Attachment 2

Survey and Manage
Additional Clarifying Questions and Answers-Group 2
About MR Amendments for Fuel Hazard Reduction Treatments Around At Risk Communities

Group 2 – Certain Mollusks, Amphibians, and Red Tree Vole

The Management Recommendations (MRs) in Attachment 1 were sent to the field previously as draft, for comments. Many of the comments were then addressed by making changes to the final version of the MR amendments and/or transmittal letter. Most of the comments that could not be accommodated by edits are addressed in the clarifying Questions & Answers below.

In addition, please see Attachment 2 for MR amendments transmitted in July 2002 for questions and answers pertaining to taxa/species covered by those amendments. Many of those questions and answers addressed in that Attachment are also applicable for species covered in this transmission.

1) Comment: *"Structures may be interspersed throughout the private property, with many of them not visible from the FS land boundary. Are we expected to GPS every structure/development on private land to be able to take advantage of the 300 foot buffer?...Depending upon the placement of their structures, more protection might be given to their barn than their home…By designing fuel treatments with varying widths along the FS boundary (depending upon where this 300 foot buffer occurs), along with untreated pockets within the 1.5 mile fuel treatment areas, subsequent fire suppression efforts may not necessarily be aided by these fuel treatments, thereby requiring more extensive (and possibly more destructive) fire suppression efforts.*

Response: Since it is likely you'll have fewer S&M sites around communities at risk than you will have structures within those communities, a suggestion would be that whenever a S&M site is found, try to determine the proximity to the nearest private property line/community at risk. It is highly likely that there are few S&M sites that are located within 300 feet of this line. If there is a community at risk boundary within 300 feet of the site, then you could determine whether there are structures within that same radius. If there are, then the 300-foot provision in the MR amendments applies. If there are not any structures, then those "higher" risk provisions for S&M site management do not apply. Since all of these species are considered rare or uncommon, the goal is to allow an increased risk to S&M site persistence only when needed. Given the parameters agreed upon previously by R5, R6 and BLM fuels specialists, that was determined to be within 300 feet of structures.

If there are numerous sites within 300 feet of structures associated with a community at risk, or if site management as recommended by these MR amendments cannot be implemented in a way that also effectively addresses fuels issues, contact the S&M program manager. In these case-by-case situations, we'll try to work towards a

reasonable resolution. In the interim, please feel free to send us maps that display these situations, where the problems you mention have arisen.

As with the lichen, bryophyte, fungi, and vascular plant fire MR amendments, these amendments for mollusks, amphibians, and red tree voles will not require survey within 300 feet of structures if the MR allows potential site loss of any site found within that radius. In other words, if the MR states that site management for any site found within 300 feet of a structure is not required, then there is no need to survey for that particular species (since if you found it you would not be managing for it anyway).

2) Comment: *"When adding S&M surveys and the additional layout necessary to avoid…sites, it would be economically unfeasible to execute these fuel treatments throughout the areas that need to be treated around communities."*

Response: S&M is a mitigation measure added to the Northwest Forest Plan to help provide a reasonable assurance of persistence for rare and little known late-successional/old growth associated species. The mitigation involves conducting surveys prior to implementing projects that may significantly impact the species and/or its habitat. Once discovered, these sites must be managed in order to achieve overall species persistence objectives. These MR amendments attempt to provide some flexibility in the management of sites found in specific areas around communities at risk. This increased flexibility may result in an increased risk to the continued existence of that particular site. These amendments attempt to balance the risk to overall species persistence with the need to reduce fuel loadings around communities at risk. The cost of implementing these recommendations is certainly greater than if no recommendations were required, but hopefully due to their increased flexibility, are less expensive and more effective than current, non-amended MRs.

Comments specific to Mollusks

3) Comment: *"Option A broadcast burning is overly prescriptive. It very well could be humanly impossible to assure that there is a 30' buffer around occupied sites. We have many documented experiences of meeting and exceeding the 80% objective but not on a site-specific basis."*

Response: Many of the recommendations for the previously released taxa (lichens, bryophytes, fungi, and vascular plants) also have prescriptive buffers around the occupied site, in order to eliminate the potential for the site to be lost through burning. Known site sizes for mollusks are likely between 1.5 to 3 acres. One way of attempting to meet the goal of retaining 20% of the known site as unburned might be to try to "buffer" the entire known site, and if the prescribed fire ends up jumping that buffer, it is likely that less than 80% of the known site may end up potentially being burned (and hence you would meet the recommendation). The recommendation to retain 20% as unburned within the

known site is to allow for continued occupancy of the site by mollusks, while allowing a reasonable risk.

4) Comment: *"We may need to thin within an occupied site."*

Response: You could thin within an occupied site if the species is considered to be locally common, and Option B is followed. Otherwise, given the rarity of the species, thinning within occupied sites is not recommended.

5) Comment: *"The issue surrounds the burning window; the preferred time period is not feasible for successful implementation due to burning conditions."*

Response: The times given (burn in late spring or early fall) are recommendations, reflective of the time periods when mollusks may not be surface active. We also recognize that early fall is wildfire season. There may be a couple of options: 1) try to burn during the recommended time periods, or 2) burn outside of the recommended time periods BUT avoid the known sites or buffer the occupied sites (as described above).

Comments specific to Amphibians

6) Comment: *"For amphibians, the inclusion of all suitable habitat contiguous with the occupied site in the definition of known site can greatly increase the size of these areas. The MR for the Applegate group of avoiding ground disturbing activities on 80% of the known site could include a substantial amount of acreage".*

Response: The definition of a known site to include all contiguous habitat was previously defined in the survey protocol. This is not a new requirement. If surveys have been conducted to protocol, then you can delineate the known site for just those areas where the habitat is occupied. You would then apply these MRs only to those areas. Unless surveys have been conducted, you would conclude all suitable habitat adjacent to an occupied site to be part of the known site.

7) Comment: *"The recommendation to maintain "all possible large woody debris post-burn" seems unreasonable…Again, more large woody debris contributes to the available fuel loading.*

Response: Large woody debris is a benefit to this species. Small woody material, fines, and flashy fuels could be treated unconditionally to reduce the potential for a fast moving wildfire.