequate provisions for consultation with the Fish and Wildlife Service (FWS) in accordance with Section 7(a)(2) of the Endangered Species Act of 1973, as amended (ESA) if a determination is made during project design and analysis that an action may affect a listed species.

To further the conservation of listed species in accordance with Section 7(a)(1) of the ESA, the FWS encourages the Wallowa-Whitman National Forest's (Forest) efforts to develop and implement plans which incorporate elements of Recovery Plans and best available techniques for species conservation. Should the Forest determine an action may affect a listed species, it is required to initiate consultation with FWS.

Informal consultations with the FWS over the last year have included a review of Bald Eagle Management Plan for Unity Reservoir (1-7-86-1-2) and evaluation of winter roosting habitat on Garham Butte (1-7-86-1-160). During the course of these consultations, the need for additional studies to identify existing and potential habitat use patterns, and feasible management techniques for habitat enhancement were identified and acknowledged. These are monitoring needs which provide basic information valuable to the forest for avoiding conflicts with threatened and endangered species. These monitoring needs should be addressed in more specific detail in the PLRMP.

Peregrine falcon recovery efforts in the Pacific Northwest are still only beginning to get underway. The Forest should be aware of the need to coordinate and cooperate with federal, state, and private organizations involved in these recovery efforts. In addition, there will be a need to monitor historic eyries within forest boundaries. These are two management directions which should be clearly identified in the DEIS and PLRMP. The importance and magnitude of the monitoring will likely increase over the next 10 years. We would encourage the Forest to define additional management directions to promote the conservation of the peregrine falcon.

Throughout the DEIS and PLRMP, fish and wildlife resources frequently are combined and considered as a single resource. Each represents a very distinct group of resources with its own habitat requirements, problems, and attributes and should be consistently analyzed and otherwise treated independently of one another.

**1230** Throughout the PLRMP it is stated that proposed actions will require considerable investment and/or funding. However, the plan fails to clearly state what, if any, action will be taken if funding is not available to implement a proposed action. Considering the uncertainty of future federal funding, the plan should address how actions affecting fish and wildlife, especially mitigation measures, will be influenced if funds are significantly reduced.

**407** The FWS is concerned that the levels of snag management recommended for the forest are not adequate to maintain viable populations of wildlife species dependent upon snag habitat. The Forest's own snag counts show that in managed timber areas only 18 percent of the optimum number of snags is present, and yet for the proposed alternative it is estimated that 40 percent of optimum snag levels will be provided in areas actively managed for timber. This apparent discrepancy should be explained. Further, inventories of the Forest's old growth timber stands show that collectively they support only 55 percent of what is considered optimum snag habitat, and yet the reviewer is led to believe that old growth will provide near optimum snag habitat for snag dependent wildlife species. Accordingly, it is not clear what level of snag habitat actually will be provided. The analysis concerning snag management should clearly identify what level of snags will be available in all management areas by size category.

**300** According to Appendix B of the DEIS, all of the Forest's tree stands have been mapped and described. If this information exists, the physical characteristics of each old growth site should be provided in an appendix to the DEIS in a manner that would make it possible for the reviewer to correlate that information to each old growth area delineated on the alternative maps provided. This would allow for a much more meaningful analysis of each alternative's impact on old growth.

**200** All of the "legally viable" alternatives substantially reduce (by at least 57 percent) roadless acreage outside the Hells Canyon Recreation Area and designated wilderness areas. The "issues, concerns, and opportunities" associated with roadless areas warrant

an analysis of at least one or two "legally viable" alternatives that retain more area in a roadless condition.

Because of their national and regional importance, anadromous fish should be designated an "issue, concern, and opportunity" (to represent the aquatic environment) and evaluated as such in the final EIS. We also believe that Alternative C (the preferred alternative) needs to be modified to retain more old growth habitat and provide for more large diameter snags if Forest plans are to adequately accommodate fish and wildlife resources.

The additions to the National River System recommended in Alternative C (the proposed action) would substantially contribute toward the preservation of the fish and wildlife resources associated with these stream segments.

Wild and Scenic Rivers

No units of the National Park System will be adversely affected by the proposed action. However, the National Park Service (NPS) has certain responsibilities for Wild and Scenic Rivers and is the custodian of the Nationwide Rivers Inventory (NRI), which was conducted under the authority of the Wild and Scenic Rivers Act (W&SRA).

- 60 A number of terms are used to describe rivers that are discussed under the heading of Wild and Scenic Rivers. On page III-63 of the Draft Environmental Impact Statement (DEIS) "eligible" and "potential" are used. The term "eligible" is also used in Appendix I to the DEIS. Page III-64 uses the term "candidate" to refer to certain rivers. Page IV-21 mentions "streams under consideration." It appears that rivers are recommended for designation, if they are eligible, without benefit of a suitability determination. None of the terms are incorrect per se, but they are never defined and appear to have been used somewhat interchangeably. We recommend that standardized terminology be adopted to describe rivers. One possible set of standard terms is provided in attachment I to these review comments.

The Forest should conduct studies in sufficient detail to make a decision regarding the river and its management and record that decision. The decision should be for a specific type of management, not to recommend additional study or future study (except in special circumstances). While the eligibility/suitability study results are a constant in each alternative considered, the possible management actions with respect to a specific river should not be limited. Studies resulting in eligibility or suitability should be viewed only as necessitating the consideration of various alternative uses of the land and water for those rivers and related land resources.

The NPS has also provided a chart (see attachment 2) which sets forth a recommended procedure of conducting river evaluations that may result in designation as a component of the National Wild and Scenic River System or elimination from the NRI or any other management designation imposed by a Federal land management agency.

The DEIS reports upon eligibility for rivers in wilderness areas but does not follow up with recommendations for inclusion in the Wild and Scenic System. We recognize the administrative problems designating a Wild and Scenic River in a wilderness area would create, but believe there would be advantages also. One would be to provide better service to the public. Excluding such rivers from maps and lists of Wild and Scenic Rivers, which the public views as a list of the best or most significant rivers in the Nation, would cause the river to be overlooked. Another advantage is the additional

protection a Wild and Scenic River has under section 7(a) of the W&SRA, which prohibited water development projects on such rivers.

Listings of rivers in various places in the DEIS, as well as in the PLRMP, are not consistent. Some of the problem may be with terms, as mentioned earlier. Appendix I of the DEIS lists the Lostine, North Powder, Grande Ronde, Eagle Creek, and Joseph Creek; the DEIS listing on page III-64 includes the North Fork John Day in addition to those in Appendix I. The listing in Appendix I is the detailed description of "eligible streams which are being considered candidates." Appendix I should provide information for every river potentially eligible that flows through the Forest, but this is not the case. For example, the South Fork Imnaha, Imnaha and Minam, which are NRI rivers, are mentioned only in the PLRMP, page 2-9, and not again. It is not clear if they were simply overlooked or if the Forest did in fact study them but found them ineligible.

Cultural Resources

The cultural resource review that is usually conducted by the NPS was not performed for this Forest Plan. Because of extremely heavy priority work loads, the Interagency Archeological Services (IAS) Branch, which normally conducts cultural resource reviews, has been unable to review this document. In the absence of the IAS review, we encourage the Forest to consider the comments of the State Historic Preservation Officer.

Water Resources

The subject plan appears to adequately address hydroelectric facilities and potential sites. The Appendices volume also recognizes potential hydro-resources, the development of which would be foregone on streams eligible for inclusion into the National Wild and Scenic Rivers System.

- 930 We did not find, however, any recognition in the plan of existing waterpower withdrawals within the forest boundaries. Currently, there are the following waterpower withdrawals, totaling about 60,000 acres: Power Site Classifications Nos. 78, 191, 248, 263, 282, 368, 380 and 421, and Power Site Reserve Nos. 77, 170, 240, and 553 within the forest. Of these, two have been recommended for termination, and three others have been tentatively identified as candidates for termination. The remaining seven are scheduled for further analysis, and recommendations on retention or termination will be made between now and 1990.
- 800 The document indicates that surface water is over-appropriated and that supplementary use of ground water would be required. Occurrence, availability, quality and use of ground water on the National Forest should be addressed; and potential effects--both beneficial and adverse--of the proposed management plan on ground-water resources should be assessed. Periodic testing of drinking water made available to the visiting public and staff should be included in the monitoring plans.
- Mineral Resources
- 940 Overall the plan does little to encourage serious mineral development of the subject National Forest. By the Forest Service's own ranking, 85 percent of the highest ranked "known mineral areas" are either closed to minerals or have restricted access under the preferred alternative (Table IV-1, page IV-B, DEIS). Of the 18 management strategies, none recognizes potential or current mineral development as a partial goal or use of an area.

Appendix N

A primary minerals-related issue not addressed is the availability of land for mineral development and, in particular, the availability of land for exploration. Under the proposed action, 54 percent of the Forest Service's "known mineral areas" are either closed or restricted to mineral development. Excluding wilderness, wild and scenic rivers and closed portions of the Hells Canyon National Recreation Area, 59 percent of the remaining lands is either restricted for minerals or has been withdrawn from mineral entry.

The plan appears to ignore the potential resource values of mineral materials, industrial minerals, and Federal leaseable minerals (coal, oil and gas, and geothermal). The areas designated as potentially valuable for oil and gas and geothermal should be considered as known mineral areas for those commodities. The plan should note that BLM currently has the responsibility to classify lands for leaseable minerals. References to the U.S. Geological Survey should be changed to the Bureau of Land Management.

The plan and DEIS lack specific information related to:

- the location of active and recently-active exploration and/or mining sites.
- the number of people employed, monies spent, and quantities and value of minerals produced.
- the number of acres of Federal minerals under lease.
- the amount of Federal revenue generated by the leasing program in the recent past and revenue projections for the future.
- the amount and value of mineral materials needed to construct National Forest roads, and
- the amount and value of mineral materials used by private parties and local governments derived from National Forest Lands.

It is recommended that Management Strategies 1, 3 and 6 be modified to specifically recognize that mineral development may require some surface disturbance not necessarily entirely compatible with the management strategy.

#### SPECIFIC COMMENTS

##### DEIS

**450** Page 1-5, Issues, Concerns and Opportunities - The fact that no issues, concerns and opportunities specifically addressing the Forest's aquatic resources were identified is viewed as a major deficiency. As a minimum, anadromous fish should be recognized and evaluated as an issue, concern, and opportunity representing the Forest's aquatic environment.

**300** Page 1-9, Old Growth - The last paragraph and related questions presented in this section imply that the proposed minimum levels of old growth to be managed may not realistically be adequate to support viable wildlife populations. The FWS suggests that a more realistic management level be prescribed for old growth and that the emphasis should be to maintain vigorous wildlife populations as opposed to only viable wildlife populations, thus reducing the level of risk referred to in question number 1.

Page 11-30, Soils and Water - This statement should be supported by a brief discussion as to how substantial improvements over "recent historical levels" are going to be achieved.

Page 11-72-73, Table 11-1 - Specific and quantifiable parameters, including total acres, range, elevation, aspect, average size and geographical location should be provided to fully identify the impacts of each alternative on old growth.

Page 11-74, Table 11-2 Old Growth - The reduction in the areas to be managed for old growth is substantial. The potential of 76,919 acres is reduced between 36.6 and 52.3 percent. The impacts of this level of reduction in fish and wildlife resources are not adequately addressed in the DEIS. A more specific analysis of these impacts would improve the quality of the DEIS and should be included in the final.

**1300** Page 11-74, Tables 11-2 and 11-3a - The relationship between the information presented in these two tables is not clear. A table similar to 11-3a which numerically quantifies outputs and environmental impacts by alternatives should be included in the final EIS.

Page 11-106, Table 11-3b - The discussion concerning wetlands and floodplains should include provisions for mitigating unavoidable wetland impacts. A general discussion explaining how this mitigation will be accomplished should also be included.

**940** Page 111-8 - The minerals maps on page 111-8 are good, but the scale is too small. Maps at the same scale as the "alternative maps", and preferably in color, would allow direct comparisons between alternatives and the mineral potential maps.

**800** Page 111-11, last paragraph - The discussion concerning the impacts of timber management on streamflows and water quality should explain that proper timber management techniques can substantially protect existing streamflows and water quality.

**26** Page 111-30, 55, Page IV-12 - Three National Recreation Trails (NRTs) are mentioned in the DEIS. The NPS has records of three (Nee-Me-Poo, Elkhorn Crest and High Wallowa) in Oregon and another (Snake River) in Idaho. Impacts to the High Wallowa NRT should be discussed.

**940** Page IV-8 - The Bureau of Mines has provided a suggested revision of Table IV-1 (see attachment 3). This format will provide needed detail as well as an easier method of comparison of alternatives.

Page IV-9 - While some general impacts of mining activity are listed, no mention is made of impacts to fish and wildlife. As is stated on page IV-7, Alternatives E and A are less favorable to mineral exploration. Would these alternatives then have less adverse impacts to habitats of fish and wildlife?

**506** Page IV-23 - In view of the discussion concerning adverse impacts of livestock grazing on meadows, riparian habitat, along creeks, streambanks, etc., the resolution of these impacts should be fully considered and described in view of their relationship to Executive Orders 11990 "wetlands" and 11988 "floodplains."

Page IV-24, Effects of Livestock Grazing on Wildlife - The FWS disagrees with the statement that "Livestock grazing results in few conflicts with most wildlife species..." (emphasis added). Impacts of livestock grazing are identified on page IV-23 of the DEIS and in a reference to Thomas *et al.* (1979) which states that:

Wildlife use riparian zones more than any other type of habitat. Of the 378 terrestrial species known to occur in the Blue Mountains, 285 are either directly dependent on riparian zones or use them more than other habitats. Vertebrates that either feed in water or reproduce in water are totally dependent on riparian

and adjacent upland zones. In short, riparian zones are the most critical wildlife habitats in the Blue Mountains.

The FWS believes that livestock grazing adversely impacts most species of wildlife on the Forest and recommends this section of the DEIS be changed to reflect and fully discuss these impacts. Habitat degradation of riparian and aquatic systems is of particular concern.

- 718 Page IV-33, Effects of Timber Management on Streamflows - This section should include a brief discussion on the potential impacts of timber harvest on seasonal streamflows. Although annual streamflows may remain relatively unaffected by timber harvest, summer flows--often critical for anadromous fish--may be significantly reduced and spring flows substantially increased.
- 407 Page IV-37 - The discussion of the effects of timber management on snags and their associated wildlife species is confusing. However, it appears that the Forest as a whole presently provides less than 55 percent of what is believed to be the optimum number of large snags (per 100 acres) for wildlife and that the number of large snags per 100 acres will be reduced by 50 percent if the preferred alternative is implemented. In view of the above, the FWS believes large snag habitat will be reduced too much. We recommend the final EIS include a discussion of alternative timber management techniques which could provide for more large snags throughout the forest without significantly reducing timber volume yields.
- 400 Page IV-38 and IV-39 - The discussions on hiding and thermal cover should include a brief description of 1) what is currently provided on the forest, 2) what is considered to be optimum, and 3) as specifically as possible, how the existing cover habitats will be impacted. Phrases such as "...less than optimum size and spacing." need to be further quantified to be measurable and fully understood. The specific tradeoffs between timber and big game should be identified and analyzed for the proposed action.  
  
Page IV-40, first paragraph - This paragraph implies that the assigned RPA is too high in terms of the resultant impacts on wildlife. If this analysis is correct, it should be fully discussed and viable options presented. The DEIS should indicate whether or not the assigned RPA can be reduced, and if so, how.
- 300 Page IV-43 and IV-44, Effects of Alternatives on Old Growth Forest - In view of the many recognized attributes of old growth to wildlife and forest ecology, we are concerned that all but one of the alternatives would reduce the acreage and distribution of old growth on the Forest. The rationale for the proposed reductions should be described in the PLRMP. The DEIS should include a detailed description of the existing old growth stands including size, spatial distribution, elevation and general condition. This information is required to fully understand the impacts of each alternative. (Appendix B states that this information has been developed.)

Proposed Land and Resource Management Plan

- 26 Page 2-3, 2-6 - The PLRMP does not mention the presence of National Recreation Trails (NRT), neither existing nor proposed. Greater recognition of NRTs, as well as other trails and trail use, should be given in the Plan.

- 60 Page 2-10 - The PLRMP states that "under this plan the nonwilderness portions of the North Fork John Day and the Grande Ronde Rivers (Lower Grande Ronde) are recommended for inclusion in the National Rivers System." Yet in Management Strategy 7, p 4-73 and in the DEIS, page 11-39, Alternative C (Proposed Action) the Lostine is also shown to be recommended for inclusion in the National Rivers System. This issue needs clarification.
- 930 Page 4-3 - Regarding energy resources (oil, gas and geothermal), the plan asserts that the Forest Service jointly approves detailed operating plans. Approval of APDs for oil and gas and plans of operation for geothermal are the responsibility of BLM. By MOU, the Forest Service concurs in the approval of plans of operations for geothermal resources.
- 440 Page 4-16, Table 4-3 - This table should include a summary of anadromous fish "proposed and probable projects."
- 1300 Page 4-23, Wetlands - The need to mitigate unavoidable wetland impacts should be discussed
- 800 Page 4-40, Standards and Guidelines - The criteria to be utilized to determine the practicality of "...the management objectives for stream shading, streambank stability, ... for fish and wildlife ..." should be identified.  
  
Page 4-52, second paragraph - The PLRMP should indicate whether or not it would be possible to manage for the proposed short rotation periods and yet retain a select group of larger (perhaps less marketable) trees to be left to develop into larger snags for wildlife. Such an option would reduce the preferred plan's impacts on snag-dependent wildlife
- 650 Page 4-81, Management Strategy 12 - The BLM proposes to designate riparian areas adjacent to three streams that traverse BLM land adjoining National Forest lands as Research Natural Areas to fill low altitude riparian cell needs for the Oregon Natural Heritage Data Base. Investigations may be needed to determine if these cell needs are also met on adjoining National Forest lands. The streams (Clover Creek, Balm Creek and Sawmill Creek) originate on National Forest lands north of Keating, Oregon, and flow to the Powder River. Management for timber production in these streams watersheds may need coordination with the BLM to avoid damage to the proposed RNAs. (Timber Sale 880612 is in this area.)
- 200 Page 4-83, Management Strategy 13 - The Homestead Wilderness Study Area (WSA) (OR-6-2), still being studied for wilderness, has been increased in size by 600 acres of split-estate (federal surface, nonfederal subsurface) land. Changes in the study area will be discussed in a forthcoming BLM supplemental draft EIS. In the draft EIS (April 1985), BLM's preferred alternative was to recommend the WSA non-suitable as wilderness.
- 460 Page 5-2 and 5-5 - The monitoring plan for threatened and endangered species should be more specific. The bald eagle, peregrine falcon and MacFarlane's four o'clock should be addressed separately with separate specific objectives for each. The FWS's Recovery Plans provide a stepdown outline which may be used to identify specific objectives.

The FWS encourages the Forest's efforts to survey and monitor federal candidate and sensitive species. The monitoring plan should be expanded to indicate specific objectives for federal candidates and other sensitive species.

**450** Page 5-6, Table 5-1 - Monitoring should include an analysis of the success of the proposed riparian objectives actually implemented.

**1300** Page 5-9, Table 5-1 - We suggest that the proposed monitoring program include an annual analysis of wetland and floodplain acreage losses.

Appendices

**400** Appendix A, Page A-1 An explanation needs to be provided as to why there are no wildlife and/or fisheries projects identified as projected activities.

**940** Appendix C - Mineral potential is not discussed for all of the Roadless Areas. It would assist the review if this information was given for each roadless area and if it were located in the same section of the discussion.

**460** Appendix G, Page G-14, Table 20 - Regarding MacFarlane's four o'clock, we encourage the Forest's efforts to monitor existing colonies and include appropriate management directions for monitoring.

**940** Appendix I, Page I-7, G.1 - It states that "Remains of old mining activity is evident from pre-1930's residual placer mining for copper and molybdenum." Bureau of Mines has no records of placer mining for copper and molybdenum, and requests details on this mine be sent to the Western Field Operations Center in Spokane, Washington.

Appendix J - With regard to minerals, Appendix J is well prepared. The definitions are clear and concise and the data are well researched and very useful. It is recommended, however, that subjective language such as "the horror stories of past operations" (page J-6) be removed.

The evaluation criteria for nonenergy minerals (Table J-3) imply that only substantial development/production within 10 years is considered in the planning process. This is too short a time frame to make judgements restricting mineral development. Long-range planning is needed for mineral resources.

Thank you for the opportunity to comment.

Sincerely,

  
Charles S. Polityka  
Regional Environmental Officer

Attachments





If you have any questions regarding the above comments, contact Diana Hwang of our office at (503) 231-6170 or PTS 429-6170

Sincerely,



Roger E. Vorderstrasse  
Acting Field Supervisor

Attachment

cc FS Attn Phil Lee Portland  
ODFW Attn Mark Henjun, La Grande  
ONHP/The Nature Conservancy



BOISE FIELD OFFICE  
4696 Overland Road, Room 576  
Boise, Idaho 83705

IV - 22  
October 19, 1989

Chuck Quimby  
Wallow-Whitman National Forest  
P O Box 907  
Baker, OR 97814

Dear Chuck

This letter is in response to our telephone conversations and a review of segments of the Threatened, Endangered, and Sensitive Program for the Wallow-Whitman National Forest as it pertains to plant species

After reviewing the extract from Chapter 4 (edition of 12/88) etc I feel very comfortable with the direction you are taking. Your goal is forthright and falls in line with the intent of the Endangered Species Act. I see no problem with the Standards and Guidelines fulfilling those needs necessary to accomplish your goal. You are to be commended on this segment of the Forest Plan and the protection and enhancement it gives sensitive plants and the plant program

I have just recently received final recommendations reviewing plant taxa candidate status for the U S. Fish and Wildlife Service in Region One. These should be published in the Federal Register soon. From these recommendations I will give you the changes we discussed in our recent telephone conversation

Federal Candidates	Federal Status
<u>Oregon</u>	
Botrychium crenulatum	2
Castilleja fraterna	3C
Lomatium erythrocarpum	1
Silene scaposa var scaposa	3C
Leptodactylon pungens ssp hazelie	2
Botrychium ascendens	2
Botrychium pedunculatum	2
Mimulus clifficola	1
Mimulus hymenophyllus	2
Primula cusickiana	3C
Senecio porteri	3C

Rubus bartonianus 3C

Idaho

Calochortus nitidus 1  
Halimolobos perplexa var perplexa 3C  
Haplopappus radiatus 1  
Lomatium rollinsii 3C

These should take care of the changes as they will be published. At this time I would recommend using them

Thank you for the continued interest in the Endangered Species Program. If you have any questions or comments please call me, FTS 554-1806. (208)334-1806

Sincerely,

*Robert L. Parent*  
Robert L Parent  
Tri-State Plant Manager  
U S Fish and Wildlife Service

cc PFO  
Attention Diana Hwang



**Department of Energy**

Bonneville Power Administration  
P O Box 3621  
Portland Oregon 97208

JUL 2 1986

4. The Plan and EIS should recognize the cumulative impacts of timber practices and mining, hydroelectric, and geothermal operations, etc., on fish, wildlife, water quality, and air quality. The environmental impacts should be analyzed and a management policy should be clearly stated.

We appreciate having the opportunity to review the draft EIS. If you need further information, please let me know.

Sincerely,

  
Anthony R. Torrell  
Environmental Manager

cc  
Bob Sipe, Region 6, USDA Forest Service, Portland, Oregon

In reply refer to SJ

Forest Supervisor  
Wallowa-Whitman National Forest  
USDA Forest Service  
P.O. Box 907  
Baker, Oregon 97814

Dear Sir

We have reviewed the Wallowa-Whitman National Forest Proposed Land and Resource Management Plan (Plan) and Draft Environmental Impact Statement (EIS) and are submitting the following comments.

1. The Plan and EIS provide exceptionally comprehensive coverage of transportation and utility corridors. The Wallowa-Whitman is one of the few National Forests that have given such consideration to this issue. It is also one of the few that have provided a map specifically illustrating existing corridors and a proposed designated corridor. Your presentation is clear and easily understood.
2. For some reason, other existing utility lines in the area were not designated or proposed for designation as joint utility corridors. Such designation should be made, if possible, otherwise, the reason for not doing so should be explained in the Plan and EIS.
3. There is a difference in the definition of exclusion areas between the Plan (page 4-31) and EIS (page III-47). The Plan defines wild rivers and wilderness areas as exclusion areas. The EIS defines "wild," "scenic," and "recreation" rivers and "research natural areas" as exclusion areas. Wilderness legislation does exclude transmission lines, however, Public Law 90-542, the Wild and Scenic Rivers Act, does not exclude transmission lines for wild, scenic, or recreation rivers. In fact, Bonneville Power Administration and other organizations do have lines crossing scenic, recreation, and even wild rivers. It is possible to span a wild river keeping structures and access far from the shoreline so that visual and other impacts are minimal.
- IV - 23  
In our corridor planning work with the Forest Service and the Bureau of Land Management, wilderness areas have been defined as exclusion areas but wild, scenic, and recreation rivers, historic trails, research natural areas, etc., have been classified as avoidance areas. We would expect that this would also be the Wallowa-Whitman's policy.

Appendix N



United States Department of the Interior

BUREAU OF MINES OCT 21 1988  
WESTERN FIELD OPERATIONS CENTER  
EAST 360 3RD AVENUE  
SPOKANE, WASHINGTON 99202

Handwritten routing slip with names and dates, including 'October 18, 1988'.

504/5

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Appendix N

RAYMOND (RAY) FRENCH  
GRANT CROOK MORROW BAKER COUNTIES  
DISTRICT 59  
REPLY TO ADDRESS INDICATED  
HOUSE OF REPRESENTATIVES  
SALEM, OREGON 97310-1347  
378 8021  
R1 2 0882306  
Hastings, Oregon 97138  
878 5285



HOUSE OF REPRESENTATIVES  
SALEM OREGON  
97310 1347

July 14, 1986

Mr. R. N. Richmond  
Forest Supervisor  
Wallowa-Whitman National Forest  
Federal Building  
P. O. Box 907  
Baker, Oregon 97814

Dear Mr. Richmond

SUBJECT: REVIEW OF SUPPLEMENT TO THE DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE WALLOWA-WHITMAN NATIONAL FOREST LAND AND RESOURCE MANAGEMENT PLAN

940 Included in the supplement is information on two roadless areas which were not discussed in the Draft Environmental Impact Statement. There are two gold areas within the Upper Grande Ronde Roadless Area (G275) that have had past mineral production.

1. The Grande Ronde Mines, with alternate names of the Golden Gate and the Sunset, are located in sec 26, T. 6 S., R. 36 E. This may be the same location as the Aurelia Mine mentioned on Page C-6 of the supplement.
2. The Camp Carson and Carson Creek Placer areas are located in secs 22 and 28, T. 6 S., R. 36 E.

Our office is lacking minerals information on these areas, therefore, we suggest that a minerals survey be conducted or information be provided to us on these areas prior to selection of a management alternative.

Sincerely,

*D. A. P. Banister*  
D'Arcy P. Banister, Supervisor  
Mineral Issue Involvement Section  
Branch of Engineering and Economic Analysis

Jerry Allen  
Forest Supervisor  
Federal Bldg  
P. O. Box 907  
Baker, OR 97814

Dear Mr. Allen

I must express concern about the management of Forest Lands in Eastern Oregon.

It has been brought to my attention that proposed timber harvest restrictions on the Wallowa - Whitman National Forests will place undue hardship in certain communities of Northeastern Oregon.

Severe curtailment of allowable cuts will drastically affect communities in Baker and Wallowa counties.

I certainly have concerns about maintaining natural resources and ecosystems, but it must also be kept in mind that our communities and citizens must not be forced into further economic crunches than has already been experienced in these past several years.

It is my belief that a multiple use system for National Forests is necessary to maintain a balance between all users. Having lived in an area for my whole lifetime where this concept has been used successfully I find it the most fair and practical. Severe cutbacks on any user group tends to have a profound negative influence on surrounding communities.

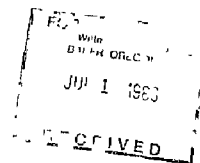
I agree our natural resources must be carefully managed for present users and for future generations. With this in mind I would urge your consideration of the Community Stability Alternative Plan as a method of maintaining the economic base of Baker and Wallowa Counties as well as preserving the aesthetic and recreational values of Eastern Oregon.

Sincerely,

*Ray French*

RAY FRENCH  
State Representative  
District 59

RJF/nf



MIKE THORNE  
UMATILLA UNION AND WALLOWA COUNTIES



OREGON STATE SENATE  
SALEM, OREGON  
97310

REPLY TO ADDRESS INDICATED  
 Senate Chamber  
Salem Oregon 97310  
 Holdman House Box 505  
Pendleton Oregon 97451

July 13, 1986

Jerry Allen  
Supervisor, Wallowa-Whitman National Forest  
Federal Building  
Baker, Oregon 97814

Dear Mr. Allen

I have had an opportunity to review some of the impacts of the proposals for the use of the Wallowa-Whitman Forest and have reached the conclusion that the community stabilization alternative is an absolute "must" if we are to maintain any viable timber industry in Oregon.

I strongly encourage your favorable consideration of the proposal offered by many in Eastern Oregon which not only allows you an opportunity to look at a most important economic question but also contains a longterm solution to the wise use of our public forest lands.

Thank you for this opportunity to comment.

Sincerely,

Mike Thorne  
Oregon State Senator

MT kr

cc Mr. Robert P. Ellingson, La Grande

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CL

MIKE THORNE  
UMATILLA UNION AND WALLOWA COUNTIES



OREGON STATE SENATE  
SALEM, OREGON  
97310

REPLY TO ADDRESS INDICATED  
 Senate Chamber  
Salem Oregon 97310  
 Holdman House Box 505  
Pendleton Oregon 97451

March 24, 1986

Mr. Jerry G. Allen  
Supervisor, Wallowa-Whitman National Forest  
P. O. Box 987  
Baker, Oregon 97814

Dear Mr. Allen

I appreciate your letter relative to your management plan on the Wallowa-Whitman and my interest in forest management.

Time always seems to be of the essence, but I would welcome an opportunity in the future to discuss mutual interests and concerns in forest management. To that end, if I am in Baker, I will try to make plans to stop by and meet you.

Thank you for your letter and invitation.

Sincerely,

Mike Thorne  
Oregon State Senator

MT kr

IV - 25

Appendix N

EUGENE D. TIMMS  
BAKER CROOK GRANT HARNEY  
LAKE MALHEUR MORGAN COUNTIES  
DISTRICT 30

REPLY TO ADDRESS INDICATED:  
 Senate Chamber  
Salem, Oregon 97310  
 1000 N. Court  
Werne, Oregon 97726



OREGON STATE SENATE  
SALEM, OREGON  
97310

COMMITTEES  
Member  
Commerce, Banking and Public Finance  
Consumer and Business Affairs  
Transportation and Tourism

AUG 19 1986

Mr. Tolson	
Mr. DeLoach	
Mr. Mohr	
Mr. Bishop	
Mr. Casper	
Mr. Callahan	
Mr. Conrad	
Mr. Felt	
Mr. Gale	
Mr. Rosen	
Mr. Sullivan	
Mr. Tavel	
Mr. Trotter	
Tele. Room	
Miss Holmes	
Miss Gandy	

August 14, 1986

Mr. Jerry Allen, Supervisor  
Wallowa-Whitman National Forest  
P.O. Box 907  
Baker, OR 97814

Dear Mr. Allen:

I have read much of the information on Forest Plan Review.  
Governor Atiyeh's recommendation I thought was reasonable.

When I first saw these forest plans in Trade and Economic  
Development Committee I became very concerned about the future  
of jobs in the five forests in my district.

I am still deeply worried with the Wallowa-Whitman Forest Plan.  
"Enough is enough!" The Hells Canyon Wilderness Area has already  
taken a big percentage of the cut in this forest. I believe the  
answer is multi use with better forest management. The bud worm  
problem has taken production away and made a tinderbox out of our  
North Eastern Forests. Where are the cries to solve this problem?

In listening to the preservationist groups in this state, I always  
see a lack of common sense and practicality in their beliefs.  
Making a decision in public and private life is made on factual  
information—not information swayed by personal bias, but gathered  
with all interest involved. Until this type of program is  
developed, I have one choice but to be with the people in the area.  
They are the resource that has made North Eastern Oregon and should  
be allowed to continue.

Sincerely yours,

Eugene (Gene) D. Timms  
State Senator  
District #30



OFFICE OF THE GOVERNOR  
STATE CAPITOL  
SALEM, OREGON 97310

July 9, 1986

Jerry Allen  
Forest Supervisor  
Wallowa-Whitman National Forest  
Federal Building  
P.O. Box 907  
Baker, OR 97814

As Governor of the nation's leading timber state, I am deeply concerned with the management of all of Oregon's forest lands, whether they are under private, state, or federal ownership. Therefore, I am keenly aware of the vital contribution of Oregon's thirteen national forests to the economic and social well-being of her citizens

- 1200** I agree with the Wallowa-Whitman National Forest's conclusion in the Draft Environmental Impact Statement (DEIS) that the potential for attracting additional diversified employment opportunities to northeast Oregon is extremely limited. This fact, coupled with the currently high unemployment and poverty rates in the area, underscores the point that any growth or decline of the timber industry in Baker, Union and Wallowa Counties significantly affects the local economies.
- 25** Past predictions that wilderness additions and the Hells Canyon National Recreation Area would generate new recreation-oriented employment have not been fulfilled. Therefore, to maximize net public benefits, the Wallowa-Whitman's preferred alternative should increase the economic vitality of these three counties by encouraging timber management and wood products manufacturing.
- 700** Unfortunately, the Wallowa-Whitman National Forest recommends reducing timber sale levels. It appears that this reduction has been based on the incorrect assumption that timber management and other resource uses are incompatible. Since the DEIS shows clearly that nontimber resources vary only slightly when timber sale levels are radically increased or decreased, it is not logical to propose further declines in timber supply.

I have directed state agencies to review each national forest DEIS and Land and Resource Management Plan (LRMP). I want to be certain that issues which both favorably and adversely affect the economic, social and environmental well-being of this state are identified in these plans. The end product of these reviews is the state coordinated response package that includes a

IV - 27

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Jerry Allen  
July 9, 1986  
Page 2

2355

summary report, and more importantly, individual state agency comments. Substantive comments on specific issues can be found in the individual agency letters which are an integral part of the overall coordinated response package.

- 701** After conducting this multi-agency review, I have concluded that, of the alternatives presented in the DEIS, Alternative B-departure best meets my objectives for the management of Oregon's forest lands. My primary objectives are the maintenance of employment throughout the state and obtaining the maximum allowable timber harvest from national forests that can be credibly produced while meeting Oregon's needs for other resources and uses.
- 1200** However, serious flaws in the data and assumptions which are used in the formulation of all ten alternatives prevent me from supporting the adoption of any of them. Of special concern are the flawed, unsubstantiable assumptions regarding population projections, logging and management costs and other economic values. If these inadequacies were corrected, I believe the potential exists to construct a new alternative that the State of Oregon can endorse. I therefore request that the Wallowa-Whitman National Forest issue a Supplement to the EIS. Without corrections, I believe that the plan will surely be appealed. That consequence would be costly and counterproductive for both the Forest Service and the State of Oregon.

My request for a Supplemental EIS is based on identification of several important issues. These issues are listed in the attached summary report and are described in detail in the agency reviews. I urge you to carefully study these detailed comments

I believe two points discussed in the agency reviews need further emphasis. First, the Wallowa-Whitman National Forest must better address the relationships that exist between the forest's resources and the communities, economies, and ecosystems that surround it. The forest cannot be considered an independent entity, no more than a single Oregon county can be considered alone, or a single community can be considered an economic island. Therefore, any preferred alternative must provide for a balance of resource outputs which reflects this interdependence.

- 1300** Secondly, the Supplement to the Wallowa-Whitman EIS must allow the public to examine the trade-offs that have been made by previous land allocation decisions and the erosion of the commercial forest land base that is continued in the planning process. This is a critical issue on the Wallowa-Whitman National Forest where 42 percent of the forest is presently set-aside in fixed land allocations and the preferred alternative recommends that only 11 percent of the forested land be managed for full timber yield.

The Wallowa-Whitman National Forest is only one of the thirteen national forests in Oregon. When the aggregate effect of all of Oregon's national forest plans has been determined, I may find it necessary to modify the state's position and recommendations on individual plans. Therefore, no final action should be taken on this forest plan before the cumulative effect of all plans is publicly known

Appendix N

IV  
REGARDING THE WALLOWA-WHITMAN NATIONAL FOREST DRAFT ENVIRONMENTAL IMPACT STATEMENT AND LAND AND RESOURCE MANAGEMENT PLAN

SUMMARY OF OREGON STATE AGENCIES' COMMENTS

Jerry Allen  
July 9, 1986  
Page 3

INTRODUCTION

National forests in Oregon play an essential role in supplying economic, social and environmental benefits to the citizens of Oregon. Resource values derived from these lands are of vital importance to Oregon.

To demonstrate the State of Oregon's commitment to participating in national forest planning, the Governor signed Executive Order EO-86-06. A copy of the Executive Order has been included in this report. The Executive Order requires twelve Oregon state agencies to cooperate in formulating a coordinated response to national forest plans. To facilitate this effort, the Oregon State Forestry Department (OSFD) was directed to be the lead agency for developing the final response to each forest.

The state's coordinated response was developed following the analysis of each agency's concerns. Coordination meetings were held on both a group and an individual agency basis to discuss the issues. A summary of the major concerns identified by the agencies is noted in the following section. Individual agency responses are appended to and considered to be an integral part of this report.

RESPONSE SUMMARY

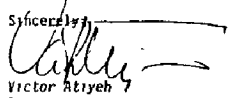
Each of the twelve responses was thoroughly examined for content. State agencies in general were dissatisfied with the plan in its present form. After consolidating the concerns expressed in the agency responses, three major problem areas were identified:

1. Data Uncertainty

It appears that considerable data which is outdated, of unknown precision or which conflicts with reliable sources was used to build the alternatives. If flawed and outdated data are utilized, and important information is missing, then faulty alternatives are created. Examples of areas where data are missing, outdated or erroneous include

- a. Population Projections - Population estimates are overly optimistic at 1.5 percent per year when the U.S. is expected to grow by 0.8 percent on an annual basis. Oregon's population is expected to rise by 0.7 percent for the remainder of the decade.
- b. IMPLAN Model - The IMPLAN input-output model uses 1977 data which are outdated and creates flawed projections regarding employment levels, personal income, and other economic and social values. Data for IMPLAN have been updated to 1983.

I can assure you that state agencies are willing to work with the Wallowa-Whitman planning staff to correct the problems identified in the coordinated response. The State of Oregon will recommend its preferred alternative to you once a supplement has been issued which fully addresses Oregon's concerns.

Sincerely,  
  
Victor Atiyeh  
Governor  
VA cn

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- 1200 c. Forest Management Costs - Wallowa-Whitman projected forest management and logging costs are excessive when compared to adjacent national forests with similar conditions. For example, the Wallowa-Whitman model uses a cost of \$179/mcf for sale preparation and administration while the Umatilla uses \$104/mcf and the Ochoco modeled a cost of \$75/mcf.
- 500 d. Grazing Allotments - The national forest plan has failed to identify the location of those grazing allotments that contribute to the 40,000 AUM difference between "recent levels" and "current direction" and the 20,000 AUM difference between "current direction" and the preferred alternative levels. Knowing where those increases in grazing usage occur by management strategy are essential to determine the impact that the additional grazing use might have on timber production, wildlife management and sediment production.
- 800 e. Air and Water Quality Data - The plan does not adequately address Oregon's Clean Air Implementation plan nor its water quality management plans. Both state plans are EPA approved and are based on the Federal Clean Air and Water Acts.
- 25 f. Recreational Economic Values - Methods to estimate values of recreation are flawed and result in a serious underevaluation of recreation. This underevaluation becomes of particular concern in those areas of the forest where irreplaceable dispersed recreational opportunities may be traded for low value timber resources. For example, willingness to pay estimates of camping are \$9 a visitor day and anadromous fishing at \$52 a day. The plan currently values camping at \$6 a day and anadromous fishing at \$33 a day.
- g. Recreational Diversity - Dispersed recreational opportunities outside of wilderness areas are declining throughout the forest, especially those defined as "primitive" and "semi-primitive." This represents an erosion of recreational diversity of which the USFS is a prime supplier.
- h. Recreational Demand - Predictions for future recreation growth are based on state population growth. Many recreational activities are growing faster than the population and also draw participants from out of state. Predictions of future use would be better grounded based on historic demand and participation trends of specific activities in the Wallowa-Whitman and in the state as a whole.
- 1200 i. Local Economy - Insufficient data has been presented to support the Wallowa-Whitman's conclusion that lower harvest levels will maintain or increase payments to counties. This assumption is based on predictions that increased timber prices will offset lower timber harvest levels.

State agencies believe that the Wallowa-Whitman is remiss by not contacting appropriate agencies to obtain updated data from which to develop their alternatives.

2. Wildlife Habitat Management

The plan needs to provide better snag habitat for cavity nesting wildlife in order to prevent their serious depletion on the forest. Better provision for hiding and thermal cover is needed in order to maintain big game populations.

3. Monitoring and Evaluation

- 1400 An aggressive monitoring and evaluation program does not exist for measuring changes in water quality and quantity, harvest levels, mining activities, employment and income, fish and wildlife habitat conditions, variations in payments to counties and other resource management accomplishments.

Additional concerns regarding a variety of issues are presented in the individual agency responses.

SUPPORTIVE COMMENTS

Supportive comments from agencies regarding specific sections of the plan include the following

- 940 1. The mineral coverage is adequately addressed and could serve as a model for other plans that are in progress. (BOGAMI)
- 2. The Department appreciates the Wallowa-Whitman's approach which compares alternative outputs to "recent levels" in addition to current direction. (OSFD)
- 450 3. The riparian zone management proposal has broad fish and wildlife objectives that are expected to give significant protection to the highly important fish and wildlife resources there. (ODFW)
- 1000 4. The Wallowa-Whitman Forest road management program objective generally leaves no more than 2.5 miles of open road per square mile. That proposal is highly likely to promote secure wildlife habitat and is endorsed by the Department. (ODFW)

Other positive comments appear in the agency responses.

ALTERNATIVE RECOMMENDATIONS

Several state agencies included a discussion regarding preference of one of the alternatives presented in the Wallowa-Whitman National Forest plan. While six agencies did not identify an alternative to support, four were very critical of the forest's preferred alternative. Department of Fish and Wildlife was the only agency that openly supported the forest's preferred alternative, and then, with qualifications.

Listed below is a summary of agency comments pertaining to alternative selection.

- 1. Department of Environmental Quality - "The Department does not recommend a preferred alternative at this time. The deficiencies outlined below reflect the lack of background information for each of the alternatives



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Appendix N

which is necessary for the Department of Environmental Quality to evaluate before selecting an alternative. After this information is included in the EIS the Department would be more capable of recommending a preferred alternative."

- 1200 2. State Economist - "Alternative B is favored over the Forest Service's Preferred Alternative C because, according to Forest Service estimates, it is projected to be more beneficial in terms of jobs and personal income."
- 3. Economic Development Department - "We advocate development of another alternative for consideration in the Wallowa-Whitman National Forest Draft Impact Statement that would provide adequate timber supplies (both quantity and quality) at least to maintain employment at current levels, and promote recreation/tourism."
- 4. Department of Forestry - "Our review concludes that the Department cannot support implementation of the Wallowa-Whitman Preferred Alternative (C). Alternative B - departure has not been presented in a form that the Department can support. Alternative B provides the best opportunity to maximize net public benefits and to improve the economy of northeast Oregon. The Department of Forestry recommends that the Wallowa-Whitman issue a supplement to the DEIS which provides additional information needed and to specifically address the issues we have identified."
- 5. Department of Fish and Wildlife - "We support Alternative C, the Preferred Alternative provided it is modified to implement our recommendations."

- o Concerning National Wild and Scenic Rivers Program, we agree with the plan conclusion of "wild status for the Grande Ronde and 'recreational' status for the Lostine and the North Fork of the John Day." Other potential scenic rivers described should be managed to maintain their eligibility for future consideration. (OOOT)
- o The Forest Service should analyze the economic impact and consider placing the Grande Ronde in the Wild and Scenic River System. This river is popular for nonmotorized boating, particularly rafting and canoeing and would, therefore, benefit the areas tourism industry. (SE)

Resolution of this difference will center upon both protecting the rivers' environment and the economic potential for managing the river and the surrounding area of influence using a multiple-use concept. The Forest Service should study the rivers on the Wallowa-Whitman National Forest for their highest economic and environmental values before designating them as wild and scenic.

The second item of disagreement pertains to forest land being allocated for timber harvest and big game habitat.

Two resource agencies, OSFD and ODFW, have differing views of how forest land can and should be managed to provide both timber and big game habitat.

- 800 6. Water Resources - "All the alternatives suggest that the quantity of water originating on forest lands will be maintained or improved, therefore, we have no preference for the forest plan finally selected."

- 400 o OSFD contends that insufficient documentation is provided to explain why additional reductions in timber harvest levels are needed to achieve "high quality habitat for big game, create recreational variety and more challenging hunting opportunities." A minimum of 357,726 acres of suitable timber land area is allocated to one or more of the strategies noted above in all alternatives.
- o ODFW maintains that the Wallowa-Whitman wildlife goals should show the intent to meet Oregon's big game management objectives. ODFW is requesting that additional forest land be allocated to thermal and hiding cover for elk.

However, from this summary it is clear that the preferred alternative is not supported in its present form.

Other concerns and recommendations regarding alternative selection are not presented here, but are noted in the individual agency responses.

AREAS OF POSSIBLE DISAGREEMENT

In addition to data that are questionable, faulty or missing, there are two areas of potential conflict resulting from agency recommendations. These issues include designation of wild and scenic rivers and the timber harvest/big game habitat interrelationship.

In the first issue, the positions of individual agencies regarding river designation are noted in the following paragraphs.

- 80 o Based on the information provided in the DEIS, the Department of Forestry cannot support inclusion of additional streams located outside wilderness areas into the Wild and Scenic River System. We support continuation of the existing management strategies which have successfully preserved the character of these streams. (OSFD)

The Wallowa-Whitman plan has recognized the importance of providing some summer range and winter range for big game animals. Management strategies 2, 3 and 18 manage timber harvest activities in order to maintain essential habitat types. OSFD considers the number of acres assigned to these management strategies may be acting as excessive constraints on timber harvest. ODFW claims that management strategy 1 areas will be harvested too fast to maintain big game cover.

In order to maintain both timber and recreational employment while protecting natural resources, the Wallowa-Whitman National Forest will need to balance wildlife habitat objectives and timber management demands. Through this balance, economic stability can be maintained locally and wildlife populations can be kept at desirable levels.

STATE AGENCIES' RECOMMENDATION TO THE  
WALLOWA-WHITMAN NATIONAL FOREST

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Department of Fish and Wildlife  
OFFICE OF THE DIRECTOR  
506 SW MILL STREET, P. O. BOX 59 PORTLAND, OREGON 97207

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The consensus of state agencies involved in the national forest coordinated response process is that the State of Oregon cannot support any of the alternatives presented in the DEIS. The reasons for this are the data deficiencies and the uncertainty surrounding the formulation of all the alternatives. As a result, agencies recommend urging the Wallowa-Whitman to issue a Supplemental Environmental Impact Statement (SEIS) which specifically addresses the State's concerns. Following the review of the SEIS, the state will recommend its preferred alternatives to the forest.

June 10, 1986

BB:cn  
5963E  
Attachments

Tom Lane  
Acting State Forester  
Department of Forestry  
2600 State Street  
Salem, Oregon 97310

Dear Tom

The Oregon Department of Fish and Wildlife staff has reviewed the Wallowa-Whitman National Forest plan documents and has attached comments to this letter. The comments were prepared according to guidelines approved by the Oregon Fish and Wildlife Commission.

- 450 The plan has elements that we can heartily endorse. The riparian zone management proposal has broad fish and wildlife objectives that are expected to give significant protection to the highly important fish and wildlife resources there.
- 1000 The Wallowa-Whitman Forest road management program objective generally leaves no more than 2.5 miles of open road per square mile. That proposal is highly likely to provide secure wildlife habitat and is endorsed by the Department.

There are, however, fish and wildlife issues that need to be better accommodated in the final plan. One of the major issues is the need to better provide snag habitat for cavity nesting wildlife in order to prevent their serious depletion on the forest. The second is the need to prevent decline in big game habitat that the Forest predicts will occur from a high rate timber harvest on the management strategy portions of the Wallowa-Whitman Forest. These and other concerns are discussed at length in the attached comments.

We support Alternative C, the Preferred Alternative, provided it is modified to implement our recommendations.

Sincerely,

(John R. Donaldson, PhD  
Director

dcs  
attachment

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Appendix N

OREGON DEPARTMENT OF FISH AND WILDLIFE COMMENTS ON  
ON THE  
WALLOWA-WHITMAN NATIONAL FOREST  
DRAFT ENVIRONMENTAL IMPACT STATEMENT AND PROPOSED PLAN

May 31, 1986

The following comments are the Department's evaluation of how well the proposed plan complies with the Fish and Wildlife Habitat Protection Criteria for forest lands. The criteria were developed by ODFW, sent to each national forest in Oregon in March, 1985, and have been approved by the Fish and Wildlife Commission.

DISCUSSION OF MAJOR CONCERNS AND RECOMMENDED RESOLUTION

**SNAGS** - The Department recommends the Forest provide sufficient habitat to maintain cavity dwelling species at 100% of the population potential in areas managed for old growth, for cavity dwelling species and in riparian zones. Further, the forest overall should provide habitat to maintain cavity dwelling species at or above 60% of the population potential.

A major concern is the plan proposal to supply considerably less snag habitat than needed to maintain cavity dwelling species. The Department recommends management at or above 60% of potential. Management at or below 40% of potential threatens cavity dwelling species with serious depletion. The Wallowa-Whitman Preferred Alternative projects future large snag levels at 27% of potential which is considerably below the threshold of viability for snag using species.

The existing level of snags may be naturally low on unharvested portions of the forest and may be very low on harvested portions. Sampling of snags done on the Wallowa-Whitman Forest found snag habitat at 54% of potential on areas that had never been harvested and at 18.4% of potential on acreage that had been logged (unpublished USFS data on file at W-W N F in Baker).

The proposed forest plan does not meet USFS Region VI policy which says in part "As a minimum, dead and defective tree habitat shall be provided in sufficient quality, quantity and distribution so as to maintain primary excavators in excess of 40 percent of their population on commercial forest lands." The Department urges the Forest to increase the proposed future supply of cavity dweller habitat to meet the Department recommendations listed above. An aggressive snag management plan is needed that adequately protects and monitors cavity dweller habitat. The standards and guidelines in the proposed plan need to be revised to reflect that protection.

The final EIS should also include an inventory of existing and potential snag habitat and a better monitoring plan. The method of monitoring listed in Table 5-1 of the Plan indicates snags will be inventoried as "part of projects, incidental observations." Those techniques are haphazard at best and objective comprehensive inventory methods should be used.

If monitoring shows that snag objectives are not being met, the plan proposes to "consider plan amendment." That action will not assure that snag

objectives will be met. The Department recommends the action indicated be changed to read "revise projects and programs to assure snag management goals are met."

**1000** **ELK AND DEER HABITAT** - Although elk populations presently meet the Department's management objective levels there are habitat-related problems on the Wallowa-Whitman Forest. Critical issues are a high density of forest roads open to vehicle traffic and a lack of thermal and hiding cover on elk ranges. The road issue is well addressed in the plan and if sufficient road mileage can be closed to vehicle use the problem of roads and big game harassment will approach resolution.

**400** The lack of cover on summer range in Management Strategy 1 areas is not well addressed in the plan. The cover is lost when logging and thinning occurs. The Forest Plan includes positive strategies to protect winter range cover through Management Strategy 3. ODFW field biologists report there is a current lack of thermal cover on many summer ranges and the problem will remain for at least another 15-20 years. The biologists report reductions in elk and deer use of those areas and possible reductions in deer and elk productivity.

Because many summer ranges on the Forest are now cover deficient, many elk and deer are beginning to avoid long used summer ranges and are starting to use traditional winter ranges longer, or even in some cases, year around. Since many winter ranges in northeast Oregon are on private land, this additional elk and deer use could result in increased conflict between wildlife and landowners.

Implementation of Management Strategy 1 in its proposed form will probably result in further reductions of elk and deer use of traditional forest summer ranges due to reduced cover and high accessibility. Elk and deer will tend to be crowded into increasingly fewer and smaller areas of undisturbed cover, including that on private lands. As elk and deer concentrate in these limited areas, hunting pressure and hunter crowding will increase in these areas. This will result in reduced herd productivity and reduced bull and buck survival leading to increasingly restrictive hunting seasons and reduced hunting recreation. It will also lead to increased private land conflicts.

The Department recognizes that the mountain pine beetle in the southwest portion of the forest has resulted in loss of cover. Elk productivity will be reduced for at least two decades. The Department recommends that areas now cover deficient, including lodgepole areas be managed to provide adequate cover in the future.

In order to reduce the shortage of useable summer range the Department recommends that the forest plan be modified to maintain cover in Management Strategy 1 areas at 20% hiding, 10% thermal, and 10% mixed hiding and thermal.

There is a need to provide secure habitat during migration between summer range and winter range. Timber harvest can occur in migration corridors, but there is a need to maintain cover characteristics in the corridor until harvested stands reach at least hiding cover condition. The desired cover

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characteristics in migration corridors are at least. 20% hiding, 10% thermal and 10% mixed thermal and hiding cover.

Page III-36 of the DEIS details some of the history of elk numbers in northeast Oregon. The first paragraph gives the mistaken impression that elk were not present until being introduced in the 1920's. Elk are a native species in northeast Oregon. Only a few dozen elk were released around 1920 to supplement existing numbers. There were several factors which contributed to low elk numbers at that time, and there are factors in addition to habitat changes that have resulted in the numbers found today. The Department recommends that the first sentence on page III-36 of the DEIS be deleted and replaced by the following language: Elk numbers have increased in response to protection, management and favorable habitat conditions since their low populations of the early 1900's.

**200** The Department has a proposal for management of the Joseph Creek Canyon. The timber there is interspersed in stringer fashion with bunchgrass meadows. Essential winter cover is limited, and any reduction in cover would result in diminished carrying capacity of the winter range and reduction of elk survival and productivity. The helicopter logging that has been practiced in recent years in this area usually left the ground littered with slash that impedes animal movement within the cover areas. Further, the opening of the tree canopy allows snowfall to build up on the ground rather than being intercepted by the tree canopy. The forage is then covered by snow and unavailable for elk use. Surrounding elk ranges have been so extensively logged that the animals no longer use the areas. The Joseph Creek canyon is also valuable for grouse, turkeys and is a potential bighorn sheep reintroduction area. The Department recommends no logging within the winter ranges of the canyon.

**MAJOR DRAFT PLAN PROPOSALS GENERALLY ENDORSED BY THE DEPARTMENT**

**450 RIPARIAN HABITAT** - The Department recommends riparian habitat be managed to maintain or improve water quality and fish and wildlife habitat values. Those habitats are crucial to fish resources and are heavily used by wildlife.

The goals, standards and guidelines on pages 4-22/25 are excellent and, with minor changes, are endorsed by the Department. The phrase "...to the extent practical" should be removed from paragraphs seven and nine on page D-23 of the plan. Snags should be managed at 100% of potential in riparian zones rather than the 60% level proposed in the plan because snags in riparian zones also have the additional value of providing structural diversity in stream channels.

**440** While dams on the Columbia and Snake rivers limit the the number of anadromous fish returning to streams on the Mallowa-Whitman National Forest, the temperature quality and quantity of water are main factors limiting fish production and survival in northeast Oregon. The habitat base for wild fish production has been shrinking over time due to cumulative impacts. Implementation of the standards and guidelines will prevent further degradation and should allow natural restoration of fish habitat.

Further stream habitat enhancement efforts are also encouraged. The cooperative efforts between USFS, BPA and ODFW represent substantial capital

investments. The forest needs a good watershed protection program to insure the investments remain productive. Many of the projects are intended to deliver high quality water downstream and it would be counterproductive to allow other resource programs to degrade fish habitat.

**1400** The forest needs to adequately monitor water quality and immediately modify any forest management programs, road building or other soil and water disturbances whenever water quality or fish habitat is adversely affected.

**1000 ROAD MANAGEMENT** - The Department recommends a road management program designed to protect fish and wildlife habitats, minimize disturbance of fish and wildlife populations and provide a variety of recreational experiences. Road and area closures, either seasonal, annual, long term or permanent are often needed to accomplish those objectives. The Department recommends design of new road construction so as to avoid important wildlife habitats such as winter ranges, thermal cover areas, elk calf rearing areas, migration corridors, dedicated old growth stands and riparian areas.

In 1984, the Department conducted a series of elk hunter workshops around the state. The purpose of the meetings was to elicit opinions regarding Oregon's elk hunting. The most frequent issue stated by the 5,000 hunter participants related to problems caused by too many open roads.

The transportation system guidelines and standards on pages 4-32/33 address many of the road-related fish and wildlife concerns expressed by the Department. The Mallowa-Whitman National Forest has 9,300 miles of road. Unrestricted use of that many miles would seriously limit the Department's ability to satisfactorily regulate hunting seasons, provide diverse hunting experience, maintain bull and buck escapement objectives, and control harassment of wildlife. Roads can also conflict with riparian zones, snags, and programs to retain and dead and down logs. While the plan proposal to limit open road densities cannot solve all road-related problems, it will certainly help mitigate the effect of roads and is strongly endorsed by the Department.

While the Department endorses the road management proposal, the final plan needs to display a comprehensive road management plan that provides implementation direction. The draft plan provides little direction beyond the proposal to leave open only 2.5 miles of road per square mile or 1.5 miles per square mile on winter ranges. As mentioned above, there are many options in road management including road obliteration, seasonal and permanent closures, and area closures. Each method has merit to meet different objectives, at differing costs, and with variable success. The final plan needs to go into greater depth describing which methods will be used when, how soon, and in what priority order the plan will be implemented. Department biologists are available to assist in drafting a more comprehensive road management plan.

This proposal also needs to recognize that a road closed to the public but still used for forest management may, in terms of habitat effectiveness, still be an open road. Road management strategies need to include standards for forest management traffic.

**OTHER COMMENTS AND RECOMMENDATIONS**

**460 BALD EAGLE AND PEREGRINE FALCON HABITAT** - The Department supports the plan proposal to protect habitat for threatened and endangered species. The Forest has the best potential habitat in the region for providing peregrine falcon and bald eagle nest sites. The Willowa-Whitman Forest needs to identify those potential sites and develop a management plan that protects these sites in compliance with the bald eagle and peregrine falcon recovery plans. ODFW field biologists will address this need jointly with USFS staff before the final is prepared

**300 OLD GROWTH** - The Department recommends that a minimum of 5% to 15% of each major plant community in the forestland base be dedicated old growth stands, well distributed by slope aspect and elevation. From the information in the planning documents the Department cannot determine how well the plan meets the Department recommendation. The final plan needs to display an inventory of existing and proposed old growth areas

**400 DEAD AND DOWN WOOD HABITAT** - The Department recommends that dead and down wood habitat be planned for and provided in order to maintain dependent wildlife species and to prevent over-simplification of the forest ecosystems. Page 4-43 of the proposed plan indicates that this important feature will not be provided for. The proposal indicates that removal for fuel wood gathering will be emphasized and residue in excess of those needed on-site will be disposed of. The goals and standards need to be revised to display that the needed quantity of dead and down wood habitat will be maintained.

**500 GRAZING** - The planning documents discuss the history and future plans of the grazing management program. However, there is little information describing where the allotments are, the range conditions, proposed range improvements or the procedures to adjust grazing if needs are indicated through monitoring. There is little conflict for forage between livestock and big game on the Willowa-Whitman, given the existing levels of grazing. If higher than existing numbers of livestock grazing are planned, the Department recommends the increases be directed toward Management Strategy 1 areas rather than toward big game winter ranges.

There appears to be an inconsistency that needs clarification regarding forage allocation. Page 3-5 of the proposed plan says "Allocation of forage to big game will provide approximately 100% of .big game objective levels." Page 4-46 of the same document says there is " no need to allocate forage between big game and livestock "

When deer and elk management objectives were adopted six years ago the Willowa-Whitman National Forest and ODFW informally agreed that increases in forage on the forest would be evenly allocated between big game and livestock. At the time, the Fish and Wildlife Commission also called for a balanced forage allocation between big game and livestock. This needs to be recognized and implemented in the final plan

**450 WILDLIFE GOALS AND STANDARDS** - The goals and standards on pages 4-40/42 of the Plan need to be clarified and strengthened

The second paragraph on page 4-41 says " where even-aged silviculture will meet riparian area objectives, its application is acceptable." Even aged silviculture is not compatible with fish and wildlife in riparian zones. The

need for streamside shade has been well documented in northeast Oregon as has the need for instream woody structure provided by trees falling into the stream from the riparian zone. The Department recommends that any timber harvest in riparian zones be designed only to benefit the resources inherent in riparian zones. In our opinion this precludes even aged silviculture in riparian zones.

**400** We recommend the third paragraph on page 4-41 be deleted. That paragraph depicts how the Forest intends to manage bighorn sheep populations. By Miller Memorandum of Understanding the management of fish and wildlife populations is clearly the state's responsibility, while the habitat management rests with the land managing agency. The Forest Service and Department cooperate in formulating population and habitat plans but the ultimate responsibility for management decisions rests upon one agency or the other depending upon whether the management pertains to animal population or habitat.

The wildlife goals need to be expanded to show the intent to provide habitat to meet or exceed Oregon's big game management objectives. The recommended language in the goal reads as follows: To provide near-optimum hiding cover, thermal cover and forage conditions on big game winter ranges and selected summer ranges so Oregon's management objective levels for big game can be met.

**405 TYPE CONVERSION** - The Department is deeply concerned that the natural forest, through timber removal and cover manipulation, is gradually becoming simplified, leading to reduced habitat diversity. A particular practice contributing to diminished diversity is type conversion. The true firs and other shade tolerant vegetative species contribute to habitat and vegetative diversity as well as provide high quality cover for big game. These species are being removed and replaced, reducing forest species diversity. During the decades when cover is deficient, the Department recommends type conversion be minimized

**440 FISHERY DATA** - The second paragraph on page III-43 of the DEIS predicts substantial increases in adult salmon and steelhead due to habitat improvements. Steelhead are projected to increase from 1,000 in 1984 to more than 9,000 and salmon could increase from 300 to 2,00 within the Grande Ronde basin. The projected increases are substantial and the assumptions leading those numbers need to be listed

The Department supplied the Forest Service with fishery data leading to Table III-8 in the DEIS and Table 2-7 of the Plan. Since then, more current information has been assembled and is available through the ODFW Portland office. The new information should be used to update the Tables.

**STARKEY EXPERIMENTAL FOREST** - If the proposed fence is built around the experiment area, adjacent migration corridors will need management protection in order to expedite elk movement around the area.

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Department of Fish and Wildlife  
REGION IV—NORTHEAST OREGON

107-20th STREET, LA GRANDE, OREGON 97850 PHONE (503) 963-2138

December 12, 1988

R M Richmond, Forest Supervisor  
Wallowa-Whitman National Forest  
Federal Building  
P O Box 907  
Baker, OR 97814

Dear Mr. Richmond

We have reviewed your supplement to the Draft Environmental Impact Statement, Wallowa-Whitman Forest Plan, and offer the following concerns and comments.

Our review focused specifically on the Upper Grande Ronde Roadless Area and the importance of this area for the restoration and enhancement of chinook salmon and steelhead in the Grande Ronde system

**440** The upper Grande Ronde River system provides critical spawning and rearing habitat for spring chinook salmon and steelhead. The headwaters of the mainstem Grande Ronde and its associated tributaries produce high quality water for the fish resources downstream. This area is currently unroaded and unlogged.

Water quality and quantity are the major factors limiting fish production and survival in the Grande Ronde basin. Temperature of water in the upper Grande Ronde River and some tributaries currently exceeds 70-80°F during the summer months. Such temperatures can be lethal to salmon and steelhead and will certainly cause them to seek other areas for rearing. This removes the area from rearing and production capability. The timing and magnitude of spring/summer run-off are important to downstream migrating juvenile salmon and steelhead and the successful upstream migration of adult chinook salmon. Removal of vegetative cover by logging and road building will change the timing and magnitude of these flows. The potential effects of timber harvest on water quality include increased water temperatures, changes in timing and quantity of flows, increased sedimentation, channel destabilization, and a reduction of large woody debris for instream structure. Road building can also create similar problems such as sedimentation, increased surface runoff and increases in water temperature.

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[Routing slip with checkboxes and handwritten marks]

The USFS Environmental Assessment for the Upper Grande Ronde harvest Program (1982) documents the potential effects of timber harvest and roading to water quality in this area. The EA describes the area as producing the highest quality water, but at the same time cautions that water quality standards may be at risk with entry into this area. The analysis also indicated that the sale of the available timber volume could not pay for the cost of the road system necessary to harvest trees.

Water quality monitoring promised in past timber sale EA's and other USFS plans have not been implemented. Without a monitoring system in place it is impossible to measure the specific and cumulative effects of USFS land use practices on water quality.

Monitoring in itself does not ensure water quality, it only identifies problems after they occur. The only acceptable impacts to water quality in the upper Grande Ronde are those that enhance rather than degrade this area for salmon and steelhead.

**200** A substantial investment of public funds has been and is currently being made to restore and enhance anadromous fish runs in the upper Grande Ronde. The following chart displays the investments made to date and future appropriations for fish enhancement (Table 1). In addition, 950,000 chinook salmon and steelhead juveniles have been released into the upper Grande Ronde to supplement natural stocks. Excess adult chinook captured at Lookingglass Hatchery have also been released in this area to supplement spawning and to provide fish for the subsistence and ceremonial fishery of the Confederated Tribes of the Umatilla Indian Reservation (CTUIR). A sport fishing season for adult chinook in the upper Grande Ronde River will be proposed for 1990.

It is our recommendation that the remaining 11,810 acres of the Upper Grande Ronde River Roadless Area be maintained as such. This recommendation offers a "no risk" alternative for maintenance of water quality for fish production now and in the future. This will also help to protect the significant investment of public money in the anadromous fish of the Grande Ronde basin. We further recommend that a monitoring program be implemented in this area to ensure maintenance of water quality for the fish resources.

Thank you for the opportunity to review and comment on the Grande Ronde roadless area. We hope our input will help to emphasize the importance that Oregon Department of Fish and Wildlife and numerous other public agencies place on this area and on the fish resources of the Grande Ronde basin.

Sincerely,  
  
Warren W Aney  
NE Regional Supervisor

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Appendix N

Table 1 Expenditures of public money to restore and enhance chinook salmon and steelhead in the Grande Ronde River

Agency	Location	Action	Expenditures (\$)	Years
USFS	Grande Ronde R	Habitat enhancement	135,000	1987-89
USFS	Grande Ronde R	Habitat enhancement	300,000	1990-92
USFS	Meadow Creek	Research Project	400,000	1987-90
USFS	Sheep Cr Fly Cr	Habitat rehabilitation	115,000	1987-89
BPA	Upper Grande Ronde R	Habitat rehabilitation	1,400,000	1986-91
NWPPC	Grande Ronde Subbasin	Subbasin planning	81,000	1987-89
ODFW	Grande Ronde System	Screening	25,000	1987-89
ODFW	Grande Ronde System	Salmon & Steelhead Research	1,600,000	1984-89
ODFW	Upper Grande Ronde	Liberation	22,000	1983-89
ODFW	Grande Ronde System	Fish Pathology	262,000	1987-89
CFUIR	Grande Ronde System	Spawning surveys	40,000	1987-89

In addition, 18,760,000 has been spent on construction of hatchery and holding facilities for salmon and steelhead for the Grande Ronde basin. The annual operating budget for these facilities is currently 1.3 million dollars.

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Department of Transportation  
**PARKS AND RECREATION DIVISION**

525 TRADE STREET SE, SALEM OREGON 97310  
June 4, 1986

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Mike Miller  
June 4, 1986  
Page 2

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Mike Miller  
State Forester  
Oregon Department of Forestry  
2600 State Street  
Salem, OR 97310

Dear Mike:

We have reviewed the draft plan with an emphasis on its impact to the Division's programs - parks, scenic waterways, trails and to recreation in general. We have relied on the 1983 Statewide Comprehensive Outdoor Recreation Plan (SCORP) endorsed by Governor Atiyeh and the 1983-89 Oregon State Park System Plan adopted by the Oregon Transportation Commission.

Our review paid special attention to the plan's treatment of providing for recreational diversity (as shown by the Recreation Opportunity Spectrum) and the protection of scenic qualities required for quality recreation experiences.

The Wallowa-Whitman is a major provider of outdoor recreation opportunities in Oregon. The diverse features of the forest serve as a recreational attractor not only for Oregonians but for out-of-state tourists which will occupy an increasingly important role in the state's economy. In order to continue to meet the expectations of the area's residents, visitors and tourism-related economic interests, the Forest must stabilize its recreational offerings and continue to maintain and improve, where appropriate, its recreation facilities. No other public agency can effectively move in to fill the future demands.

Our specific areas of concern are

1. Predictions for future recreation use are based on state population growth. Much recreation grows faster than population. Predictions of future use would be better grounded based on historic trends in the Wallowa-Whitman.
2. Planned development of campsites appear to be concentrated in the Hells Canyon National Recreation area. We are concerned that other recreation sites in the Forest be given equal consideration for development and improvement as needed.

- 26 3 Where possible, efforts should be made to improve public access to forest trailheads.
- 60 4 Concerning National Wild and Scenic River Programs, we agree with the plan's conclusion of "wild" status for the Grande Ronde and "recreational" status for the Lostine and the North Fork of the John Day. Other potential scenic rivers described should be managed to maintain their eligibility for future consideration.
- 25 5 Methods employed to estimate the economic values of recreation are flawed and result in a serious undervaluation of recreation. This undervaluation becomes particularly of concern in those areas of the forest where irreplaceable recreational opportunities may be traded for low value timber resources.

We are pleased to offer these comments. If you have any questions, please contact Don Eixenberger (378-6597) or

Very truly yours,

John E. Lilly  
Assistant Administrator

JEL:jn  
9750C

cc Bob Brown, State Forestry

JUN 11 1986  
JUN 11 1986

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Appendix N



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**Department of Transportation**

TRANSPORTATION BUILDING SALEM, OREGON 97310

James E. Brown  
June 24, 1986  
Page Two

DATE: June 24, 1986

TO: James E. Brown, State Forester  
Forestry Department

FROM: Robert N. Bothman, Deputy Director *[Signature]*

SUBJECT: "Proposed Land and Resource Management Plan  
Willowa-Whitman National Forest"

PLEASE REFER TO  
THIS NO. PLA 16-9

The Oregon Department of Transportation, Highway Division, has reviewed the "Proposed Land and Resource Management Plan" for the Willowa-Whitman National Forest. It is our understanding that Governor Atiyeh has designated your agency to coordinate the various State responses. Please include the following comments into your reply to the U.S. Forest Service concerning this Draft Environmental Impact Statement.

1. Highway Vision Clearance

**1000** Effective thinning of trees adjacent to highways is important to the safety of the traveling motorist. By leaving a clear zone between the highway and timber stands, the motorist benefits in two ways (1) fewer accidents between automobiles and deer/elk, and (2) the clear zone will eliminate shady spots on the highway which allows moisture on the road surface to freeze in cold weather, causing unsafe driving conditions.

The Draft Environmental Impact Statement should include this information in its policy concerning timber harvesting and management of lands adjacent to state highways.

2. Protecting Material Sources

Our regional office in La Grande is interested in preserving the integrity of aggregate/material sources. The extraction of gravel from aggregate sites is jeopardized when conflicting uses are located close to these sites.

It is recommended that material sites be protected so that our agency and the U.S. Forest Service can utilize these mineral deposits for highway/road facilities maintenance.

3 Maintaining Interagency Cooperation

This Draft Environmental Impact Statement should include a policy statement that encourages cooperation between the National Forest Service and the Oregon Department of Transportation concerning maintenance and minor widening/improvements for those public roads and highway facilities that are located within the National Forest Service area.

It is important to our agency that these types of highway activities be allowed without time-consuming negotiations between our two agencies.

Thank you for the opportunity of replying to this Draft Environmental Impact Statement. Please keep our agency informed as to the status of this project.



Water Resources Department

3850 PORTLAND ROAD NE, SALEM, OREGON 97310

378-3011  
PHONE

May 29, 1986

H. Mike Miller, State Forester  
Department of Forestry  
2600 State St.  
Salem, OR 97310

ATTN: Dave Stere - Wallowa-Whitman Forest Comments

Dear Mr. Miller,

We have reviewed the Wallowa-Whitman National Forest Proposed Land Use and Resource Management plan and our comments follow

All the alternatives suggest that the quantity of water originating on forest lands, will be maintained or improved, therefore, we have no preference for the forest plan finally selected. We encourage and support sound forest management decisions that allow for increased streamflows during the summer. However, we would suggest the Wallowa-Whitman Forest provide additional data and possibly install monitoring equipment to determine the actual long-term effects of forest management on streamflow.

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Specific Comments - DEIS  
5-32 Minerals

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The DEIS refers to adverse effects on mining that will still be present after all protection measures are in operation. However, the various mineral sections throughout the three volume draft report do not seem to discuss the adverse effects.

800 III-11 Water

The section on water should refer to the state's water policy for the basins involved (basin programs enclosed). We suggest the report identify potential reservoir sites and other factors that could provide additional water supplies originating from forest lands

Finally, we suggest an additional chapter be developed to discuss forest management and its effects on long-term streamflow. The chapter could be used to support the claim that streamflow will be maintained or improved.

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450 III-13

The section should be expanded to describe some of the opportunities that are available to increase riparian habitat through increased protection measures.

III-15

The section on flood problems should be expanded to mention existing county and city flood plain zoning ordinances currently in effect and the flood plain maps available. This material does not pertain to federal lands but flood data is available.

Land and Resource Plan

We suggest a discussion addressing Oregon's geothermal policy and the impact on forest resource should be included in the report. Although not extensive, there are some geothermal areas within the forest boundaries. We have enclosed the state's geothermal rules.

Thank you for the opportunity to review and provide comments on the proposed forest plan.

Sincerely,

*Bill*

WILLIAM H. YOUNG  
Director

WHY:jt

Enclosure

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Appendix N



Oregon Department of Agriculture

635 CAPITOL STREET NE, SALEM, OREGON 97310 0110

June 10, 1986

H. Mike Miller, State Forester  
Oregon Department of Forestry  
2600 State St.  
SALEM OR 97310

Dear Mike:

In response to the State Department of Forestry's request for review of the proposed Wallowa-Whitman National Forest Land and Resource Management Plan, the Oregon Department of Agriculture, through the Soil and Water Conservation Division, gives the following response.

The area covered in the study lies within designated soil and water conservation districts. These districts are governed by local elected officers responsible for carrying out the policies described in ORS 56B. Wallowa, Union, Eagle Valley, and Kenting SWCDs are located in the northeasterly section of the forest, whereas Umatilla County, a part of Union, Baker Valley, Burnt River, Grant, and Monument SWCDs are located in the section of the national forest west of Highway 84, between La Grande and Baker. All of these SWCDs are involved in good soil and water conservation programs.

Those properties of the national forest in the upper watershed have a great impact on the properties lying in the lower areas of the watershed.

The soil and water conservation districts where studies are being conducted on forest lands should be contacted for input. I suggest that you might wish a response from each of the districts I mentioned above. Addresses of involved SWCDs are included as an enclosure to this letter.

Sincerely,

George C. Stubbert, Administrator  
Soil & Water Conservation Division  
(503) 378-3810

cc:14J  
Enclosure

SWCDs LOCATED IN WALLOWA-WHITMAN NATIONAL FOREST AREA

SWCD	ADDRESS	PHONE
Wallowa	PO Box 477, Enterprise 97828	426-3782
Union	Route 1, Box 1707, La Grande 97850	963-0724
Eagle Valley	PO Box 206, Richland 97870	893-3753
Kenting	3990 Midway Dr., Baker 97814	523-7121
Umatilla County	1229 SE 3rd, Pendleton 97801	276-3811 Bxt. 435
Baker Valley	3990 Midway Dr., Baker 97814	523-7121
Burnt River	3990 Midway Dr., Baker 97814	523-7121
Grant	PO Box 160, Canyon City 97820	575-0135
Monument	PO Box 160, Canyon City 97820	575-0135

cc:15J  
Enclosure to Letter dated 6/10/86

Appendix



Department of Geology and Mineral Industries  
 ADMINISTRATIVE OFFICE  
 910 STATE OFFICE BLDG., 1400 SW 5th AVE., PORTLAND, OR 97201-5528 PHONE (503) 229 5580

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May 14, 1986

Review Comments for Wallowa-Whitman National Forest Plan

May 1, 1986

(Oregon Department of Geology and Mineral Industries)

Mr. H. Mike Miller  
 Department of Forestry  
 2600 State Street  
 Salem, Oregon 97310

Dear Mike.

The Oregon Department of Geology and Mineral Industries has prepared the following comments on the Wallowa Whitman National Forest Proposed Land and Resource Management Plan. They refer only to portions of the Plan and Draft Environmental Impact Statement dealing with minerals and mineral fuels. Reviewers in the Department include Dennis Olmstead (oil and gas), George Priest (geothermal), and Howard Brooks and Mark Ferns (minerals).

The minerals coverage is well done overall and could serve as a model for other plans that are in progress. In the following paragraphs we point out a few places where we think some additional information or clarification is in order. The expertise and qualifications of the individuals on the USFS planning team with respect to geology and minerals should be described in the documents.

940

Sincerely,  
  
 John B. Beaulieu  
 Deputy State Geologist

Encl  
 DAH tk

General The plan does an admirable job at inventorying and addressing minerals issues from the perspective of planning. The following comments provide the basis for improving what already is a very good document. In summary we propose the following improvements.

- 1) Incorporate more information on industrial minerals
- 2) Include reference to geologic and mineral information in the description of how the plan was developed
- 3) Revise the classification of the Bourne area
- 4) Provide the plan changes related to minerals in the future as the data base matures and monitor mining as an activity

Specific comments follow

- 1) Industrial Minerals
- 940 Suggestions (1) Provide more information on the distribution and production of nonmetallic mineral occurrences in Appendix J pages 2-6 and elsewhere as appropriate. Limestone resources are widely scattered in association with Permian and Triassic sedimentary and volcanic rocks. The largest exposures are comprised of the Martin Bridge Formation in the Wallowa Mountains both within and outside of the Eagle Cap Wilderness area (Wallowa area, page J-4). Because these deposits are poorly located in

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Appendix N



Department of Energy

625 MARION ST NE SALEM, OREGON 97310 PHONE 378-4040 TOLL FREE 1-800-221-8035

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TO Mike Miller, State Forester DATE May 29, 1986  
FROM Lynn Rank Director  
SUBJECT Wallowa-Whitman National Forest Proposed Forest Plan

The Oregon Department of Energy has reviewed the Wallowa-Whitman National Forest Proposed Land and Resource Management Plan, DEIS and Appendices. The Department has no problems with the proposed Forest Plan.

Areas of interest to the Department are energy resource (fossil, geothermal, hydroelectric) and transmission line policies. The proposed Forest Plan and DEIS addresses these areas. Our responses are below.

**930 Fossil fuels:** The low potential of finding oil, gas and coal resources in the Wallowa-Whitman National Forest is indicated in the proposed Forest Plan and DEIS. ODOE agrees with both this conclusion and the resulting lack of need to have policies addressing development of these energy resources.

**Geothermal:** The low potential of finding exploitable geothermal resources in the Wallowa-Whitman National Forest is indicated in the proposed Forest Plan and DEIS. ODOE agrees with both this conclusion and the resulting lack of specific forest policies addressing development of this energy resource. In addition, other federal standards are already in place should development ever appear likely.

**Hydroelectric:** There appears to be little potential to develop additional hydroelectric facilities which are larger than 25 megawatts in the Wallowa-Whitman National Forest. ODOE believes the analysis in the DEIS and the energy policy in the proposed Forest Plan are appropriate.

**Transmission lines:** ODOE believes the analysis in the DEIS is adequate and the establishment of a utility corridor along Interstate Highway 84 is appropriate. The policy for locating transmission lines in the proposed Forest Plan is appropriate.

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The Oregon Department of Energy is an Equal Opportunity Employer



Division of State Lands

1445 STATE STREET, SALEM, OREGON 97310 PHONE 378-3805

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Appendix N

OREGON STATE  
LAND BOARD  
VICTOR ATHEIS  
Director  
DAVID M. ROBERTS  
Secretary of State  
BILL HUTCHERSON  
State Treasurer

May 30, 1986

Dave Stere, Director  
Forest Resources Planning  
Forestry Department  
2600 State Street  
Salem, Oregon 97310

Re National Forest Planning Response Coordination.  
Wallowa-Whitman National Forest.

Dear Dave

The staff at the Division of State Lands has reviewed the proposed management plan for Wallowa-Whitman National Forest and have the following issues that should be addressed in the coordinated state response:

1. The Division of State Lands has title to the submerged and submersible lands under the Grande Ronde and the Oregon half of the Snake Rivers. Some uses or facilities in the river may require permits or leases from the Division.
- 900 2. There are a few isolated parcels of land which the Division may want to propose for exchange if it will enhance blocking ownership.
- 650 3. The Natural Heritage Advisory Council's concerns of natural area cells have been addressed in the plan and while the specific plants are not listed, we believe the plan is good.

We appreciate the opportunity to comment and look forward to discussing it further at the next meeting.

Sincerely,

*Ed Christie*  
Ed Christie  
Assistant Director  
Land and Mineral Resources

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regard to transportation they probably will not be mined for many years, but they constitute a huge resource. The report by Moore provides some information on the deposits and should be added to the bibliography (B. N. Moore, 1937, Nonmetallic mineral resources of eastern Oregon. U. S. Geological Survey Bulletin 875). Two chemical grade privately owned limestone deposits occur just outside the boundary of the Marble Point Roadless area, one on Marble Creek and the other on Baboon Creek (Baker area, J-11 and page C-42). Chemical Lime Company produced large tonnages of limestone from both deposits in 1958 - 1969. Reserves remain and someday will be mined. Perlite occurs in large quantities on Dooley Mountain (Bald-Dooley area, page J-12). There has been minor production in recent years. Demand for this resource will increase as more easily accessible deposits elsewhere are depleted. Building stone has been produced in small quantity for many years from quarries on Dooley Mountain (Bald-Dooley, page J-12). The stone, used mainly for decorative purposes and sold under the trade name "Moon Mesa", has been marketed in Seattle, Portland, Spokane and other areas of the northwest.

The Wallowa County coal field is discussed briefly on pages I-5 and J-3 (appendices). Ferns' coal report should be added to the bibliography (Preliminary report on northeastern Oregon lignite and coal resources, Union, Wallowa and Wheeler Counties. Oregon Department of Geology and Mineral Industries, Open File Report No. O-85-2, M. L. Ferns, 1985). Mention should be made that sedimentary deposits overlying the coal may contain local concentrations

of quartz-feldspar sand that could be mined, although nothing found to date is judged to be of commercial grade. An inventory of crushed rock and sand and gravel sources is not included and may not be needed. It may be desirable, however, to provide data on the quantity and types of materials utilized, where and by whom, number of pits and such other information as would help demonstrate the usefulness of the resource. Talc occurrences are known in the Bald-Dooley (page J-12) and Mt. Ireland (page J-23) areas. Small uneconomic manganese deposits occur in the Bald-Dooley and Greenhorn-Whitney (page J-19) areas.

2) Plan Development Description

Minerals related information and planning concepts are included in many parts of the documents. The data base used in the planning process is summarized in Appendix J, pages III - 5 to 10 of the DEIS, and pages 2-19 and 20 of the Forest Plan. The main authoritative sources of information on the mining history and geology of the region, including recent geologic mapping by DOGAMI, are listed on pages J - 29 to 31 of the Appendix. DEIS Table III - 3 (page III-7) lists the known metal mining districts. A page size map (Figure III - 2, p III - 8, and elsewhere) shows the boundaries of these districts and classifies the districts according to their mineral potential and likelihood of near-term development (10 years). There are five classes ranging from high to low or unknown. Appendix J of the DEIS gives a more detailed description of each district.

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Appendix B describes the analysis process used in developing the plan. We found no reference to geologic or mineral resource information. Sources of data on minerals (e.g. published maps and reports) should be identified, probably under part B page B-5

3) Bourne Area

(2) The Bourne area probably qualifies as a Class I mineralized area because the Bald Mountain mine could begin operating within ten years as a result of on-going exploration efforts by American Copper and Nickel Company and Merco. Exploration, including extensive diamond drilling, has been underway since 1980 and is scheduled to continue in 1986

(3) The upper parts of the North Powder River and the North Fork of the John Day River which head on opposite sides of Elkhorn Ridge is a Class II mineralized area. Manville Corporation has been exploring copper, molybdenum and gold occurrences in the area for more than ten years and recently leased the properties to Shell Mining Company. The area probably should be made a part of the Cable Cover area (Map no. 16, page J-14). Manville's activity is mentioned on page 1-7

One statement in paragraph G. 1, page 1-7 regarding the North Powder River as a potential Wild and Scenic River is incorrect. Gold, not copper and molybdenum, was the target of the pre-1930's placer mining on the stream

4) Provide for plan changes related to minerals

It is stated on page 3-4 and 5 of the Forest Plan that "194,400 acres with mineral potential are closed to mineral entry by wilderness or Hells Canyon National Recreation Area legislation. Of the

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Appendix N

229,400 acres of known mineral potential that are not closed to entry, 195,000 acres are available for mineral entry with only normal restrictions. The remaining 34,400 acres are all available but lie within undeveloped areas or areas with special environmental constraints which may make exploration more difficult."

Suggestions (1) Provide information regarding the effect of the added restrictions on exploration and mining in the latter 34,400 acres and the procedures to be followed by the USFS in regulating and permitting these activities. (2) Provide a process for altering area management plans to accommodate new discoveries, particularly in areas where the existing plan imposes more than normal restrictions on development. The plan may be amended as conditions change (page 5-3) but does this call for the incorporation of new data or mineral deposits into the plan on an interim basis?

Table 5-1 identifies key activities and outputs to be monitored during implementation of the plan. Minerals are not part of that program

Suggestion. Document the amount of forest use (visitor days) by prospectors and miners, both professional and recreational. Monitor reclamation plan compliance.



Department of Environmental Quality

622 SW FIFTH AVENUE BOX 1780 PORTLAND OREGON 97207 PHONE (503) 229 6686

May 28, 1986

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H. Mike Miller, State Forester  
May 28, 1986  
Page 2

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- H. Mike Miller, State Forester  
Forestry Department  
Office of State Forester  
2600 State Street  
Salem, OR 97310

Re: Draft Environmental Impact Statement for the Mallowa-Whitman National Forest Plan

M. Ke  
Dear Mr. Miller:

The Department has reviewed the draft Environmental Impact Statement (EIS) and management plan for the Mallowa-Whitman National Forest Plan and provides the following comments for the Forest Service to use in preparing the state's coordinated response. These comments are related to air quality and water quality impact of the proposed plan. The Department does not recommend a "preferred alternative" at this time. The deficiencies outlined below reflect the lack of background information for each of the alternatives which is necessary for the Department of Environmental Quality to evaluate before selecting an alternative. After this information is included in the EIS, the Department would be more capable of recommending a preferred alternative.

800 Regarding water quality, the Department's concerns are that the Plan be consistent with Oregon's adopted Statewide Water Quality Management Plan for forest practices as required by the Clean Water Act. It is important to insure that the proposed activities of timber harvest, road construction, chemical handling and usage, sewage disposal, livestock grazing and other forest land activities comply with Oregon's water quality standards and guidelines. The draft EIS does not include adequate technical information to allow water quality impacts of the Plan to be assessed. Findings need to be made regarding: 1) the consistency of the plan with the provisions of the Clean Water Act; 2) the relationship between baseline water quality conditions and the effects of planned forest activities; 3) water quality monitoring plans; and 4) the different water quality impacts of the alternatives.

830 Regarding air quality, the Department's main area of concern is that the plan be consistent with the state and federal air quality standards. The draft EIS does not provide sufficient technical information in order to assess the air quality impacts of the plan. Findings need to be made regarding: 1) an assessment of the preferred alternative with respect to the Clean Air Act and the Oregon Clean Air Implementation Plan; 2) how the plan will not affect Prevention of Significant Deterioration (PSD) increments; 3) the impact of proposed prescribed burning activities on the Visibility Protection Plan; and 4) the plan's consistency with state and federal policies for wilderness areas.

Thank you for allowing us the opportunity to review the draft EIS. The Department looks forward to reviewing the amendments to the draft EIS before a final recommendation is made regarding the "preferred alternative" for the Forest Management Plan.

Sincerely,

*Ful*  
Fred Hansen  
Director

FH:r  
MR1025  
Attachment

Appendix N



State of Oregon  
Department of Environmental Quality  
Comments on the Proposed Management Plan  
and Draft Environmental Impact Statement (DEIS)  
for the Willowa-Whitman National Forest

WATER QUALITY DIVISION COMMENTS

The Management Plan and DEIS were reviewed within the concept that land management activities have the potential to beneficially or adversely impact the quality of the waters in the forest land downstream of the forest. The management plan has the opportunity to improve existing degraded resources and to maintain or protect existing desired resource conditions. The level of emphasis placed on water quality conditions and the processes used to protect that quality play an important role in providing guidance to the managers in the future on a project-by-project basis.

The Water Quality Division comments are detailed in the following five sections:

1. Review for Consistency with Provisions of the Clean Water Act

The plan provides a goal statement to maintain and enhance water quality in the forest. It also references the water quality standards set by the state. The plan appears to be consistent with the State's Nonpoint Source Water Quality Management Plan for the Grande Ronde, John Day, Burnt and Powder River basins.

800 The plan also references the best management practices certified to protect water quality relative to timber management activities. However, do these same standards and guidelines identified in the plan govern livestock grazing and integrated pest management activities? If not, we recommend that a reference to Oregon's water quality standards also be placed in the appropriate sections of Chapter 4 of the Plan dealing with livestock and pest management. In addition, a statement pertaining to Oregon Administrative Rules for sewage disposal on the forest lands should be added to the present wording on page 4-24 of the Plan.

We would like to applaud the effort by the Forest staff to make predictions of sediment yield by the different alternatives and in particular the prediction for the sediment yield in 10 year increments for the preferred alternative. However, additional information is needed to identify whether these predictions include sediment production from increased livestock grazing proposed for the Forest. We recommend that those predictions be incorporated into Table 4-1 separate from the yields predicted for timber management.

Discussion of existing water quality and current trends is inadequate considering the public value placed on the forest for visual quality, recreation and water quality. We suggest the Plan and DEIS provide the existing water quality and projected trends in a section of the appendices to the DEIS. With the magnitude of the potential impacts that this plan can have on water quality, it is vitally important to display the baseline water quality conditions in some detail prior to implementation of the plan. We are aware of the extensive water monitoring work done in the past by the Forest staff. Results of this work and the problems identified should be displayed in the DEIS.

Statements of some aspects of water quality and soil erosion problems are made in the Plan and DEIS. Statements are also made specific to a management strategy such as those for water quality in Chapter 4 of the DEIS. However, specific stream problems need to be addressed, including measures to either improve an existing problem or prevent further deterioration. In addition, the project increased sediment yield displayed in Table 4-1 requires an explanation with respect to where it will occur and how it will be mitigated.

2. Review of Water Quality Monitoring Plans.

Statements of goals and the accompanying plan to achieve the goals and objectives, in our estimation, are only a portion of what is necessary in a plan. The plan must also include a process to assess its effectiveness in protecting the water quality during the life of the plan.

The proposed land and resource management plan also lacks a comprehensive water quality monitoring element. Table 5-1 briefly mentions the water quality monitoring plans for the forest. However, there is no discussion of which water quality parameters will be monitored and how the forest staff intends to determine cumulative impacts on water quality during the life of the plan. Due to the high value the public places on the Willowa-Whitman Forest for visual and recreational quality, it is important for the forest managers to be aware of existing and developing trends in water quality. Cumulative impact trends should play a vital role in this assessment and subsequent management decisions. This need is especially true for the proposed increase in livestock grazing.

We would like to emphasize the need to sample a range of management activities and to present the results of the monitoring to the appropriate forest managers. The plan does not display how the results of the monitoring activities will be incorporated into the management decisions for the forest. A process should be developed in the plan to incorporate results of monitoring activities and other information into future management decisions.

3. Review of Management Strategies and Alternatives.

The DEQ made no attempt to determine a preferred alternative for water quality. We recognize this is a land management plan so we were concerned with the various levels of potential water quality impacts

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from those land activities. We also recognize that differences in management intensity of an activity between alternatives will create varying potential impacts on water quality.

We reviewed all alternatives and management strategies and prescriptions with interest towards the degree of potential for water quality impacts and the opportunities available to insure water quality protection. We assumed that the higher the level of soil disturbing activity the greater the potential for problems; also, the greater the encouragement for recreation and livestock grazing, the greater the potential for additional water quality problems.

In Chapter 4 of the Plan, we concur with the statements of "Direction" for the "Watershed" only if the standards and guidelines pertaining to water quality for watersheds include recommendations for livestock grazing, integrated pest management and sewage disposal. If the standards and guidelines do not include these, then statements to that effect should be made in each management strategy "Direction" for "Range", "Recreation", and "Insects and Disease".

In the management strategy discussions, statements are made regarding degraded water quality as a result of various activities. Mitigation of these actions is not readily apparent without searching through much of the Plan and DEIS for mitigation statements. We recommend that a mitigation statement accompany statements of water quality degradation where mitigation is a high priority.

100 Statements in Table 4-4 of the Plan for "Water" under the column heading of "Physical/Biological Setting Objectives" violate the anti-degradation policy stated in OAR 340-41-026. For high quality waters such as those identified by the DEIS for wilderness and semiprimitive wilderness streams, there can be no temporary degradation of these waters that degrades the value of the beneficial uses of those same waters. As stated in the rules for such high quality waters, degradation may only be allowed after careful consideration by the Oregon Environmental Quality Commission, the Director of the DEQ or his designee.

4. Review of Management of Special Use Watersheds

We concur with the plan and monitoring strategies displayed for the Eagle Cap Wilderness.

The management plan for the Hells Canyon Wilderness lacks information on existing condition of water quality. It also lacks management strategies and a monitoring plan for the wilderness. We recommend discussion of these topics similar in substance and format to that displayed for the Eagle Cap management plan.

800 For the roadless area discussion in Appendix C of the DEIS, a water quality impacts discussion should be included in the "Environmental Consequences" section beginning on page C-68. It is our opinion that a major source of sediment production in forested areas is from roads and in particular the condition of those roads. If this is a correct assumption for the roadless areas discussed in Appendix C, then increased sediment production to the streams will occur without mitigation and should be so stated.

The standards and guidelines sections for municipal watersheds should state which standards will be met for water quality. The plan does not discuss management considerations for small private water systems that might include the national forest as part of its watershed. Protection should be provided to any such watersheds in the Willowa-Whitsan National Forest. The plan should also describe how the protection will be monitored.

5 Review of Plan For Ground Water Quality Protection

The plan virtually ignores the ground water component of the hydrologic cycle. Although ground water probably will be minimally affected by forest management activities, the plan should recognize the importance of ground water quality protection and discuss the following points.

- a) Activities that affect ground water quality will eventually affect surface water quality. Conversely, change in surface water quality might reflect in ground water quality.
- b) Lakes with unique pristine water quality may need special ground water protection requirements to prevent nutrient enrichment. Particularly with regard to sewage disposal practices associated with intensive recreational use.
- c) All sewage disposal practices should be in compliance with state requirements. Please state those requirements by reference in the Plan.
- d) Ground water protection planning should be included in all chemical handling practices in the forest. This would include herbicides, pesticides, fertilizers, and degreasing solvents at maintenance shops.
- e) Activities and procedures that minimize erosion, and surface water runoff also will increase infiltration allowing for stable year round stream flows.

For further information regarding water quality, contact John Jackson at 229-6035.

AIR QUALITY DIVISION COMMENTS

The Air Quality Division comments are organized into four sections, each of which addresses the adequacy and consistency of the DEIS with respect to the following elements:

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Appendix N

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- 1. Attainment and Maintenance of Air Quality Standards
- 2. Prevention of Significant Deterioration Requirements
- 3. Visibility Protection of Class I areas
- 4. Consistency with respect to Federal and State of Oregon environmental policies.

830 Current information describing air quality monitoring activities and summarizing air quality conditions across the state may be found in the Air Quality Division's Annual Report (attached). Technical assistance and guidance in the preparation of EISs is available from the Department on request. For example, the DEIS states (Page IV-19) that off-Forest sources are the primary sources of air pollutants impacting the Willows-Whitman. This is not consistent with the Department's assessment of the importance of prescribed burning as the single largest source impacting forest land air quality within Northeastern Oregon.

1. Attainment and Maintenance of Air Quality Standards.

The DEIS should include a statement assessing the impact of the preferred alternative with respect to the Clean Air Act and Oregon Clean Air Implementation Plan requirements. Specifically, the DEIS must show that the proposed alternative will not cause or significantly contribute to air quality standard violations. Air quality impacts within attainment areas must not exceed Prevention of Significant Deterioration (PSD) increments (Table 2) nor may the impact cause violations of air quality standards (See Annual Report) estimated by summing current air quality conditions and the estimated increment for the appropriate averaging times.

2. Prevention of Significant Deterioration

Part C of the Clean Air Act, requires the Department to insure that pollutant increments in Class I areas (Table 2) do not exceed specific limits adopted by Congress irrespective of the originating source. Since the proposed alternative proposes to reduce emissions, the DEIS should include a statement to the effect that PSD increments would not be effected by the plan.

3. Visibility Protection For Class I Areas

The Oregon Visibility Protection Plan requires the protection of visibility within Class I areas. The DEIS should evaluate the impact of proposed prescribed burning activities on the Visibility Protection Plan with respect to (a) assuring the continued protection of visibility within Class I areas from further deterioration and (b) the affect of proposed burning activities on short and long-term visibility control strategies as outlined in the State Implementation Plan (SIP).

4. Consistency With Federal and State Environmental Policies.

Department policy (OAR 340-20-001) requires that the Highest and Best Practicable Treatment and Control be applied to pollution sources within Oregon. OAR 340-13-005, Environmental Standard for Wilderness Areas, sets forth policies on environmental impacts within wilderness lands while USDA Forest Service Region VI policy (Service Manual No. 2400, Supplement 347, March 1985) requires that, in recognition of the value of forest residues utilization, prescribed burning only be accomplished for those units where all other alternative treatments are unacceptable. The DEIS should include a statement addressing the consistency of the proposed plan with respect to these policies, stating the degree to which alternatives to prescribed fire have been considered.

Table 1  
Significant Air Quality  
Ambient Air Quality Impacts  
For Nonattainment Areas  
(micrograms per cubic meter)

Pollutant	Annual	24-Hour	8-Hour	3-Hour	1-Hour
SO <sub>2</sub>	1.0	5.0		25.0	
TSP	0.2	1.0			
NO <sub>2</sub>	1.0				
CO *			0.5		2.0

\* Milligrams per cubic meter

Table 2  
Maximum Allowable Increases  
(PSD Increments)  
Micrograms Per Cubic Meter

Class I Areas		Annual	24-Hour	8-Hour	3-Hour
Pollutant					
SO <sub>2</sub>		2.0	5.0		25.0
TSP		5.0	10.0		
Class II Areas		Annual	24-Hour	8-Hour	3-Hour
Pollutant					
SO <sub>2</sub>		20.0	91.0		512.0
TSP		19.0	37.0		
Class III Areas		Annual	24-Hour	8-Hour	3-Hour
Pollutant					
SO <sub>2</sub>		40.0	182.0		700.0
TSP		37.0	75.0		

For further information regarding water quality, contact John Core at 229-5380.



Department of Land Conservation and Development

1175 COURT STREET NE SALEM OREGON 97310-0590 PHONE (503) 378-4926

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H Mike Miller, State Forester  
May 21, 1986  
Page 2

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I hope these comments are helpful in preparing Oregon's response to the Forest Service's plan for the Wallowa-Whitman National Forest. Please feel free to contact Jim Knight of our office if you have any further questions about our letter.

May 21, 1986

Sincerely,

James F. Ross  
Director

H Mike Miller, State Forester  
Department of Forestry  
2600 State Street  
Salem, OR 97310

JR s1  
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cc Pat Amedeo, Governor's Office  
Baker County Court  
Union County Court  
Wallowa County Court  
Brent Lake, DLCD  
Jim Knight, DLCD  
State Agency Review Group

Dear Mike

The purpose of this letter is to provide DLCD comments as input into the overall state response to the proposed resources plan and draft environmental impact statement for the Wallowa-Whitman National Forest

As you know, the statewide goals and acknowledged comprehensive plans outside Oregon's coastal zone do not have any binding effect over federal resource planning activities like the Forest Service's management plans. Nevertheless, DLCD is quite concerned that the Forest Service clearly demonstrates that such plans (and their various alternatives) are developed to be as compatible as possible with the affected communities' acknowledged comprehensive plans.

Our preliminary review reveals that the Wallowa-Whitman's planning staff has endeavored to produce the resources plan and the DEIS with extensive interest group and local involvement. We believe, however, that the DEIS at pp III-52 and IV-50 should be more specific in supporting its contention that the various forest management alternatives are generally compatible with the acknowledged comprehensive plans in the area. Such information would not only strengthen federal-local coordination but hopefully will permit easier identification of a preferred management alternative from the state's perspective.

Finally, our review noted one typographical error which should be corrected. Pages III-52 and IV-53 of the DEIS refers to Goal 15 as the urbanization goal. Goal 14 is the urbanization goal while Goal 15 deals with the Willamette Greenway.

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Appendix N

Forestry Department  
**OFFICE OF STATE FORESTER**  
2600 STATE STREET SALEM OREGON 97310 PHONE 378 2570

MEMORANDUM

SUBJECT. WALLOWA-WHITMAN NATIONAL FOREST DRAFT ENVIRONMENTAL  
IMPACT STATEMENT AND PROPOSED LAND AND RESOURCE  
MANAGEMENT PLAN  
TO. H. Mike Miller, State Forester *MM*  
FROM. Dave Stere, Resources Planning Program Director  
DATE May 28, 1986

The Department of Forestry Resources Planning Section and field staff have reviewed the Wallowa-Whitman National Forest Draft Environmental Impact Statement (DEIS) and Proposed Land and Resource Management Plan (LRMP).

**1200** Our review concludes that the Department cannot support implementation of the Wallowa-Whitman preferred alternative (C). This alternative reduces job numbers, personal income and timber harvests below recent levels. The DEIS indicates the potential exists to maintain or increase all of these factors while improving wildlife habitat, recreation opportunities and other resource values. In light of the previous land withdrawals on the Wallowa-Whitman for wilderness and other uses which prohibit or restrict timber management, we believe it is essential that the selected alternative promote intensive management of the remaining commercial forest land, which amounts to only 46 percent of the Forest.

**1300** Alternative B provides the best opportunity to maximize net public benefits and to improve the economy of northeast Oregon. Alternative B-departure was developed by the Wallowa-Whitman to specifically address the Department's Forestry Program for Oregon timber harvest targets. However, this alternative cannot be supported due to its poor economic performance and

unacceptable modelling assumptions. Adherence to strictly following FPF0 targets without meeting other important FPF0 objectives resulted in a distorted view of the desired result of Oregon's Forestry Program.

Our review includes recommendations for improving Alternative B-departure. Without computer testing it is impossible to accurately predict the outputs of a recrafted Alternative B-departure. However, the changes we have suggested may result in a new alternative that better meets our objectives while maximizing net public benefits.

In addition to comparing the Wallowa-Whitman DEIS and LRMP to the Forestry Program, the Department review also identifies factual errors and omissions in the documents and comments on how legal requirements could be better met. To summarize this review, four major problems in the planning documents are listed below accompanied by Department recommendations for correcting these problems.

**700** 1 Problem - Alternative B-departure has not been presented in a form that the Department can support. The alternative fails to constrain changes in timber harvest levels between decades and results in an unacceptable loss of present net value.

Recommendation - Revise Alternative B-departure by including a 10 percent decadal harvest change constraint and a harvest floor of 45.7 MNCF. The ponderosa pine and Douglas-fir components of the first decade timber harvest in Alternative B-departure should be maintained at levels provided by the existing timber management plan. Also, more costly long span cable and helicopter logging acres should not be substituted for tractor logging acres. Doing so may distort the PNV analysis of this alternative. It will be necessary to conduct additional FORPLAN runs to determine the outputs and judge the economic performance of this modified alternative.

**1300** 2. Problem - A high degree of data uncertainty exists in several areas of the plan. The Forest has used assumptions which are significantly different than those used by adjacent National Forests.

OREGON STATE DEPARTMENT OF FORESTRY  
 REVIEW OF THE MALLOWA-WHITMAN NATIONAL FOREST'S  
 DRAFT ENVIRONMENTAL IMPACT STATEMENT AND PROPOSED  
 LAND AND RESOURCE MANAGEMENT PLAN

The Oregon State Department of Forestry's Resources Planning Section and field staff have reviewed the Mallowa-Whitman National Forest's Draft Environmental Impact Statement (DEIS) and Proposed Land and Resource Management Plan (LRMP). Our comments focus on four areas of concern: 1) Compatibility of the Mallowa-Whitman DEIS and LRMP with the basic objectives of the Forestry Program for Oregon (FPFO), 2) Factual errors and omissions in the document, 3) Legal sufficiency of the documents, and 4) Comparison of the DEIS and LRMP view of the future with the Forestry Program for Oregon.

The Mallowa-Whitman DEIS and LRMP have succeeded in providing much of the background information and assumptions that were lacking in the Analysis of the Management Situation. Our review indicates, however, that important technical and potential legal problems remain. The Department has also concluded that the Forest's preferred alternative fails to maximize public net benefits or to satisfy state objectives for National forest management, despite the potential to do so. The following comments are the Department of Forestry's recommendations for improving the Mallowa-Whitman plan.

COMPATIBILITY OF THE MALLOWA-WHITMAN  
 DEIS AND LRMP WITH THE BASIC OBJECTIVES OF  
 THE FORESTRY PROGRAM FOR OREGON

**700** Alternative B-departure - (DEIS pages 11-33-37) The Department of Forestry appreciates that the Mallowa-Whitman attempts to provide an alternative which meets the Forestry Program for Oregon (FPFO) timber harvest targets. However, the DEIS states these targets are met only through a significant loss of present net value (PNV). It is apparent from Table II-a that the loss of 407,300 acres (30%) of the commercial forest land between 1980 and the formulation of Alternative B-departure is one obvious reason for this outcome. The high management and logging costs used by the Forest as well as the lack of a decadal harvest change constraint have also contributed to this poor economic performance. Therefore, the Department cannot support Alternative B-departure based on the information presented in the DEIS.

Since Alternative B and B-departure have the same land allocations and since Alternative B has the second highest PNV of any alternative, opportunities exist to improve Alternative B-departure. From the text and discussion with Forest planners, it appears that shortened rotation lengths and the harvesting of additional below-cost stands did not contribute to a loss of PNV. If this is true, then we recommend retaining these characteristics of the alternative. The DEIS states that Alternative B-departure cannot be implemented without violating NFMA since it utilizes shortened rotations. However, CFR Part 219.16(a)(2)(iii) allows exceptions to this regulation if "...overall multiple-use objectives would be better attained." The DEIS should note this flexibility in the regulations and consider Alternative B-departure as a viable, legally implementable alternative.

We do not support the Forest's omission of a decadal harvest change constraint from the model and the resulting harvest falldown in decade six depicted in Figure 11-1. A 10 percent decadal harvest change constraint, along with a harvest floor equal to the Alternative B first decade harvest of 45.7 MMCF is recommended for this departure alternative. The ponderosa pine and Douglas-fir components of the Alternative B-departure first decade timber harvest should be maintained at levels provided by the existing timber management plan. Also, long span cable and helicopter logged acres should not be substituted for tractor logged acres, as was done with the existing Alternative B-departure. We believe these revisions, along with the use of more realistic management costs, would generate an alternative which more closely meets the Forestry Program objectives, of which harvest levels are only one measure. Additional FORPLAN runs should be made to more precisely determine the outputs and economic performance of a recrafted Alternative B-departure.

**1300** The Department requests that the Forest include the table (required by Regional direction) which compares the DEIS alternatives with the objectives of the FPFO. An example which makes this comparison for the Mallowa-Whitman alternatives is attached. Assignment of the alternatives to the proper level is based on compatibility standards provided to the Region just prior to the Mallowa-Whitman DEIS release. The FPFO timber harvest targets and a discussion of the basic objectives should also be presented in the DEIS.

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Recommendation - Prior to the consideration of any alternative that will reduce the Forest's contributions to local and state economies, the Wallowa-Whitman should review the assumptions made on the following topics and revise as needed

1. MMR formulation
2. Big game management
3. Management costs
4. Timber inventory and yield tables
5. Land suitability analysis
6. Recreation benefits

In addition, current management direction should be maintained in these areas where significant data uncertainty persists. Where management strategies, assumptions and cost estimates differ significantly from adjacent National Forests, the Wallowa-Whitman should address these differences and revise the plan as needed to eliminate unjustified inconsistencies

- 1200 3. Problem** - The economic analysis conducted by the Forest fails to fully address the timber supply situation on adjacent ownerships and does not recognize the effect of the Forest's actions on the State's economy

Recommendation - The actions of adjacent federal and private timber suppliers and the resulting effect on local and State economies should be considered in this analysis. The Forest should also more completely document its economic influence outside of the local three county area.

- 1400 4. Problem** - The Forest's proposed system for monitoring and evaluating the performance of the plan is incomplete. The economic effects of the plan are not fully considered.

Recommendation - Changes in employment, income and payments to counties within the Forest's area of economic influence should be monitored on an annual basis. Forest plan revisions should be considered when variability from predicted levels exceed  $\pm 10$  percent. The economic efficiency of and the costs involved in implementing scheduled practices and activities as well as the values of goods and services produced by the Forest should be monitored on an annual basis with a  $\pm 10$  percent allowable variance triggering consideration of plan revisions.

Several of the concerns and recommendations expressed in our review of the Wallowa-Whitman plan involve the use of questionable data and assumptions in the development of all the alternatives. Therefore, we have concluded that it is premature to proceed with the preparation of a Final Environmental Impact Statement so long as these problems are unresolved.

The Department of Forestry recommends that the Wallowa-Whitman issue a supplement to the DEIS which provides additional information needed and which specifically addresses the issues we have identified. This action is essential if the Forest intends to produce a sound, supportable management plan.

DHS/DH jp

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**704 Departures** - (DEIS, page 11-8) The Department of Forestry supports the use of timber harvest schedules which utilize a departure from nondeclining even-flow. Region 6 direction to the Forest requires consideration of departure alternatives in the following situations-

- When losses from insect attacks can be reduced
- When fire risks can be reduced.
- When timber harvests from other ownerships are expected to decline
- To better meet range and wildlife goals.
- When the species mix of timber harvests on all ownerships is changing in a way that could adversely affect the economics of local communities.
- To meet FPFO timber harvest targets.

Clearly, all of these conditions exist on the Wallowa-Whitman. Collectively, they point out the necessity for the preferred alternative to include a departure in order to meet multiple-use goals and maximize public net benefits.

**Agency Coordination** (Appendix, page A-4) In addition to written correspondence to the Wallowa-Whitman, Department of Forestry staff members have met with the Forest planning team to discuss our concerns on four occasions since 1982. Two of these meetings (6/2/82 and 4/5/83) have not been documented in this table.

FACTUAL ERRORS AND OMISSIONS IN THE DOCUMENT

**200 Undeveloped Land** - (DEIS, page 5-27) Figure 5-6 minimizes the fact that there are 582,700 acres of wilderness on the Wallowa-Whitman which provide undeveloped land in addition to the nonwilderness acres shown here. Thus, even under Alternative B-departure, there would still be nearly 900,000 acres of roadless land on the Forest.

This example illustrates a larger problem in National Forest planning. The public has not been fully informed about the wildlife, recreation and scenic values that are currently being produced through land allocations such as wilderness, RNA's and the Hells Canyon NRA which limit or prohibit timber management. Timber values that have been lost to these and other management designations are not clearly presented in the plan analysis. Therefore, the public cannot easily determine the actual level of values provided by the National Forest. They also cannot examine tradeoffs that have been made by previous land allocation processes nor trace the continued erosion of the commercial forest land base. Since these fixed land allocations involve 42 percent of the total Wallowa-Whitman National Forest acreage, this issue must be addressed

To leave out a discussion of the valuable contributions to recreation, wildlife habitat, watershed protection and other non-market values that accrue to the public from legislative and administrative designation and from management strategies that are not decided through this planning process is doing the public a great disservice and may violate NEPA and NFMA requirements.

**702 Regeneration Lag Time** - (Appendix, page B-37) The Wallowa-Whitman's use of a 20 year natural regeneration lag time for the mid to higher elevation mixed conifer types is inconsistent with the 10 year lag time used by the Umatilla National Forest. Additional documentation is needed to justify these differences.

**1200 Social and Economic Overview** - (Appendix, page B-63) Most of the introductory discussion of this topic consists of value judgements and conclusions which are not supported with data; therefore, the validity of these statements cannot be determined. For example, statements such as "There is ...a marked ambivalence toward growth in the area" and "The growth potential of Baker County is dimmed by the cyclical nature of the lumber and wood products industry and a lack of economic diversification" are inappropriate without accompanying documentation. In addition, data provided on personal income and poverty levels are outdated and do not reflect the current economic downturn in northeast Oregon. This section should be rewritten to present a more current, factual overview of the subject.

We agree with the Wallowa-Whitman conclusion that the potential for attracting additional diversified employment opportunities to northeast Oregon is extremely limited. This fact, coupled with statistics on high unemployment and poverty rates in this area, emphasizes the point that any growth or decline of the timber industry in Baker, Union and Wallowa Counties will significantly affect these local economies. Past predictions that wilderness additions and the Hells Canyon NRA would generate new recreation-oriented employment have not been fulfilled. Therefore, to maximize net public benefits the Wallowa-Whitman's preferred alternative should attempt to increase the economic vitality of these three counties by encouraging timber management and wood products manufacturing rather than proposing additional reductions in jobs and personal income derived from this resource.

**700 Derivation of Manufactured Product Selling Value** - (Appendix, pages B-80, 81) This measure of final demand for Wallowa-Whitman timber may not be accurate as presented. Bid prices, logging costs, manufacturing costs and remanufacturing multipliers differ by species. However, these differences are not considered. Since species composition will vary by alternative, species-specific selling values should be used rather than an average.

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Appendix N



Big Game MMR - (Appendix, page B-85) In the discussion of minimum management requirement development, no facts, purpose statement, rationale, or trade offs are presented which justify the need to provide minimum levels of elk habitat. Without this information it is impossible to determine the necessity of this constraint

Mill Capacity - (LRMP, pages 2-38) Table 2-15 lists the installed mill capacity of Baker, Union and Wallowa Counties as 250 MMBF per year based on Howard's 1982 report. More recent information provided to us by Boise Cascade Corporation states that mill capacity is 377 MMBF per year. The Wallowa-Whitman should review the installed mill capacity estimate and revise it as needed to reflect the existing situation.

- 900** Map Error - A brief examination of the maps of the alternative land allocations reveals that parcels of land which are no longer in federal ownership have been included in the Forest landbase. Over 2000 acres of land in the Indian Creek area shown on the maps as USFS lands were actually traded to Boise Cascade Corporation in 1984. This and any other mapping errors should be corrected. Documentation is needed to establish that these privately owned acres have not been included in the FORPLAN data as part of the Forest landbase.

LEGAL SUFFICIENCY OF THE DEIS AND LMP

- 700** Potential Yield Comparison - No discussion in the text compares the harvest levels of the proposed alternatives with the existing timber management plan potential of 45.34 MMBF per year (182.8 MMBF per year). Since the Forest is recommending a preferred alternative with an allowable sale quantity that is 36 percent lower than the existing plan's potential yield, a thorough documentation of the reasons for and the effects of this decline should be included in the DEIS. By failing to even mention the existing potential yield the Forest has failed to meet its legal requirements for full public disclosure of the planning process.

Data Uncertainty in Planning - Many of the decisions made in the current planning process are based on data which is either outdated, of unknown precision, conflicting with data from other reliable sources, or derived solely from "best professional judgement". Wildlife MMR formulation, predictions of future recreation demand, timber yield tables, timber inventory, and the decision criteria used in the new land suitability analyses are all areas where a high degree of uncertainty exists in the Wallowa-Whitman DEIS. In addition, these decisions and assumptions have been finalized and incorporated in all alternatives without the provision of any opportunity for full public review, as required by both NFMA and NEPA

It is unacceptable that local, state, and regional economies be threatened by changes in forest resource outputs resulting from decisions which are not fully supported by current sound data. Therefore, we recommend that the existing planning direction be continued for those resources until uncertainties in the data can be eliminated through research and on-the-ground verification. Very few, if any, resource management opportunities would be threatened or irretrievably lost during the ten-year life of the plan if major changes in output levels were postponed until sufficient evidence to justify them is obtained. Adherence to a well designed monitoring program would protect all resources from unforeseen risks and could incorporate new, reliable information into the plan as it becomes available.

- 420** Pine Marten Habitat - The DEIS includes no information on the number of habitats provided for the pine marten and other wildlife which "depend on" old-growth timber. The Region's wildlife MMR matrix dated August 22, 1984 is the most recent data we have seen on this subject. That matrix states that the Wallowa-Whitman will manage for 332 pine marten habitats to provide a well distributed, minimum viable population. In comparison, the Umatilla and Malheur National Forests are providing 98 and 95 pine marten habitats respectively to achieve the same objective. Because of the similarities between the three Forests, it appears that the Wallowa-Whitman pine marten MMR may be excessive. The DEIS should document the need for these additional habitats

- 38** Hells Canyon National Recreation Area (HCNRA) - (Appendix, page B-107) The Department of Forestry believes the Wallowa-Whitman may have biased its model against timber management in the HCNRA by assigning log haul and road maintenance costs to stands within the Area which are higher than identical stands with identical haul distances outside the NRA. No satisfactory justification is given for this decision. If forestwide average costs are not adequate for the HCNRA, they are very likely not adequate elsewhere. If this is true, area-specific costs should be developed for the entire Forest

(DEIS, page 11-14) - In light of the Assistant Secretary's April 27, 1984 decision on the HCNRA management plan, we believe it is essential that the Wallowa-Whitman DEIS specifically state what level of adverse economic effects resulting from the Forest Plan will trigger an NRA plan revision. The Oregonians who live in Baker and Wallowa Counties deserve to know how much unemployment, loss of personal income and county payment reductions they will have to endure before the comprehensive management plan is amended.

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**1300 Current Direction** (DEIS, page 11-26) The DEIS glossary defines current direction as "the combination of activities dictated by laws, regulations, the Forest Service Manual, and existing unit plans" (page VIII-7) Therefore, it is not clear why the current direction alternative (Alternative A) is modeled using new yield tables, a new land suitability analysis, and a new timber inventory which are part of the present planning process. The differences between the "existing plan" process and the proposed, new process are enormous.

The resulting timber outputs for this alternative show a first decade allowable sale quantity which is 38 percent lower than the existing timber management plan, in terms of cubic feet. To label Alternative A as a "no action" alternative grossly misstates the facts and may therefore not meet NEPA requirements.

The Department appreciates the Wallowa-Whitman's approach which compares alternative outputs to "recent levels" in addition to current direction. We found this comparison with historical output levels very helpful and illustrates that Alternative A is actually a new management direction rather than current direction.

COMPARISON OF THE DEIS AND LMP VIEW OF THE FUTURE WITH THE FORESTRY PROGRAM FOR OREGON

**1200 Cost Comparisons with Adjacent National Forests** - The Wallowa-Whitman model uses a cost of \$179/MCF for sale preparation and administration while the Umatilla uses \$104/MCF and the Ochoco has modeled a cost of \$75/MCF. Skyline logging costs on the Wallowa-Whitman are \$130/MCF higher than the Umatilla's and \$100/MCF higher than the Malheur's. These significantly higher costs result in more acres being removed by the model for economic reasons. However, no evidence has been presented justify the use of higher costs on the Wallowa-Whitman for similar situations.

The cumulative effect of these cost differences is reflected in the benchmark runs of the Wallowa-Whitman and Umatilla National Forests. For example, the PNV of the Maximum Biological Potential Run for the Umatilla is 3.1 times greater than for the Wallowa-Whitman, even though first decade volumes are about the same. Comparisons of Maximum PNV Run No. 7 exhibit the same trend. Timber management acres are 51,000 acres higher on the Wallowa-Whitman but first decade harvest is 70 MMBF lower and PNV is only 42 percent of the Umatilla's. What causes these extreme differences on the Wallowa-Whitman?

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The Department of Forestry recommends that the Wallowa-Whitman reevaluate its timber sale and management costs to insure that timber and other resource programs are operated at maximum efficiency. Have costs incurred by unrelated programs such as job training and retraining been incorrectly included? Costs should not be significantly higher than on adjacent National Forests when similar sites are compared. Sensitivity testing should be expanded to determine the effect of using reasonable costs on present net value and timber harvest levels.

**Economic Analysis** - The DEIS has failed to fully address the changing timber supply situation in Oregon. Inventories on private industry lands are falling and ponderosa pine availability on all ownerships is decreasing. In light of these trends, it is unrealistic to assume that the Wallowa-Whitman National Forest faces a horizontal demand curve for timber and that the number of jobs, personal income, and payments to counties will not be affected by economic influences outside the National Forest boundaries. The economic analysis for the DEIS should take into account the dynamic social and economic environment in which the Forest operates instead of maintaining the false premise that the Wallowa-Whitman is an isolated, independent entity.

It also appears that the DEIS may be understating the value of Wallowa-Whitman timber to the region's economy. Table B-13 indicates that an increasing amount of Wallowa-Whitman timber is being processed outside of Union, Baker and Wallowa Counties. Jobs and income created by exported volume, especially roundwood volume, may not be fully considered. Oregon's metropolitan economy, through such industries as banking, insurance, and heavy machinery, is indirectly dependent on timber and other resources from all the Region's National Forests. This large-scale economic influence of the Wallowa-Whitman should be addressed.

**400 Big Game Management** - In addition to all the other land allocations which prohibit or limit timber production on otherwise suitable lands, the Forest has constrained timber management on additional acres to provide "high quality habitat for big game", "greater recreational variety", and "more challenging hunting opportunities" (Management Strategies 2, 3 and 18). A minimum of 357,726 acres of suitable timber land are allocated to one or more of these strategies in all alternatives. Insufficient documentation is provided to explain why additional reductions in timber harvest levels are needed to achieve these objectives.

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Other questions on big game management unanswered by the DEIS include:

1. Since some winter range areas receive heavier use than others, would not more intensive management of these preferred ranges and less on the remainder be more desirable and promote both big game and timber with lower management costs?
2. Despite a range of land allocations to management strategies 2, 3 and 18 in the alternatives, wildlife and fish recreation use and elk numbers vary only slightly during the 50 year planning horizon. What benefits are being gained from these strategies and what would be the result if no acres were assigned to them?
3. More challenging hunting opportunities can also be achieved through road closures, limiting the numbers of hunters, and restricting the harvest to certain types of game (example - Bulls with three or more antler points). To what degree would increased use of these other methods of regulation reduce or eliminate the need to limit timber production?
4. Elk numbers in northeast Oregon have increased to the point where the availability of winter range is apparently the limiting factor. Conflicts with other uses on the privately owned, natural winter range are increasing. By continuing to optimize the available summer and winter elk range on the Forest, the Wallowa-Whitman may be managing its land for elk numbers that cannot be supported by the total habitat. In light of the other resource uses on the Forest, at what point will the marginal value of additional elk be exceeded by the marginal cost of providing the habitat?
5. What costs and property damage may be incurred by adjacent landowners through elk migration and hunting recreation? How will the Forest's actions affect this problem? How are these costs factored into the Plan's analysis?

**800 Watershed Management** - (DEIS, page III-12) The Department of Forestry supports continuation of the current management direction for municipal watersheds located on the Wallowa-Whitman. We believe that carefully planned timber management activities are compatible with the goal of water quality protection in these areas. In the case of the LaGrande watershed, we support careful salvaging of dead and dying lodgepole pine stands to reduce the extreme fire hazard, to facilitate the reestablishment of a new timber cover, and to provide raw material to wood processors.

**1120 Insect Epidemics** - (DEIS, page III-25) The text devotes very little discussion to the present and past insect epidemics which have had major effects on the species composition and growth rates of Wallowa-Whitman timber. The text correctly states that the ability to prevent future insect outbreaks is somewhat dependent upon the level and intensity of timber management. With the large, and apparently increasing number of acres which prohibit or reduce timber management, future epidemics are likely. How is the likelihood of future insect epidemics, and the dramatic changes that accompany them, to be used in making the Final Plan decision?

The DEIS should provide more detail on how the current western spruce budworm epidemic will be addressed by the different alternatives and how the different management strategies will prevent or promote future outbreaks of the budworm, tussock moth and pine beetle. In addition, at least one of the DEIS alternatives should consider accelerated harvest of host tree species to capture mortality resulting from the ongoing budworm infestation. The Department recommends that the Forest continue to utilize integrated pest management and that intensive forest management practices be implemented at levels that will help prevent future losses.

**Road Management** - (DEIS, page III-30) The Department supports the efforts of the Wallowa-Whitman to reduce the costs of road construction and to close unneeded roads either seasonally or permanently to increase effective wildlife habitat. Cooperative road closure programs during elk season have proven to be very successful. Benefits of regulated road closures include:

1. Improved animal hiding cover
2. More opportunities for semi-primitive, high-quality hunting experiences.
3. Reduced conflict between timber and wildlife management.
4. Reduced road maintenance costs by eliminating hunter traffic during wet fall months.

The DEIS should emphasize that it is the use of roads not the roads themselves which affect wildlife habitat. The Wallowa-Whitman is moving in the right direction by regulating the use of roads while still allowing access for periodic timber management activities.

While the Department agrees with this logic, we disagree with the inference made by the Forest that the reasons for these negative-value sales are purely resource and market based. An additional reason may be the use of questionable assumptions and unrealistically high management costs by the Forest. For example, it is not appropriate that certain fixed costs be charged to the timber program. Eighty percent of the Water Resource costs, 90 percent of the Cultural Resource inventory costs, and 20 percent of the Mining Law Compliance and Administrative costs are charged to timber. This action is not justified in the planning documents. Fewer negative value sales may result if more reasonable assumptions and costs are used.

- 60 Wild and Scenic Rivers** (DEIS, page IV-21) - Based on the information provided in the DEIS, the Department of Forestry cannot support inclusion of additional streams located outside Wilderness areas into the Wild and Scenic Rivers System. The text describes primary justification for a wild and scenic designation is to prohibit future hydroelectric development. However, the text states the potential for such development is low. State and federal agencies already have the authority to regulate and restrict hydroelectric projects, so it is not clear why another layer of bureaucracy is needed. We support continuation of the existing management strategies which have successfully preserved the character of these streams. Any hydroelectric developments or water impoundments proposed in the future will be fully evaluated by the Forest Service and other State and federal agencies to assess the costs and benefits involved prior to any development.
- 700 Harvest Cutting Methods** (Appendix, page B-29) - The Department of Forestry supports the flexible, site specific approach to the selection of harvest cutting methods as required by the Regional Guide. The Wallowa-Whitman is encouraged to maintain this flexibility in the Forest plan. When determining the harvest cutting method, economic benefits to the forest and the timber purchaser should be considered as well as logging feasibility, stand characteristics, silvicultural response, and the effect on other resources and their uses. In addition, uneven-aged management should be considered to maintain timber yield in those areas where clearcutting is limited or prohibited to accommodate other resource uses. The Forest should work to improve knowledge of uneven-aged management applications in eastside forests through silvicultural research, refined yield tables, and economic analysis.
- 705 Below Cost Timber Sales** - (Appendix, page B-47) The occurrence of below cost timber sales in most of the Wallowa-Whitman alternatives is discussed in the text along with the need to sacrifice some economic efficiency in order to maintain an acceptable level of economic stability in the local communities and to enhance other resources. As Assistant Secretary Myers has stated, the real measure of the worth of the timber program is not costs versus revenues but costs versus public benefits. The correction to the DEIS also points out that blending in some negative-value sales can actually lead to improved economic performance on a forest-wide basis.

- 25 Recreation Use Forecast** (Appendix, page B-52) - The Forest uses the 1980 OBER'S BEA regional population projections to forecast future recreation demand. This source is outdated and may provide an overly optimistic growth rate. The Wallowa-Whitman should revise its analysis of recreation benefits using the State Economist's current population growth projection.
- 1300 Research** - (LRMP, page 2-39) The forestry Program for Oregon encourages research to improve forest productivity, the economics of intensive management practices, and to identify the habitat needs of old-growth preferring wildlife. Therefore, the Department supports the research program outlined by the Forest. In addition to the research needs identified by the Wallowa-Whitman, we believe more research is needed to:
1. Develop new technology to return some of the 77,349 acres removed from the suitable landbase for regeneration difficulty or resource damage potential to timber management status.
  2. Improve knowledge of elk/cattle competition.
  3. Gain better silvicultural knowledge on understory management and uneven-aged management.
- 1400 Monitoring** - (LRMP, page 5-2) The monitoring program described in the Land and Resource Management Plan could be improved in several areas. First, the vague terms of "on-going" and "continuous" as applied to monitoring frequency should be defined, including an explanation of the difference between the two terms. Also, the monitoring program needs to better address the economic effects of the plan.

The Department recommends that changes in employment, income and payments to counties within the Forest's area of economic influence be monitored on an annual basis. Forest Plan revisions should be considered when variability from predicted levels exceed  $\pm 10$  percent. The economic efficiency of and the costs involved in implementing scheduled practices and activities as well as the values of the goods and services produced by the Forest should also be monitored on an annual basis with a  $\pm 10$  percent variability triggering consideration of plan revisions.

#### SUMMARY OF DEPARTMENT RECOMMENDATIONS

The Department of Forestry's review of the Wallowa-Whitman DEIS and LRMP can be summarized by the following list of unresolved problems and recommendations to correct these problems

1. Problem - Alternative B-departure has not been presented in a form that the Department can support. The alternative fails to constrain changes in timber harvest levels between decades and results in an unacceptable loss of present net value.

Recommendation - Revise Alternative B-departure by including a 10 percent decadal harvest change constraint and a harvest floor of 45.7 MMCF. The ponderosa pine and Douglas-fir components of the first decade timber harvest in Alternative B-departure should be maintained at levels provided by the existing timber management plan. Also, more costly long span cable and helicopter logging acres should not be substituted for tractor logging acres. Doing so may distort the PHV analysis of this alternative. It will be necessary to conduct additional FORPLAN runs to determine the outputs and judge the economic performance of this modified alternative.

2. Problem - A high degree of data uncertainty exists in several areas of the plan. The Forest has used assumptions which are significantly different than those used by adjacent National Forests.

Recommendation - Prior to the consideration of any alternative that will reduce the Forest's contribution to local and State economies, the Wallowa-Whitman should review the assumptions made on the following topics and revise as needed:

1. MMR formulation
2. Big game management
3. Management costs
4. Timber inventory and yield tables
5. Land suitability analysis
6. Recreation benefits

In addition, current management direction should be maintained in these areas where significant data uncertainty persists. Where management strategies, assumptions and costs estimates differ significantly from adjacent National Forests, the Wallowa-Whitman should address these differences and revise the plan as needed to eliminate unjustified inconsistencies.



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Mike Miller

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May 30, 1986

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TO: Mike Miller, State Forester  
State Forestry Department

DATE: May 30, 1986

FROM: Ann Nolan Hanus, State Economist  
Office of Economic Analysis

SUBJECT: Summary of Findings and Recommendations for the Wallowa-Whitman National Forest Plan

My specific recommendations follow

I have reviewed the Draft Environmental Impact Statement (DEIS) for the Wallowa-Whitman National Forest Plan. I have appreciated the assistance of your staff, especially Dave Stere and Dave Morman. The Employment Division, Economic Development Department, and Department of Revenue also provided data and analyses that were critical for compiling this report. I have attached the reports that I received from the Employment Division and the Economic Development Department for your information. Furthermore, I received information on the plan's impact from local government officials, U.S. Forest Service planners, members of the Governor's Council of Economic Advisors, industry representatives, and other individuals concerned with the plan.

The counties most directly affected by the Wallowa-Whitman National Forest are Union, Wallowa, and Baker. These counties' economies have suffered disproportionately during the 1980's because of their reliance on the forest industries. In general, they are less diversified, have below average per capita income, and higher than average unemployment rates when compared to the state as a whole. While the area has tried to increase tourism and diversify its economy, their distance from major population centers has been a disadvantage. Direct employment in the lumber and wood products industry accounts for nearly 16 percent of workers in the area compared to about seven percent statewide. Furthermore, the Irion county area mills depend heavily on the Wallowa-Whitman National Forest and use 85 percent of the logs from the Wallowa-Whitman National Forest.

The Forest Service has attempted to provide a range of alternatives dealing with how the Wallowa-Whitman Forest will be used in future decades. While the Forest Service has selected Alternative C as its preferred alternative, I believe that Alternative B would benefit the economy more. While each of the alternative's timber harvest levels (with the exception of the departure alternatives B-dep and C-dep) are below recent levels of 159 MMBF for the first decade, Alternative C is 16.0 MMBF below the 1979-83 level. In terms of sawtimber, it is 26.0 MMBF or 16.8 percent the 1979-83 level of 155 MMBF. Alternative B's total first decade harvest would only be one MMBF below the 1979-83 level, but sawtimber would be 17 MMBF under the 1979-83 level. In addition, it appears that for all of the alternatives the species mix will be changing with the trend being toward a lower proportion of Ponderosa Pine harvested out of the total proposed harvest schedule.

- 1200 1 Alternative B is favored over the Forest Service's preferred Alternative C because, according to Forest Service estimates, it is projected to be more beneficial in terms of jobs and personal income. While the harvest schedule of Alternative B is about 15 MMBF higher than Alternative C, it also maintains a more even sawtimber harvest schedule in the subsequent decades. A more even or rising schedule is probably less disruptive than Alternative C's which tends to fall down substantially in the second decade (down 11 MMBF) and then rise by 37 MMBF in the third decade. It should be noted again, however, that the more valued Ponderosa Pine appears to be becoming more scarce and will become a smaller proportion of the total harvest in the future. Declines in the harvest of the Ponderosa Pine will be detrimental to those mills that depend on this species and could cost some jobs. Unanswered questions are whether mills that depend on Ponderosa Pine can profitably convert to using other species and to what degree this will affect jobs.
- 701 2 The forest Service should consider its proposed harvest levels for the Wallowa-Whitman National Forest in conjunction with those proposed by other National Forests, the Bureau of Land Management, and private lands. The cumulative effects of harvest plans may have major ramifications for Oregon's lumber and wood industry. Similarly, the market effects of proposed harvest levels should also be analyzed.
- 700 3 The Wallowa-Whitman National Forest plan is based on its 1979 inventory of trees. An updated inventory will probably be done within the next three years. The plan should be flexible enough to revise its harvest schedules depending on the results of the inventory. In addition, every effort should be made to conduct a thorough inventory of the timber available by species and maturity on both public and private lands. It is extremely difficult to determine what Oregon's actual total supply is and whether the state has the capability for expansion of its output. As a result, it is difficult to assess whether proposed harvest changes on the Wallowa-Whitman can be offset by other sources.
- 1200 4 The forest Service should revise its population estimates downward. Their estimate for the 1980's is 1.75 percent per year. Oregon suffered population losses during the early 1980's, and I am projecting Oregon's population to rise by 0.7 percent for the remainder of the decade. Their estimate for the 1990's is also overly optimistic at 1.5 percent per year when, according to Data Resources Inc., the U.S. population is expected to grow by 0.8 percent on an annual basis.
- 5 According to Forest Service estimates, local governments would receive more revenues under both Alternative C and Alternative B in the future compared to recent levels. Higher valued harvests per acre were given as the reason for the increase. One local government

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3. Problem - The economic analysis conducted by the Forest falls to fully address the timber supply situation on adjacent ownerships and does not recognize the effect of the Forest's actions on the State's economy.

Recommendation - The actions of adjacent federal and private timber suppliers and the resulting effect on local and State economies should be considered in this analysis. The Forest should also more completely document its economic influence outside of the local three county area.

4. Problem - The Forest's proposed system for monitoring and evaluating the performance of the plan is incomplete. The economic effects of the plan are not fully considered.

Recommendation - Changes in employment, income and payments to counties within the Forest's area of economic influence should be monitored on an annual basis. Forest plan revisions should be considered when variability from predicted levels exceed  $\pm 10$  percent. The economic efficiency of and the costs involved in implementing scheduled practices and activities as well as the values of goods and services produced by the forest should be monitored on an annual basis with a  $\pm 10$  percent allowable variance triggering consideration of plan revisions.

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TABLE WALLOWA-WHITMAN National Forest  
RELATIONSHIP OF THE PROPOSED ACTION AND ALTERNATIVES  
TO THE BASIC OBJECTIVES OF THE FORESTRY PROGRAM FOR OREGON DM 4/86

Basic Objective	Proposed Action and Alternatives			Discussion
	Level 1 <sup>1/</sup>	Level 2 <sup>2/</sup>	Level 3 <sup>3/</sup>	
To maintain the maximum potential commercial Forest land base consistent with other resource uses while assuring environmental quality.	B-dep,C-dep	A,B,C,D	E,F,G,H	Congressional Acts and Executive Orders (see Purpose and Need section) and State law (Oregon Forest Practices Act) mandate management guidelines for certain lands. Incorporated throughout the planning process, these guidelines have served to define the suitable land for timber production that is compatible with the objective.
To identify and implement economically feasible levels of intensive forest management required to achieve cost effective growth and harvest.	B-dep,C-dep	A,B,C,D, E,H	F,G	A full range of intensive timber management practices (refer to Management Strategies and Management Area Direction, this chapter) is utilized for timber production. New and improved practices would be implemented consistent with technological advances.
To maintain community stability by remaining flexible for increases in future harvest levels that would offset projected shortages.	C-dep	A,B,B-dep, C,D,E	F,G,H	Deviation from even-flow sustained yield management would be implemented consistent with NFMA regulations and Forest Plan direction. This involves the harvest of available surplus old-growth inventory to offset projected shortages.

1/ Meets share of FPFO target level and is compatible with basic objective  
 2/ Is compatible with the basic objective but does not meet target level or meets the target level but is not compatible with the basic objective  
 3/ Does not meet target level and is not compatible with the basic objective  
 NOTE Current direction parameters for jobs and personal income are below recent levels  
 Alternative B-dep meets the FPFO timber harvest targets in decades 1,3 and 4  
 Alternative C-dep meets the FPFO timber harvest targets in decade 1.

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TO Ann Nolan Hanus  
State Economist

DATE May 16, 1986

FROM *for* Thomas F. Kennedy, Director  
Economic Development Department

SUBJECT Review of Wallowa-Whitman Forest Plan -- Economic Development Department Review Process

*Handwritten signature: Thomas F. Kennedy*

Attached is the Economic Development Department's analysis of the Wallowa-Whitman Forest Plan. I appreciate the chance to respond.

First, let me summarize the process we went through to develop the response.

I forwarded the material on the Wallowa-Whitman Forest Plan to various Department divisions, including Business Information Division, Business Development Division, International Trade Division, Tourism Division, and our regional manager in Eastern Oregon.

Laila Cully, Manager of the Business Information Division, met with Scott Horngren of the Western Forest Industries Association, and requested input from them regarding the industry's view of the Preferred Alternative. The industry was going to complete its response on May 15, the same day our review is due to you. I have asked Laila to follow up and have a second meeting with Scott, to obtain from him the industry's position. She will be sending you an addendum to this memo. Don Farnam met with officials from Boise Cascade, the U S Forest Service, and the local area. This information is reflected in our review.

Allan Crisler from our Tourism Division consulted with tourism/recreation officials in Eastern Oregon, and their perceptions also are reflected in this response.

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TO Ann Hanus, State Economist

DATE May 15, 1986

FROM *for* Thomas F. Kennedy, Director  
Economic Development Department

SUBJECT Wallowa-Whitman Forest Plan Review

*Handwritten signature: Thomas F. Kennedy*

OVERVIEW

The Wallowa-Whitman National Forest contributes to the timber supply for the following sawmills and chip utilization plants.

Umatilla County

Harris Pine, Sawmill--Furniture  
Louisiana-Pacific, Sawmill  
Blue Mountain Forest Products, Sawmill

Grant County

Prairie Wood Products, Sawmill  
John Day Lumber Company, Sawmill

Baker County

Ellingson Lumber Company, Sawmill

Wallowa County

Boise Cascade Corp, Sawmill  
Sequoia Forest Industries, Sawmill  
Rogge Lumber Company, Sawmill

Union County

Peacock Lumber Company, Sawmill  
Boise Cascade Corp, Sawmill--Veneer  
Hoff-Ronde Valley Lumber, Sawmill  
Boise Cascade Corp, Sawmill  
Christaad Enterprises, Chipmill, Sawmill  
Boise Cascade Corp., Particleboard Manufacturing  
Powder Valley Lumber Co., Sawmill  
Christaad Enterprises, Chipmill

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Mike Miller

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May 30, 1986

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official noted, however, that these revenues are dependent on the timing of the sales and whether the Forest Service's assumption of a one percent real price increase is accurate. It is questionable whether local governments will really see these increases in revenues since harvests will be lower than prior years and less of the highly valued species, Ponderosa Pine, will be cut.

**25 6** Alternative B would provide higher than recent levels (and the same levels as the Forest Service's preferred Alternative C) for developed recreational use and nonwilderness dispersed recreational use. From a tourism standpoint, better road access to recreational areas would encourage the expansion of tourism facilities and opportunities.

**60 7** The Forest Service should analyze the economic impact and consider placing the Grande Ronde in the Wild and Scenic Rivers System. This river is popular for nonmotorized boating, particularly rafting and canoeing and would, therefore, benefit the area's tourism industry.

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**Attachments**

cc Jon Yunker  
Thomas Kennedy  
Pat Amedeo  
Richard Munn

Additionally, cull log material is shipped to the Port of Umatilla for processing into chip material. Some logs are also sent to Guy Bennett Lumber Company in Clarkston, Washington for lumber manufacturing.

The U.S. Forest Service's amended 1962 timber management plan, which has guided timber management in the Forest, listed 1.4 million acres as "suitable" for timber management. But that number has decreased over the years. The 1962 study found that some areas identified as timber lands were not suitable for timber production. Insect epidemics have also contributed to the shrinking base. The timber base is identified in the current proposed plan as 1.1 million acres. Not included in the base is 231,623 capable timber acres that have been withdrawn as wilderness areas.

As for tourism, the national forest also has long been recognized as important to the tourism/recreational features in the northeast Oregon region. The Oregon Legislature allocated funding for this area to produce a tourism marketing plan and to help implement provisions of the plan.

QUESTIONS/ANSWERS

1. Is the Preferred Alternative (Alternative C) consistent with the state's economic development strategy?

**701** Alternative C proposes to reduce the harvestable timber by at least 16 million board feet (mbf) per year. In addition to the reduction, a change in the mix of harvestable timber is proposed that reduces the higher-quality species (such as Douglas fir, ponderosa pine, spruce and larch) in favor of lodgepole pine. The reason for this is to increase the harvest of dead lodgepole during the current decade without departing from a nondeclining flow schedule.

One of the state's overall economic development goals is to assist Oregon's existing businesses to expand, and to attract new businesses. To achieve this goal, a new alternative needs to be analyzed that provides, at least, the current volume of timber to the mills in the Wallowa-Whitman area.

The Federal Government's Resource Planning Act (RPA) targeted timber production from the Wallowa-Whitman National Forest at 220 mbf per year for 1986-1999. Since this plan overestimated the number of productive acres, did not account for the withdrawal of lands for wilderness and experimental stations, and did not fund the requested level of intensive management, we realize that this is an unrealistic level of harvest.

However, a proposal such as Alternative C, that reduces the harvest of mixed species below current levels -- which are already well below the targeted RPA harvest level -- should not be considered.

We suggest that the Forest Service should consider:

- 704** a Requesting a temporary departure from nondeclining flows to harvest the dead and dying lodgepole pine while not reducing the harvest of other species.
- 1200** b Reexamine the demand for recreational use with respect to the Office of Business Economics Research Service (OBERS) population projection. The Forest Service is estimating the demand for recreational use from a projected population growth rate of 1.9% per annum.

In summary, Alternative C will result in a loss in lumber and wood products employment. The Forest Service estimate is 275 direct and indirect jobs as a result of the proposed reduction in the timber harvest. The job impact is discussed further below.

When the harvest is reduced, county receipts from the sale of federal timber will also decline.

**1000** From a tourism standpoint, some officials in Eastern Oregon also are concerned that Alternative C lacks proper planning for road access to recreation areas.

**2** What are the significant economic development effects of the Preferred Alternative on various sectors of the economy?

Under the provisions of the Preferred Alternative, the mixed species will be reduced by 26 mbf and the lodgepole pine will be increased by 10 mbf, for a total difference of 16 mbf. The following table shows the "current" and proposed volume.

Allowable Sale Quantity and Quality are Reduced

SAWTIMBER MMBF/YR	"CURRENT"	PROPOSED	DIFFERENCE
Mixed Species	155	129	-26
Lodgepole	4	14	+10
Total	159	143	-16

a Employment Impact

**1200** According to Bob Messinger of Boise Cascade Corporation, the Forest Service's proposal to offer more low-value lodgepole pine and less high-value ponderosa pine will reduce employment at the Boise Cascade mills. Mr. Messinger, a timber land manager for

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Boise Cascade, states that 354 timber-related jobs in three northeast Oregon counties are threatened by the Forest Service's proposed plan. Both the La Grande and Joseph Boise Cascade sawmills use ponderosa pine "exclusively." The Joseph mill is down to two shifts at present, any further reduction in work will result in closure of this facility.

To assure short-term economic stability, the Forest Service needs to maintain current levels of available ponderosa pine. Alternative C calls for reducing the amount of available sawtimber including ponderosa pine, by about 16 mmbf a year.

The Forest Service's model of the local economy estimates that 10.6 local jobs are lost with every 1 mmbf reduction in available sawtimber. The 16 mmbf reduction would represent 170 local jobs. The Forest Service estimates another 45 jobs will be lost due to the changes in the mix of the allowable cut, as shown in the table above. Indications from the industry suggest that this estimate is low. However, an alternative estimate has not been given. In an area as sparsely populated as the Wallowa-Whitman area, this is a substantial reduction in employment.

The proposed plan shows an estimated job loss of only 55. This is because the loss of 215 jobs due to timber reductions is projected to be offset by an additional 150 jobs from increased recreational use and 10 jobs from increased levels of livestock grazing.

Whether these new jobs will materialize is unclear. As mentioned below on page 5, the population projection of 2.0% per year, used in the Forest Service model, is too high. The population projection determines the demand for recreation in the model. If the population projection is too high, as Economic Development Department contends, many of these 150 jobs will not be created.

b. Export Impact

Reductions in the amount of old-growth timber available for harvest will have an impact on Oregon's exports. Wood products manufactured from old-growth timber are a primary export to Japan.

c. Local Government Impact

Payments to counties are shown to increase under the Preferred Alternative as compared with recent receipts. While the Forest Service is recommending lowering of volume cut, it assumes increased prices in timber sufficient to increase the revenues to counties from timber sales. This is based on guesswork concerning future prices. The counties should expect declines in the timber sales payments they receive from the Federal Government commensurate with reductions in the timber harvest.

The Forest Service should develop a new alternative that would at least maintain the current amount of harvestable timber. The Economic Development Department believes that the Wallowa-Whitman National Forest could support higher levels of timber harvest while preserving an adequate land base for alternative uses.

25 From a tourism standpoint, the economic impact of Alternative C could be very dramatic and have a detrimental effect on the area's economy. It does not take into consideration a study prepared for the Tourism Division by an outside consultant. That study details the lack of destination facilities in northeast Oregon. Alternative C compounds this situation by further restricting this needed type of development for expansion of recreation/tourism.

It also does not allow for expansion of the Wallowa Lake Basin Project, which involves future development of recreational facilities, housing, attractions and destination properties.

3 Do you agree with the economic assumptions as they relate to economic development?

The alternatives have been generated from various runs of the federal input-output model known as IIPLAN. That model, at the time those runs were made, contained 1977 data, which assumes sawmill productivity is held constant at its 1977 level through the life of the plan. Since 1977, there have been dramatic increases in the productivity of labor in the forest products industry. This will reduce the number of jobs per mmbf of harvested timber.

The Oregon population projection used is higher than actual trends. Consequently, the demand for recreation which is derived from the population projection is also high. The Forest Service source is the 1980 Office of Business Economics Research Service projection. A more reasonable projected population growth rate would be 0.8 percent per annum, which is what you have recommended in the past. The OBERs projection is 2.0 percent per year.

In addition, the assumptions categorize wilderness and multiple-use areas as both having recreation/tourism value. However, the Preferred Alternative includes expansion of wilderness at the cost of multiple-use acreage. The manager of the Wallowa County Chamber of Commerce who also sits on the State Tourism Council says that National Forest Service data (page 111 - 158) of the Draft Environmental Statement reflects 1,766,515 acres of non-wilderness land. Current recreation use in this category is 1,389,000

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visitors. Wilderness land, comprising 582,000 acres, is being used for recreation by 122,000 visitors. On the basis of these comparisons, multiple-use acreage has a much stronger visitor-to-acre ratio.

4. Do local economic development authorities agree with the direction of the plan?

Most Local economic development authorities do not agree with Alternative C and suggest there are oversights in the other alternatives. These persons have been contacted to gain background in preparing this report and their comments are incorporated in this response.

5. What sort of economic development opportunities would the plan generate or inhibit? What actions can the state take to augment or counter the anticipated effects of the plan?

**1200** The plan as it now stands would reduce economic development opportunities. Limiting allowable harvest of ponderosa pine and the cutback of old growth would be detrimental to the timber industry in the following sectors: wood products/millwork, secondary industries, and exports.

Research also suggests that the Wallowa-Whitman Draft Environmental Impact Statement and the alternatives contained do not all allow for sufficient recreation/tourism expansion. Specific instances have been previously cited.

In summary, we advocate development of another alternative for consideration in the Wallowa-Whitman National Forest Draft Impact Statement that would provide adequate timber supplies (both quantity and quality) at least to maintain employment at current levels, and to promote recreation/tourism.

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STATE OF OREGON  
EMPLOYMENT DIVISION  
DEPARTMENT OF HUMAN RESOURCES

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State of Oregon  
EMPLOYMENT DIVISION  
Department of Human Resources

Appendix N

**TO:** Ann Hanus, State Economist  
**Address:** Office of Economic Analysis  
**FROM:** D. R. Steward, Ass't Administrator  
**Address:** for Research and Statistics  
**Subject:** Willowa-Whitman National Forest Plan

**Date:** May 30, 1986  
**No.** RES WH H&S 2

**TO:** Mike Staten, LMI supervisor  
**Address:** Salem CO  
**FROM:** William Street, LME  
**Address:** La Grande, LO  
**RE:** Willowa-Whitman National Forest Plan  
**Date:** May 15, 1986

**Overview**

Attached is a revised copy (no major changes) of Bill Street's analysis of the Willowa-Whitman National Forest Plan, including several tables which were not available at the time you received the first draft.

First, I want to commend Bill for his research and thorough report.

Secondly, I want to concur with his overall analysis that the preferred alternative (Option C) is an acceptable approach and represents a good compromise between conflicting demands.

**704** I also want to emphasize that we do not favor either of the departure alternatives under Option C or B that would accelerate harvests in the first decade. Rather, we strongly recommend that whatever plan is adopted be flexible enough to allow for adjusting the timber (especially Ponderosa Pine) sale volume depending on the results of the next complete timber inventory by species (1990?).

And lastly, we recommend greater coordination between the Willowa-Whitman, Umatilla, and Malheur National Forests. If this approach was followed, it may be possible to offset, to some extent, the reduced availability of Ponderosa Pine (PP) on the Willowa-Whitman National Forest with increased PP sale volumes on the other two national forests.

Another piece of information which would be very helpful, but is currently missing, is the availability of PP from private lands during the planning period.

Although it would be desirable to have more complete and even accurate data, we do appreciate the opportunity to participate in the forest planning process.

DRS jm

**Attachments**

cc Staten  
Street

The planning process is designed to create stability, and to insure that choices made today do not cause irreparable damage tomorrow. In terms of forest practices in Oregon such activity is not only long overdue, but welcome. Each area of the state has gone through the economic hardships generated by short-sighted natural resource management activity. Most of these hardships were justified in the name of economics. That is, the trees had to be cut yesterday in order to insure profits and protect communities. What is now known is that the tree can only provide a job once per generation. Trees harvested yesterday can not provide employment for workers today. Likewise, trees harvested today cannot provide employment or community stability for our children.

**1300** The Willowa-Whitman (WH) National Forest Plan is in some ways conservative in its estimates as to the amount of material which can be harvested. This error builds in a margin for safety. By being cautious, the plan is attempting to preserve options for future generations of Oregonians which the present generation were not offered. Because for the most part, over-harvesting occurred, when it was profitable to do so, this generation will suffer employment hardships greater than previous. Hopefully, the WH plan will prevent future generations from having to address these difficult problems.

Anyone of three alternatives seem to provide a balance between present needs and future uses. Alternatives B, C (the preferred alternative), and D, appear to provide for a balanced approach between conflicting present uses and potential future uses. Alternative B is more lumber oriented than D, and D is more commodity oriented than C. As will be discussed later, all three will decrease the amount of ponderosa pine available for harvest.

If particular management strategies wish to be explored, it seems desired, in the short-term, to trade off some winter range elk habitat for additional harvest of ponderosa pine. But this is recommended assuming that future industrial uses and costs will be identical to current industrial uses, an assumption unsupported by historical analysis.

The goal of the WW plan is to balance the public good. It is clear they have attempted to achieve this goal. It seems extremely arrogant, to say the least, to hold managers of the public good to the same standard as managers of private resources. If the same for-profit management standard had been applied in the past to the public sector resource there would be no debate today about options since there would be no public timber resource to fight over. The plan and the preferred alternative do balance the conflicting political groups. It is a true compromise since neither industry officials or environmental groups are satisfied. Yet, either B or D alternatives would also offer future choices, although not to the same degree as C.

1200 The key to the plan seems to be in understanding that the forest products industry is changing and that it is impossible to determine today exactly what its needs will be tomorrow. Thus, maintaining options for the future seems a wise approach. What does appear clear is that overall, employment per board foot processed is declining. Technology has improved productivity and will continue to do so, thus, some dislocation within this industry is inevitable. Likewise, there is no certainty that the major economic players today will be the major players tomorrow, so designing a plan to meet the specific needs of specific corporations would be very short-sighted. Finally, if short-term economic concerns are to prevail over longer-term resource management considerations it seems desirable to make changes within the management strategies especially within the preferred alternative, rather than to attempt to change alternatives or timber harvesting schedules.

#### 1. Dependency

As can be seen from Table 1, approximately 15.7% of total employment in District 13 is in the Lumber and Wood products sector. This does not include any secondary or indirect employment impacts. The Lumber and Wood Products sector has the largest source of private sector payroll in the three county area. This sector also provides more higher paying jobs than any other sector. In addition, since it is a basic industry, as demonstrated by the Export Employment column in Table 1, its payroll brings money into the area which would not be present otherwise. If any of the major mills in the three counties were to close the area would experience a decline similar to Harney County when Hines Lumber Company ceased operations. The closure of this mill in Harney County resulted in a 12.6% population decline in less than three years. It is easy to visualize the importance of lumber to the three county area.

The second most important industry in terms of jobs and payroll is Government. This sector employs approximately 3510, of which about 1287 represent payroll supported by non-local tax dollars. The presence of Eastern Oregon State College and the National Forest Service, provide an economic stability absent from most lumber-dependent local economies.

Agriculture plays an important role in the area's economy. In 1984, area farmers spent in excess of \$108.6 million on production expenses. While some of this was spent out of the area, a major portion was spent locally. Farm income represents about 3.2% of total income, although farm employment is not large in the area outside of owner operators.

Finally, the travel industry is regarded by many to be an important source of income and employment. With winter ski facilities, summer wilderness camping, and fall hunting, the area has year round activities. Unfortunately, it is extremely difficult to realistically gage the contribution of this sector to the local economy. The distance from major population centers, has historically hindered the efficient exploitation of the areas recreational resources, although there is evidence that this may be changing. A conservative estimate derived from the export employment column in Table 1 suggests that approximately 500 jobs in Retail Trade, Lodging, and Miscellaneous Services may be the outgrowth of the travel industry.

#### 2. Comparison

District 13 tends to lag the State of Oregon in every comparison. The area is less diversified, has below-average per capita income, and higher average unemployment rates. Statewide Lumber and Wood products comprises 6.6% of wage and salary employment, compared to the mid-teens percentage listed earlier for District 13. Baker County, in 1984, had per capita income of \$9,333 (80% of state average), Union had \$10,108 (87% of state average), while Wallowa had \$10,305 (89% of state average). The District's unemployment is usually about 4% above the state average. The high unemployment rates result in lower labor force participation rates and lately have contributed to continuing population decline.

#### 3. Harvesting

The desired species within the Wallowa-Whitman National Forest for all but two users is ponderosa pine. The two users not using Ponderosa pine rely on Lodgepole and cull, to chip for a local particleboard plant. Regardless of the Forest Service alternative decided upon, it seems clear that the amount of Ponderosa pine (PP) available will be decreased. The Maximum Timber with MMR's will yield about 193 MMBF of sawtimber from the forest, an amount well above the ten year actual sales average of 153 MMBF. Yet, even within the Maximum Timber with MMR's computer run, the amount of Ponderosa pine available would be approximately 29 MMBF, well below the ten year actual sales average of around 70 MMBF. Given this decline in Ponderosa pine, it is important to realize that for most options there is no trade-off of species. More Lodgepole is available in most alternatives since it is less affected by MMR's than is ponderosa. One example may serve to clarify the trade-offs. Ponderosa pine harvest availability is adversely affected by protection of elk habitat, whereas, lodgepole availability is not since it is located in different areas. A substantial portion of ponderosa pine is situated on ground used to protect elk winter range. While there is some evidence that the forest has been harvesting Ponderosa pine at a rate above the nondeclining flow level, it is difficult to clarify this because of such intervening variables as the Mountain Pine Beetle outbreak, and the tendency for lodgepole to succeed ponderosa pine in earlier reforestation activity.

The consequences of the decline of PP cannot be overstated. Its value is double and in some instances triple the value of its nearest species competitor. The loss of PP will seriously alter the profit picture for local mills, especially since some of the larger forest products firms have overcut the PP from their own holdings during the 1976-1980 boom. Remembering that

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the decline is similar through most proposed alternatives, it is not particularly helpful in deciding upon an alternative. On the other hand, if any management strategy could have the PP trade-offs identified and altered, such as decreasing elk habitat especially for winter range, then the PP problem would be mitigated to a certain degree

As far as deciding on an alternative based on the varying amounts of sawtimber available, it seems ill-advised. First, because of the overwhelming importance of PP to the local mills profit picture, focusing solely on sawtimber offers little input. For example, the amount of PP available for harvest in Option C is essentially identical to the amount in Option D, yet D offers 6 MMBF more sawtimber than C. Even the difference between C and B is small given the 15 MMBF additional sawtimber offered in the first decade in option B.

The second problem with keying on sawtimber as the major focus is that it is difficult if not impossible to ascertain a clear correlation between MMBF of sawtimber and area employment in the lumber and wood products industry. As table two shows, area mills have a maximum capacity of around 301 MMBF per year. Yet, the industry has not operated at this capacity for several years. If PP is not available in historic amounts, which seems inevitable, then it seems likely that capacity will shrink as less efficient producers are eliminated from the market. In 1982, near the bottom of the recession, area mills used 192 MMBF. Since then, with the closing of a sawmill shift in July 1984, the area has lost 30 MMBF capacity. This places the area's need somewhere between 162 MMBF (which would probably result in additional mill closures) and 301 MMBF (which would probably lead to new mill openings). The high sawtimber option (option B) would provide 158 MMBF per year while the preferred alternative (Option C) would provide 143 MMBF. Add private sources, which averaged 105 MMBF between 1978 and 1984, and sawtimber availability given the preferred alternative becomes 248 MMBF which is well below industrial capacity but probably close to market demand in 1983 and 1984. The obvious problem occurs when market demand approaches pre-1980 levels. As a side note, it is also important to realize that industry profits in the Northwest seem tied to capacity use. Southern mills seem able to protect profit levels with lower capacity use rates, while Northwest mills, especially in Oregon, suffer sizeable declines in profits per worker hour when operating at low capacity levels.

The overall picture offers an interesting challenge. Mill profits decline when demand falls, and even when demand falls, mill profits are tied to the availability of PP. The key question is, can local mills maintain sufficient profits when demand rises (as it now is), with lower value species such as white fir and Douglas fir? The only real potential bright spot is in the speculation that the Umatilla National Forest and the Malheur National Forest may increase harvest levels in their plans. During the boom in 1976, the Umatilla provided local mills with 30 MMBF of sawtimber. If the area could re-gain this level of timber from the Umatilla, as market demand increases, then the area shortfall would be reduced to 23 MMBF per year. While some of this shortfall could be made up from the Malheur National Forest, it could only occur under high finished product price/demand conditions since transportation costs to local mills are extremely high.

4. Planning

The key here is not so much planning as marketing and economic development. Given the current type of tourism the area experiences, little infrastructure is needed. Unfortunately, since the tourism is low intensity (e.g. camping, skiing, hunting) the area is not able to capture the dollars to the same degree as other areas, especially in Central Oregon. The need is for larger lodging units and more developed recreational activity. Yet, without the investment capital these structures will not be developed, and with the lack of transportation, primarily air service, few have been willing to invest the money in tourism. Thus, tourist increases may occur but they will not tax the local system until the area attracts additional investments.

b Population

25 Population is essentially irrelevant to the plan's recreational use estimates since the area attracts campers and skiers from three states. The key to understanding area tourism is in examining repeat visits rather than focusing on the state's population base. Likewise, the number of repeat visits is a function of the quality of the experience. Knowing that a mountain can be climbed by a nontechnical walk-up, or being able to view a bald eagle, will have more to do with whether the recreation estimates are reasonable than any change in population.

7 Impact area

In terms of lumber production, most of the lumber from the MW National Forest is consumed and processed locally. Thus, there seems to be no reason to expand the impact area. It would be nice, however, if the three forests, the MW, the Umatilla, and the Malheur could coordinate the planning process.

8. Other issues

Perhaps the major issue in the MW, in addition to availability of PP is the timing of harvest schedules. Two of the options have departure alternatives which simply front-end-load harvesting. In B departure, sawtimber is harvested at accelerated rates through the first three decades to decline by 82 MMBF in the fourth decade. In C departure, the drop off occurs in the second decade and equals 37 MMBF. Both departures are based on the assumption that the industry needs time to adapt to the smaller diameter log and will take the opportunity provided by the departure harvest schedules to prepare for a shortfall. Both assumptions are very weak. The industry has known since at least 1960, that large diameter logs were being cut at a rate above natural regeneration. Their failure to respond is not likely to be altered by another decade or so. In fact, another decade of continued accelerated harvesting will simply prolong existing activity and not act as an economic stimulus for change. In both instances, the decline in the out-decades exceeds the decline between annual current sales and the estimated sales for the preferred alternative or alternative B or D. The trade-off for the communities with the departure alternatives is simply stated as, a few current jobs lost or many more future jobs lost. The community option is to have the parent unemployed today or two of his/her children unemployed tomorrow.

231

The second problem with the altered harvest schedules is that they are predicated on private lands being able to compensate for decreases in public yields in the out-generations. This is extremely troublesome since no guarantees exist to insure that this will in fact occur. On the other hand, most economic maximizing behavior would insure that the private shortfall problem would not be solved by increased public offerings now.

Finally, it is not at all clear what the accelerated harvest schedules will do in regards to the availability of PP in either the short run or the long run. While deciding among the various alternatives is fairly subjective, the two departure options seem to insure considerable economic dislocation during the next generations.





Region 2  
1540 Warner Avenue  
Twinton, Idaho 83501  
Telephone (208) 743 6502

Mr. Jerry Allen, Forest Supervisor  
Malheur-Nahcotta National Forest  
P. O. Box 907  
Baker, OR 97814

Dear Jerry

We have reviewed the Proposed Land and Resource Management Plan for the Idaho portion of the Malheur-Nahcotta National Forest. We generally concur with the management direction specific to individual Management Areas. However, we offer the following comments:

Within management strategy 4 (wilderness) under planning assumptions for wildlife, you state that fish populations are likely to decrease in those areas where fish stocking is discontinued. It is our understanding based upon the U.S.F.S. Washington Office guidelines that fish stocking that occurred prior to the Act will still be allowed with appropriate fish management plans.

All the lakes within the Seven-Ulvis that are capable of supporting the fish populations have been aerially planted for years prior to the Act. It is our intent to continue stocking mountain lakes within this management area in accordance with the previous statements and our own Fisheries Management Plan (1986-1990).

We appreciate the opportunity to comment on the proposed plan.

Sincerely,  
*Jerry Thiessen*  
Jerry Thiessen  
Regional Supervisor

JT/GRI/ct

c Bureau of Program Coordination

EQUAL OPPORTUNITY EMPLOYER





July 2, 1986

Jerry Allen  
Wallowa Whitman National Forest  
P O Box 907  
Baker, Oregon 97814

Dear Jerry

We have considered closely the recent draft Forest Plan and the recommended alternative. We ask you to reconsider that alternative for one that allows greater resource utilization. Specifically the reduction of allowable saw timber harvested, the number of acres dedicated to wildlife habitat and the number of acres reduced from multiple use cause us great concern.

You see, we at this end are the recipients of total action. Reductions in our local economy are compounded by loss of multiple use by the Hells Canyon National Recreation Act of 1975, the 1984 Oregon Wilderness Bill, the roadless designation decisions made by U S National Forest, and the BLM has currently another on the street for consideration which adds to our dilemma.

**100** It has been shown, although our congressional leaders would not consider it, that Baker County is currently losing three million dollars annually as a result of the Wilderness Bill. When we first assumed office, we had a population of 16,250. It is now 15,600. This indicates a loss of 650, but what about the natural increase of the population? We've lost it too.

Those of us responsible for peoples welfare have just got to stand up and say enough is enough. We must return to a full multiple use concept, previous allowable cuts and a management scheme to insure continuance. It can be done. We both know it can.

Please reconsider your draft alternative for one that better promotes our failing economy and dwindling population. Without your help, only a grim

Jerry Allen  
Wallowa Whitman National Forest

Page -2-

future will be available for many of our youth if they choose to remain in Baker County.

Sincerely,  
*Larry L. Smith*

Larry L. Smith, County Judge

*Rod McCullough*  
Rod McCullough, County Commissioner

for

BAKER COUNTY COURT

LIS/dg  
cc: Committee for a Stable Community  
P O Box 610  
LaGrande, Oregon 97850

file

WALLOWA COUNTY COURT

Office of the Judge  
Phone 503 426 3586  
P O Box E

Enterprise Oregon 97828

State of Oregon

June 19, 1986

Mr Jerry Allen, Supervisor  
Wallowa-Whitman National Forest  
PO Box 907  
Baker, Oregon 97814

Dear Mr Allen:

The Wallowa County Court supports the Community Stability  
Alternative as presented by the Committee for a Stable  
Community for the following reasons

The Community Stability Alternative provides enough timber  
for our mills in the area of the Wallowa-Whitman to operate,  
which provides the necessary jobs for our very existence

701 Also we need a continued, stable amount of money produced from  
the forests to help maintain our county roads and schools  
Although the Forest Service's Alternative C makes predictions  
of a continued level of support as in the preceding ten years,  
we cannot agree that a substantial reduction of the high cost  
pine harvest can be replaced with lodge pole and white fir,  
which is much cheaper timber, and substituting larch and red  
fir for the remainder of the reduced pine cut We feel that  
the Wallowa-Whitman produces enough new growth timber each  
year to produce 156 million board feet per year ad infinitum

We hope that you will consider the economic hardship that  
Eastern Oregon will face under your plan until some kind of a  
predictable alternative is produced for our economic stability

Sincerely yours,

WALLOWA COUNTY COURT

*Salmon J. Childers*  
Judge  
*Mike Orwick*  
Commissioner  
*Ken B. Mervin*  
Commissioner

LCC sp

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Appendix N



# UNION COUNTY ROAD DEPARTMENT

RT 1 Box 1570 LA GRANDE OREGON 97850

July 15, 1986

Mr. Jerry Allen, Forest Supervisor  
WALLOWA-MILLMAN NATIONAL FOREST  
P O Box 907  
Laker, Oregon 97814

Dear Mr. Allen

I am writing this letter as a representative of Union County. I am the newly appointed Director of Public Works for Union County. As such, I am in the precarious position of being heavily dependent upon receipts from Federal Forests for the major portion of the county budget. This region's economic health and the county's ability to function hinge on harvesting more green saw timber than the suggested 143 million board feet (MMBF) per year of the forest Service's preferred alternative (Alternative C).

I attended the Farmer-Merchant Banquet in Union at which you were the guest speaker. I asked several pointed questions at that time. I also requested the Draft Environmental Impact Statement which you promptly sent. After studying this document, listening to the community comments, and having my own concerns for what is right for the county and the community, I am strongly in favor of the "Community Stability Alternative". This alternative will: 1. Keep jobs and maintain a stable economy and a stable community, 2. Provide for a greater variety of recreation and improved facilities, 3. Keep firewood cutting at present levels, 4. Maintain populations of elk and other wildlife, 5. Provide for a well-managed and healthy forest -- into eternity, 6. Keep taxes down by maintaining timber payments to the county for schools and roads.

Please consider the community input you have received prior to making the final decision on the new ten year management plan. If I can be of any further service, please do not hesitate to get in touch with me. Thanks for the opportunity to respond.

*Roger James*  
ROGER JAMES, Public Works Director

2154  
tc

# WALLOWA COUNTY ROAD DEPARTMENT

P O Box 219  
ENTERPRISE, OREGON 97828  
July 15, 1986

Phone  
426-3332

W - 74  
MERLIN SKIP LOVELL  
ROADMASTER

Jerry Allen  
Forest Supervisor  
Wallowa-Millman National Forest  
PO Box 907  
Laker, Oregon 97814

Dear Sir

As Roadmaster for Wallowa County, I have a direct interest in the future management of our timber:

1. I feel the ten-year management plan that has been in effect less than two years to be given a chance.
2. I want the Forest Service to live up to their statements made at the dedication of the HRA and the Hell's Canyon NRA.
- 100 3. I want the Forest Service to better manage what wilderness that they already have before taking any more land out of production.
4. I want more multiple use rather than uses aimed at special interest groups.
5. I want the Fish and Wildlife to prove that their method of habitat is best.
6. I want timber harvest to remain at present cutting levels.
- 700 7. I want better utilization of our renewable resources - blowdowns, insect kill, etc.
8. I want you to adopt the Community Stability Alternative Plan.

Sincerely,  
*Merlin Lovell*  
Merlin Lovell  
Roadmaster

cc Mr. Hatfield  
Bob Packwood  
Denny Smith  
Gob Smith  
Les AuCoin  
James Weaver  
Ron Wyden



- UNION COUNTY -  
County Court

1328  
7c  
EMERGENCY SERVICE  
WALLOA COUNTY  
BANKS 97814  
Phone (503) 963 1001

RESOLUTION

1100 L Avenue

La Grande Oregon 97850

Phone (503) 963 1001

July 15, 1986

Jerry Allen, Forest Supervisor  
Wallowa Whitman National Forest  
P.O. box 907  
Baker, Oregon 97814

Dear Jerry:

Enclosed you will find a resolution adopted by the listed counties of AOC District 1 in opposition to the current proposed Forest Service Management Plan.

As you can see, Grant County is not listed, primarily due to a logistics problem in getting everyone together during this busy summer season. I can't speak for Grant County, but my initial feeling from contacts with them is that they too would be supportive of this resolution. If in fact they go on record with a position on this subject, I will send it along as an addendum for your consideration.

I look forward to seeing you again soon and I am confident an equitable solution will be reached on this very important matter.

Regards,

Mike Caldwell, Commissioner  
Chairman, AOC District 1

MC:sb

Enclosure

cc: AOC District 1 Counties

WHEREAS, the Counties of Baker, Malheur, Umatilla, Union and Wallowa which constitute a majority of the membership in the Association of Oregon Counties District 1 recognize that Forest Service proposed plans for managing the Wallowa/Whitman National Forest for the next 10 years do not meet the needs of citizens in terms of jobs, taxes, wildlife, management or firewood; and

1300 WHEREAS, the above Counties of AOC District 1 feel that the interest of all citizens of Northeast Oregon will be better served by the adoption of the Community Stability Alternative for managing the forest.

NOW THEREFORE it is HEREBY RESOLVED that the Counties of Baker, Malheur, Umatilla, Union, and Wallowa call upon the U.S. Forest Service to reject their forest management proposals and adopt the Community Stability Alternative Management Plan

DATED this 15<sup>th</sup> day of July, 1986.

  
Commissioner Mike Caldwell  
AOC District 1 Chairman

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Appendix N

BL IT REMEMBERED, that <sup>1975 Rldo</sup> regular term of the County Court of <sup>CL</sup> State of Oregon, for the County of Union sitting for the transaction of County business, begun and held at the Court House in the City of La Grande, in said County and State, on Wednesday, the 30th day of June, A.D. 1986, the same being the first Wednesday of said month and the time fixed by law for holding a regular term of said Court, when were present

The Honorable EAPLE C. MISENER County Judge  
 MIKE CALDWELL Commissioner  
 MARIE C. LESTER Commissioner  
 R. NELLIE BOGUE Clerk  
 DEL RICHMOND Sheriff  
 BARBARA DEAN Tax Treasurer  
 PATTY GOODERMAN Assessor

WHEN, on Wednesday, the 30th day of June, A.D. 1986 or the Second Judicial day of said term, among others, the following proceedings were had, to-wit

IN THE MATTER OF A )  
 RESOLUTION SUPPORTING ) RESOLUTION  
 THE COMMUNITY STABILITY ) 1986-6  
 ALTERNATIVE IN FOREST )  
 MANAGEMENT )

1300 WHEREAS, the Union County Court in its meeting on July 2, 1985 at La Grande, Oregon, recognized that Forest Service proposed plans for managing the Willows/Whitman National Forest for the next 10 years do not meet the needs of citizens in terms of jobs, taxes, wildlife, management or firewood. The Forest Service proposals also do not meet the potential of the forest and do not constitute responsible forest management, and

WHEREAS, the Union County Court feels that the interests of all citizens of Northeast Oregon will be better served by the adoption of the Community Stability Alternative for managing the forest. This alternative would help us maintain our much-needed wood products jobs, add to the stability of the economy, help keep taxes from rising, improve deer and elk herds, and permit the public to cut more firewood, and

WHEREAS, the Forest Service proposed plans project allowable cuts to Union, Baker and Willows counties would decline from the current 172 MMBF (44% ponderosa pine) to a proposed 143 MMBF (20% ponderosa pine), and

1200 WHEREAS, the forest service has projected revenues for counties at \$3.9 million, and

WHEREAS, current prices per thousand board feet are Ponderosa Pine \$147.03, Other Saw Timber \$15.02; Average Saw Timber \$41.42; and Cull and Poles \$2.11, and

WHEREAS, the Community Stability Alternative Committee projects the average stumpage price would have to increase 2.6 times above the current level to \$110.00 per thousand board feet for all species in order to meet the forest service projection, and

WHEREAS, the Community Stability Alternative Committee projects the above allowable cuts would cause the revenues to Union, Willows, and Baker counties to decline from \$2,642,493 in 1985 to \$1,518,817, and

IN THE MATTER OF A )  
 RESOLUTION SUPPORTING ) RESOLUTION  
 THE COMMUNITY STABILITY ) 1986-6  
 ALTERNATIVE IN FOREST MANAGEMENT ) Page 2

WHEREAS, specifically, we do not believe the forest should be managed for the needs of a vocal few who would lock up much land, let timber go to waste and disregard the potential resources of the forest for a variety of types of recreation, and wildlife development.

IT IS HEREBY RESOLVED that the Union County Court therefore calls on the U.S. Forest Service to reject their forest management proposals and adopt the Community Stability Alternative management plan. We will also notify our Representatives and Senators in the U.S. Congress to lend their weight and support to the adoption of the Community Stability Alternative.

DATED this 2nd day of July, 1986.

*Earle C. Misener*  
 EARLE C. MISENER, COUNTY JUDGE  
*Mike Caldwell*  
 MIKE CALDWELL, COMMISSIONER  
*Marie C. Lester*  
 MARIE C. LESTER, COMMISSIONER

RECEIVED  
 JUL 09 1986  
 DAVID C. MISENER  
 COUNTY JUDGE



- UNION COUNTY -  
County Court

1966  
MARC C. LESTER, Commissioner  
Phone (503) 963 1001

1100 L Avenue

La Grande Oregon 97850

1966 CL  
Jerry Allen  
July 14, 1986  
Page 2

plan that does include good timber management and the allowable cut that would not deplete old growth timber, nor timber in general, a plan that does not detrimentally affect the stability of wildlife nor deter the privacy of a secluded camping experience.

Please read and carefully consider the Community Stability Alternative. It has been put together with every precaution that all figures are absolutely correct.

Sincerely,

*Marie C. Lester*  
Marie C. Lester  
Commissioner

MCL:sab

cc Representative Bob Smith  
Jim Brown, State Forester

July 14, 1986

Jerry Allen  
Forest Supervisor  
Wallowa/Whitman National Forest  
P.O. Box 907  
Baker, Oregon 97814

Dear Jerry:

**1200** Economic Stability is the determination that has to be recognized when considering the timber resource of the Wallowa-Whitman. Economic Stability has to be considered because it affects the lives of the human beings and their ability to survive in the vicinity in which they live.

I believe the Forest Service Management Plan and all of the alternatives are designed to appease the preservationists idealist dream. I cannot find within it, justifiable fact that proves the need for the dramatic decrease in allowable cut, nor can the formula for substituting different species be accepted as a solution. The wildlife management is totally irrational. As timber production has increased over the last two or three decades and the documented licensed hunters have increased, so also have the herds of elk and deer increased. For these reasons the Forest Service Management Plan is not acceptable to the communities included within its boundaries.

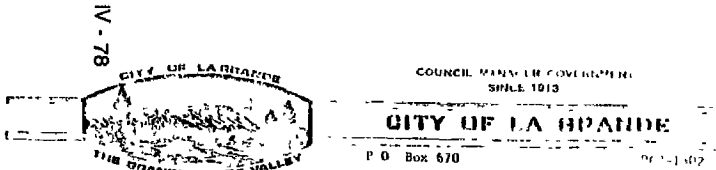
**400**

A plan has been developed that is acceptable to the Economic Stability of the communities within the Wallowa Whitman boundaries and also to the management of trees to be harvested. I have served on the Special Task Force that has been involved in the preparation of a reasonable management

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Appendix N





July 8, 1986

Mr. Jeff Blackwood  
 District Ranger  
 La Grande Forest Service  
 Rt. 2, Box 2108  
 La Grande, OR 97850

Dear Mr Blackwood

The City Council of the City of La Grande has reviewed the Forest Plan for the Mallowa-Whitman National forest as it pertains to planning for the La Grande Watershed. The following comments and changes are those we would like to see made in the final plan. The changes would bring the language of the plan into conformance with our existing agreements

**800** Under Chapter 4, Forest Management Direction, Forest Management Goals, Municipal Watersheds (pp 4-1) revise the goal to read: To manage municipal watersheds to maintain or improve water quality and stream flow.

Under municipal Watersheds, Goal (pp 4-24) should be revised as follows. All domestic supply watersheds will be managed to provide a safe and satisfactory water supply and to maintain or improve water quality and streamflows

Under the same section on page 4-25, we suggest deletion of the entire statement, "Management activities may include the use of pesticides and fertilizers when site-specific analysis indicates that water quality will not be adversely affected." The City takes strong exception to the use of chemical pesticides and fertilizers in the watershed. It is to be expected that any applications will be carried into the municipal water supply. Biological control methods of insect infestations are preferred.

On the same page, The use of fire retardants is mentioned. Our agreement calls for the use of fertilizer based fire retardants when fire suppression is necessary. This requirement should be added to the section.

The last paragraph in this section deals with waste removal within the watershed. " can be transported. " should be changed to " will be transported. . ."

Mr Jeff Blackwood  
 July 8, 1986  
 Page two

On page 4-27, the sentence reading, "The Beaver Creek Reservoir will remain closed to fishing, swimming, wading or other activities which include substantial contact with the water." should be amended to include "and intakes" after "Reservoirs"

At the direction of the Council, the following language is strongly recommended to improve and strengthen protection of the La Grande Watershed

On page 4-24 under Standards and Goals Applicable to All Domestic Supply Watersheds

~~Water quality will be the major factor in designing and developing logging and transportation systems.~~ (The City does not want "logging" or "transportation systems" within the watershed.)

Management activities may include the use of pesticides and fertilizers when site-specific analysis indisputably indicates that water quality will not be adversely affected

Activities having the potential to affect water quality will include monitoring to determine if objectives are met. If not, immediate mitigation measures will be taken and paid for by the parties initiating the activity.

Fire retardants will not be used except in extreme emergencies.

Fire camps will not be located inside watersheds except in extreme emergencies

On page 4-24 under Standards and Guidelines Specific to the LaGrande Watershed

All Forest Service activities will comply with the 1935 Cooperative Agreements between the Secretary of Agriculture and the City of La Grande as supplemented until a new agreement more relevant to present conditions is signed.

On page 4-26, Change the designation of the requirements for the 1935 Cooperative Agreement to numeric form instead of alphabetic

Other standards and guidelines include. The watershed will be managed to provide water of a quality which is consistent with current levels of purity. Activities will be designed with the objective to maintain or improve water quality and streamflows. ~~Maintaining the water quality and quantity will be the major factors in designing and developing logging and transportation systems.~~ (We wish to have no new roads within the watershed.)

2715  
CL

All Projects and activities proposed within the watershed, having the potential to affect water quantity or quality, will receive site-specific environmental analysis under the Forest Service NEPA process. This analysis will include consultation with the City and whichever measures requested by the City to maintain water standards shall be imposed by the Forest Service.

Activities having the potential to affect water quality and quantity will include monitoring to determine if objectives are met if not, immediate mitigation measures will be taken and paid for by the parties initiating the activities.

The area immediately adjacent to the reservoir and domestic supply intakes, consisting of approximately 3,500 acres, is presently closed to camping. In the future, if the City desires to further limit use and access to the watershed, a written request to the Forest Service will be acted upon under the Forest Service-NEPA process.

Roads within the watershed will be managed to limit public access, provide for fire prevention and suppression, to facilitate Forest management by the U.S. Forest Service, and administration by the City.

No roads within the watershed will be open to the public except the road to the caretakers site and perimeter roads. These roads may be used by the public with permission from the city.

The watershed will be closed to off-road vehicle use except for over snow vehicles operating on four or more inches of snow.

The entire watershed will remain open to nonmotorized types of dispersed recreation including hunting, hiking and backpacking. However, there will be stringent regulations regarding wastes, wading in streams, etc. Pack animals and horses will not be allowed inside the watershed.

A trail system permitting access to the watershed will be provided.


No trail system shall be maintained.

Administrative Access by the City to the reservoir area and other facilities will continue as has been established or as approved by agreement with the Forest Service in order to maintain, repair, replace or otherwise maintain the caretaker facility, reservoir, intakes, pipelines and other water facility structures.

When the current sale of beetle-killed lodgepole Pine has been harvested, there shall be no further timber sales in the watershed area.

If you have any questions or comments regarding these concerns, please contact the City Manager, Lynn Hamilton at 962-1302

Sincerely,

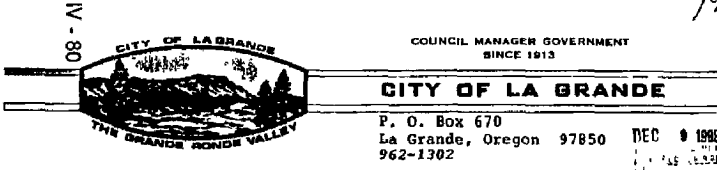


Walter E. Fulton  
Mayor, City of La Grande

tlid

\* Discussed apparent conflict with Sam Tunda on 8/12/86. She says they recognize the inventory. Says the council does prefer no logging or roads, but believe the road would go through anyway. Says they prefer no further harvest or roads after that time. But, their real desire is for no logging or road building.

8/11/86



CITY OF LA GRANDE  
RESOLUTION NUMBER 4021  
SERIES 1988

December 8, 1988

R. M. Richmond  
Forest Supervisor  
Wallowa-Whitman National Forest  
Federal Building  
P. O. Box 907  
Baker, Oregon 97814

Dear Mr. Richmond,

In response to the August 8, 1988, Supplement to the Draft Environmental Impact Statement for the Wallowa-Whitman National Forest, (1986), the City Council of the City of La Grande, Oregon, passed Resolution Number 4021, Series 1988, during its Regular Session on December 7, 1988, (copy enclosed). Resolution Number 4021 is intended to supplement, not replace, Resolution Number 3961, Series 1986, which was submitted after its passage on July 11, 1986.

The thrust of Resolution Number 4021 is the City's desire to not allocate nor limit the Beaver Creek Roadless Area to roadless recreation use. Our concern is that such limits would restrict the City's ability, in conjunction with the Forest Service, to manage the Watershed in an effort to maximize quality and quantity of water. The City has an excellent working relationship and agreements with the Forest Service, which we want to continue without any artificial constraints. We have established a Watershed Advisory Committee, on which the Forest Service is represented, to assist with managing the Watershed; and we would like to see that Committee be able to function unimpaired.

Thank you for your attention to this issue; if you have any questions, please feel free to call me at (503) 962-1302.

Sincerely  
*Kenneth S. Whorton*  
Kenneth S. Whorton  
City Manager

enclosure

KSW  
alnl

DEC 9 1988  
CITY OF LA GRANDE  
CITY CLERK  
CITY MANAGER  
CITY ATTORNEY  
CITY ENGINEER  
CITY PLANNING  
CITY PUBLIC WORKS  
CITY UTILITIES  
CITY WATER DEPARTMENT  
CITY ZONING DEPARTMENT  
CITY RECORDS  
CITY TREASURER  
CITY CLERK

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF LA GRANDE, OREGON, REQUESTING THE U S FOREST SERVICE TO NOT ALLOCATE THE BEAVER CREEK ROADLESS AREA WITHIN THE WALLOWA-WHITMAN NATIONAL FOREST TO ROADLESS RECREATION USE.

WHEREAS, the Forest Service is considering the Beaver Creek Roadless Area for roadless recreation use, and,

WHEREAS, the area is devoid of unusual scenic or unique features, and there are no threatened nor endangered species of plants or animals known to occupy the area, nor are there known opportunities for historical or archaeological study, and,

WHEREAS, the Beaver Creek Roadless Area contains the La Grande Watershed, an area designated for protection by a 1938 Cooperative Agreement, as amended in 1943, between the Secretary of Agriculture and the City of La Grande, and supplemented by a Memorandum of Understanding in 1984, between the City of La Grande and the Wallowa-Whitman National Forest, and,

WHEREAS, the City of La Grande is desirous of maintaining those Agreements in effect to properly manage the Watershed in order to maintain the quality and quantity of water now received from the Watershed, and,

WHEREAS, the designation of this area as "roadless" would remove an estimated 1 13 MMBF of timber from the annual allowable harvest for the Wallowa-Whitman National Forest, which would have a negative economic impact upon Union County and the City of La Grande,

NOW, THEREFORE BE IT RESOLVED, by the City Council of the City of La Grande, Oregon, that the Forest Supervisor of the Wallowa-Whitman National Forest be requested to not allocate the Beaver Creek Roadless Area to roadless recreation uses and that it be managed for a variety of resource outputs, with the predominant use being water quality and quantity and other uses which are compatible with management for water, and,

BE IT FURTHER RESOLVED, by the City Council of the City of La Grande, Oregon, that the Forest Supervisor of the Wallowa-Whitman National Forest be requested to not allocate the Beaver Creek Roadless Area to roadless recreation use, in order to prevent an undue negative economic impact upon Union County and the City of La Grande by removing 1 13 MMBF of timber from the annual allowable yield

PASSED this seventh (7th) day of December, 1988, by five (5) Council members voting therefor

*Alexandra Norgan Lund*  
*Richard J. ...*  
*...*  
*...*  
*...*

ATTEST  
*Alexandra Norgan Lund*  
Alexandra Norgan Lund, City Recorder



# CITY OF PENDLETON

July 2, 1986

Office of City Attorney  
P.O. Box 190 • 444 E. Doran Ave.  
Pendleton, Oregon 97801  
Telephone (503) 276-15

Forest Supervisor  
Wallowa/Whitman National Forest  
P. O. Box 907  
Baker, Oregon 97814

RE. Community Stability Alternative Management Plan  
Resolution No. 1454 Supporting a Community Stability  
Alternative for Management of the Wallowa/Whitman  
National Forest

The Pendleton City Council passed the above resolution by a  
5-2 vote the night of July 1, 1986. A copy is enclosed.  
Mayor McLaughlin asked that I mail this to you today.  
Please telephone if you have any questions.

Very truly yours,

Rudy M. Murgoo  
City Attorney

rmm/sg  
enclosure  
cc: Joe McLaughlin, Mayor  
Jon Nelson, City Manager

RESOLUTION NO. 1454

WHEREAS, the City Council, in its meeting on July 1, 1986, at  
Pendleton, Oregon, recognizes that Forest Service proposed plans for  
managing the Wallowa/Whitman National Forest for the next ten (10)  
years do not meet the needs of citizens in terms of jobs, taxes,  
wildlife, management or firewood. The Forest Service proposals also  
do not meet the potential of the forest and do not constitute respon-  
sible forest management.

**1200** WHEREAS, the City Council feels that the interests of all citizens of  
Northeast Oregon will be better served by the adoption of the Com-  
munity Stability Alternative for managing the forest. This alterna-  
tive would help us maintain our much-needed wood products jobs, and to  
the stability of the economy, help keep taxes from rising, improve  
deer and elk herds, and permit the public to cut more firewood.

WHEREAS, specifically, we do not believe the forest should be managed  
for the needs of a vocal few who would lock up much land, let timber  
go to waste and disregard the potential resources of the forest for a  
variety of types of recreation, and wildlife development.

NOW THEREFORE, THE CITY OF PENDLETON RESOLVES that we call on the  
U. S. Forest Service to reject their forest management proposals and  
adopt the Community Stability Alternative management plan. We will  
also notify our Representatives and Senators in the U. S. Congress to  
lend their weight and support to the adoption of the Community Stabi-  
lity Alternative.

DATED this 1st day of July, 1986

APPROVED Joe McLaughlin  
Mayor

ATTEST Jill Turner  
City Recorder

Approved as to Form

Rudy M. Murgoo, City Attorney

sg



Home of the World Famous Pendleton Round Up

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Appendix N

CITY OF JOSEPH  
Joseph, Oregon  
July 6, 1986

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Mayor Council Government



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Appendix N

Forest Supervisor  
Wallowa-Whitman National Forest  
P.O. Box 907  
Baker, OR 97811

U. S. Forest Service  
Federal Building  
Baker, Oregon 97814

Attention: Jerry Allen, Supervisor

Dear Sirs:

Dear Mr. Allen:

**1200** The Joseph City Council and myself would like to take this time to go on record, that this forest service consider adopting the Community Stability Alternative. As you well know this whole County of Wallowa has undergone a tremendous setback in its' local economy. We are hoping to diversify this depressed economy within the next couple of years. By allowing more development into the area and creating more jobs that will in turn help weaken the lines of food stamps, welfare and unemployment. Without your consideration for the Community Stability Alternative Plan you will only aid in strengthening the depressed economy, thus providing more costs to the working people to maintain people that will fill the lines of unemployment, welfare and food stamps.

**100**

The Common Council of the City of Haines wishes to go on record as opposing the plan to increase the wilderness area in the Wallowa-Whitman National Forest. At their regular meeting held Tuesday July 8, 1986, the council voted in favor of a motion to write this letter stating their objection to expanding the present area already taken away from use by the general public.

The majority of the council members prefer to have the forest lands managed by the multiple use concept as practiced by the government in the past.

We have written to Mr. Packwood of our concern for the timber industry and expressed opposition for more wilderness. Thank you for taking the time to read this and hope that your decision will be that of Community Stability Alternation Plan.

Respectfully yours,

Sincerely,  
*Paul Cantillejo*  
Paul Cantillejo,  
Mayor

*Ladona Hayhurst*  
Ladona Hayhurst, Recorder  
CITY OF HAINES



The City of Greenhorn, Oregon

Oregon's Smallest and Highest Incorporated City  
P O Box 791  
Baker, Oregon 97814

THE CITY OF GREENHORN  
775 S. Clematis Road  
West Linn, Oregon 97068

May 28, 1986

Wallowa-Whitman National Forest  
P. O. Box 907  
Baker, Oregon 97814

Attention: Planning

Gentlemen:

Enclosed with this response form are several documents of authentication regarding the City of Greenhorn, Oregon; Exhibit No. 1, Charter for the City of Greenhorn. Exhibit No. 2, Patent for the City of Greenhorn. Exhibit No. 3. Oregon House Bill No. 2991, Chapter 355. Exhibit No. 4, Comprehensive Land Use Plan for the City of Greenhorn, and Exhibit No. 5, acceptance by the Land Conservation and Development Commission of Exhibit No. 4.

Greenhorn, as Oregon's smallest and highest incorporated City is in a unique circumstance. It is located in both Baker and Grant Counties and its South and East boundaries are identical with the division between the Wallowa-Whitman and the Umatilla National Forests. This further complicated by the land mass being administered by the Umatilla Forest, and all access routes being provided through the Wallowa-Whitman Forest.

Land Use: At this time there are twelve (12) property owners in Greenhorn. Four of these families stay from mid-May to mid-October. The balance of the 53.58 acres are under the control of Mr. Larry Pearson, successor Trustee, appointed to that trusteeship by Judge William L. Jackson of the Baker Circuit Court on November 16, 1984. There are approximately 600 to 800 acres of privately owned lands in the immediate vicinity of Greenhorn, mostly patented mining claims.

The Greenhorn City Council and the Trustee are in the process of surveying the Trustee controlled lands, and will offer some lots for sale, hopefully this summer, by a sealed bid process.

The City of Greenhorn operates under a Special Use Permit from the Umatilla Forest, issued August 9, 1971, for a spring site and water transmission facilities for the municipal water supply. This permit is due for renewal December 31, 1986. The City provides water for the public use by a hydrant in the center of town.

We maintain a Visitors Register at Greenhorn and have records from 1971 thru 1985. Thru 1982 one individual responsible for this register reported

a record total of 1382 signatures, many including families. We estimate that only 1/3 to 1/2 of the visitors sign the register. So in its own small way Greenhorn contributes to the economy of the region. The support services for these trips primarily comes from Baker and John Day.

In 1974 the City contracted with Mr. James H. Hambleton, registered land surveyor, to survey a parcel of approximately five acres, with the intent to deed it to the Wallowa-Whitman Forest for a minimum use campground site. Constraints on Forest Service budgets will probably delay this project to some time in the future.

The above information and exhibits 1 thru 5 may or may not be included in the public record as your reviewer determines. It is provided for the express purpose of supplying background information to our response to the Draft Environmental Impact Statement, beginning on page 3.

Should you require additional information, please contact;

The City of Greenhorn  
Gail L. Poyser 656-6936  
City Manager  
775 S. Clematis Road  
West Linn, Oregon 97068

Sincerely,

THE CITY OF GREENHORN

*Gail L. Poyser*  
Gail L. Poyser  
City Manager

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Page 1.

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THE CITY OF GREENHORN  
775 S. Clematis Road  
West Linn, Oregon 97141

Page 4. Continuation of response to Alternative C.

cover to its best advantage. We would have to assume that during the intervening period before the next assessment of the proposed plan there will be an increase of ten to twenty families residing in Greenhorn.

Regeneration of Tracts No. 15 and 16 most certainly would take a good many years due to elevation, lack of water retaining soils and the probability of brushwood completely taking over the area, this at a time when these adjoining City parcels are being put up for sale.

We have no objections to tract No. 55 continuing in sale No. 87097, due to the topography of the land involved, this would not present a serious problem to the City's visual resources.

**1300** We respectfully suggest that an area be created one-quarter mile wide around the South and East boundaries of the City and be designated as Management Strategy No. 16. This we believe would provide a buffer zone around this summer home area. Since the City of Greenhorn was incorporated before the advent of the Forest Service, and that two generations beyond the present ownerships are waiting in the wings, Greenhorn will not just go away. The area referred to in our cover letter to be deeded to the Forest Service for a minimum use campground, would also be included in this Management Strategy. We are also requesting this same Management Strategy from the Umatilla Forest, for the North and West boundaries of the City.

For some time we have been experiencing a problem with permittee livestock in the City proper and the watershed of Greenhorn Creek, which originates on private lands adjacent to Greenhorn. This concentration of livestock in late summer becomes acute as their other water sources diminishes. Competition between game animals and permittee livestock will always be a problem for both forage and water. We tend to favor the game animals as their habits are not so messy as livestock. The writer has not researched this livestock allotment area, but will do so, in July when we are in the area. We are sure that a satisfactory solution can be found to diminish the effects of this problem.

We have included two maps, one showing the boundaries of the Management Strategy No. 16, and the location of tracts No. 15 and 16, and the other showing a small change from your Alternative C map.

The Wallawa-Whitman Forest and its employees are to be commended for its presentation of its proposed Land and Resource Management Plan.

**Alternative B-Departure**

Check here if this is your preferred alternative.

Comments:

**Alternative C (Proposed Action)**

Check here if this is your preferred alternative.

Comments.  
This alternative seems to provide for the best overall use of the forest lands, and at the same time not seriously creating a negative impact on the economy of the region.

**718** Adjacent to the South and East boundaries of the City of Greenhorn are two small tracts No. 15 and 16, included in the Greenhorn Timber Sale No. 87097. These tracts are in the viewshed of the City and by clear cutting this area would seriously jeopardize the visual resource of the adjacent City property. On page 4-39 of the proposed Land and Resource Management Plan, it is stated; "Where conflicts develop between visual quality objectives and timber or range management objectives, these conflicts will be resolved in favor of meeting the visual objectives". We would presume that the tracts No. 15 and 16 would be considered below-cost sales incorporated into Sale No. 87097, so that their removal from the Greenhorn Sale would not materially effect the overall sale proceeds.

With the expanding recreational possibilities of the area, it would seem that the game and non-game animals would use this additional

# CITY OF BAKER OREGON

P.O. Box 650 Baker, Oregon 97814

July 10, 1986

Mr. Jerry Allen, Forest Supervisor  
United States Forest Service  
Baker Ranger District  
Rte. 1, Box 1, Pocahontas Road  
Baker, Oregon 97814

Dear Mr. Allen:

**1300** The City Council of the City of Baker, while in regular session Tuesday, July 8, 1986, passed enclosed Resolution No. 2909 supporting the "Community Stability Alternative" Plan for the Wallowa-Whitman National Forest. A point of interest may be that this Resolution is different and separate from the one recently passed by the Baker Industrial Development Commission

The City Council's concerns are very strong in this matter, and they would urge you to give your utmost consideration to taking action that would be in the best interests of this community

Thank you for any efforts that you may make on behalf of the City of Baker

Sincerely,

*Arthur F. Reiff*  
Arthur F. Reiff  
City Manager

AFR:kjw

Enclosure (Resolution No. 2909)

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BAKER CITY OF GOLD

RESOLUTION NO. 2909

## RESOLUTION IN SUPPORT OF "COMMUNITY STABILITY ALTERNATIVE" PLAN FOR WALLOWA-WHITMAN NATIONAL FOREST

WHEREAS, the Wallowa-Whitman National Forest will soon be adopting a long-term plan for the management of the forest, and

WHEREAS, the proposed plan receiving the most consideration by the Forest Service provides for an annual timber harvest of some 40 million board feet less historic levels, and further provides that the harvest will be weighted more heavily towards less commercially valuable species such as white fir, and,

WHEREAS, said plan would mean the loss of at least 200 forest industry jobs and 150 other community jobs due to the reduced timber harvest, and,

WHEREAS, said plan acknowledges that the forest produces annually 20 million board feet more than historic cutting levels, and 60 million board feet more than its proposed plan, and

WHEREAS, an alternative plan has been proposed which would keep harvest levels near recent averages and still prohibit logging on the 40% of the forest reserved for the Eagle Cap Wilderness area and the Hells Canyon National Recreation Area, and

WHEREAS, this plan, called the "Community Stability Alternative" would cause the retention of 350 jobs as well as ample recreation opportunities,

NOW, THEREFORE, BE IT RESOLVED by the City Council of the City of Baker, Oregon, that the Forest Supervisor for the Wallowa-Whitman National Forest is urged to accept the essential elements of the "Community Stability Alternative" when choosing a long-term management plan for the forest

PASSED by the City Council of the City of Baker, Oregon, and APPROVED by the Mayor of the City of Baker, Oregon, this 8th day of July, 1986

APPROVED: *[Signature]*  
Mayor

ATTEST: *[Signature]*  
City Recorder

Appendix N



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**JOSEPH PUBLIC SCHOOLS**

**ADMINISTRATIVE SCHOOL DISTRICT NO. 6**

P. O. BOX W

**Russell C. Hoffman**  
Superintendent  
Elementary Principal

**JOSEPH, OREGON 97846**

**William McCadden**  
High School Principal  
Phone (503) 432-2401

July 9, 1986

Forest Supervisor  
Wallowa Whitman National Forest  
POB 907  
Baker, OR 97814

Dear Forest Supervisor:

**1200** The Board of Directors of Joseph Administrative School District No. 6, at the July meeting unanimously passed the following motion:

"The Joseph School Board send a letter to the appropriate persons, stating that the Board was opposed to any forest management plan that will reduce revenues to the Joseph School District

Respectively Submitted By,  
Carol Gibbs  
Deputy Clerk

Center of Oregon  
Adventureland

Office City Hall  
503-523-6541

**CITY OF BAKER OREGON**

P. O. Box 650 Baker, Oregon 97814

July 10, 1986

Mr. Jerry Allen, forest Supervisor  
United States Forest Service  
Baker Ranger District  
Rte 1, Box 1 Pocatontas Road  
Baker, Oregon 97814

Dear Jerry

I am writing this letter to express concern about the Forest Service plan and the effects that it would have upon the City of Baker, the County of Baker, and the people in Baker County

Most of our economic basis for existence in this area comes from the timber industry and from logging. The drastic reduction that the Forest Service has planned in the cut from the Forest would have a very detrimental effect upon the economic well-being of our community.

I would urge you not to adopt the preferred plan that has been proposed by the Forest Service, and to at least give consideration for either adopting the Community Stability Plan or a plan similar to it that would allow sufficient timber cutting, and particularly timber that has economic value and is not in great competition with the Canadian market.

Your every consideration of our economic well-being in the area would be sincerely appreciated.

Sincerely,

Arthur F. Reiff  
City Manager

AFR kjw

BAKER CITY OF GOLD

2088 to

# CITY OF BAKER OREGON

P O Box 650 Baker, Oregon 97814


July 8, 1986

Mr Jerry Allen, Forest Supervisor  
United States Forest Service  
Baker Ranger District  
Rte 1, Box 1 Pocatontas Road  
Baker, Oregon 97814

Dear Jerry

Enclosed is a Resolution that the Baker Industrial Development commission passed at their last meeting July 1, 1986 We would all appreciate it very much if you would give it your best consideration Thank you.

Sincerely,



Richard G. Haynes, Chairman  
Baker Industrial Development Commission

RGH k:jw

Enclosure (Resolution)

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BAKER CITY OF GOLD

# CITY OF BAKER OREGON

P O Box 650 Baker, Oregon 97814  
BAKER INDUSTRIAL DEVELOPMENT COMMISSION

## RESOLUTION

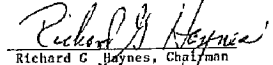
The Baker Industrial Development Commission, in its meeting on July 1, 1986, at Baker, Oregon, recognized that Forest Service proposed plans for managing the Willowa/Whitman National Forest for the next ten years do not meet the needs of citizens in terms of jobs, taxes, wildlife, management or firewood. The Forest Service proposals also do not meet the potential of the forest and do not constitute responsible forest management.

The Baker Industrial Development Commission feels that the interests of all citizens of Northeast Oregon will be better served by the adoption of the Community Stability Alternative for managing the forest. This alternative would help us maintain our much-needed wood products jobs, add to the stability of the economy, help keep taxes from rising, improve deer and elk herds, and permit the public to cut more firewood.

Specifically, we do not believe the forest should be managed for the needs of a vocal few who would lock up much land, let timber go to waste and disregard the potential resources of the forest for a variety of types of recreation, and wildlife development.

We therefore call on the U S Forest Service to reject their forest management proposals and adopt the Community Stability Alternative management plan. We will also notify our Representatives and Senators in the U S Congress to lend their weight and support to the adoption of the Community Stability Alternative.

DATED at Baker, Oregon, this 1st day of July, 1986



Richard G. Haynes, Chairman  
Baker Industrial Development Commission

BAKER CITY OF GOLD

Appendix N



# ENTERPRISE PUBLIC SCHOOLS

SCHOOL DISTRICT 21

P O BOX 620  
July 7, 1986

ENTERPRISE, OREGON 97828

AREA 503-426-3193

Jerry Allen, Forest Supervisor  
Wallowa-Whitman National Forest  
P O Box 907  
Baker, Oregon 97814

Dear Mr Allen

**1200** Enterprise School District No 21 would appreciate your consideration to our interest concerning the Wallowa-Whitman Forest Plan

In general we support the Community Stability Alternative as proposed by the Committee for the Stable Community

Specifically we are concerned about the following issues

- 1 Maintain or increase the past decade annual average receipts to Wallowa County of \$875,502 00 Accomplish this with a sale program of 158 million board feet of green sawtimber consisting of at least 48 million board feet of Ponderosa Pine
- 2 Provide full multiple use of 56% of the Wallowa-Whitman forest This will maintain elk numbers, improve access for firewood cutters, and in general benefit the average citizen
- 3 Plan and support additional access for developed recreation that will increase the tax base that schools depend on for operating dollars

Attached please note the resolution supporting the Community Stability Alternative

Sincerely,

Larry L. Christman, Superintendent  
Enterprise Public Schools  
Enterprise, Oregon

## ADMINISTRATIVE OFFICE

LARRY L. CHRISTMAN, Superintendent  
MELLO VI TUP, High School Principal  
ROBERT E. FORD, Elementary School Principal  
PATRICIA H. SULLIVAN, Deputy Clerk

ENTERPRISE SCHOOL DISTRICT NO. 21  
RESOLUTION 86 - #3

WHEREAS the Forest Service proposals for managing the Wallowa/Whitman National Forest would restrict the amount of usable timber that can be harvested, and

WHEREAS this restriction would throw people out of work in the wood products industry and cause school and road taxes to rise or services to decline, and

WHEREAS eight (8) more people in the area would lose jobs for every ten (10) wood products jobs that are lost, causing even higher unemployment, and

WHEREAS the variety of recreation and wildlife development would be restricted and the potential of the forest would be wasted

BE IT THEREFORE RESOLVED that the Enterprise School District No 21 calls upon the U S Forest Service to reject their management alternative for the Wallowa/Whitman National Forest and adopt the Community Stability Alternative management plan

Dated at Enterprise School this 7<sup>th</sup> day of July, 1986

Signature of Chairman

Signature of Clerk



# Baker School District 53

2000 Fourth Street Baker, Oregon 97814 Phone 523-5614

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Supervisor  
Charles W. Wallace Jr.

Board of Directors  
Chuck Schillingman  
Keith McMed  
Cathy Hammond  
Dr. Robert McKee  
Pawson Reed

July 14, 1986

Mr. Jerry Allen  
Forest Supervisor  
Wallowa-Whitman National Forest  
P O Box 907  
Baker, Oregon 97814

Dear Jerry:

How the Forest Service manages the Wallowa-Whitman Forest has a direct effect on educational services provided to young people by the staff in our school system. It has come to my attention that the Forest Service is presently in the process of developing a multi-year plan and that a local business is proposing an alternative said to provide adequate stability. Adequate stability of resources from the Forest Service will benefit the operation of the educational system and the people of our community and local business.

1200

During the past ten (10) years, drastic fluctuations have occurred in the resources received from forest production. Resources received have ranged from \$70,720.00 to \$360,408.00 during this period of time. The average for the past ten (10) years had been \$177,790.00. Drastic fluctuations of this nature impedes the educational planning process and generally creates negativism in the community when additional burdens are placed upon other resources.

Any plan proposed which reduces employment will have an additional effect upon the financial resources of our school district. As employment decreases so does the number of students attending our schools. Basic school support from the State of Oregon is based upon the number of students in attendance. Although the funds become less, many operational costs remain the same or increase, causing reductions of services to young people and adults in the community.

*Qualifies BAKER land of logging ranching farming mining and recreation*

Reduced population decreases business activity and subsequently has two additional effects upon financing schools. When local business and their facilities cease to exist, local taxes needed are spread over fewer tax payers, generally resulting in higher taxes. Second, as these families move, the reduced student population causes further reductions in funds received from the State, which again places a heavier load upon local tax payers. As local taxes increase, the community will look less desirable to businesses looking to locate here.

Currently, local leaders are attempting to improve the economic base of our community. To facilitate this endeavor, the community, at this time, needs to be able to add to, not substitute for the current economy. During a time of economic diversification, such as tourism, the community needs to maintain its present economic base. Substituting one industry for another, at this time, could result in a no-growth situation. Any no-growth situation has a negative affect upon our school system.

700

Once a plan is adopted, it is extremely important that personnel implementing the plan understand the effect their decisions are having upon the schools and the local community. It has come to our attention that some timber sales are initially going un-sold, then re-bid, etc. Are these timber sales priced reasonably so mills can participate in the bidding process on a profitable basis? It would appear that with current technology and trained staff, more accurate values could be placed so as to ensure sales and reduce the ineffectiveness of repeating the process.

All subtractions made from timber sales, which reduce revenues to the county and schools, must be scrutinized carefully. Are these subtractions necessary? If so, are they being accomplished in the most effective and economic manner, so as to have as little effect as possible on the income to local entities.

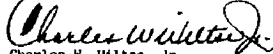
Over 50% of our county is federally owned. With so much of this area coming under the influence of the Forest Service, the resulting effects upon local communities must be considered in the adoption of any plan. Currently much attention is being given to animals, trees, recreation, etc. and indeed it should, but the effects on local institutions,

business and people must also receive consideration. Local forests are a resource upon which local communities have relied, and upon which local people have made investments - both personal and public, such as schools.

Any fluctuations in the way the Forest Service is doing business will have an effect upon local communities. Forest Service management personnel must maintain a broad perspective of the ramifications of their decision-making.

To provide the most effective educational system, stable funding resources are necessary. I would ask that much importance be placed upon adequate and stable funding for schools, in the consideration and implementation of any final plan. Thank you for this opportunity to express our feelings in the developmental stages of planning. If I can be of any further assistance, please contact me.

Sincerely,

  
Charles W. Wiltse, Jr.  
Superintendent of Schools



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CONFEDERATED TRIBES OF THE UMATILLA INDIAN RESERVATION

FOREST PLAN INTERDISCIPLINARY TEAM

Louie Dick, Jr. - Vice - Chairman, Natural Resources Commission  
 Michael J. Farrow - Director, Department of Natural Resources  
 Weisha Mize - Tribal Attorney  
 Jerry Laker - Wildlife Biologist/B.I.A.  
 Don Motanic - Forester/B I.A  
 Aaron Skirvin - Water Resources Officer/D.N.R.  
 Jo Marie Hile - Land Use Planner/D.N.R.  
 Larry Calkins - Forester/D.N.R.  
 Gary James - Fisheries Biologist/D.N.R.  
 Donald Sampson - Fisheries Biologist/D.N.R.  
 Randy Williams - Environmental Planner/I D. Team Coordinator/  
 D.N.R.

Mr. Jerry G. Allen, Wallowa-Whitman National Forest  
 Federal Building  
 P. O. Box 907  
 Baker, OR 97814

RE Formal comments of C T U.I.R. on Wallowa-Whitman D.E.I.S.

Mr. Allen:

The Confederated Tribes of the Umatilla Indian Reservation appreciate the opportunity to comment on the Wallowa-Whitman 1275 draft environmental impact statement. The lands within the legal boundaries of the Wallowa-Whitman National Forest have been utilized by the Walla Walla, Cayuse and Umatilla tribes for fishing, hunting, root gathering, medicinal and religious uses since time immemorial. These lands provide their home as well as a way of life, and retention of these rights has been federally recognized and upheld by treaty since 1855. Protection and enhancement of these finite natural resources is absolutely critical to sustaining these treaty rights; however, various management policies have qualitatively and quantitatively reduced and compromised to a high degree almost every one of these natural resources. Past management practices of the Wallowa-Whitman National Forest have caused significant degradation of anadromous fisheries habitat, water quality and big game winter and summer ranges. The Confederated Tribes are determined to protect these natural resources and desire to cooperatively address forest management policy and provide input that will be utilized.



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800 There is often a tendency of the Forest service for an overdependence of mitigation to solve degraded habitat problems. Mitigation for degraded watershed and other habitat has proven not only very expensive but seriously deficient in returning habitat to optimal productivity. Prevention of further degradation or loss of natural resources and enhancement of soil, water, flora and fauna is therefore preferable to the Confederated Tribes.

1275 The Confederated Tribes would like to commend the Wallowa-Whitman National Forest in its effort to plan in a comprehensive manner with specific management strategies allocated to particular geographical areas. The willingness to enhance and maintain a high quality level of communication between the forest service and tribes is also very much appreciated. The Confederated Tribes do not recommend a preferred alternative at this time due to a lack of sufficient information provided in the D.E.I.S. The Confederated Tribes submit the following recommendations, comments, questions and deficiencies regarding the D.E.I.S. The Confederated Tribes would like to remind the Wallowa-Whitman National Forest of its federal trust responsibility to protect the treaty right which has been interpreted in the case, U.S. vs. Washington to include fisheries habitat protected from man-made despoilation. The Confederated Tribes feel current forest management practices have not protected fisheries habitat sufficiently and therefore are an abrogation to the treaty right. The Forest planning process provides an excellent

opportunity to correct these management deficiencies and to preserve these valuable resources for generations to come and for all concerned.

Concerns of the Confederated Tribes are categorically formatted according to the areas of concern which were denoted in "Recommendations for National Forest Plans" prepared by the Department of Natural Resources of the Confederated Tribes and submitted to Wallowa-Whitman National Forest in May, 1985. The D.E.I.S. is general in context and lacks specific criteria and guidelines for standards sufficient to protect anadromous fisheries habitat and other areas of concern, therefore, the Confederated Tribes have included criteria and standards which should be utilized to afford more adequate protection. The areas of concern are economics; timber management; fisheries; wildlife; roads; watershed management; grazing; and roots, berries, medicinal plants, historic and cultural sites. These concerns are intrinsically interconnected and discussed within context of each other. A summarized list of recommendations is made concluding comments on the areas of concern.

ECONOMICS

1275 The largest and most painfully obvious compromise of treaty rights has resulted from past forest management policies of heavily biasing what have been labeled as "commodity" values such as timber, grazing, and mining. Those values termed as "amenities" including anadromous fisheries, resident trout, big

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game and recreation have been managed in a subservient manner around the prioritized "commodities". The D.E.I.S. suggests the preferred alternative to be a balanced alternative but to the contrary it is classically biased toward "commodity" interests. On page II-114 Benefit/Cost ratios for recreation are highest for all alternatives while B/C ratios for timber are quite low, yet recreation and other amenity values are sacrificed in the "preferred" and supposedly balanced alternative C. An example is allocation of 656,355 acres (one fourth of entire forest) to management strategy 1 which is emphasized for timber and forage production and subsequent significant increase in roads and activity levels which are deleterious to elk habitat, fisheries habitat and decline in semiprimitive recreation areas, all of which have demands greater than present capabilities. What is the amount of subsidies given to timber sales and associated roads as compared with subsidies and revenues in behalf of fisheries enhancement?

**1200** Recent impacts on local economy due to major dependency on timber and livestock industries are excellent examples of the folly in not having a diversified economy. Baker County median income is ranked as 35th out of Oregon's 36 counties, Wallowa County ranks 34th and Union ranks 13th. Union County has the most diversified economy of the Tri-County area and is maintaining its younger aged population, primarily because of Eastern Oregon State College, while Wallowa and Baker are

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indicating a loss of younger aged people - the effects of a poor local economy. The timber and wood products industry will not measurably reverse the general economy of the Tri-County area, particularly when timber market values and competing British Columbia and southern forest markets currently and are forecast to have long term negative effects on northwest timber markets. The Confederated Tribes supports a forest management philosophy which produces and encourages a more diversified economy arising from an overall optimization of all natural resource values.

Economic models are available for use to assess fisheries, hunting and various recreational activities in a comprehensive manner in regard to local economy. They include statistical evaluation with dollar values on travel, food, lodging, services and etc. Yet Wallowa-Whitman D.E.I.S. did not utilize these economic tools to assess "amenity" dollar values in a thorough manner. It should be emphasized that, although these amenity dollar values have not been fairly represented in the D.E.I.S., the fishing, hunting, food gathering, recreational use and cultural values dependent upon these natural resources within the forest have a very tangible and perhaps more long-lasting positive impact on the quality of life for both the Confederated Tribes and all other citizens utilizing

**1275** Wallowa-Whitman National Forest. The religion of the Confederated Tribes is and has been in jeopardy due to a lack of opportunity to physically collect and utilize fish,

Appendix N

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roots, medicinal plants and enable tribal members to learn the religious significance of each type of food or ceremony dependent upon forest resources. An excellent example are tribal imposed conservation closures to fish in most of the usual and accustomed fishing rivers of the Wallowa-Whitman National Forest due to both off-forest and on-forest impacts. The detrimental on-forest impact can be negated by Wallowa-Whitman National Forest plans if so chosen.

TIMBER MANAGEMENT

**704** Management should be directed toward long term maintenance of forest values in a broad sense, not limited to short term expedients. Management alternatives such as the listed departure alternatives which would increase regulated cut volumes in the short term will not allow the forest to maintain sustained yields and comply with federal regulations. Market demand at the end of the life of the plan or at the year 2000 is expected to be greater than presently exists due to a decrease in availability of timber on private forest lands that will be available. Even greater emphasis than now exists would then be the case, as a subsequent plan is formulated, to increase the volume of cut from Wallowa-Whitman National Forest. Both short-term and long-term fisheries and big game values would be sacrificed from harvest in excess of sustained yields. The Confederated Tribes therefore recommend exclusion of departure oriented volumes from realistically viable alternatives.

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**700** The Confederated Tribes feel that even-aged management across the board will not fulfill the multiple use needs and best manage all of the types of ecosystems within the forest. It is recommended that both even-aged and uneven-aged practices be utilized to maintain a diversity of habitat necessary to fish and wildlife. Disease and insect damaged stands of timber should be managed sensitively but primary emphasis should be placed upon fish and wildlife values in these areas. Rather than exceed any single cutting unit of 40 acres in size for large blocks of these damaged stands a mosaic cut plan over longer periods of time with emphasis on regeneration should be utilized. Innovative methodology should be utilized to manage these large stands to retain and enhance optimum ecological diversity for fish and wildlife. A map of current disease and insect damaged stands with acreage size and potential management effects on fisheries and wildlife habitat should be included in the final D.E.I.S. An updated map and appropriate acreages should be provided for interested agency review on an annual basis. Harvest management of timber from high elevation and slow growth areas or where sensitive soils and watersheds exist should be prioritized for maintenance of these areas for Fish and Wildlife habitat areas as opposed to low benefit/ cost timber sales. Figures were presented in the D.E.I.S. that estimated board feet harvested/alternative, however, additional information should include the number of acres harvested and treated/decade to provide a better picture of forest wide cumulative impacts. The Confederated Tribes recommend that grassland-timber

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mosaic areas commonly found on north facing stringered slopes be deleted from the regulated timber volume base. These areas have been shown to provide preferable thermal and hiding cover for elk and other wildlife. These mosaic areas also maintain soil integrity and slope stability which protects water quality and anadromous fisheries.

**702** The Confederated Tribes also support accelerated establishment of timber stands in riparian zones with a particular emphasis to encourage white fir in these areas.

**FISHERIES**

The traditional ceremonial and subsistence use of anadromous fish and resident trout by the tribes are well known. Also well known is the fact that both on & off-forest impacts have contributed to a heavy cumulative impact. It has been the attitude of various National Forests that downstream impacts such as hydro-power projects and harvest management problems are so great at times that forest

**440** policies will not make significant differences. The Confederated Tribes believe that "downstream impacts" place even greater importance on the quality and quantity of fisheries habitat. Identified limiting factors of fisheries productivity are low summer flows, high summer water temperatures, high sedimentation levels, reduction of canopy, stream channelization, and poor riffle: pool ratios. All of these variables are associated with degraded riparian habitat and watershed quality. It is imperative that the forest plan recognize these variables and provide for non-

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degradation riparian management guidelines. Current management standards and criteria for protection of riparian areas within the forest are not adequate. The Confederated Tribes submit the following recommendations as minimum requirements to safeguard fisheries values.

The Wallowa-Whitman National Forest must have a full time fisheries biologist to properly manage this extremely important resource. Though Wallowa-Whitman is the largest national forest in the northwest, with 7 river systems, it is the only Oregon

**440** forest without a fisheries biologist. All spring chinook and steelhead streams should have habitat protection and enhancement practiced to achieve 90% smolt habitat capability index. Habitat capability must be based on the total potential of the site not necessarily on the present habitat condition. Manage streamside vegetation to maintain an 80% shade canopy in areas of naturally occurring shade along all stream used by anadromous fish. Previous forest service interpretation has been an average of 80% of entire length which can leave large gaps in treated areas and **450** adjacent to streams and is unacceptable. 100% snag level management in riparian areas should be practiced to provide needed instream habitat structure. No more than 10% of exposed mineral soil should be exposed and disturbed per project basis within 250 feet of all class I, II and III streams and associated wet areas. A no-cut buffer strip of 100 feet within class I, II and III streams is vital to riparian integrity as minimum requirements. Additional width of buffer strips should be implemented if slopes

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within 100 foot buffer are in excess of 45 degrees and therefore provide inadequate protection to water quality and riparian area from erosion and surface runoff. No-cut buffer strips of at least 50 feet should surround all springs, seeps, bogs and wetlands. Lack of protection in these areas results in increased evaporation, lowering of the groundwater level, and reduction of summer and fall flow levels in nearby streams. Recommended minimum buffer widths are necessary to provide adequate canopy shade, prevent buffer blow-down problems, and act as a vital filter to instream habitat and water quality. These recommendations should be in harmony with or supplemental to any or all management strategies

800 utilized in the Wallowa-Whitman final E.I.S. Watersheds determined to be of high priority and of critical value to the Confederated Tribes are additionally recommended to include protective criteria of management strategy 18. These streams with appropriate reasoning are listed below.

North Fork John Day River - The most important production stream of the entire John Day basin; joint wild fish management policy for spring chinook and steelhead which depend on optimal quality habitat; drains from Wallowa-Whitman downstream into wilderness area requiring high water quality standards; and has traditionally been an especially important tribal usual & accustomed fishery.

Upper Grande Ronde Basin - Contains all life phases of spring chinook and steelhead; targeted spring chinook outplant area to increase natural production under Lower Snake river Comprehensive Plan,

intensively funded anadromous fish habitat improvements by B.P.A.; formerly productive usual & accustomed subsistence fishery with conservation closure since 1979 to allow enhancement efforts noted above to successfully generate tribal fishery; and serves as prime supply of water for mid and lower Grande Ronde affecting rearing habitat quality and quantity, water temperatures, and seasonal flows.

Catherine Creek - Formerly very productive subsistence fishery of spring chinook but now very reduced populations; targeted area under Lower Snake Comprehensive Plan for smolt outplanting; and considerable expenditures for screening irrigation diversions downstream are ongoing

Joseph Creek - Wild Management policy for steelhead which places emphasis on quality habitat; site of intensive B.P.A. funded enhancement efforts; and an important cultural site.

Lanah - Spring chinook and steelhead were formerly productive tribal subsistence fishery but barely viable today due to depressed levels; natural enhancement management policy of tribes & ODFW places emphasis on the unique habitat of this system and fish run.

Logside - Spring chinook and steelhead are providing limited tribal subsistence fishery which is on the upswing; retention of natural riparian character is vital.

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Lower Mainstem Grande Ronde - Contains important juvenile rearing and critical adult passage for spring chinook and steelhead, potential fall chinook habitat for spawning and rearing; and proper temperature levels are crucial to habitat quality.

**60** The Confederated Tribes supports all proposed wild, scenic and recreational rivers for the reasoning of protecting riparian and fisheries habitat and promoting a diversity of economy. Please refer to the section Grazing for fisheries concerns in regard to grazing management.

WILDLIFE

**400** Bureau of Indian Affairs and tribal studies suggest that substantial portions of the 5,500 or more elk wintering on the Umatilla Indian Reservation in recent years utilize the upper Grande Ronde basin as well as portions of the north fork of the Powder River and Upper North Fork John Day River as summer range. The tribe deems these areas to be of special importance for quality habitat and recommends only management strategies 3A, 4, 6 and 18 be considered in these summer range areas. The transportation corridors between these summer ranges and the winter range on or adjacent to the reservation are also of great importance as is the winter range on forest land itself between the reservation and summer ranges. The Confederated Tribes therefore recommends only management strategies 3, 4, 6 and 18 be considered in these winter ranges in order to provide adequate thermal, hiding and security habitat for elk. The exceptions are the Starkey Experimental Forest which

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should remain under strategy 14 and the current R.N.A. strategy 12 area. Management strategies 1 and 2 do not provide adequate protection for elk and enhancement of their habitat due to increased thermal cover loss in summer ranges, inadequate forage/cover ratios, and especially impacting high activity level from increased roads and their use. Road caused impacts are perhaps the highest on the priority list of problems associated with elk use of any particular geographical area. The Confederated Tribes therefore recommend a very aggressive road closure program with roads being put to bed and a reduction in unnecessary construction quality for secondary roads. New roads may be minimized by maintaining unroaded natural areas and utilizing management strategies 3, 3A, 6 or 18 instead of strategies 1 or 2 forest-wide. Open roads in management strategy 18 should be a maximum of 1.5 miles/square mile to protect elk utilization in these assigned areas. It is unnecessary to force a compromise of protection for elk and fisheries habitat between management strategies 3, 3A and strategy 18. Please refer to the section on Roads for additional specific recommendations regarding road impacts on elk. Recommendations of agriculture handbook #553 (Thomas) should be utilized and enforced with regard to visual buffer, canopy closure for thermal cover on both winter and summer range, and effective size of created opening. Buffer strips recommended for fisheries riparian habitat will also be essential to elk and other big game as travel corridors.

**300** Because of the diminished amount, size and widely scattered old growth stands which makes them uniquely important to pileated woodpeckers and other species, particularly when considering management practices around and adjacent to these stands, the Confederated Tribes recommends retainment of all existing old growth stands. These stands are a highly favored traditional place to hunt for big game by tribal members, and certain woodpeckers and jays inhabiting the old growth are important to special ceremonial and religious uses also.

**407** Snag dependent species such as woodpeckers are in jeopardy at the projected 27% level of large snags in the proposed alternative C. Actual retainment of even suggested population levels of cavity dwelling species is very suspect due to previous lack of enforcement and retainment of historically planned snag levels. The Confederated Tribes recommend a minimum of 60% of cavity dwelling species population potential by habitat provisions forest wide. Past forest practices have favored cutting ponderosa pine old growth stands and leaving old growth stands of lesser quality for snag and old growth habitat species. Agriculture handbook #553 (Thomas) states ponderosa pine as the most highly favored tree species by pileated woodpeckers and therefore these stands are especially important.

**ROADS**

As stated previously, the excessive open roaded areas of the Wallowa-Whitman National Forest have taken a heavy toll on the

amount and quality of fisheries and wildlife habitat. It is imperative to enforce adequate road closure programs and minimize new road construction as much as possible for true multiple use benefit.

**1000** The Confederated Tribes are very concerned with the amount of roads on the Wallowa-Whitman National Forest and the management of those roads. A road may be built previous to a timber sale and then when the timber is actually sold the successful bidder has up to 5 years to harvest that sale. Harvest time may take 2-3 years and it is not uncommon to wait 2-3 years to determine whether or not seedlings should be planted. The pressure to utilize firewood in harvested areas often keeps these roads open for 2-3 years after harvest is complete. A continuous open road time of 10-12 years is and has been very realistic. This time does not even take into account the precommercial thinning on the original sale or another entirely different sale on the same road. The Confederated Tribes recommend a system of time constraints be implemented and enforced to significantly reduce this high level of open road time. Authorized use only of roads during various treatment stages should be utilized on secondary roads. Firewood gathering should be regulated in such a manner as to allow permittees adequate access to specific roads and areas instead of leaving roads open for several years to any entrant. Gates should be utilized for road closures during non-permitted use times as well as signs denoting closure or authorized use. The importance of implementation and enforcement of a successful transportation management system cannot be overemphasized, primarily due to the present impact on snag levels, elk habitat use,

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and fisheries habitat quality.

**1300** Page 3-3 of the D.E.I.S. states "of the 107,000 forested acres of roadless area outside the Hells Canyon National recreation area, 74% are considered technically or economically unsuited for timber production." This leaves only 26% of that forested roadless area outside the HCRNA or only 27,820 acres suitable for harvest. All of these acres are scheduled for harvest, most of which will occur during the next 3 decades. This proposed further reduction of forested semiprimitive roadless area leaves inadequate areas for refuge for elk in both winter and summer range and decreases quality recreational opportunities in semiprimitive areas. The Confederated Tribes therefore advocate only management strategies 3, 3A or 18 be considered in these areas to be entered and roads only be left open temporarily during harvesting and treatment, according to strict time constraint guidelines with subsequent gated road closures. This will help protect the very limited roadless natural area left on the Wallowa-Whitman National Forest.

WATERSHED MANAGEMENT

The Confederated Tribes cannot over-emphasize the importance of watersheds on the Wallowa-Whitman National Forest in providing water for multiple uses ( in-stream and out-of-stream) on and off national forest lands. The water supplies needed for current and future human and livestock consumption, fish and wildlife habitat, irrigation, recreation, and economic development in the Tri-County

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area primarily originate on watersheds in the Wallowa-Whitman

**800** National Forest. Three basic water-shed management concerns should be more specifically addressed in the DEIS: (1) surface water discharge, (2) ground water recharge, and (3) water quality protection. Vegetation management practices, road development and use, and land-use practices in general on the Wallowa-Whitman National Forest profoundly affect these basic watershed management concerns. Moreover, the Confederated Tribes believe it is incumbent upon the Wallowa-Whitman National Forest to develop and implement a Forest Plan which intentionally and directly addresses goals to maintain and improve water quality, to promote uniform seasonal streamflow regimes, to increase water infiltration, and to produce good quality water in sufficient quantities to meet reasonable water needs for multiple beneficial uses in the Tri-County area. As presented in the DEIS, the scope of "watershed management" is limited to a few specific municipal watersheds. In the final FIS, scope of watershed management should be broadened to address the above-mentioned goals and to encompass the entire Wallowa-Whitman National Forest. These watersheds should be considered as nature's reservoirs and are the source of clean and high quality surface and ground waters. Indian custom, religion, and ceremony begin and end with water. It is classified as "medicine".

GRAZING

**500** The Confederated Tribes recognize the need for a proper livestock grazing program on the Wallowa-Whitman National Forest

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that will not destroy or cause deterioration to the sensitive ecosystems of the forest. It is imperative that fisheries and wildlife values be prioritized when livestock grazing practices negatively impact them. In areas where grazing is a limiting factor to achievement of 80% of naturally occurring shade canopy potential fencing should be utilized with other innovative techniques to restore and maintain high quality riparian areas. Fencing of both streambanks and exclusion of livestock should take place to insure the riparian area will recover to 80% shade level. Rotational and stocking level management techniques may then be applied in such a way as to maintain the riparian area quality. Use of fertilizer should be encouraged to enhance vegetative growth times and will subsequently benefit both riparian habitat and livestock grazing. Fences should be designed to allow livestock access to watering areas without degradation to the habitat. Stream crossings for livestock and big game should be considered. Streams having high runoff or winter ice flows should receive appropriate consideration for fencing distance from the bank. The D.E.I.S. contains insufficient information on grazing management criteria and standards. This information should be included in the final D.E.I.S. in detail. Whenever a negative impact on elk and other big game occurs due to livestock grazing, restraints upon livestock grazing should be implemented.

#### MONITORING

Without quality evaluation and enforcement of a well chosen final plan with excellent protective criteria for maintaining and enhancing the forests natural resources the practical outcome will cause further loss of natural resource values. Monitoring of fisheries, wildlife and water management implementations has been a shortcoming of previous national forest plans 1400 due to a lack of emphasis and funding. Funding should never be an excuse for lack of proper monitoring and evaluation of forest management practices. The Confederated Tribes sees monitoring as a high priority item, not as an extra item that may be adequately implemented if funding permits. Responsible management dictates a high quality monitoring system that will evaluate impacts on the natural resources of the forest

At a minimum, monitoring should include analysis of the following trends or changes in each distinct drainage area where timber harvest and/or livestock grazing is occurring. Components that should be monitored and analyzed are water quantity and flow regimes, water temperatures, composition of fine sediments in streambeds, and condition of riparian areas (bank stability and vegetative quantity/quality). Examples of distinct drainages are Catherine Creek, Big Sheep Creek, Upper Innaha below the wilderness boundary, Dark Canyon and Sheep Creeks, Meadow Creek, Five Points Creek, Beaver Creek, Fly Creek, Upper North Fork John Day River, Upper Grande Ronde

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River, and Joseph Creek. Large areas such as the last two listed should have monitoring in small tributaries and also downstream in the larger order streams for analysis of potential cumulative effects. Monitoring of each basin should factor in variables of diverse timber management techniques and highly harvested tributaries.

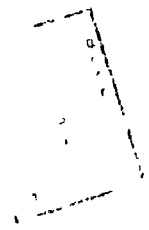
Roots, Berries, Medicinal Plants, Cultural and Historic Sites

1275 The Confederated Tribes suggest that all management practices of the Wallowa-Whitman Forest continue to be correlated with the forest archaeologist to determine extent of impacts on special ecological areas containing these resources. Close correlation with the Department of Natural Resources of the Confederated Tribes is also necessary to insure adequate protection. The Confederated Tribes support the development of a core team consisting of Tribal and U.S.F.S. staff to establish a closer working relationship with regards to archaeological and cultural concerns of the tribe. The emphasis of the core team should be to establish and correlate criteria, guidelines and standards to protect the cultural and archaeological resource within Wallowa-Whitman National Forest. It is imperative to understand that roots, berries, medicinal plants, fish, and both big and small game food are an integral part of the religion of the Confederated Tribes and not simply subsistence issuances.

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It is important to the members of the Confederated Tribes that they have ample opportunity to gather teepee poles and firewood for subsistence and cultural use. Members of the Confederated Tribes desire to utilize these resources while simultaneously protecting other natural resources of the forest. Consultation with the Department of Natural Resources of the Confederated Tribes concerning this matter is recommended.



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*Nez Perce*

TRIBAL EXECUTIVE COMMITTEE



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We appreciate the time you have taken to come present the draft plan to the Executive Committee and our staff  
Specific comments to follow

Sincerely,

*Herman Reuben*  
Herman Reuben  
NPTEC Chairman

Mr Jerry G Allen, Forest Supervisor  
Wallowa-Whitman National Forest  
Federal Building  
P O Box 907  
Baker, Oregon 97814

7 July, 1986

Dear Mr Allen

The Nez Perce Tribe appreciates the opportunity to comment on the Draft Environmental Impact Statement (DEIS) and the proposed Wallowa-Whitman National Forest Plan. This plan is important to the Tribe because, by treaty, we retain fishing and hunting rights which will be affected by the land uses proposed in the plan.

Existing court decisions state that all agencies of the federal government have retained "trust" responsibility for management of treaty right resources. So, not only is the Wallowa-Whitman National Forest managing the habitat supporting treaty right resources it also retains the responsibility to manage these resources "in the strictest fiduciary" sense (according to Nance v EPA) for use by members of the Nez Perce Tribe. It is our impression that issues identified in the DEIS such as "community stability" have taken precedence over the legal obligations of the U S Forest Service to uphold the treaties between the Nez Perce Tribe and the Federal Government.

1275 The Tribe notes that fish and wildlife populations within northeastern Oregon are vitally dependent on habitat management and protection as well as harvest management for their continued existence. The Nez Perce Tribe as a comanager of treaty right resources is actively involved in fish and wildlife population management with the three states occupying the ceded area and other entities exercising harvest regulation authority such as the U S Fish and Wildlife Service.

The Forest Planning process is an opportunity to become as actively involved in habitat management as we are in harvest management. Only through a closer tribal involvement in the planning process will you and your staff be prepared to act on your legal responsibilities embodied in the treaties.

cc Tom Remington, BIA  
file

JHR smc

Nez Perce

TRIBAL EXECUTIVE COMMITTEE



(208) 843 2253

July 23, 1986

Mr. Jerry G. Allen, Forest Supervisor  
Wallowa-Whitman National Forest  
Federal Building  
P. O. Box 907  
Baker, Oregon 97814

Dear Mr. Allen

On July 7, 1986, we sent to you a cover letter summarizing our concerns and indicating additional comments will follow. Enclosed are our specific comments pertaining to the Proposed Wallowa-Whitman National Forest Plan.

We appreciate the opportunity to comment on the planning process and look forward to working together in the future.

Sincerely,

Herman Reuben  
NPTEC Chairman

cc: file  
Fisheries Department

JHR bjr

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NEZ PERCE TRIBE'S COMMENTS  
WALLOWA - WHITMAN NATIONAL FOREST PLAN

The Nez Perce Tribe has reviewed the Draft Environmental Impact Statement and the Proposed Forest Management Plan for the Wallowa - Whitman National Forest. The Tribe understands the Proposed Plan(C) to be the preferred choice by the Forest among the numerous alternatives developed within the timber production constraints imposed as "given" by the National Forest Management Act using assigned resource values and various algorithms chosen by USFS personnel. The Tribe appreciates the effort which has gone into the development of the plan and commends the Wallowa - Whitman National Forest for their concern of Tribal values and comments during the planning process.

The Tribe is concerned over the Plan's vulnerability to future budget cutbacks which might prevent its implementation, the quality of the monitoring plan, and management directives in relation to roadless areas, riparian areas, fisheries/water quality constraints, and minimum viable wildlife populations. The Tribe feels that the following comments should be examined for incorporation into the Plan as they would raise the level of protection and enhancement efforts for fisheries and wildlife resources and their habitats; for it is the Forest Service that manages the habitat supporting the populations comanaged by the states and Tribes.

## BUDGET

A major concern deals with an adequate budget to properly implement the Proposed Plan. Considering the current economy, present budget cutting measures in the federal government, and the possibility of every forest requesting an increased budget to implement forest plans, there is some doubt whether the required budget will be appropriated every year. In order to properly implement the Plan, funding for fish, water quality, and wildlife mitigation, and fish and wildlife habitat improvement (for past practices and annual maintenance) needs to be available initially as well as in subsequent years. In recent years, the Wallowa - Whitman National Forest has been relying on "soft money" from the Bonneville Power Administration to fund habitat enhancement projects. The Tribe supports these projects, but notes that the Forest Service has a responsibility to adequately fund mitigation and enhancement projects, especially where developmental activities have impacted fish and wildlife resources. Historically, budget cuts affect fisheries and wildlife resources more than timber-oriented activities. In years of inadequate funding, the budgets for development-oriented activities (timber, road construction) should be reduced to meet fisheries and wildlife goals and objectives.

The forest-wide management direction identifies research needs to improve and update the Forest Plan. Research involving fisheries, water quality, wildlife, and other resources is needed to "fine tune" and improve on the models and increase the database. Any budget cuts

involving research will definitely prevent the Forest from achieving an effective long-term management plan.

Monitoring, which is an integral component of the Forest Plan, essentially shows if the Forest is meeting its planned goals and objectives. Budget cuts affecting the monitoring of any past, ongoing or planned activities would not adequately protect the fish/water quality and wildlife resources. Therefore, the Tribe strongly recommends that monitoring and evaluation of the Forest Plan be adequately funded to protect and enhance the fisheries and wildlife resources.

## MONITORING - EVALUATION

The monitoring and evaluation of the proposed plan is the most critical component of the planning process. The Tribe notes the future of the fish and wildlife resources hinges on the success or failure of the monitoring efforts to provide the manager with reliable, accurate, and timely evaluations of the Forest activities. The monitoring plan needs to evaluate the proposed activities on a forest-wide basis as well as analyzing the effects of a specific project within a small watershed.

The proposed monitoring plan fails to adequately evaluate the impacts of developmental activities on the fish and wildlife resources. The Plan outlines monitoring of fish habitat improvement work, riparian zones, and water quality, but neglects to provide a

plan that monitors the overall condition of fisheries habitat throughout the forest and at specific locations. To effectively evaluate a proposed action, the monitoring plan must be geared to the collection of baseline data. The Forest needs to select a series of representative streams for the monitoring program and inform the public of the locations and parameters to be monitored. The Tribe suggests the Forest integrate the fish habitat monitoring program that the Nez Perce National Forest has developed into this monitoring plan.

The method of monitoring several wildlife related concerns appears to have standards that are: (1) poorly defined and (2) scheduled to be summarized only every 5 years with (3) high thresholds of variability versus the standards of "allowable timber sale quantity". As an example, one method of monitoring available snag habitat is "incidental observations", which are to be summarized every 5 years, with a threshold of variability set at "significantly different", while the allowable timber sale quantity is to be monitored 3 different ways, annually, with a 10% (+or-) threshold of variability. If the monitoring plan is to work, both for the Forest and for the Nez Perce Tribe, these monitoring criteria need to be made meaningful not only for timber but for wildlife concerns too. Most Forests envision a plan lasting for a maximum of 15 and possibly only a 10-year period. Therefore, monitoring needs to be performed and reported to the agencies managing the fish and wildlife resources on a shorter time table than a five year period. We recommend a yearly report and meeting of the Tribes, State and Federal Fish and Game Agencies during which the Wallowa-Whitman Forest can update the

population managers regarding achievement of Forest Plan goals.

#### FISHERIES

The Nez Perce Tribe is concerned with all activities which may alter the status of streams within the range of Columbia River anadromous fish. The wild runs of both steelhead and chinook salmon are now at critical levels where environmental impacts could greatly reduce their ability to maintain their reproductive status. The anadromous fisheries in the Northeastern Oregon subbasins is a major concern for the Nez Perce Tribe in terms of protecting and enhancing the runs and providing for the ceremonial and subsistence needs of its people. The anadromous fisheries habitat has been severely altered in the Grande Ronde, Imnaha, and other drainages by past developmental activities. Planned mitigation will, in some cases, improve the habitat potential (if necessary funding is available), but existing roads, future roads with related timber harvest, and present livestock grazing levels will prevent or delay the achievement of self-perpetuating and harvestable production levels.

The Wallowa - Whitman National Forest has in the Tribe's view devalued the importance of fisheries habitat in the restoration of the anadromous fish runs. The Tribe acknowledges that the hydroelectric development on the Columbia and Snake Rivers is a major factor for the decline in the anadromous fish runs, but notes that habitat degradation has also contributed to the demise of the runs. Federal, state and Tribal entities are joining forces in a coordinated effort

to achieve optimum passage and survival of the anadromous fish within the Columbia and Snake River mainstems. To achieve the long-term objective of historic runs of anadromous fish, quality habitat for rearing and spawning must be available. Any additional habitat degradation will not only reduce current anadromous fish production, but will seriously jeopardize basinwide plans. Therefore, undeveloped areas are increasingly important to the Tribe, to provide the spawning and rearing habitat necessary for the production of wild/natural runs and a harvestable supply of anadromous fish.

The proposed management directives for the roadless areas on the Wallowa - Whitman National Forest are a major concern to the Tribe in terms of anadromous fisheries protection. The Tribe is opposed to any further road construction or timber harvesting within the Joseph Creek roadless areas as these activities could potentially jeopardize the benefits of the ongoing enhancement efforts. The Tribe also recommends that the roadless areas within the Hells Canyon National Recreation Area remain essentially roadless with minimum timber harvest.

MANAGEMENT AREAS

In reviewing the Management Areas and corresponding prescriptions, the Tribe noticed the limited application of the anadromous fisheries prescription. The Tribe supports the proposed anadromous fisheries prescription in the John Day drainage (Management

Area 18), but notes additional drainages should be designated under this management prescription. The Tribe recommends the Upper Grande Ronde subbasin, Joseph Creek, Imnaha River, and Catherine Creek be included in Management Area 18.

RIPARIAN AREAS

The riparian standards and guidelines outlined in the Proposed Plan to achieve the management intent of protecting or enhancing riparian-dependent resources need to be more specific and drainage-oriented. In the Proposed Plan, riparian acres are included in management areas which emphasize other resource objectives. The Tribe recommends a separate management area be created to include all riparian areas along Class I, II, and III streams and a specific set of standards be developed for managing these areas.

The Proposed Plan allows for clearcut and selection harvesting practices in riparian areas. Even though the standards require designing timber harvest activities to protect or enhance riparian-dependent resources, the Forest needs to restrain excessive harvesting in riparian areas. Reduction of basal area from timber harvest in riparian areas should be limited to 25 percent to minimize effects on stream cover and temperature. Also, to provide for natural structure recruitment, management activities should avoid harvesting only mature and old growth trees.

and adjacent to critical anadromous spawning and rearing habitat be classified nongrazing areas.

3) The grazing intensity on remaining riparian areas (Class I streams) be reduced to enhance the anadromous fisheries.

#### WILDLIFE

Page III-36 of the DEIS seems to embody the spirit that prior to the 1920's elk did not exist in northeast Oregon and the advent of timber management has allowed elk numbers to rapidly expand. The idea that "modern day management" has provided elk for all is foreign to us. Archaeologists inform us that there is record of Nez Perce hunting camps in Idaho that date back 10,000 years. There were elk and deer bones found throughout these excavations. Investigations have shown that members of the Confederated Salish- Kootenai Tribes, with whom the Nez Perce had social discourse, periodically burned ranges within their area of influence. Additionally, Lewis and Clark recorded traversing extensive burned areas on the west side of the Bitterroot Mountains. The journals also make mention of the party being entertained in the evening by Nez Perce using dry kindling stacked around the base of live trees to create a Roman Candle of sorts. From our perspective, prior to non-Indian settlement, herds of big game were maintained by periodic burning of ranges by natural or man-caused means and light hunting pressure from a relatively small,

Specific standards for managing riparian areas are needed to adequately protect the fish and wildlife resources. New road construction should be avoided near or adjacent to streams except at specified crossings. If conditions require roads parallel to streams, a buffer strip of 100' width should be required between road and stream. This buffer strip should be protected from harvesting and not be prescribed in road management plans as the mitigation of road runoff. For fisheries, streambank and streambed protection, and reducing overall sediment impacts, the standards should require that skid trails are located outside riparian areas and logs are suspended completely when crossing riparian areas of perennial streams.

The Tribe is very concerned over the continued deterioration of the riparian areas along anadromous streams due to livestock grazing. The Tribe notes the Forest proposes changes in the current grazing management directives for anadromous fisheries protection, but concedes to livestock interests by allowing moderate grazing along Class I streams. Considering the present condition of the riparian habitat along anadromous streams and the critical condition of the wild anadromous fish runs, the Tribe recommends:

1) Riparian areas along Class I streams that have not been subjected to past grazing practices or are not being currently grazed be classified nongrazing areas

2) Riparian areas along Class I stream currently being grazed



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10 dispersed, subsistence-oriented population.

The situation changed with the advent of non-Indian incursion into the region and the initiation of market hunting. We feel that herds depressed by settler subsistence activities and market hunting were only further reduced by the extensive efforts expended to suppress wildfire during the early and mid part of this century. It is our contention that herd levels fluctuated according to available habitat prior to the mid to late 1800's. Since then the elimination of market hunting and the transition of hunting, for the non-treaty population, from a subsistence activity to a "sport" has allowed big game populations to increase once again, if the habitat now remains to support populations at their former levels. Which brings us back to the Wallowa-Whitman National Forest Plan and its efforts to balance wildlife habitat management, grazing, timber production, and a variety of other concerns.

The Columbia River Intertribal Fish Commission comments will provide the legal background to illucidate the fact that the initial goal of the Plan should be to meet its LEGAL TREATY OBLIGATIONS BEFORE allocating resources for concerns such as "economic stability", which, in actuality, is more dependent on price of lumber and home mortgage interest rates than the supply of wood. It seems plainly evident to us that the Forest Service does not control the employment of individuals at area mills, corporations headquartered outside the region do. Corporations that are consistently constructing more and more efficient mills that employ fewer and fewer people.

We believe that the Wallowa-Whitman N. F. should concentrate on meeting its trust responsibility to the Nez Perce Tribe as spelled out in the Treaty of 1855, sections of which are quoted on page 4-18, FIRST, before addressing constraints such as "economic stability." As an example, we cannot find anywhere in the Plan where stability of the Nez Perce Indian community, which is dependent on subsistence products from the forest such as fish, elk, deer, pasturing of stock, roots, and berries, or the value of a cultural experience are evaluated. It appears that the concerns for supplying wood fiber to area mills and AUM's to local ranchers overrides the trust responsibility to manage for tribal subsistence opportunities because the monetary values of the former products are easily assessed. We believe this position to be legally indefensible if maintained in the final plan.

Many of the wildlife values driving Forplan are based on WFUD's. Dollar values per WFUD stated are not comparable for similar activities in Idaho. Are hunters and campers more frugal in Eastern Oregon? Do the Idaho residents that hunt in Oregon spend less there than in Idaho? Knowing the volume of traffic from the Portland metropolitan area that comes to the forest to hunt, fish, camp, and recreate, it seems that the value for an eastern Oregon WFUD would be higher than an Idaho WFUD. Does the WFUD include the Nez Perce subsistence activites (hunting and fishing) and a nonconsumptive cultural/religious excursion? We keep no records on the extent of these activities so whatever value has been attached to them and how the value was established would be of great interest to us.

When reviewing the alternative plans and their various outputs as found in Table #II-3a of the DEIS, we noticed that comparative values between 'Option B-Departure' and 'Option F' varied by 44% and 53% respectively for allowable timber harvest and miles of road constructed. Yet the elk and anadromous fish output levels are the same. Even by the year 2030 the anadromous fish levels have not changed and the elk population is only decreased by 10% for the same time period. We understand that the timber harvest mitigation activities to be implemented by the Forest Service will dampen the impact of developmental activities. However, it is hard to envision that sawlog volume and miles of road constructed can fluctuate by close to 50% and have no impact on the anadromous fishery and only a 10% change in the number of elk summering on the forest. Computer modeling is probably the best way to evaluate the numerous alternatives available. However, the output comparison discussed above indicates to us that the model has reached its performance limits in this instance. We seriously question the assumptions built into the elk management section and the ability of this element of Forplan to achieve its designed purpose in this instance since Option F, which is intended to maximize elk, does not even show elk population levels that were actually attained within the last 10 years for this region. There appears to be an artificial ceiling regarding population levels and a dampening effect that minimizes developmental impacts such as timber harvest. This again points to the plan's high emphasis on timber outputs and a low emphasis on wildlife outputs. As an example, the "Proposed Land and Resource Management Plan" contains a table on

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page 2-17 entitled, "RPA Targets and Maximum Implementable Timber Outputs" which appear to be one in the same. The Fish and Wildlife appendices, F and G, are repeatedly sprinkled with the terms "maintain viable populations" and "minimum management requirements." The presence of these issues phrased in this manner appears to reflect a management attitude or prerogative rather than NFMA direction. We have not encountered the concept of minimum viable populations in other forest plans we have reviewed and can only conclude that this position is, again, legally indefensible. Plentiful wildlife resources are an integral part of our cultural, religious, subsistence heritage that must be maintained above "minimum management requirements" to have any real meaning.

#### CULTURAL RESOURCES

The identification, protection, and especially any collection/excavation activities regarding cultural resources should involve the affected Tribe. Any artifacts excavated are the property of the Tribe and their disposition should be coordinated between the State Historic Preservation Officer, the Wallowa - Whitman National Forest, and the affected Tribe. Any activity with the potential to impact cultural resources should receive a cultural clearance. All sites identified should be avoided.

## GRAZING

It may be true that there is currently no conflict between grazing and big game, as the plan states, but no evidence is presented that proves this situation will be maintained if AUMs available for lease are increased by 11%. The plan does not address the President's Indian Policy and Implementation Guidelines to assist the Tribe's in achieving self-determination. The Nez Perce Tribe, once the predominant "allottee" in Northeastern Oregon, wishes to seek self-determination through exercising treaty rights not utilized to date. The Nez Perce Tribe is interested in reserving an allotment for use by its members, which is not addressed in the plan.

October 19, 1989

Chuck Quimby  
 Wallow-Whitman National Forest  
 P.O. Box 907  
 Baker, OR 97814

Dear Chuck:

This letter is in response to our telephone conversations and a review of segments of the Threatened, Endangered, and Sensitive Program for the Wallow-Whitman National Forest as it pertains to plant species.

After reviewing the extract from Chapter 4 (edition of 12/88) etc I feel very comfortable with the direction you are taking. Your goal is forthright and falls in line with the intent of the Endangered Species Act. I see no problem with the Standards and Guidelines fulfilling those needs necessary to accomplish your goal. You are to be commended on this segment of the Forest Plan and the protection and enhancement it gives sensitive plants and the plant program.

I have just recently received final recommendations reviewing plant taxa candidate status for the U.S. Fish and Wildlife Service in Region One. These should be published in the Federal Register soon. From these recommendations I will give you the changes we discussed in our recent telephone conversation.

Federal Candidates	Federal Status
<u>Oregon</u>	
Botrychium crenulatum	2
Castilleja fraterna	3C
Lomatium erythrocarpum	1
Silene scaposa var. scaposa	3C
Leptodactylon pungens ssp. hazeliae	2
Botrychium ascendens	2
Botrychium pedunculatum	2
Mimulus clavicola	1
Mimulus hymenophyllus	2
Primula cusickiana	3C
Senecio porteri	3C

Rubus bartonianus 3C

Idaho

Calochortus nitidus 1  
 Halimolobos perplexa var. perplexa 3C  
 Haplopappus radiatus 1  
 Lomatium rollinsii 3C

These should take care of the changes as they will be published. At this time I would recommend using them.

Thank you for the continued interest in the Endangered Species Program. If you have any questions or comments please call me, FTS 554-1806, (208)334-1806.

Sincerely,

*Robert L. Parenti*  
 Robert L. Parenti  
 Tri-State Plant Manager  
 U.S. Fish and Wildlife Service

cc: PFO  
 Attention Diana Hwang

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