Alternative A- No Action

Direct/Indirect Effects – Alternative A

The No Action alternative would not create any further human-caused ground disturbance in the South George Vegetation and Fuels Management project planning area and therefore, no direct or indirect effects. The spread of invasive plants from currently existing populations and off-forest seed sources would continue at the current level. Animal and vehicle vectors would likely be the primary means of seed introduction into the project area.

Cumulative Effects – Alternative A

For the No Action alternative, South George project would not be authorizing any actions; therefore it would not be adding anything to the effects of past, present, and reasonably foreseeable future actions. Based on the definition provided in the CEQ regulations (p. 3-1), there would be no cumulative effects for the No Action Alternative.

Effects Common to Action Alternatives

Direct /Indirect Effects – Alternatives B, C, and D

The activities that are the same with regard to spreading populations in all action alternatives are shown with approximate acres below in Tables 3-72 and Table 3-73. These activities also are the same between action alternatives for the potential for introducing infestations.

Table 3-73a Invasive Species Mapped In Activity Areas

Species priority group	Jackpot Burn Acres	Broadcast Burn Acres	Grapple Pile Units Acres	Hand Thinning Acres	Mechanical Thinning Acres	Landscape Prescribed Fire Acres
1	75	0	7	0	150	1
2	870	0.5	870	870	1,015	870
3	880	0.25	870	870	875	870

Table 3-73b Invasive Species Mapped Along Temporary and Decommissioned Roads

Species priority group	Alternative B Temp. Roads Acres	Alternative C Decommissioned Roads Acres	Alternative D Temp. Roads Acres
1	0	75	0
2	0	925	0
3	0	885	0

Design features (Chapter 2, Table 2-5), such as inspecting activity areas and haul routes before and during activities is expected to reduce any increase in weed infestations caused by the spreading of new seed, even if prevention measures are not 100 percent effective. These prevention measures would not affect spread of any older seed that may be present in the soil seedbank in the vicinity of pre-existing populations. It is not possible to calculate exact acreage reductions resulting from these weed treatments. However, the reductions in areas at risk would be proportional for each action alternative.

(*) We are concerned about the potential for this project to spread existing invasive plant populations through the management activities proposed and listed in Tables 3-73a, "-b, and 3-74 and 3-75. Why is the Forest Service not planning to avoid these activities in and adjacent to known populations of invasive plants? This is the safest approach and typical of other timber sale planning by the Forest Service elsewhere. We request that all known invasive plant populations be avoided and buffered from planned management activities to prevent the dispersal of invasives in addition to other prevention measures. Roads to be decommissioned should have invasive plants eradicated first or otherwise contained.

(*) This is a substantial amount of acreage of infestations not to be avoiding.

(*) The Pomeroy District and the Umatilla National Forest should use herbicides as a last resort, not the first response, create a timetable with benchmark goals for phasing out toxic herbicide use, and move away from using Picloram, as it kills many native plants and spreads through soils and water readily.

Blue Mtns. Biodiversity Project comments: ...

(*) Re: Table 3-74, there is no choice offered among action alternatives to avoid potential dispersal of invasive exotic plants through proposed management activities.

The following table shows the number of approximate acres of invasive species, by priority group, previously mapped within harvest units and along haul routes. The acres listed indicate the relative potential for spreading populations. Inadequate range of alternatives re: invasive plant avoidance

Table 3-74 Invasive Species Mapped In Harvest Units and Along Haul Routes

	Alternative B and C		Alternative D	
Species priority group	Acres within harvest units	*Miles along haul routes	Acres within harvest units	*Miles along haul routes
1	366	27	110	16
2	1,055	36	960	34
3	940	34	915	30

*Danger tree removal will occur on 300 feet on each side of haul routes and have the same area affected as the haul routes.

Reason for our concern → (*) The potential for introducing new infestations is relative to the total amount of disturbance and therefore can be compared by the number of acres of activity in each alternative, including transportation activities.

Table 3-75 Proposed Harvest Acres and Road Miles Used in Action Alternatives

Unit of Measure	Alternative A	Alternatives B and C	Alternative D
Harvest Acres	0	3,900	2,600
Haul Route Miles	0	79	71

Cumulative Effects - Alternatives B, C, and D

Ongoing human and animal activities in the project planning area that could create bare soil and spread plant propagules include vehicle traffic, cattle grazing, recreation activities, woodcutting, and wild animal movement. All of these activities could affect areas outside the project planning area. It is not possible at this time to calculate how many acres may be affected.

Future foreseeable non-commercial thinning activities within the project planning area, occurring 18-20-years from harvest activities, would not likely create bare soil, but would involve vehicle traffic that would go outside of the project planning area. Future foreseeable invasive plant treatments, over the next 10-years, would continue to manage weed populations in the project planning area and outside the area Monitoring, mapping, and assessment of new populations would increase tracking capacity in preparation for treatment. These foreseeable future actions would further reduce the number of acres at high risk of weed spread. It is not possible at this time to calculate exact acreage reductions resulting from these weed treatments.

FINDING OF CONSISTENCY

The proposed South George Vegetation and Fuels Management Project is consistent with the Forest Plan, as amended, with respect to noxious weeds. Compliance includes the above discussions of existing condition, the mechanisms of invasive species spread, prevention measures (standards and guidelines) listed as design features, and risks.

(*) One of the key problems with this DEIS is that the Forest Service has ignored the spirit and intent of the Forest Plan and other guiding laws & standards - in this case, to prevent the introduction & dispersal of invasive plants, which should logically include avoiding dispersing activities within known invasive plant populations, not just discussing the problem. In other instances, the intent to avoid further reducing numbers of large trees (>21" dbh) and old forest structure is ignored & protection of critical TES & MIS wildlife habitat.

VISUAL RESOURCE (SCENERY)

This section incorporates by reference the South George Scenery Resource Report contained in the project analysis file at Pomeroy Ranger District. Specific information on the methodologies, assumptions, and limitations of analysis and other details are contained in the report. A summary of the current conditions of the affected environment and the predicted effects of the proposed action and its alternatives are discussed in this section.

SCALE OF ANALYSIS

The South George project planning area is located on Pomeroy Ranger District and is approximately 21,000 acres in size. It is primarily situated in Asotin County with a small portion in Garfield County, Washington.

Indicators for comparison purposes between alternatives are:

- **Scenic Integrity** - The degree to which the scenery is free from visible disturbances that detract from the natural and socially valued appearance, including disturbances due to human activities or extreme natural events inconsistent with the historical range of variability.
- **Scenic Stability** -The degree to which the desired scenic character can be sustained through time and ecological progression

Regulatory Framework:
Integration of this scenery analysis assures the South George Project is consistent with scenery-related Forest Plan direction, Forest Service policies, and applicable elements of Forest Service Visual Management and Scenery Management systems. The following table shows Forest Plan visual quality objectives by management area (FP pp. 4-117 – 4-163)

Table 3-78 Visual Quality Objectives for Specific Management Areas

Management Area	VQO
A6-Developed Recreation	Retention-Partial Retention
C1-Dedicated old Growth	Retention
C3-Big Game Winter Range	Retention –Maximum Modification
C3A-Sensitive Big Game Winter Range	Retention –Modification
C4-Wildlife Habitat	Retention –Modification
C5-Riparian Habitat	Retention –Modification

AFFECTED ENVIRONMENT

Scenic Integrity

Scenic Character - The project planning area lies at the head of the drainage system flowing east which includes several streams; and at the breaks of Wenatchee Creek and the Grande Ronde River drainage that flows south. The topography drops dramatically away to the west along forest road (FR) 4300 giving way to an expansive vista that stretches into Oregon and Idaho where the Wallowa Mountains and the Seven Devils can be seen on the horizon. To the east, and within the project area the topography is made up of a series of steep canyons that start at the headwaters as heavily timbered draws of mixed conifer and transition to ponderosa pine stands and grassland slopes. The views of these landscapes are a mix of

foreground views into the timber stands and vistas down and across the canyons. The vegetative mosaic of timber and grasslands laid across the dissected topography creates diverse views.

Visual Quality - The existing visual quality is evaluated by looking at the scenery from the routes and sites that were utilized in assigning the visual quality objectives for the Forest Plan. An evaluation of the existing condition considers the degree of visual disturbances of past activities to the natural appearing scenery that is derived by the contextual landscape and the historical range of variability.

Transportation Routes - There are currently 50 miles of roads open to motorized vehicle travel in the project planning area (33 miles of maintenance level 3[19] and 17 miles of maintenance level 2[20] roads). Approximately 43 of those miles are open to ATV's and motorcycles (all are open roads except FR 4300 which is approximately 7 miles in length). These routes provide access for hiking, ATV riding, hunting, berry picking, and sight-seeing.

Portions of FR 4300 and 4400 and FR 4304 are open to motor vehicle travel, except from December 1st to April 1st when they are used for snowmobile activity. These routes and FR 4302 (Hogback Road) are popular for ATV riding during summer and fall hunting season. They also constitute a significant portion of the groomed snowmobile trail system during the winter months.

Forest road 4300 runs along the breaks of the Grande Ronde River drainage. Immediate views to the south are of the vast expanse of steep drainages and flat ridges. The Wallowa Mountains and Seven Devils in Idaho are visible on the horizon. Views to the north looking into the project area are varied. The timbered foreground in areas that have not been previously harvested are dense with very little understory growth. The thick canopy closure makes these areas dark. The viewing distance into these areas is very limited. There are many areas that have been harvested and these plantations area more than 20 feet in height. A recent thinning has taken place which has reduced the thick regrowth allowing views through the trees. The patchwork appearance of young plantations and unharvested timber is very unnatural appearing. The edges of the plantations are very prominent in the middle ground views from Hogback Road. Where these patches are most visible the visual quality is modification. This patchwork is not evident from FR 4300 road; therefore the existing visual quality is partial retention. See Figures 3-12 and 3-13. ® This dosn't to the experience of recreationists who get off main roads (hiking, hunting, berry-picking, etc.) and experience a greatly modified landscape that is very unnatural in appearance. This view on p. 3-161 looks very modified by clearcuts and unnatural to us, not just "partial retention."

[19] Maintenance level 3 – suitable for passenger vehicles, surface not smooth.
[20] Maintenance level 2 – suitable for high clearance vehicles.

The views in photo figures 3-13, 3(1)-14, 3-15, and 3-16 don't appear to support DEIS statements that "the remaining timber is visibly unhealthy" and that: "Much of the grand fir is dead or dying." Instead we see alot of green mature trees on slopes outside of clearcuts and in draws. These appear to be mostly fir except for fig. 3(1)-14 and possibly fig. 3-15. There appears to be green Grand fir in Fig 3-16. Fig. 3(1)-14 appears to be naturally patchy with grasslands and forest in draws, not unnatural appearing. Figs. 3-13, 3-15 and 3-16 show the unnatural appearance of clearcuts fragmenting mature forest. In these situations, unhealthy Grand fir could have been from heavy logging exposing them as unshaded, isolated canopy trees and disrupting soil fertility. Yet none of this is discussed in the DEIS.

Figure 3-12 View looking south east from the Hogback Road

Figure 3-13 View looking west from the Hogback Road

Forest road 4400 runs east west up Smoothing Iron ridge. To the west views are directly into the Asotin Creek drainage which has very steep slopes. This drainage is not within the project planning area but is a key visual attraction of this route. To the east views are of Cook Ridge, Dark Canyon, and Park Ridge which are rolling ridges running northeast. From this road, past clearcuts are visible in rectangular shapes across the north facing slopes. The remaining timber is visibly unhealthy. Much of the grand fir is dead or dying. The stands are very densely stocked with large amounts of down and dead material. The clearcut patches are coming in with small trees, but the view is very patchy and unnatural appearing. It then meets FR 4300 at the breaks of Wenatchee Creek. The views into North Fork Asotin Creek are similar to that of Wenatchee Creek. This route runs through previous harvest units as it traverses the landscape north south. The current visual quality varies from modification to maximum modification (Low to Very Low Scenic Integrity). See Figures 3-14 and 3-15

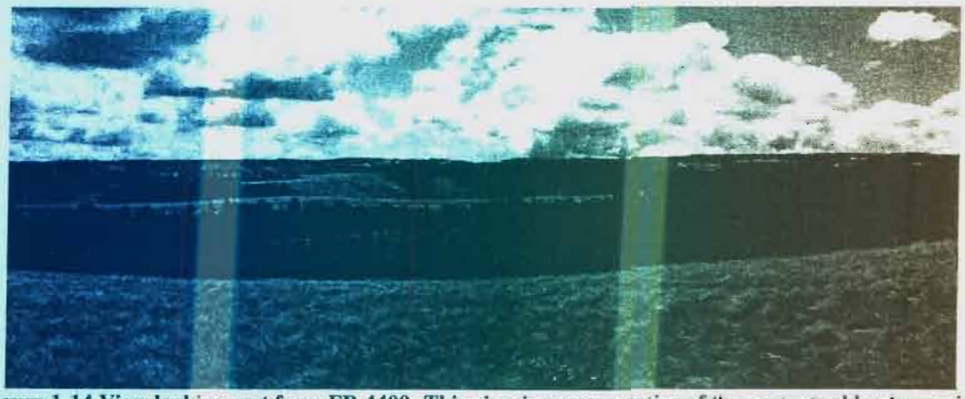


Figure 1-14 View looking east from FR 4400 -This view is representative of the contextual landscape in which the project area lies. The timbered canyons are often flanked by rolling open ridges. The draws are heavily timbered and contrast strongly with the grass slopes.

of the Wenatchee watershed to the south and the Grande Ronde River valley to the south east. The cabin is consistently rented throughout the summer and fall months. Currently the visual quality of scenery visible from the rental cabin is partial retention (moderate scenic integrity).

Cloverland Sno-Park is a developed winter recreation trail head located within the project planning area at the forest boundary on FR 43. This sno-park is the primary staging facility on the east side of Pomeroy Ranger District. The site is designed to accommodate vehicles with snowmobile trailers. Trailheads are in a sense the portal to recreation experiences on the forest. Therefore, scenery at this point establishes the initial setting for the experience. Snowmobiling is a popular winter activity across Pomeroy District. Approximately 47 miles of designated snowmobile trail are groomed on Pomeroy District each year. There are about 19 miles of groomed routes within the project planning area. The views from these routes are varied with canyon views, and timbered rolling ridges intermixed with grassy slopes. The timbered areas show visual signs of past timber harvest which often dominate the foreground and middleground views. The existing condition is modification along this route.

There is no inventory of dispersed campsites in the project planning area; however, there are a number of traditional dispersed campsites scattered throughout. Dispersed camping has traditionally been a popular activity in the area, particularly during big game hunting season. The scenery is an essential aspect of the recreation setting. The existing condition is modification to partial retention from dispersed campsites.

The table below lists the visual quality objectives (VQOs), scenic integrity as perceived by the public, and scenery integrity objectives.

Table 3-79 Visual Quality Objectives and Perceived Alteration

Visual Quality Objectives	Scenic Integrity as people perceive it	Scenic Integrity Objectives
Preservation	Unaltered (visually complete or intact)	Very High
Retention	Unnoticeably altered	High
Partial Retention	Slightly altered	Moderate
Modification	Moderately altered	Low
Maximum Modification	Heavily altered	Very Low
Unacceptable Modification	Unacceptably altered	Unacceptable

Scenic Stability

Scenic stability is the degree to which the desired scenic character can be sustained through time and ecological progression. The existing scenic stability analysis for South George project planning area focuses on the single major scenery attribute of vegetation, addressing its ecosystem conditions identified by field observation and Fire Regime Condition Class (FRCC) 7 coarse-scale data on vegetation and fire history data. Ecosystem changes to other minor scenery attributes such as landform, rock outcrops, and winter snowfall are not as critical to the project area's scenic character as its vegetation, since these changes are relatively stable over time regardless of fire behavior and human activities.

Evaluating scenic stability is done by considering conditions necessary to sustain desired scenic character of stands within the natural and historical range of the landscape. Appropriate stand density, species composition, and fuel loads are necessary for stands to maintain the inherent characteristics through their lifecycle. When trends such as increasing stand density, encroachment of less resilient species, increasing fuel loads, and high levels of mortality exist, the expected consequences are changes in the scenic character that are beyond the historical range. Examples of these consequences are large canopy openings

from intense wildfires, large stands of dead and dying timber, and loss of distinctive characteristic such as open, large tree character pine stands, lodgepole stand mosaics and multi-layered mixed species stands.

Gradual trends over time have altered species composition, stand structure, and age classes of the forest vegetation. Stands of large mature ponderosa pine that provide an open forest are diminished due to encroaching mixed conifer species, and past harvest practices that removed pine to release shade tolerant species. (See Vegetation and Fuels sections of this chapter).

Scenic stability levels provide a measuring tool that addresses the resiliency of the scenic attributes and the scenic composition of the desired scenic character. Scenic stability levels are defined as follows:

Scenic Stability Level Definitions:

Very High Stability—All dominant and minor scenery attributes of the valued scenic character are present and are likely to be sustained.

High Stability—All dominant scenery attributes of the valued scenic character are present and are likely to be sustained. However, there may be scenery attribute conditions and ecosystem stressors that present a low risk to the sustainability of the dominant scenery attributes.

Moderate Stability—Most dominant scenery attributes of the valued scenic character are present and are likely to be sustained. A few may have been lost or are in serious decline.

Low Stability—Some dominant scenery attributes of the valued scenic character are present and are likely to be sustained. Known scenery attribute conditions and ecosystem stressors may seriously threaten or have already eliminated the others.

Very Low Stability—Most dominant scenery attributes of the valued scenic character are seriously threatened or absent due to their conditions and ecosystem stressors and are not likely to be sustained. The few that remain may be moderately threatened but are likely to be sustained.

No Stability—All dominant scenery attributes of the valued scenic character are absent or seriously threatened by their conditions and ecosystem stressors. None are likely to be sustained, except relatively permanent attributes such as landforms.

The greatest hazard to scenery resources in the South George project planning area are large stand replacement fires that would burn much more intensely than what has historically occurred. Fire is a natural disturbance in this area but due to the stocking levels, species compositions, ladder fuels, and canopy closure that have developed over time, it is expected that a fire event would be much larger and more severe.

ENVIRONMENTAL CONSEQUENCES

ALTERNATIVE A – No Action

Direct/Indirect Effects – Alternative A

Visual Quality/Scenic Integrity – Implementing the no action alternative would cause no direct or indirect effects to the existing conditions. The existing visual quality would remain at *modification to partial retention.*

Scenic Stability – Implementing the no action alternative would cause no direct effects to the existing condition. Indirect effects are related to increasing stand density, encroachment of less resilient species,

(*) The majority of the public probably feels that unimpeded forest growth without logging & fuel reduction - especially in moist & cold forests - improves, not degrades, scenic & recreational values.

increasing fuel loads, and high levels of mortality. This trend decreases the resiliency of the timber stands causing the scenic stability to be continually reduced as conditions degrade. (!) The Forest Service is seriously out of touch with majority, modern public opinion.

Cumulative Effects – Alternative A

There would be no cumulative effects to visual quality/scenic integrity with implementing Alternative A because no direct or indirect effects would occur. Scenic stability would continue downward in future years as conditions degrade due to the lack of resiliency of timber stands.

Effects Common to All Action Alternatives (B, C, and D)

(*) A "longer viewing distance into stands" is not desirable when it is due to logging & unnatural conversion.

Direct/Indirect Effects -Alternatives B, C, and D

Effects vary as to the number of acres treated in each action alternative.

(*) These are unsupported assumptions that all or most forest stands in sale units are unnaturally dense or "overstocked".

Commercial harvest

The project units are designed to address the dense, overstocked stands throughout the project area. Proposed thinning prescriptions are to soften the hard edges of the past harvest units, which would decrease the unnatural appearance over time. (*) "Soften the hard edges" translates to increasing the size of existing clearcuts & increasing forest fragmentation.

(*) We are very opposed to conversion of moist mixed conifer forest to predominantly open Ponderosa pine & western larch - an unnatural & unsustainable condition for Grand fir & spruce fir forest types.

The silviculture prescription of improvement cutting (free thinning) would be used to select trees to harvest. This prescription selects trees based on species and size, leaving the "preferred" species (fire-resistant species - Ponderosa pine and western larch). Large trees of non-resistant species would remain. This practice leaves an uneven aged structure of the "desired" composition and densities. Commercial harvest leaves stumps which are visible from an immediate foreground distance (300 feet). Commercial harvest would open up the stands and allow more sunlight into the forest floor, and provides a longer viewing distance into the forest stands. Species "preferred" by whom? The timber industry. Composition "desired" by whom? Only the FS & timber industry.

Commercial harvest activities that would occur include tractor logging and skidding, skyline logging, and helicopter logging. Tractor logging and skidding creates some soil disturbance along skid trails, tearing the topsoil and exposing the soils. The understory vegetation is torn up along these skid trails which are visible from an immediate foreground distance. These visual effects are usually an immediate impact that dissipates within a short period of time. As vegetation returns the impacts are usually not visible after a growing season to the casual viewer. Skyline logging creates similar effects as tractor logging. The skid trails associated with skyline logging are usually longer than those associated with tractor logging. These trails can often times be visible from middleground viewing distances. However, these visual effects are also short-term. Helicopter logging creates very minimal effects to scenery. The stumps remaining are the only visible evidence that is created, when slash is treated.

(*) The visual impacts of skyline logging skid trails are often not "short term" but last for decades or longer.

Danger Tree Removal

Danger tree removal would cause some stumps to be created along haul routes in the immediate foreground. Stumps would be visible from the road and would cause a visible effect. The degree of effect is dependent on the amount of stumps and the location of the stump related to the road, as well as the viewing angle and the amount of grasses and forbs that may screen the stump.

(*) No one comes to the forest to see evidence of logging, which may discourage return visits & more recreation.

Fuel Treatments

Fuel treatments that would occur congruently with harvest treatments include mechanical thinning, prescribed burning of activity fuels, grapple piling, and yarding with tops attached. These treatments would "clean up" the majority of the slash created by the harvest activities. The effects are primarily beneficial to the visual quality, reducing the visual impacts of human activities with a natural appearing landscape. Removal or burning of residual material (tree stumps, snags, limbs and brush piles), removes "the clutter" that detracts from the remaining trees other scenic attributes. Most visual preference surveys indicate dislike for "messy" landscapes (Bradley, Forest Aesthetics, 1996, pg. 6). Non-commercial thinning

(*) "Terms like "clean up", "clutter" and "messy landscapes" have no relevance to ecological values and are purposefully misleading to the public, with no discussion of the ecological benefits of down wood & snags.

removes trees less than 10 inches DBH, where these trees are in excess. This activity is usually a benefit to the visual quality. Viewers are known to prefer views of large trees with open spacing.

(*) Viewers from where, viewing what? This is relevant to naturally dry, Ponderosa pine-dominant forest, not naturally denser, moister mixed conifer.

Landscape prescribed fire would create scorching across the acres of the prescription. This activity would create visual effects that are within the natural scenic character that is dynamic, changing with natural disturbance and cycles of growth and renewal. There would be some torching of individual trees, and groups of trees. (*) Recreationists do not just stay within the campground (eg. hikers, hunters, berry pickers, snowmobilers, ATV riders) so will see

Wickiup campground is located approximately one-half mile from the nearest harvest unit under all action alternatives. Visitors at Wickiup campground are not likely to experience direct or indirect scenic effects from harvest or fuels treatments with implementation of any action alternative.

direct & indirect impacts to scenic quality.

Under Alternatives B and C the Wenatchee Cabin Rental is between two tractor harvest units (Units 58 and 59). Visitors would experience a more open stand in areas several hundred feet to either side of the cabin. Under Alternative D the nearest harvest unit (unit 71) is located about one-quarter mile to the east and would likely be unnoticeable from the cabin. The scenic vistas to the south that many people come to the cabin to enjoy would remain unaffected with implementation of any action alternative.

(*) It's ridiculous & unnecessary to surround a popular recreation cabin with 2 logging units. Drop units 58 & 59.

Views from dispersed camp sites that are near or within treatment areas would initially be impacted by the harvest activities because of stumps and skid trail disturbance. The foreground views from these dispersed camps would be more open, allowing the more visual distance into the forest.

(*) An alternative would be to only non-commercially thin (up to 6-8" dbh) around dispersed campsites - in drier forest only.

There are no harvest or fuels treatment units proposed near Cloverland Sno-Park under any of the action alternatives. Visitors to the sno-park are not likely to experience visual direct or indirect effects from harvest treatments. However, those utilizing the trails would travel through a setting where harvest activity would be very evident. Stumps, skid trails, and blackened grasses and scorched trees would be visibly dominant in the short-term for the first 1 to 2 years. Treated stands would be more open visually. In the long-term stands would appear healthier after 1 to 2 years. (*) It simply isn't necessary to log everywhere the Forest Service has planned. Don't log along recreational trails.

There are a small number of acres that are within the partial retention visual quality objective (VQO). These acres are located along FR 4300. Alternative B proposes 158 acres of intermediate harvest, Alternative C proposes 158 acres of intermediate harvest, and Alternative D proposes 58 acres of intermediate harvest. The harvest treatments are expected to meet partial retention. Proposed harvest visible from FR 4400 would treat timber stands that remain between past clearcuts, thinning from below and opening up the canopy to allow more light into the forest floor, and "cleaning up" the dead and down material. This proposed harvest would soften the patchiness of the timbered landscape by blending the previous cuts that are now regenerating with less dense harvested pieces of this project. The result would remain at a visual quality level of modification, but could soften the stark visual patchwork. Eventually the patches would completely blend to a contiguous natural appearing forest. The images below (Figures 3-17 and 3-18) depict a representation of the expected results of the treatments and a few years of regrowth. As past harvested areas continue to grow, the blending of the two harvest efforts would improve the scenic integrity. It is expected that the trend toward low scenic integrity would be slowed by all the action alternatives. Alternative D would not slow that trend as much.

(*) We don't want forest ("timber stands") between clearcuts logged! We don't want the canopy opened up or "clean up" of dead and down wood needed by species such as American marten, Pileated woodpecker, and others, and for nutrient recycling and soil fertility. We don't want logging to "soften the patchiness." Logging, roading, and fuel reduction destroy scenic integrity & stability, not unimpeded natural forest growth. Logging would cause a trend toward low scenic integrity which, where it exists now, is due to past logging, as the photos in the DEIS illustrate.

(*) This DEIS is truly Orwellian, in the sense of "War is Peace" re: the F.K. that more logging will cure the problems caused by past logging.

(*) This is an unbelievably bogus "before & after" comparison (Figs 3-17 + 3-18) They are obviously showing the same photo with a sharper focus and brightening effects in Fig. 3-18. If areas between clearcuts were logged it would likely be more obvious than the fewer trees in the middle patch of forest in Figure 3-18. This also says nothing about the visual impacts of proposed clearcutting, virtual clearcutting, and roading.

Figure 3-17 Existing view looking southeast from the Hogback Rd

New reduction in snags & down wood needed by many species, including Pileated & American Three-toed woodpeckers & American marten. This is obviously moister, natural mixed conifer that should be denser, with snags & down logs.

unsightly new gaps

Figure 3-18 Rendition of Expected results after 5-10 years

(*) There is no support for these assumptions

(*) This is ridiculous: "Regeneration clearcutting + seedtree cutting opens up the canopy for regrowth of small, more flammable, homogenous seedlings, including very flammable Lodgepole pine & grand fir in mixed conifer stands.

The scenic stability of the area is dependent on the conditions that favor resiliency to fire and insects and disease. Currently much of the area is outside of the historical range of variability in ways that put the forest at greater risk of large, severe fire. Proposed action Alternatives B and C would harvest 3,900 acres in a selective manner leaving fire resilient species and densities, as well as utilizing fuels treatments on approximately 7,100 acres. Alternative D treats 2,600 acres with harvest techniques, and approximately 6,100 acres of fuel treatments. It is expected that the additional regeneration harvests proposed in Alternatives B and C could potentially help control fires, whereas Alternative D would not. Therefore Alternative B and C would be more beneficial to the improvement of scenic stability. However it is not expected that the difference would be measurable by the scenic stability scale.

(*) Actually Alt. D would obviously be more beneficial to scenic stability but we much prefer no logging or roading at all, & no fuel reduction.

Alternatives B and C are expected to maintain a moderate scenic stability while Alternative D is expected only to slow the trend toward low scenic stability. very out of touch w/ public opinion.

Cumulative Effects – Alternatives B, C, and D

Past, present, and foreseeable activities (pp. 3-1 to 3-4) that contribute to the cumulative effects to scenery resources range from regeneration harvests, thinning, prescribed fire, and grazing practices that overlap in time and space. The timeframe for which these effects overlap ranges from the time of the activity through the life of the effect. Created openings that are unnatural appearing last until the seed trees gain enough height to make the opening disappear as a visual form. This usually occurs when the trees reach 20 feet in height. This usually takes 20 to 25 years. The project planning area is not highly visible from outside the project boundary due to the slope and orientation of the landscape, therefore the project

boundary is the spatial boundary for cumulative effects. Past, present and reasonable and foreseeable activities are briefly described and the cumulative effects disclosed below.

The harvest activities that created long term visual effects in the area that would overlap in time would be the regeneration harvests that occurred after 1990 (p. 3-2). Approximately 1,830 acres have been harvested in this manner creating openings of varying sizes. These opening do remain and create an existing visual condition that is really blocky with squarish openings arranged horizontally across the slopes with timbered blocks between the openings. Harvest units in this project treat timbered blocks in a manner that would soften this blocky appearance by thinning out dense timbered areas. The cumulative effect would result in maintaining the existing visual quality in some areas and improving it slightly in others.

There have been minimal effects due to past wildfires; approximately 40 acres have been burned in the project area, which does not create cumulative significant effects to visual quality. The visual evidence of past fires is in keeping with what is naturally expected in a fire dependent ecosystem.

The Red Hill prescribed fire project would add the remaining 156 acres to the amount of acres proposed for prescribed fire in this project. These additional acres would not change the visual quality objective expected to be met by any of the three action alternatives. The scenic stability would remain the same as well.

The Park Ridge project of non-commercial thinning, pullback and prescribed fire would add the remaining 247 acres to the amount of acres proposed for this project. These additional acres would not change the visual quality objective expected to be met by any of the three action alternatives. These activities would open up stands and improve the appearance of the forested stands by making large healthy trees more visible. Short-term effects such as the red needles of the cut whips would be visible for one to one and one half years. The scenic stability would remain the same as well even though this project contributes to improving the health and viability of the stands it is not enough additional acres to make significant changes to merit an improved rating.

The ongoing recreation activities are not expected to decrease the visual quality objective that is associated with this project. The effects of ongoing recreation activities are accounted for in the existing visual quality objective.

The ongoing grazing activities are not expected to decrease the visual quality objective that is associated with this project. The effects of ongoing grazing activities are accounted for in the existing visual quality objective.

The invasive plant treatments are not expected to add substantial effects to this project to effect the visual quality objective achievement. Reduction in invasive plants is an effort that maintains the scenic stability of the herbaceous scenic attributes.

Non-commercial thinning and fuels reduction that would occur over the 5 year period would open up the forest and clear small understory trees to express large tree character. Short-term effects such as the red needles of the cut trees would be visible in foreground views remaining for 1 to 1 ½ years. These activities in addition to the proposed activities in all action alternatives would meet visual quality objectives and maintain or improve scenic stability.

Invasive plant treatments planned through 2013 is expected to improve the grassland composition, restoring areas, and cumulatively maintain visual quality and scenic stability.

The Eastside prescribe burning would create visual effects that are in keeping with natural fire effects such as smoke, scorched boles, red needles and blackened forest floor. Most of these effects would be localized, and limited to foreground views. Many of the effects would be reduced significantly by new spring growth of grasses and forbs, making them short-term effects. The remaining effects in addition to the South George project activities would not reduce the visual quality objective. The cumulative effect to scenic stability would be positive, but would not increase the rating.

Three areas along the Hogback Road (FR 4302) and two other areas near problem culverts have been identified as sites where cattle watering at road crossings cause localized bank disturbance (map in project file). Hardening of these sites with rock is proposed to reduce disturbance and improve bank conditions and localized water quality.

The spring development restoration and access sites would not contribute significantly to the achievement or degradation of visual quality. Where visible from FR 4302, the restoration would improve the appearance of the sites that have been degraded.

This landscape would continue to express the activities that occur as management, and other uses. Reasonably foreseeable activities that are planned to occur would perpetuate a modified scenic expression of the landscape. It is expected that this expression would improve as present and foreseeable actions are of a lighter or more sensitive approach to management than those of the past. The resiliency of the scenic attributes is expected to be improved as management activities are carried out to maintain the vegetation within the natural range of variation. These practices should improve scenic stability.

FINDINGS OF CONSISTENCY

The proposed action alternatives (B, C, and D) have very little differences between them that relate to scenery resources overall. The impacts would not exceed the limits of visual impacts defined by maximum modification, modification, and partial retention. All proposed action alternatives would meet the visual quality objectives established in the Forest Plan (see Table 3-78).

ECONOMIC ANALYSIS

This section incorporates by reference the South George Economic Analysis Report contained in the project analysis file at Pomeroy Ranger District. Specific information on the methodologies, assumptions, and limitations of analysis and other details are contained in the report. A summary of the current conditions of the affected environment and the predicted effects of the proposed action and its alternatives are discussed in this section.

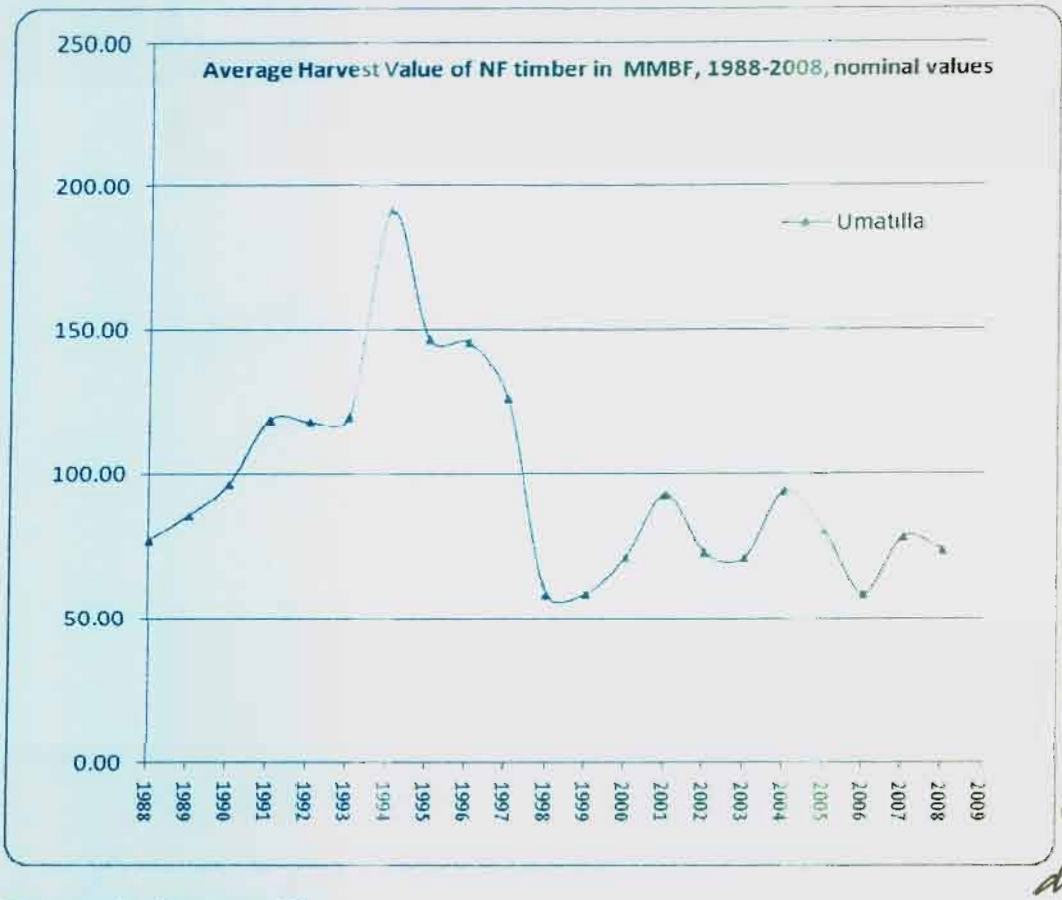
INTRODUCTION

The management of Umatilla National Forest has the potential to affect local economies. Production of resources and recreational use on the Forest generate employment and income in the surrounding communities and counties and generate revenues that are returned to the federal treasury. This section presents the economic effects of the project, including the project feasibility, financial efficiency, and impacts to jobs and income. Refer to the Umatilla National Forest, Land and Resource Management Plan, FEIS, Appendix B, for further detailed description of the main social and economic characteristics of the area (USDA 1990).

The Purpose and Need for this project, as stated in Chapter 1, include a social economic secondary objective to provide sawlogs and wood fiber for utilization by local and regional economies.

So, with such an obvious decline in sawlog production, reflecting unsustainable over extraction, legal violations, and a virtually non-existent timber market lately,

Figure 3-19 Trend in Timber Revenue on Umatilla National Forest (1998-2009). Why does this project include sawlog production as part of its (overly narrow) purpose and need, rather than considering focusing on non-extractive restoration (eg. removing roads) or dry logged forest non-CT to provide local jobs?



Community Demographics

During 2009, approximately 23,502 people lived in the bi-county economic impact area (BEA, WA REAP, 2009). Between 1969 and 2009, Asotin County's population rose from 13,285 in 1969 to 21,385 in 2008, for a net gain of 8,100, or (61.0 percent). Garfield County's population decreased from 2,755 in 1969 to 2,117 in 2008, for a net loss of 638, or (-23.2 percent).

Employment

Agriculture, manufacturing, retail, and service sectors are important sources of employment and income in this area. There were 10,026 part and full time jobs in the bi-county area economy during 2008, with over two thirds of these jobs created since 1970. Asotin County's employment rose from 3,179 in 1969 to 8,738 in 2008, for a net gain of 5,559, or (174.9 percent). Garfield County's employment dropped from 1,579 in 1969 to 1,288 in 2008, for a net loss of 291, or (-18.4 percent). Asotin County employment growth was slightly higher than the state aggregate (161 percent) and significantly higher than the national average (100 percent).

Obviously these new jobs & employment gain were not from sawlog production increases but from more sustainable economic diversification

In 2009, the average annual unemployment rate for Asotin County area was 7.8 percent, and 10.2 percent for Garfield County (WA OFM 2009). There is a clear trend of the lowest unemployment during the late summer months and increased unemployment during the winter months due to the cyclic pattern common in agricultural based economies. Annual timber harvest related employment from Umatilla National Forest between the years 1995 to 1997 averaged 394 jobs. This is not many jobs & dated information - How many timber harvest-related jobs now? Why is this not disclosed?

(*) = Reasons for our concerns re: the economic inefficiency of the So. George timber sale (aka "project")

(*) So why cause all these extensive and lasting impacts from logging, roading, fuel reduction & burning in moist mixed conifer forest, etc. when all action alt.s are financially inefficient?!

ENVIRONMENTAL CONSEQUENCES

The economic analysis for this project measures three aspects of the project's economic merits. They are project feasibility (sale viability), financial efficiency (PNV), and economic impacts (number of jobs).

Project Feasibility

The estimation of project feasibility was based on the Region 6 transaction evidence appraisal (TEA) model, which took into account logging system, timber species, and quality, volume removed per acre, lumber market trends, costs for slash treatment, and the cost of specified roads, temporary roads, and road maintenance. The estimated high bid and base rates for each action alternative is displayed in Table 3-80. The estimated high bid for each alternative indicates that the action alternatives are feasible (likely to sell). The predicted high bid from the feasibility analysis is used in the financial efficiency analysis discussed below. The higher the anticipated value above base rates a potential sale has the more likely the timber sale would sell.

Financial Efficiency

The financial efficiency analysis is specific to the timber harvest and restoration activities associated with the alternatives (as directed in Forest Service Manual 2400-Timber Management and guidance found in the Forest Service Handbook 2409.18). Costs for sale administration, regeneration, and restoration activities are included. All costs, timing, and amounts were developed by the specialists on the project's interdisciplinary team. If exact costs were not known, the maximum of the cost range was used to produce the most conservative present net value (PNV) result. The expected revenue for each alternative is the corresponding predicted high bid. The PNV was calculated using R6 sale evaluation residual value model, a program for economic analysis of long-term, on-the-ground resource management projects. A 4 percent real discount rate was used over the seven-year project lifespan (2011-2017).

(*) Why not a comprehensive cost-benefit analysis? What about all the externalized costs of DEIS preparation, treemarking, stand exams, etc.? These add greatly to taxpayer subsidized-costs.

This analysis is not intended to be a comprehensive cost-benefit or PNV analysis that incorporates a monetary expression of all known market and non-market benefits and costs. Many of the values associated with natural resource management are best handled apart from, but in conjunction with, a more limited benefit-cost framework. These values are discussed throughout this chapter, for each respective resource area.

(*) Why is it assumed "values associated w/ natural resource management" "are best handled apart from" "a more limited benefit-cost framework"?

Table 3-80 summarizes the project feasibility and financial efficiency, including the base rates, predicted high bid (i.e., estimated stumpage value), total revenue, and PNV for each alternative. The PNV value indicates the financial efficiency of the timber sale, including all costs and revenues associated with the timber harvest and required design criteria. Table 3-80 indicates financial inefficiency for all action alternatives, due primarily to the current economic recession and poor demand for wood products. The No Action Alternative has no costs or revenues associated with it.

(*) A reduction of financial PNV in any alternative as compared to the most efficient solution is a component of the economic trade-off, or opportunity cost, of achieving that alternative. The no action alternative would not harvest or take other restorative actions and, therefore, incur no costs. As indicated earlier, many of the values associated with natural resource management are non-market benefits.

(*) We can only support the "No Action" alt. based on all the DEIS analysis.

Economic Impacts

No mention of all the Forest Service staff time that cost $ for this project.

This analysis calculated the jobs and labor income associated with the processing of the timber products harvested and conducting mandatory and other land management activities, such as non-commercial fuel reduction, and road decommissioning. Timber products harvested from the proposed project and the non-timber activities would have direct and indirect effects on local jobs and labor income. Table 3-80 displays total estimates for employment (part and full-time) and labor income that may be attributed to

(*) = Reasons for our concerns re: the economic inefficiency of the So. George timber sale (aka "project")

(*) So why cause all these extensive and lasting impacts from logging, roading, fuel reduction & burning in moist mixed conifer forest, etc. when all action alt.s are financially inefficient?!

ENVIRONMENTAL CONSEQUENCES

The economic analysis for this project measures three aspects of the project's economic merits. They are project feasibility (sale viability), financial efficiency (PNV), and economic impacts (number of jobs).

Project Feasibility

The estimation of project feasibility was based on the Region 6 transaction evidence appraisal (TEA) model, which took into account logging system, timber species, and quality, volume removed per acre, lumber market trends, costs for slash treatment, and the cost of specified roads, temporary roads, and road maintenance. The estimated high bid and base rates for each action alternative is displayed in Table 3-80. The estimated high bid for each alternative indicates that the action alternatives are feasible (likely to sell). The predicted high bid from the feasibility analysis is used in the financial efficiency analysis discussed below. The higher the anticipated value above base rates a potential sale has the more likely the timber sale would sell.

Financial Efficiency

The financial efficiency analysis is specific to the timber harvest and restoration activities associated with the alternatives (as directed in Forest Service Manual 2400-Timber Management and guidance found in the Forest Service Handbook 2409.18). Costs for sale administration, regeneration, and restoration activities are included. All costs, timing, and amounts were developed by the specialists on the project's interdisciplinary team. If exact costs were not known, the maximum of the cost range was used to produce the most conservative present net value (PNV) result. The expected revenue for each alternative is the corresponding predicted high bid. The PNV was calculated using R6 sale evaluation residual value model, a program for economic analysis of long-term, on-the-ground resource management projects. A 4 percent real discount rate was used over the seven-year project lifespan (2011-2017).

(*) Why not a comprehensive cost-benefit analysis? What about all the externalized costs of DEIS preparation, tree marking, stand exams, etc.? These add greatly to taxpayer subsidized-costs.

This analysis is not intended to be a comprehensive cost-benefit or PNV analysis that incorporates a monetary expression of all known market and non-market benefits and costs. Many of the values associated with natural resource management are best handled apart from, but in conjunction with, a more limited benefit-cost framework. These values are discussed throughout this chapter, for each respective resource area.

(*) Why is it assumed "values associated w/ natural resource management" "are best handled apart from" "a more limited benefit-cost framework"?

Table 3-80 summarizes the project feasibility and financial efficiency, including the base rates, predicted high bid (i.e., estimated stumpage value), total revenue, and PNV for each alternative. The PNV value indicates the financial efficiency of the timber sale, including all costs and revenues associated with the timber harvest and required design criteria. Table 3-80 indicates financial inefficiency for all action alternatives, due primarily to the current economic recession and poor demand for wood products. The No Action Alternative has no costs or revenues associated with it.

(*)

A reduction of financial PNV in any alternative as compared to the most efficient solution is a component of the economic trade-off, or opportunity cost, of achieving that alternative. The no action alternative would not harvest or take other restorative actions and, therefore, incur no costs. As indicated earlier, many of the values associated with natural resource management are non-market benefits.

(*) We can only support the "No Action" alt. based on all the DEIS analysis.

Economic Impacts

No mention at all of the Forest Service staff time that cost $ for this project.

This analysis calculated the jobs and labor income associated with the processing of the timber products harvested and conducting mandatory and other land management activities, such as non-commercial fuel reduction, and road decommissioning. Timber products harvested from the proposed project and the non-timber activities would have direct and indirect effects on local jobs and labor income. Table 3-80 displays total estimates for employment (part and full-time) and labor income that may be attributed to

each alternative. Since the expenditures occur over a seven-year period, the estimated impacts of jobs and labor income would be spread out over the life of the project. Most of the timber harvest and wood processing jobs would occur over the first five years of the project and most of the economic impacts related to the land management activities would occur during the later stages of the project. It is important to note that these are not new jobs or income, but rather jobs and income that can be attributed to this project.

Estimates in Table 3-80 indicate that each action alternative would maintain approximately between 75-140 jobs and $3.4 -$6.3 million of labor income are attributable to the processing of the timber products and mandatory and land management activities. Alternative A maintains no jobs or income because there are no activities associated with this alternative.

Table 3-80 Economic Comparison by Alternative

	Alternative A	Alternative B	Alternative C	Alternative D
Commercial Unit Area (acres)	0	3,900	3,900	2,600
Volume Harvested (CCF)	0	47,250	47,250	25,350
Value/CCF (Above Base Rates)	$0	$49.00	$36.00	$41.00
Total Timber Value at Predicted High Bid Rate (Revenue)	$0	$2,315,250	$1,701,000	$1,039,350
Discounted Revenue	$0	$2,130,000	$1,564,920	$956,202
Discounted cost	$0	(-$3,449,250)	(-$3,449,250)	(-$1,850,550)
Financial Present net value (PNV)	$0	(-$1,319,250)	(-$1,884,330)	(-$894,348)
Cost/Acre	$0	(-$338)	(-$483)	(-$344)
Financial Benefit/cost ratio (B/C)	N/A	(-1.62)	(-2.20)	(-1.94)
Local Employment*- jobs	0	140	140	75
Total Potential Labor Income**	0	$6,329,260	$6,329,260	$3,390,675

* Definitions: Employment is the total full-and part-time wage, salaried, and self-employed jobs in region.
**Labor income includes the wages and salaries as well of benefits of workers who are paid by employers, and income to proprietors.

(*) This is a very expensive & very destructive timber sale with no net positive revenue & few jobs ~~created~~ or sustained. (No new jobs & income - see above.)

Alternative A – No Action

Direct /Indirect Effects – Alternative A

This alternative proposes no action. No costs or benefits are derived from this alternative and no detailed analysis was calculated for it. However, selection of this alternative could lead to costs in the future. These costs would be associated with increased fire suppression costs, loss of private property, and other costs associated with failure to treat the vegetation in this area.

(*) Only 75-140 jobs for counties w/ 10,026 jobs (Asotin) & 1,288 (Garfield) in 2008.

Alternative B (Proposed and Preferred Alternative) (DEIS p. 3-172)

Direct/Indirect Effects – Alternative B

The PNV for this alternative is negative. This alternative has the least cost per acre of the three action alternatives and the least cost per acre of the three action alternatives. Alternative B proposes more commercial harvest than Alternative D and has a lower cost per acre. Alternative B has the highest predicted bid rate as compared to Alternatives C and D. The number of job (140) would be the same as Alternative C but higher than Alternative D. The anticipated value above base rates is positive and higher than Alternatives C or D, so the sale of commercial products is assumed to be viable. Trust funds can be expected to adequately fund vegetative treatments with implementation of this alternative.

(*) This is questionable

(*) We request (or FOIA if necessary, requesting a fee waiver as a non-profit organization) a copy of the South George IRA, PWA, and Other Undeveloped Lands Report - a print copy by mail.

INVENTORIED ROADLESS AREAS (IRAs) POTENTIAL WILDERNESS AREAS (PWAs) AND OTHER UNDEVELOPED LANDS

This section incorporates by reference the South George IRA, PWA, and Other Undeveloped Lands Report contained in the project analysis file at Pomeroy Ranger District. Specific information on the methodologies, assumptions, and limitations of analysis and other details are contained in the report. A summary of the current conditions of the affected environment and the predicted effects of the Proposed Action and its alternatives are discussed in this section.

INTRODUCTION

This section of the EIS discloses the affected environment and environmental consequences for, inventoried roadless areas (IRAs), potential wilderness areas (PWAs), and other remaining undeveloped lands. These three resource topics (IRA, PWA, other undeveloped lands) are grouped and discussed together because they share a complicated set of terminology and interrelated history. Appendix H and Appendix I of this EIS discloses additional narrative and maps in support of this topic.

During public involvement for this project, and in past similar projects, a wide range of terms have been used by respondents, the courts, and the Forest Service when referring to these topics such as roadless, inventoried roadless area, unroaded, uninventoried roadless, potential wilderness area, undeveloped lands, and roadless expanse.

From the mid-1970s through 2001 the Forest Service maintained a roadless area inventory of undeveloped lands that we used and updated for RARE, RARE II, and in support of Land and Resource Management Planning completed in 1990. All during that time we called these polygons "roadless areas" or "inventoried roadless areas" (IRA). With completion of the Roadless Area Conservation Rule (RACR) in 2001 these lands ceased being just an inventory, and IRAs became more of a designation, with fixed boundaries and prohibitions set by Forest Service regulation (36 CFR 294). Confusion ensued because two Forest Service maps used the same name; IRA. One map had fixed boundaries set by the RACR and another map had changeable boundaries based on inventory criteria.

To address this situation, the Forest Service created a new term for their inventory of undeveloped lands called "potential wilderness areas" (PWA) to make a clear distinction between the IRA term used by the 2001 RACR. This terminology addition was made policy by changing the 2006 handbook for wilderness evaluation (FSH 1909.12 Chapter 70) and is also reflected in the 2008 Forest Service NEPA regulations (36 CFR 220). In the regulations, potential effects to 'inventoried roadless areas' and 'potential wilderness areas' are factors in determining whether a CE, EA, or EIS is the appropriate NEPA document for a particular project. The term 'other undeveloped lands' is presented and used in this document to provide a consideration for the balance of those remaining lands that did not meet the inventory criteria for a PWA, were not designated an IRA under the RACR, and do not contain roads and evidence of timber harvest (see definitions below).

To resolve this confusion the Forest Service uses its discretion to rely on agency policy, agency definitions of terms, and agency procedures for the inventory of resources and facilities. Inventory criteria and procedures for potential wilderness areas are found in Forest Service Handbook 1909.12, Chapter 71.

(*) Please send us a hard copy of the Forest Service Handbook 1909.12, Chapter 71 unless these are fully stated in this DEIS. Also please send Chapters 72 + 73.

The terms and definitions as stated below will be used in this site-specific analysis. The following four resource topics are based on current law, regulation, agency policy, and the Umatilla Land and Resource Management Plan (Forest Plan), as amended.

1. **Wilderness**: A wilderness area is designated by congressional action under the Wilderness Act of 1964 and other wilderness acts. Wilderness is undeveloped Federal land retaining primeval character and influence without permanent improvements or human habitation (Umatilla Forest Plan, page GL-45).

2. **Inventoried Roadless Area (IRA)**: These areas were identified in the 2001 Roadless Area Conservation Rule in a set of inventoried roadless area maps, contained in Forest Service Roadless Area Conservation Final Environmental Impact Statement, Volume 2, dated November 2000, which are held at the National headquarters office of the Forest Service, or any subsequent update or revision of those maps (36 CFR 294.11). These areas were set aside through administrative rulemaking and have provisions, within the context of multiple use management, for the protection of inventoried roadless areas. Most IRA boundaries are substantially identical to those identified as 'Roadless Areas', referred to in the 1982 planning rule (36 CFR 219.17) and identified by the Forest Plan, FEIS, Appendix C; however some localized, minor differences in boundaries may exist. All roadless area acres were allocated to various management area strategies as disclosed in the Umatilla Forest Plan FEIS, Appendix C and described in the Record of Decision (page 6-9) for the FEIS. Some management area strategies were intended to retain the undeveloped roadless character of the roadless area and some management area strategies were intended to develop the lands with timber harvest and road building activities; thus forgoing roadless character.

(*) The Umatilla NF Forest Plan management area strategies for logging & roadbuilding within roadless areas should be superceded by the later 2001 Roadless Area Conservation Rule.

3. **Potential Wilderness Area (PWA)**: Areas of potential wilderness identified using inventory procedures found in Forest Service Handbook (FSH) 1909.12, Chapter 71 are called potential wilderness areas (PWAs). The inventory is conducted by the Forest Service with the purpose of identifying potential wilderness areas in the National Forest System. The National Forest System Land and Resource Management Planning Rule (currently the 1982 Rule, 36 CFR §219.17) directs that roadless areas be evaluated and considered for wilderness recommendation during the forest planning process.

↕ Direct contradiction!

PWAs are not a land designation decision, they do not imply or impart any particular level of management direction or protection, they are not an evaluation of potential wilderness (Chapter 72), and lastly they are not preliminary administrative recommendations for wilderness designation (Chapter 73). The inventory of PWAs does not change the administrative boundary of any inventoried roadless area (IRA).

Typically, PWAs substantially overlap, and/or are contiguous with IRAs, and can be considered as an IRA/PWA. PWAs may also be contiguous with designated wilderness areas. Some newly inventoried PWAs may be stand alone areas that were not identified as 'roadless areas' in Appendix C of the 1990 Umatilla Forest Plan and 'inventoried roadless areas' as identified in a set of maps in the 2001 Roadless Area Conservation Rule (RACR). PWAs overlap inventoried roadless areas only where those acres of land are consistent with the inventory criteria (FSH 1909.12 Chapter 71) and may extend beyond IRA and wilderness boundaries consistent with inventory criteria.

(*) We want all newly inventoried or new IRA-contiguous PWAs to be set aside as part of our new IRAs and fully protected from all logging and roading.

Table 3-81 displays a contextual display of these areas discussed above.

Table 3-81 Contextual Display of Wilderness and Roadless Areas in PNW Region, Umatilla NF, Pomeroy RD, and South George Project Planning Area

Unit	Acres	Percentage
Pacific Northwest Region	27.2 million	27%[22]
• Wilderness	5 million	18%
• Inventoried Roadless Area	4 million	15%
Umatilla National Forest	1.4 million	5%[23]
• Wilderness	303,000	21%
• Inventoried Roadless Area	282,000	20%
Pomeroy Ranger District	366,000	26%[24]
• Wilderness	177,500	48%
• Inventoried Roadless Area	69,000	19%
South George Project Planning Area	21,000	6%[25]
• Wilderness	0[26]	0%
• Inventoried Roadless Area	0	0%
• PWAs	0	0%
• Other lands that have undeveloped character	8,785[27]	42%

(*) We want all lands within the South George Project planning area with undeveloped character to be dropped from all logging and roading plans.

[22] Percentage represents the portion (acres) of both Oregon and Washington that are National Forest System lands.
[23] Percentage represents the portion (acres) of US Forest Service Pacific Northwest Region that is managed by Umatilla National Forest.
[24] Represents the portion (acres) of Umatilla National Forest that is managed by Pomeroy Ranger District
[25] Represents the portion (acres) of Pomeroy Ranger District that occurs within the boundary of South George project planning area.
[26] Wenaha Tucannon Wilderness does not occur within South George project planning area.
[27] This number reflects the acreages of other undeveloped lands.

BACKGROUND

Oregon Wild submitted written comments (April 1, 2009) about what they called "roadless areas" and "uninventoried roadless areas" during the scoping period for South George Vegetation and Fuels Management Project EIS. Their letter included a map with a polygon they identified as "South Fork Asotin Creek roadless area." In their letter they requested that the NEPA analysis clearly state what activities are planned within any portion of the roadless area they had identified. Oregon Wild did not provide information on the inventory criteria they used to develop their map.

Confusion surrounds this issue because there are conflicts between Forest Service maps and the map presented by Oregon Wild. Their map of a roadless area has its own history of genesis. Confusion continues when Oregon Wild in their letter of April 1, 2009 asked the Forest Service to fully analyze any effects to roadless areas and roadless values on lands the Forest Service determined do not meet agency inventory criteria.

In a related example, this EIS discloses impacts to a number of resources sensitive to the construction of temporary roads. A road is defined and criteria and methods for inventorying a road conform to agency policy. Definitions and inventory criteria do not change project to project, Forest to Forest; they are common agency-wide. It would not be reasonable for a single individual or group to assert their own definition of a road or how to inventory a road system and then ask the Forest Service to disclose the impacts of 'their road system' on resources present such as elk habitat, fish habitat, or potential wilderness areas. Further, it is unreasonable to consider one version of inventoried forest roads to analyze impacts to elk and fish habitat and then apply a second version of roads in another analysis (PWA, undeveloped lands) within the same EIS. Inventories of resources and facilities in support of the South George project have been predicated on agency policy and procedures. The situations described above confound our ability to conduct a clear and meaningful effects analysis for the "roadless" issue in the South George project planning area. To resolve this confusion the Forest Service uses its discretion to rely on agency policy, agency definitions of terms, and agency procedures for the inventory of resources and facilities. Inventory criteria and procedures for potential wilderness areas are found in Forest Service Handbook 1909.12, Ch 71. The application of these procedures used for analysis of the South George project is found in Appendix H of this EIS. There are no designated wilderness areas within or contiguous to South George project planning area. Asotin Creek and Wenatchee Creek IRAs (for this document they are referred to as IRAs/PWAs) are separated from the project planning area by existing main access forest system roads (FRs 4400, 4300, and 4304).

ASOTIN CREEK AND WENATCHEE CREEK IRAs/PWAs

On Umatilla National Forest most inventoried roadless areas (IRAs) are potential wilderness areas (PWAs), but not all acres in an IRA[28] may meet PWA inventory criteria (FSH 1901.12, Chapter 71). This situation may have occurred because the lands within the IRA were allocated to a Forest Plan management area that provided for timber harvest and road construction (FP ROD p. 8 and FP p. 3-5). Therefore, past management activities on some acres within IRAs may now have stumps and skid trails or roads that are substantially recognizable, or have acres where clear-cuts have not regenerated to the

[28] Not meeting PWA inventory criteria does not change the status of an area as an IRA, nor does it change the boundary of an IRA as identified in maps in the 2001 RACR.

environmental effects to the intrinsic physical and social values disclosed in this chapter for other undeveloped lands applies to the acres of Oregon Wild's polygon that overlap with Forest Service inventoried other undeveloped lands as displayed in maps located in Appendix I. There are also maps in Appendix I that show the relationship of Oregon Wild's polygon to activities proposed in action Alternatives (B, C, and D).

OTHER UNDEVELOPED LANDS

BACKGROUND

An outcome of the PWA inventory process found at FSH 1909.12, Chapter 71 was the identification of isolated polygons of other undeveloped lands (see Appendix H, Map H-5, Table H-1B). These polygons did not meet inventory criteria as potential wilderness areas and they are not inventoried roadless areas or a designated wilderness area. Each individual polygon of isolated land has no history of harvest activity and does not contain forest roads. They are stand-alone polygons of varying acreages all less than or equal to 4,999 acres within the project planning area (Table H-1B). The process used to identify undeveloped lands is described in Appendix H.

There are no forest-wide or management area standards specific to other undeveloped lands in Umatilla Forest Plan; however, there are allocated management areas that prohibit scheduled harvest of timber. All lands, including undeveloped lands, are managed consistent with forest-wide standards and guidelines and by designated Forest Plan management area allocations (Forest Plan – pp. 4-94 to 4-195).

The descriptions of environmental effects to the 'intrinsic physical and social values' disclosed in the section below for other undeveloped lands also applies to the acres in Oregon Wild's map with their identified polygon in relation to other undeveloped lands.

Temporary road construction, timber harvest, natural fuels treatments, and prescribed fire are proposed within these other undeveloped lands. We are opposed to any road construction, logging, fuel reduction in undeveloped (unroaded, unlogged) lands regardless of their size.

SCALE OF ANALYSIS

The scale of analysis is represented by the South George project planning area, approximately 21,000 acres.

(*) Other undeveloped lands have intrinsic ecological and social values because they do not contain roads and evidence of past timber harvest. These values are used as indicators of comparison to display effects between alternatives. Values and features that often characterize an inventoried roadless area (36 CFR 294) were specifically avoided as indicators of comparison to reduce confusion because other undeveloped lands are not inventoried roadless areas or potential wilderness areas and therefore are described using different indicators of comparison. Roadless and unlogged areas share many intrinsic values regardless of their official designation and these shared values should be considered.

Indicators of comparison between alternatives are:

- Intrinsic physical and biological resources (soils, water, wildlife, recreation, fisheries, etc.)
- Intrinsic social values (apparent naturalness, solitude, remoteness)
- Change in acres of other undeveloped lands

(*) Why is there no assessment of values unique to roadless and unlogged areas, such as undisturbed soils, reference character of forest conditions less human disturbance, etc. and of values of larger blocks of roadless and unlogged areas for particular far-ranging and disturbance-sensitive species, such as Lynx, Wolverine, Gray Wolf, & American marten?

(*) About 43% of the project area is a significant amount of undeveloped lands that should be protected.

AFFECTED ENVIRONMENT

Table 3-82 below displays the acres of remaining other undeveloped lands within South George project planning area along with references to maps in Appendix H for a visual representation. In South George project planning area (approximately 21,000 acres) there are approximately 8,785 acres (about 43% of the project planning area) that have been identified as isolated polygons of other undeveloped lands. The remaining approximately 11,815 acres (about 57% of the project planning area are developed and managed lands (contain evidence of past harvest and forest roads). Individual polygons of other undeveloped lands less than an acre were eliminated from further study because no special or unique resource values were identified and the description of effects to individual pieces of land less than one acre are better disclosed as part of the other resource effects section in this EIS.

Following is a summary table of the potential wilderness inventory for this project as displayed in Appendix H.

Table 3-82 Potential Wilderness Area Inventory Summary

	Approximate Acres
Total Acres Inventoried Map H-1	21,000
Acres Removed from inventory (past harvest) Map H-2	*6,890
Acres removed from inventory (roads) Map H-3	*4,925
Acres identified as Other Undeveloped Lands Map H-4	**8,785
Acres of Potential Wilderness Areas identified within the project planning area Map H-5	None (0)
*Acres that overlapped were not considered in this figure. ** This number does not include polygons less than one acre in size.	

Table 3-83 below displays the number, size class, and approximate acres represented in polygons of other undeveloped lands. Approximately 90 percent of the polygons are in the 1 to 99-acre size class. For perspective, one square mile is about 640 acres, Wenatchee Creek IRA/PWA is about 15,315 acres, Asotin Creek IRA/PWA is 16,432, and the closest designated wilderness area (Wenaha-Tucannon) is over 176,754 acres. The residual shape of each undeveloped polygon is the result of boundaries created by past harvest and road building. The largest polygon of other undeveloped lands is approximately 4,440 acres or just under seven square miles. This polygon (number 1 on Map H-4 in Appendix H and see Table H-1C) is, the largest polygon, approximately 2.6 miles in gross length. It has a gross width of roughly 2.2 miles and a pinch-point less than one mile in width. The eastern boundary, a length of 2.7 miles, of this polygon is adjacent to private land.

(*) The 5,000 acre limit to PWA status should not be seen as fixed in stone or prohibiting other protective status designation such as IRA.

Table 3-83 Size Class and Acres of Other Undeveloped Lands in the Project Planning Area

Number of Polygons	Size Class	Approximate Acres
64	1 to 99 acres	787
3	100 to 499 acres	399
1	500 to 999 acres	993
3	1,000 to 4,999 acres	6,606
None	>5,000 acres	None

(*) These should all be fully protected from logging & roading. The smaller unlogged/unroaded areas should at least be left as retention areas for wildlife even if surrounding acreage is thinned. Anything over 50 acres should be left alone.

#1 "Polygon" is quite large and very close to 5,000 acres.

The majority of the approximately 8,785 acres of other undeveloped lands are allocated to Forest Plan management areas C1- Dedicated Old Growth, C3-Big Game Winter Range, and C3A-Sensitive Big

Game Habitat, C4-Wildlife Habitat, and C5-Riparian and Wildlife. The following table shows a summary of management area allocations in the four largest polygons of undeveloped lands.

Table 3-84 Summary of Forest Plan Management Area Allocations in Polygons 1, 2, 3 and 4

Management Area (MA)	Polygon 1 (4,440 acres)	Polygon 2 (995 acres)	Polygon 3 (1,115 acres)	Polygon4 (1,055 acres)
C1-Old Growth	520 acres	0 acres	305 acres	0 acres
C3-Big Game Winter Range	98 acres	74 acres	0 acres	0 acres
C3A- Sensitive Big Game Winter Range	670 acres	921 acres	0 acres	0 acres
C4- Wildlife Habitat	2,685 acres	0 acres	730 acres	850 acres
C5-Riparian	467 acres	0 acres	80 acres	205 acres

Any areas with unique ecological values within South George project planning area are currently maintained for those values with Forest Plan standards and guidelines for management area allocations such as C1-Old Growth, C3-Big Game Winter Range, C3A- Sensitive Big Game Winter Range. See Chapter 1, pp. 1-12 to 1-14, for brief descriptions of goals, and standards and guidelines associated with each Forest Plan management area allocations located within South George project planning area.

No special or unique values in other undeveloped lands have been identified by project resource specialists in their environmental analysis for the implementation of any alternative analyzed in detail. Other undeveloped lands include soils, water, fish and wildlife habitat etc. that have not been impacted directly by past harvest and road building. The current condition of soil; water quality; air quality; plant and animal communities; habitat for threatened, endangered, and sensitive species; noxious weeds; recreation; and cultural resources within the project planning area, including other undeveloped lands are described elsewhere in this chapter.

Human influences have had limited impact to long-term ecological processes within other undeveloped lands. Disturbance by insects and fire has been and most likely would continue to be the factors with the most potential to impact the area. Opportunities for primitive recreation are limited to hiking, mostly cross-country, and hunting. Ongoing firewood gathering and removal of danger trees along forest roads that border each polygon changes the vegetation, leaves stumps, and presents a managed appearance within a developed transportation corridor.

Opportunities for a feeling of solitude, the spirit of adventure and awareness, serenity, and self-reliance are limited by the size and shape of the polygon. Distance and topographic screening are also factors. The optimum shape and location to retain solitude and a sense of isolation from noise and sights of other humans and their activities would be at the center of a circle. Areas greater than or equal to 5,000 acres or about 8 square miles may have sufficient size to offer a sense of solitude yet this may vary by individual. Long narrow shapes provide less distance from noise at their midpoint. Nearby, non-conforming sights and sounds of roads and timber harvest can be heard and often seen from within 67 polygons of other undeveloped lands because they are all less than one square mile in size and none are a perfect circle in shape.

Affected environment for other undeveloped lands as described above is the same for the 3,485 acres polygon submitted by Oregon Wild that overlaps with Forest Service identified other undeveloped lands polygons displayed in Appendix I.

The existing condition of approximately 11,815 acres of developed lands within South George project planning area and affected by proposed activities presents a landscape that has been managed and is generally developed in nature; these lands contain evidence of past harvest and forest roads. Past management actions and current conditions within these acres reflect the multiple-use intent and decisions made in the Forest Plan (1990 as amended), and reflects consistency with Forest Plan management area allocations.

Descriptions of the affected environment for the approximately 11,815 developed acres also applies to the approximately 485 acres of Oregon Wild's polygon that do not overlap with Forest Service polygons of other undeveloped lands displayed in Appendix H; map H-5 and Appendix I.

ENVIRONMENTAL CONSEQUENCES

Alternative A - No Action

Direct/Indirect Effects – Alternative A

There would be no direct effects to undeveloped lands because no activities would occur in these areas. The affected environment would remain unchanged, except by natural processes and ongoing management activities. Biological and ecosystem functions would continue. The landscape would likely continue developing complex fuel loads. A wildfire may burn more extensively and kill more trees within upland forest stands which would result in larger acreages of blackened landscapes compared to prescribed fires. Some forest visitors may avoid blackened landscapes until green vegetation returns after 3 to 5 years. Fire is a natural occurrence and expected disturbance process in this landscape. All polygons of other undeveloped lands (8,785 acres) would continue to not meet inventory criteria as potential wilderness areas and would continue to not be an inventoried roadless area or a designated wilderness area.

Cumulative Effects – Alternative A

For the No Action alternative, South George project would not be authorizing any actions; therefore it would not be adding anything to the effects of past, present, and reasonably foreseeable future actions. Based on the definition provided in the CEQ regulations (p. 3-1), there would be no cumulative effects for the No Action Alternative.

Effects Common to All Action Alternatives

Direct/Indirect Effects (Alternatives B, C, and D)

Timber harvest would occur on approximately 1,405 acres of other undeveloped lands. Associated activities (mechanical, RHCA mechanical, and hand thinning) in Alternatives B and C would occur on approximately 225 acres and landscape prescribed fire would occur on about 1,805 acres of other undeveloped lands. If Alternative B were implemented approximately 1.7 miles of temporary road would be constructed in other undeveloped lands to facilitate haul. There would be no temporary road constructed in other undeveloped lands if Alternative C were implemented.

If Alternative D were implemented there would be approximately 955 acres harvested in other undeveloped lands and approximately 1.16 mile of temporary road constructed to facilitate access and haul. Associated activities (mechanical, RHCA mechanical, and hand thinning) in Alternative D would occur on approximately 225 acres and landscape prescribed fire on about 1,805 acres of other undeveloped lands.

Maps H-6, H-7, and H-8 in Appendix H display the location of activity units and other undeveloped lands. Appendix B of this document displays a listing of harvest activity units, logging methods and additional information. Table 3-85 below is a summary of acres of activities and miles of temporary road construction proposed under each action alternative that occurs within other undeveloped lands.

Table 3-85 Proposed Activities in Other Undeveloped Lands by Action Alternative

Activities within Other Undeveloped Lands	Alternative B	Alternative C	Alternative D
Commercial Harvest and associated activity fuels treatments	1,405 acres	1,405 acres	955 acres
Natural Fuels Treatments (mechanical, manual, RHCA)	225 acres	225 acres	225 acres
Landscape Prescribed Fire	1,805 acres	1,805 acres	1,805 acres
Temporary Road Construction	1.7 miles	None	1.16 miles
Danger tree removal	Yes – as needed	Yes – as needed	Yes – as needed

The descriptions of environmental consequences to the 'intrinsic physical and social values' of other undeveloped lands also applies to the 3,485 acres of Oregon Wild's submitted polygon that overlap with the polygon of other undeveloped lands displayed in Appendix I; maps I-OW-AltB, I-OW-AltC, I-OW-AltD.

The environmental consequences to the approximate 11,815 remaining acres of developed land within South George project planning area that are not IRAs/PWAs and not other undeveloped lands are disclosed throughout all other resource sections of this chapter. The descriptions of environmental consequences to the remaining developed acres also applies to the 485 acres of Oregon Wild's polygon that do not overlap with other undeveloped lands polygons displayed in Map H-5 in Appendix H, and maps in Appendix I.

Environmental effects to the acres listed above in Table 3-85 and the physical, biological, and social values within them are described below.

Intrinsic physical and biological resources (soils, water, wildlife, recreation, fisheries, etc.)

For other undeveloped lands within South George project planning area where proposed timber harvest, mechanical fuel treatments, temporary road construction, and prescribed fire activity would occur, the impacts to soil, water quality, air quality, forage; plant and animal communities; habitat for threatened, endangered, and sensitive species; recreation; noxious weeds; and cultural resources, etc. are essentially the same as disclosed for areas of proposed project activity in previous sections of this chapter and are not reiterated here.

Environmental effects to resources in other undeveloped lands due to the implementation of proposed project activities would be consistent with applicable laws, regulations, and Forest Plan management area standards and guidelines (see previous sections of this chapter for Findings of Consistency for each resource).

Intrinsic social values (apparent naturalness, degree of solitude, sense of remoteness

Proposed timber harvest, mechanical fuel treatments, temporary road construction, and prescribed fire activity in other undeveloped lands would create stumps which would reduce the size of the undeveloped

polygon. Lands would appear managed and developed. The sights, sounds, and changes in vegetation from timber harvest and associated activities and use would further decrease the natural integrity and sense of naturalness within harvest units and along roads. Skid trails, stumps, and landings would be evident. Stand structure would change, therefore, diversity of plant and animal communities may shift from current patterns but ecological diversity would remain (see Vegetation section this chapter). Impacts to natural integrity and sense of naturalness would likely be evident until stumps and vegetation canopies are no longer substantially recognizable (about 75 to 100 years). The sounds of timber harvest and road building machinery from active units would reduce a sense of naturalness and solitude during project operations but would not persist in the long-term. Other impacts, such as tree marking paint and logging slash would be visible in the short-term (about 5 to 10 years). Effects such as closed roads, skid trails, and tree stumps would be evident much longer.

Other undeveloped lands with no proposed thinning or mechanized activity would retain their intrinsic physical, biological, and social values as described in the affected environment. They would remain free of developments such as forest roads or timber harvest stumps. All 8,785 acres of other undeveloped lands within the project planning area would still not be considered PWAs, inventoried roadless areas, or a designated wilderness area.

All acres of other undeveloped lands would continue to not meet inventory criteria as potential wilderness areas and would continue to not be an inventoried roadless area or a designated wilderness area. Table 3-86 is a summary showing the changes in acres for other undeveloped lands by alternative.

Table 3-86 Changes in Undeveloped Lands in South George Project Planning Area by Alternative

Alternative	Undeveloped Acres After Implementation	Acres changed (harvest and mechanical fuels treatments	Percent of Area* After Implementation	Percent Change	Developed** Acres After Implementation
A (No Action)	8,785	No change	42%	No change	11,815
B	7,155	(-1,630)	34%	(-8%)	13,445
C	7,155	(-1,630)	34%	(-8%)	13,445
D	7,605	(-1,180)	36%	(-6%)	12,995

*approximately 21,000 acres within the project planning area is 100 percent
**Developed defined here as managed acres that contain evidence of past harvest and forest roads
Currently there are approximately 8,785 acres of other remaining undeveloped land within planning area (Table 3-82).
Currently there are approximately 11,815 acres of developed lands within planning area (Table 3-82)

Cumulative Effects (Alternatives B, C, and D)

For other undeveloped lands in which project activities would occur the cumulative effects to soil, water quality, air quality; plant and animal communities; habitat for threatened, endangered, and sensitive species; recreation; noxious weeds; and cultural resources are disclosed in previous sections of this chapter and are not reiterated here. In the project planning area the increased numbers of stumps and the open nature of the forest stand would likely be the most apparent visual change resulting from implementation. In the long-term (about 50 plus years), the project would result in the development of historical open, park-like conditions, characterized by larger diameter trees, though more stumps would be present than currently exist.

Prescribed burning (including ongoing and reasonably foreseeable) and future wildfires would cumulatively change composition and structure of vegetation which could affect some forest visitor's sense of naturalness and remoteness. For a few years burned areas would display a blackened color. Outside the burned areas, the conditions described in the affected environment would remain unchanged except by natural processes and ongoing management activities such as grazing and hunting.

* We are opposed to naturalness, solitude, and remoteness being cumulatively impacted by increased access for ATVs, other vehicle use, and livestock due to logging, roading, fuel reduction, & burning of undeveloped areas.

Apparent naturalness and solitude and remoteness would be cumulatively impacted by grazing, dispersed camping, and motorized ATV and vehicle use on roads. Effects associated with recreational use, including noxious weed spread, hunting, fishing, erosion, litter, and evidence of fire rings, are expected to remain cumulatively minor. Ongoing removal of danger trees along forest roads changes the vegetation but does not change the overall sense of naturalness or sense of solitude along an existing developed transportation corridor. Overall, cumulative impacts from these activities on apparent naturalness, solitude and remoteness is very small (not measurable/indistinguishable) in proportion to the changes anticipated from the direct and indirect impacts of the alternatives disclosed above.

Cumulative impacts add up to eventual loss of solitude, remoteness, natural conditions, and dependent #

FINDINGS OF CONSISTENCY

Other undeveloped lands with no proposed harvest activity (7,155 acres in Alternative B, 7,155 acres in Alternative C, and 7,605 acres in Alternative D) would retain their intrinsic physical, biological, and social values as described in the affected environment (Table 3-86). They would remain free of developments such as forest roads or timber harvest stumps. All 8,785 acres of other undeveloped lands (Alternative A- no action) within the project planning area would still not be a potential wilderness area, inventoried roadless area, or a designated wilderness area. This outcome is consistent with the intent of management area land allocation decisions made in the Forest Plan.

* How is this outcome consistent w/ management area allocations prioritizing wildlife habitat, elk & deer winter range & riparian values? We don't think it's consistent.

* wildlife, yet this is not analyzed.

SPECIFICALLY REQUIRED DISCLOSURES

This section describes how the action alternatives comply with applicable state and Federal laws, and Forest Service policies and regulations.

National Historic Preservation Act –Heritage surveys have been completed. State Historic Preservation Office consultation was conducted under the Programmatic Agreement among the United States Department of Agriculture, Forest Service, Pacific Northwest Region (Region 6), the Advisory Council on Historic Preservation, and Washington State Historic Preservation Officer regarding Cultural Resource Management on National Forests dated April 1997. Identified sites and any newly recorded sites are protected from all project activities associated with South George Vegetation and Fuels Management Project (Chapter 2, Table 2-5). Because heritage resources would not be affected by proposed activities under any action alternative, there would be no effect to any historic property listed in or eligible to the National Register of Historic Places.

Endangered Species Act and Regional Forester's Sensitive Species - The Endangered Species Act requires protection of all species listed as "Threatened" or "Endangered" by Federal regulating agencies (Fish and Wildlife Service and National Marine Fisheries Service). The Forest Service also maintains through the Federal Register a list of species which are proposed for classification and official listing under the Endangered Species Act, species which appear on an official State lists, or that are recognized by the Regional Forester as needing special management to prevent their being placed on Federal or State lists. Biological Evaluations have been completed for all TE&S plant, aquatic and terrestrial wildlife. Details are found in the Fisheries, Plants, and Wildlife sections of this chapter, and Appendix F.

* We request hard copies of all Biological Evaluations for TES plants & wildlife prepared for this project.

Wild and Scenic River Act – There are no Wild and Scenic Rivers within the project area. No designated or potential wild and scenic river sections would be affected by implementation of any alternative.

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

Civil Rights, Women, and Minorities - No adverse effects on civil rights, women, and minorities not already identified in the FEIS for the Forest Plan would be expected to result from implementation of any alternative. Alternatives B, C, and D would be governed by Forest Service contracts, which are awarded to qualified contractors and/or purchasers regardless of race, color, sex, religion, etc. Such contracts also contain nondiscrimination requirements. (*) The DEIS fails to disclose the NFMA requirement to protect all native vertebrate species & to monitor the viability of ~~all~~ MIS—

National Forest Management Act Compliance – The National Forest Management Act of 1976 (P.L. 94-588), including its amendments to the Forest and Rangeland Renewable Resources Planning Act of 1974 (P.L. 93-378), states that when trees are cut to achieve timber production objectives, the cuttings shall be made in such a way that "there is assurance that such lands can be adequately restocked within 5 years after harvest" (P.L. 93-378, Sec. 6, (g), (3), (E), (ii)). See Appendix C, pp. C-9 to C-10. We believe the South George project is not consistent w/ NFMA in these requirements.

This reforestation policy is based specifically on language from the National Forest Management Act of 1976 (P.L. 94-588), including its amendments to the Forest and Rangeland Renewable Resources Planning Act of 1974 (P.L. 93-378): "Sec. 3 (d) (1) It is the policy of the Congress that all forested lands in the National Forest System be maintained in appropriate forest cover with species of trees, degree of stocking, rate of growth, and conditions of stand designed to secure the maximum benefits of multiple use sustained yield management in accordance with land management plans."

Treaty Trust Responsibilities - In this analysis, the primary focus of the federal government Trust Responsibility is the protection of the treaty rights and interests that tribes reserve on land included in this project. The Nez Perce Tribe has treaty rights and interests in the South George area.

For this project, a government to government scoping letter was sent to tribal staff members of the Nez Perce Tribe on March 2, 2009, informing them of the South George proposed project and requesting any comments or concerns regarding this proposed project. Pomeroy's District Ranger presented the District's Program of Work to Nez Perce tribal staff members on May 23, 2011, and November 7, 2011. At these meetings, projects are presented and an offer is made by the District Ranger to respond to any questions or present any additional information requested on a project. No specific comments or concerns for South George project were presented by tribal staff members after the government to government consultation scoping letter or Program of Work meetings. Tribal staff members have identified for similar past projects the rights they believed most at risk. Of major concern are potential effects on Treaty rights, fish habitat and populations, water quality, and protection of archaeological sites, traditional cultural properties, and first foods resources.

Cultural Resource surveys were conducted to locate cultural sites and gather the information necessary to evaluate historic properties. Identified sites and any newly recorded sites would be protected from all project activities associated with the South George Vegetation and Fuels Management Project (Chapter 2, Table 2-5). A Project Review for Heritage Resources under the terms of the 1997 Programmatic Agreement between ACHP, SHPO, and USFS R6, has been completed (3/24/11). A No Effect determination was made.

Timber harvest has the potential to negatively affect water quality and thus indirectly aquatic habitat. The effects of harvest and associated activities on water quality are discussed in the Hydrology section in this

chapter. It was found that effects of the action alternatives would not adversely or measurably affect water quality. The action alternatives were designed to prevent damage to RHCAs. Riparian and channel components that protect water quality would be maintained. Other design criteria and BMPs would control disturbance that could lead to erosion and sedimentation.

The effects of harvest and associated activities on aquatic species and habitats are found in the Fisheries section. It was determined that action alternatives may effect – not likely to adversely affect threatened species and may impact some sensitive species (see Table 3-15).

(*) What about impacts to hunting rights re: effects to "big game" species and to cultural food + medicine gathering sites?

Based on the information summarized above, it is reasonable to assume that treaty rights would be protected during implementation of the proposal.

Roads Analysis - A Forest-wide Roads Analysis was completed in March 2004 on the Umatilla National Forest. The forest scale analysis addressed only those National Forest System Roads maintained for passenger car traffic, arterial, and collector roads. South George project planning area has arterial, collector, and local roads. These roads are seasonally opened or are closed system roads. A site-specific project Roads Analysis containing a road risk value for each road was completed for this project and is located in the project file. This project analysis also includes maps showing the risk value for each road and the operational maintenance level of each road in the project planning area (also see Appendix G). A summary list of miles of roads used as haul routes for each alternative and other proposed road activity such as temporary road construction, and proposed decommissioning of roads in Alternative C is found in Table 2-11 and Appendix G. No new road construction is proposed for this project.

"Temporary road construction is essentially new road construction with impacts to soils, forest

Floodplains, Executive Order 11988 – Executive Order (EO) 11988 requires the Forest Service to avoid "to the extent possible the long and short term adverse impacts associated with the occupation or modification of floodplains…" The proposed alternatives would avoid all floodplains and affects to floodplains and is consistent with this EO.

fragmentation, creating openings for

Wetlands, Executive Order 11990 - Executive Order (EO) 11990 requires the Forest Service to "avoid to the extent possible the long and short term adverse impacts associated with the destruction or modification of wetlands." The proposed alternatives would avoid all wetlands and affects to wetlands and is consistent with this EO.

invasive weed dispersal & introduction & increased livestock impacts.

Municipal Watersheds - There is no de-facto or designated municipal watershed in South George project planning area.

Energy Requirements - No adverse effects on energy requirements would be expected to result from implementation of any alternative.

Public Health and Safety - Public health and safety would be improved with Alternatives B, C, and D removing danger trees along open forest routes, haul routes, developed recreation sites, and administrative sites within South George project planning area.

Environmental Justice – No local minority or low income populations were identified during scoping or environmental effects assessment. No minority or low-income populations are expected to be affected by implementation of any of the alternatives, in accordance with Executive Order 12898.

(*) What about Nez Perce people? They are both local (re: treaty rights) and low income. They would also be affected by the proposed actions.

OTHER RESOURCE CONCERNS AND OPPORTUNITIES

Probable Adverse Environmental Effects that Cannot be Avoided - There are no unavoidable adverse effects associated with implementing any of the alternatives that are not already identified in the FEIS for the Forest Plan (Chapter 4 pages IV 1- 15). How This means all the impacts are avoidable and the Forest Service should try harder to avoid them w/ a broader range of alternatives and a broader purpose and Need.

Congressionally Designated Areas - There are no Congressionally Designated Areas within the project area.

Research Natural Areas – There are no Research Natural Research Areas (RNA) within the project area.

Relationship Between Short-Term Use and Long-Term Productivity - Maintenance of healthy soils in terms of organic matter and structure is a key prerequisite to maintaining healthy ecosystems (Forest Health Report). Long-term productivity depends on maintaining the basic ecosystem resources and their function. For this project, implementation of standards and guidelines as outlined in the FEIS for the Forest Plan are designed to provide for continued long-term site productivity. However, there would be some short-term effects related to the implementation of any of the action alternatives (pages 3-8 to 3-14).

Irreversible and Irretrievable Commitment of Resources – Irreversible commitment of resources refers to a loss of future options with nonrenewable resources. Irretrievable commitment of resources refers to a loss of production of renewable resources. * Yet there is an undisclosed irretrievable commitment of undeveloped lands to management and of large trees & LOS to logging. No irreversible or irretrievable effects are anticipated from any of the alternatives. No irreversible commitments of land would occur. No unavoidable adverse effects over and above those addressed in the Forest Plan FEIS (Chapter 4, pages IV-231-233) have been identified.

Potential Conflicts with Plans and Policies of Other Jurisdictions - There are no known conflicts with plans and policies of other jurisdictions associated with implementing the alternatives. The FEIS for the Forest Plan (Chapter 4, pages IV 226 - 227) discusses this in further detail.

— we think that given the loss of 6,840 acres of potential wilderness to past logging and an additional 4,925 acres of potential wilderness because of it being within 300 feet of a road (see Table H-1A, p. H-2) and due to the existing and increasing deficit of unlogged and unroaded wildlife habitat areas closer to or more than 1,000 acres

Table H-1B: South George Potential Wilderness Inventory

The following inventory for the South George project planning area was created using the inventory criteria found in Forest Service Handbook (FSH) 1909.12 Chapter 71.1. Each polygon from Map H-4 (described above) was examined against the following criteria from FSH 1909.12 Chapter 71.1: should be protected from logging and roading and proposed for

(1) Area is more than 5,000 acres in size

(2) Area contains less than 5,000 acres, but can meet one or more of the following criteria:

2a. Area can be preserved due to physical terrain and natural conditions.

2b. Areas are self-contained ecosystems, such as an island, that can be effectively managed as a separate unit of the National Wilderness Preservation System.

2c. Areas are contiguous to existing wilderness, primitive areas, Administration-endorsed wilderness, or potential wilderness in other Federal ownership, regardless of their size.

Wilderness designation i.e. "polygons" 1, 2, 3 & 4.

We reject using fire exclusion as a criterion for not protecting an area it conveniently opens up anything so described — yet fire suppression may not have been effective.

The Forest Service relied on local knowledge and judgment regarding unique, site specific conditions of each area being considered for placement on the inventory of potential wilderness. Delineation of areas for potential wilderness inventory; locate boundaries at prominent natural or semi-permanent human-made features to facilitate easy on-the-ground identification. If not designated as Wilderness, these undeveloped lands about or >1,000 acres should be added to the Inventoried Roadless & protected as such.

Note 1: The following narrative is a comment that applies to each of the 71 polygons in Table H-1B. 'This individual polygon displayed on Map H-4 is part of a larger ecosystem and is not a separate, self-contained ecosystem, such as found on an island surrounded by water. This polygon cannot be separately preserved due to a physical terrain or a natural condition because of the small size and shape of this polygon in relation to the setting of its physical terrain. While there are no roads or past timber harvest in this polygon, this condition alone is not a sole indication of a natural condition. For example, policies over the past 50 years have excluded fire disturbance from much of the area surrounding this polygon creating a context of uncharacteristic or un-natural conditions. In addition this polygon is part of a larger, overall continuous ecosystem condition distributed throughout and beyond the project area. This isolated, individual polygon cannot be effectively managed as a separate unit of the National Wilderness Preservation System.

This is ridiculous! Of course small areas can be protected! Witness protection of individual groves of Redwoods, RNAs, unique features, sensitive or rare plants, etc.

>5,000 acres is an arbitrary & unwarranted criterion for exclusion from potential wilderness designation.

Polygon ID	Sum of Acres	FSH 1909.12 71.1 (1)	FSH 1909.12 71.1 (2a.)	FSH 1909.12 71.1 (2b.)	FSH 1909.12 71.1 (2c.)	Comments Note 1 above applies to all 71 polygons in Table H-1B
1	4,440	No	No	No	No	See Comments in Table H-1C
2	995	No	No	No	No	See Comments in Table H-1C
3	1,115	No	No	No	No	See Comments in Table H-1C
4	1,055	No	No	No	No	See Comments in Table H-1C
5	161	No	No	No	No	
6	129	No	No	No	No	
7	109	No	No	No	No	
8	98	No	No	No	No	
9	83	No	No	No	No	
10	75	No	No	No	No	
11	54	No	No	No	No	
12	35	No	No	No	No	

4,440
995
1,115
1,055
7,605 Total acres in polygons 1, 2, 3 + 4 out of 8,875 acres of other undeveloped lands = the majority of these lands

8,875 − 7,605 = 1,270 rest of undeveloped lands

Polygon ID	Sum of Acres	FSH 1909.12 71.1 (1)	FSH 1909.12 71.1 (2a.)	FSH 1909.12 71.1 (2b.)	FSH 1909.12 71.1 (2c.)	Comments Note 1 above applies to all 71 polygons in Table H-1B
57	3	No	No	No	No	
58	3	No	No	No	No	
59	2	No	No	No	No	
60	2	No	No	No	No	
61	2	No	No	No	No	
62	2	No	No	No	No	
63	2	No	No	No	No	
64	2	No	No	No	No	
65	2	No	No	No	No	
66	1	No	No	No	No	
67	1	No	No	No	No	
68	1	No	No	No	No	
69	1	No	No	No	No	
70	1	No	No	No	No	
71	1	No	No	No	No	
Grand Total	**8,785**					

(*) A blanket statement that all these areas can't be protected because of their "small" size & shape is insufficient justification for sacrificing these unlogged, unroaded areas of wildlife habitat to logging and roading and no further consideration as PWA or IRAs.

INVENTORY RESULTS:
In summary there are no areas within the project planning area that meet the inventory criteria as potential wilderness areas as displayed in Map H-5.

CONSIDERATION OF FOUR LARGEST POLYGONS:
The following four polygons of undeveloped lands were analyzed in more detail because of their size. Other remaining polygons of undeveloped lands were smaller in size (about 160 acres or less). Table H-1C reflects the result of the review.

Table H-1C – Consideration of Four Largest Polygons of Other Undeveloped Lands

PWA Inventory Criteria	Polygon 1 Approx. 4,440 acres	Polygon 2 Approx. 995 acres	Polygon 3 Approx. 1,115 acres	Polygon 4 Approx. 1,055 acres
FSH 1909.12 71.1 (1) Areas contain 5,000 acres or more	No	No	No	No
FSH 1909.12 71.1 (2a.) Areas contain less than 5,000 acres but, can be preserved due to physical terrain and natural conditions	(*) The majority of acres are in FP management area allocations C4 and C3A. The goal and desired future condition for both MAs is to provide high levels of habitat effectiveness for big game and other wildlife. Prescribed fire alone without management of	Size and shape of polygon prohibits preserving it due to physical terrain and natural conditions. (*) It is located in FP management area allocations C3 and C3A. The goal and	Same as Polygon 2 (size and shape of polygon and majority of acres are in MA C4) (*) The majority of acres remain in MA C4	Same as Polygon 2 (size and shape of polygon and majority of acres are in MA C4)

should be adequate reason to protect these areas from roading & logging for wildlife habitat.

* These lame excuses for roading and logging relatively rare (across the region) roadless, unlogged, undeveloped large blocks of interior forest habitat represent inaccurate use of the science and lack of professional integrity re: a clear bias and financial incentive to log.

PWA Inventory Criteria	Polygon 1 Approx. 4,440 acres	Polygon 2 Approx. 995 acres	Polygon 3 Approx. 1,115 acres	Polygon 4 Approx. 1,055 acres
This is patently absurd and biased. If this is true (which it isn't) how did "big game" & other wildlife survive prior to Forest Service (mis)management? Logging is not needed to provide wildlife habitat. Future options for wildlife are not limited by natural conditions (unmanaged) which include natural disturbances to create openings such as wildfire & defoliating insects and forest cover to provide thermal and hiding cover. Large blocks of unlogged + unroaded wildlife habitat are needed * →	vegetation would not maintain or enhance big game or other wildlife habitat. If added to the PWA inventory future options for big game and wildlife habitat would be limited and eventually in the long-term have a negative impact on wildlife. Proximity of existing road systems adjacent to the polygon with ongoing activity, adjacent private land and associated activities, and the size of the polygon itself would preclude a primitive wilderness experience. Adjacent private land (Cloverland area) on the western boundary is being parceled off in 5-acre sections for development. Past history and ongoing experience is that some private landowners enter onto National Forest land from their adjacent property on ATVs, and snowmobiles regardless of whether the Forest Service land is open to that use. It would not be possible to monitor this boundary area at all times.	desired future condition for these MAs is to provide high levels of habitat effectiveness for big game. Prescribed fire alone without management of vegetation would not maintain or enhance big game habitat. If added to PWA inventory future options for wildlife habitat would be limited and eventually in the long-term have a negative impact on wildlife. ← Bogus rationale Cook Ridge Pond is located within this polygon and is used for the grazing allotment. So? * regardless of whether they qualify as wilderness, to provide for far-ranging species such as Wolverine, Lynx, Wolves, and Marten	Same comment as for "polygon 1" - high levels of habitat effectiveness for "big game" species are best provided by leaving these areas intact and roadless - elk are sensitive to human disturbance and the fragmentation effect of roads and need adequate amounts of forest cover, not just openings (which are already plentiful in the area.)	
FSH 1909.12 71.1 (2b.) Areas contain less than 5,000 acres but, are self-contained ecosystems, such as an island, that can be effectively managed as a separate unit on the National Wilderness	No It is part of a larger overall contiguous ecosystem condition distributed throughout and beyond the project planning area.	No Same as 1	No Same as 1	No Same as 1

PWA Inventory Criteria	Polygon 1 Approx. 4,440 acres	Polygon 2 Approx. 995 acres	Polygon 3 Approx. 1,115 acres	Polygon 4 Approx. 1,055 acres
Preservation System				
FSH 1909.12 71.1 (2c.) Areas contain less than 5,000 acres but, are contiguous to existing wilderness, primitive areas, Administration-endorsed wilderness, or potential wilderness in other Federal ownership, regardless of their size	No	No	No	No
FSH 1909.12 71.1 (3) Areas do not contain forest roads (36 CFR 212.1) or other permanent authorized roads, except as permitted in areas east of the 100th meridian.	No roads	No roads	No roads	No roads

(*) No roads is a good reason to incorporate all of these four areas (and others listed in Table H-1B - especially those over 50 acres) as part of the Inventoried Roadless Areas and protect them from logging and roading.