

**Finding of No Significant Impact  
for  
Doubleday Fire Salvage  
EA # DOI-BLM-OR-M050-2009-0015**

**Introduction**

The Medford District Bureau of Land Management, Butte Falls Resource Area (BLM) recently completed the *Doubleday Fire Salvage Environmental Assessment* (EA) for salvage activities proposed in the Doubleday Fire area. Based on the context and intensity of the impacts analyzed in the EA (p. 23-83), I have determined that Alternative 2 (the selected alternative), with the associated project design features, is not a major Federal action that would significantly affect the quality of the human environment, individually, or cumulatively with other actions, in the general area.

The BLM began work on this project prior to the 2008 Medford District Record of Decision and Resource Management Plan (2008 ROD/RMP) and, as allowed by the 2008 ROD/RMP for transition projects, the project is designed based on management direction from the 1995 Medford District Resource Management Plan (1995 ROD/RMP). Implementation of management direction from the 1995 ROD/RMP, in almost all cases will “result in less change to the current condition of the affected environment than if the . . . projects were implemented consistent with the management direction” in the 2008 ROD/RMP (2008 ROD/RMP, 4). The 2008 ROD/RMP allows the BLM to use work already begun on the planning and analysis of projects if a decision on the project will be signed within two years of the effective date of the 2008 ROD. As a result, this document uses land use allocations and project design features contained in the 1995 RMP that may not be consistent with the management direction found in the 2008 ROD/RMP.

As allowed by the 2008 ROD/RMP, the design features for this project that are consistent with the 1995 RMP but not consistent with the 2008 RMP include:

- Across the 220 acres that will be salvaged, leaving a minimum of 120 linear feet of logs per acre greater than or equal to 16 inches in diameter and 16 feet long.
- Across the 220 acres that will be salvaged, leaving two snags per acre 20 inches in diameter at breast height (DBH) or greater.

The Doubleday Fire Salvage project will not have any significant effects beyond those described in the broader analyses conducted and disclosed in 2008 Final Environmental Impact Statement for the Revision of the Resource Management Plan of the Western Oregon Bureau of Land Management (2008 FEIS), or the effects have been determined to be insignificant.

Environmental effects do not meet the definition of significance in context or intensity as defined in 40 CFR § 1508.27. Therefore, an environmental impact statement is not necessary and will not be prepared.

In making this finding, I considered the following criteria as required in 40 CFR § 1508.27 by the Council on Environmental Quality, for evaluating the significance of the impacts of the activities proposed in the Doubleday Fire Salvage project.

### **Context**

The *Medford District Record of Decision and Resource Management Plan* (1995 ROD/RMP) addresses the need for a sustainable supply of timber and other forest products that will help maintain the stability of local and regional economies, and contribute valuable resources to the national economy on a predictable and long-term basis. It also responds to the need for a healthy forest and rangeland ecosystem with habitat that will contribute toward and support populations of native species, particularly those associated with late-successional and old-growth forests.

Within the Medford District, 190,000 acres of BLM-administered lands designated as Matrix make up approximately 22 percent of the total land base. Within the Butte Falls Resource Area, approximately 42,800 acres of the BLM-administered lands, or 21 percent of the Butte Falls Resource Area, are Matrix lands. The 1995 Medford District ROD/RMP identified Matrix lands as “federal land outside of reserves and special management areas that will be available for timber harvest at varying levels” (1995 ROD/RMP p. 107). These lands are expected to provide a sustainable supply of timber to help support local economies and communities.

The Project Area is one mile south of Butte Falls, Oregon in the Lower South Fork Big Butte Creek sixth field watershed (in the Big Butte Creek fifth field watershed) and the Salt Creek-Long Branch sixth field watershed (in the Little Butte Creek fifth field watershed). The Project Area contains the entire 1,236 acres burned by the Doubleday Fire in September 2008. The fire burned across the following ownerships: 451 acres BLM and 785 acres private. BLM-administered land is intermixed with privately owned lands, creating a scattered ownership pattern. The BLM is proposing salvage harvest on 220 acres of Matrix lands located within two sixth field watersheds. The Project Area contains BLM-administered and private lands located in Township 35 South, Range 2 East, sections 14, 15, 22, 23, 26, 27, and 34; Willamette Meridian; Jackson County, Oregon. Salvage projects are only proposed on BLM-administered lands in sections 23 and 27.

Chapter 3 of the EA (p. 23-84) details the effects of the selected alternative. None of the effects identified, including direct, indirect, and cumulative effects, are considered to be significant and all anticipated effects are of the type and within the magnitude of effects analyzed and described in the 2008 Final Environmental Impact Statement for the Revision of the Resource Management Plan of the Western Oregon Bureau of Land Management (2008 FEIS).

### **Intensity**

I have considered the intensity of the impacts anticipated from the Doubleday Fire Salvage project relative to the intensity or severity of impacts described in 40 CFR § 1508.27(b).

#### **1. Impacts that may be both beneficial and adverse.**

The *Doubleday Fire Salvage Environmental Assessment* documented the site-specific analysis of effects to the environment. Required project design features are an integral part of the Doubleday

Fire Salvage project, ensuring that the potential for adverse effects on resources are minimized to the extent possible.

Based on the analysis documented in the EA, no significant adverse or beneficial effects will result from implementing the Doubleday Fire Salvage project. All effects are of the type and within the magnitude of effects described in the 2008 FEIS.

The Butte Falls Blowdown Salvage project will protect **soils and site productivity** by implementing the following project design features (EA p. 16-18):

- using existing and predesignated skid trails,
- ripping or subsoiling,
- walking machinery over logging slash,
- restricting operations to dry soil periods,
- restricting heavy equipment to slopes less than 20 percent,
- restricting tractor yarding, ripping, road construction, maintenance and decommissioning work to the dry season, or when soil moisture is less than 25 percent,
- requiring one-end log suspension for skyline yarding,
- grass seeding and mulching, and
- water barring.

The Doubleday Fire Salvage project will not increase **peak stream flows** for the following reasons (EA p. 54-56):

- the project will not change the current crown closure;
- the project will not provide connectivity to stream channels from tractor yarding;
- road densities and the percent of area in roads will essentially remain the same; and
- road renovation will occur before roads are used for salvage activities. During road renovation, rock surfacing will reduce the likelihood of runoff concentrating on the road surface; road drainage improvements will further disperse road runoff and decrease the rapid concentrated routing of water to streams during storm events; and culvert upgrades will reduce the likelihood of water being routed down roads during high flows.

The salvage project will have no direct or indirect effects on **stream temperature** because the use of no salvage buffers will maintain existing shade on perennial streams during salvage treatments and proposed road work (EA p. 56).

The salvage project will have minimal effects on **sedimentation** because (EA p. 54-55):

- temporary roads will be constructed in stable locations away from stream channels to prevent sediment from reaching streams;
- adding rock to the existing road base, ditch relief culverts, and armored water dips will decrease sediment delivery;
- tractor yarding will be restricted to slopes of 20 percent or less;
- the potential for sediment from salvage units to reach stream channels is very low due to the use of project design features and riparian reserves; and

- landings would be constructed outside riparian reserves and project design features would greatly limit any sediment moving off-site.

The salvage project will not affect **fish** because (EA p. 60-62):

- any sediment moving off roads will be an inconsequential amount and will be assimilated into background conditions;
- all road renovation will occur during the dry season; and
- road renovation would reduce road runoff and minimize road-related sediment.

Because of these factors, if sediment were to reach area streams it would be a negligible amount. Due to the limited acres of salvage (220 acres over 1,200 acres), PDFs that limit soil movement and disturbance, and the distance to coho salmon and coho critical habitat (at least 1.5 miles to coho critical habitat), this project would have “no affect” on coho salmon or coho critical habitat.

The salvage project will not negatively affect the function of the **Ginger Springs Municipal Watershed** because (EA p. 55-56):

- no activities are located within the high zone of influence;
- temporary roads will be located on stable locations away from stream channels;
- temporary roads will be ripped, seeded with native grasses, and mulched to increase infiltration, reduce runoff, and prevent sediment from reaching stream channels; and
- road realignment will reduce erosion from existing entrenched road.

The salvage project will reduce, but not eliminate, the potential for **epidemic insect populations**. The reduced amount of breeding habitat (i.e. burned trees adjacent to live trees) is expected to correspond to the reduction of insects and lower the potential for green tree mortality in areas salvaged prior to beetle emergence (EA p. 39).

The salvage project will not modify the current **northern spotted owl habitat**. The fire made the changes to spotted owl habitat and salvage will maintain the current post-fire function. Spotted owls will continue to use available post-fire nesting, roosting, and foraging, and dispersal habitat after implementation of the proposed action in the same manner as they did before because (EA p. 142-144):

- spotted owls should continue to use available nesting, roosting, and foraging, and dispersal habitat, after implementation of the proposed action in the same manner as they did before;
- canopy cover will be maintained at 60 percent or greater in the remaining nesting, roosting, and foraging habitat;
- canopy cover would be maintained at 40 percent or greater in dispersal habitat because no live trees would be removed in these stands;
- all multi-canopy, uneven-aged tree structure that was present pre-treatment would remain post-treatment;
- decadent woody material, such as large snags and down wood, would remain after treatment, as required by Medford BLM’s management guidelines; and

- no spotted owl nest trees would be removed and a seasonal restriction for activities within 0.25 miles of nest trees would be implemented.

The BLM has determined the effects as a result of the implementation of salvage treatments within dispersal habitat will be “No Affect” to northern spotted owls. Burned stands proposed for salvage harvest do not currently provide nesting, roosting, and foraging habitat. Although 39 acres proposed for salvage provide dispersal habitat, only dead trees would be salvaged, and canopy cover would remain the same. The remaining 181 acres do not have enough canopy closure and sufficient component of live trees to provide cover for spotted owls.

The salvage project will have no known effects on **Threatened and Endangered and Special Status botanical species** because (EA p. 127-128):

- no populations of T&E plant species occur in areas that would be impacted by salvage operations;
- no Sensitive vascular or nonvascular plant sites are known to occur in the salvage area;
- the units proposed for salvage do not currently provide habitat for Sensitive fungi because of damage caused during the Doubleday Fire;
- removing fire-killed trees would not reduce the amount of late-successional habitat in the Project Area that Special Status fungi could occupy in the future. The severely burned stands would not provide suitable habitat for rare fungi for decades;
- landscape level strategic surveys, suitable habitat in late-successional reserves, and protection of known sites throughout the Northwest Forest Plan area is expected to prevent Sensitive fungi from trending toward listing as a result of the proposed salvage activities; and
- the magnitude and scale of the salvage harvest is small enough that Sensitive fungi would not trend toward listing.

The salvage project will minimize or avoid the potential for new introductions, or the spread of existing, **noxious weed populations** because (EA p. 132-133):

- noxious weed populations will be treated in salvage units and areas proposed for landing and road construction;
- vehicles and equipment will be pressure washed before entering BLM lands;
- noxious weed populations in rock quarries where gravel will be removed for road work will be treated;
- areas disturbed during project implementation will be seeded or planted with native plant materials;
- disturbed areas will be mulched with weed-free straw or hay; and
- landings and decommissioned roads will be monitored for 1 to 3 years after salvage is complete and noxious weeds will be treated as detected.

The salvage project will provide for recovery of salvage material on BLM-administered Matrix stands within the Doubleday fire perimeter. Approximately 2 million board feet would be harvested. Direct employment as a result of timber harvest and processing a commodity would result in approximately 18 full-time equivalent jobs. The estimated return to the Federal Treasury

for timber harvest would be \$200.00 per thousand board feet for a total value of approximately \$400,000.

## **2. The degree to which the selected alternative will affect public health or safety.**

The salvage project will not significantly or adversely impact health or safety because:

- trees identified as hazards to workers or the public will be felled;
- salvage of the fire-killed trees by professional loggers will meet Occupational Safety and Health Association regulations for worker and public safety; and
- prescribed burning operations will follow all requirements of the Oregon Smoke Management Plan and the Department of Environmental Quality Air Quality and Visibility Protection Program. By following these requirements, the project will have negligible effects on air quality within the Project Area.

## **3. Unique characteristics of the geographic area such as proximity to historic or cultural resources, park lands, prime farm lands, wetlands, wild and scenic rivers, or ecologically critical areas.**

The Doubleday Fire Salvage Project was designed to have no affect on historic or cultural resources, park lands, prime farm lands, wetlands, wild and scenic rivers, or ecologically critical areas (EA p. 19-22). Where required, the BLM completed surveys and inventories to identify areas with unique characteristics. This allowed the BLM to design the project in such a way to avoid impacts to these features as follows:

- the BLM completed a cultural survey for the Project Area and the project archaeologist assessed the project as “No Effect Determination, No Resources”;
- salvage activities were designed to treat and maintain spotted owl dispersal and nesting, roosting, and foraging habitat. There would be no change from current habitat ratings. Trees in nesting, roosting, and foraging habitat would not be salvaged, while spotted owl dispersal habitat would maintain at least 40 percent canopy after the salvage. Salvage would be seasonally restricted within 0.25 miles of known or suspected northern spotted owl sites from March 1 through June 30, unless surveys by BLM biologists indicate the sites are vacant or the resident owls are not nesting that year (EA p. 135). **The BLM has determined the effects to spotted owls as a result of the implementation of salvage treatments within dispersal habitat will be “No Affect” to northern spotted owls** (EA p. 142);
- the EA analyzed 220 acres for salvage harvest, 186 acres are within the Ginger Springs Municipal Watershed. The logging systems on these acres include 79 acres of tractor yarding and 107 acres of skyline yarding. Approximately 0.9 miles of the 1.5 miles total of temporary road would be constructed within the municipal watershed. These temporary roads would be located on stable locations away from stream channels. After use, temporary roads would be ripped, seeded with native grasses, and mulched to increase infiltration, reduce runoff, and prevent sediment from reaching stream channels. Activities **that could affect water quality, such as road building and tractor yarding, would take place within the low zone of influence so municipal water quality would remain at its current condition.** Skyline and tractor yarding would occur on a small portion (about 10 acres) of the moderate zone of influence in this watershed. The moderate zone of influence mostly follows stream channels (with some upland exceptions) that would be protected with riparian reserves. There are no

activities proposed in the high zone of influence in the Ginger Springs Municipal Watershed so municipal water quality would remain high (EA p. 55);

- this project would have **“no affect” on coho salmon or coho critical habitat** because of the limited acres of salvage (220 acres over 1,200 acres), PDFs to limit soil movement and disturbance, and the distance to coho salmon and coho critical habitat (at least 1.5 miles to coho critical habitat)(EA p. 62); and
- this decision will not **result in significant wetland or floodplain-related impacts** (per Executive Orders 11990 or 11998). Any wetlands within or near the Project Area have been identified, mapped, and protected by excluding wetlands from the Project Area through establishment and designation of **riparian reserves**. All Northwest Forest Plan and Medford District Resource Management Plan protection measures for riparian reserves and wetlands are incorporated in the Doubleday Fire Salvage project design.

**4. The degree to which the effects on the quality of the human environment are likely to be highly controversial.**

The effects of the Doubleday Fire Salvage project are similar in nature to those of other commercial timber sales, including fire salvage projects that have been implemented within the scope of the Medford District Resource Management Plan. The anticipated effects of salvaging windthrown and fire-killed trees and post-salvage fuels reduction, documented in the EA, are well supported with referenced literature throughout the EA. The effects of the selected alternative are described in Chapter 3 of the *Doubleday Fire Salvage EA* (EA p. 23-84).

**5. The degree to which the possible effects on the human environment are highly uncertain or involve unique or unknown risks.**

The analysis did not indicate this action will involve any unique or unknown risks outside of those addressed and anticipated in the EIS for the Medford District Resource Management Plan. While large fires do not occur routinely (they are more periodic), the methods for removing harvesting timber (e.g., tractor, cable, and helicopter yarding) are the same methods used on a regular basis when harvesting commercial timber. The anticipated effects of implementing the Doubleday Fire Salvage Project are well supported with referenced literature throughout the EA and are similar in nature to the effects estimated and observed for other timber sales implemented on lands in the Medford District BLM.

**6. The degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about future considerations.**

The decision to implement Alternative 2 of the Doubleday Fire Salvage project will not set any precedents for future actions with significant effects. The Doubleday Fire Salvage project will implement actions approved for forest management under the 1995 Medford District Resource Management Plan. Salvage of disturbance events, including fires, was anticipated under, and consistent with, the direction of the Medford District Resource Management Plan (EA p. 5). Any future salvage projects will have its own set of conditions and will be subject to a new environmental analysis

**7. Whether the action is related to other actions with individually insignificant but cumulatively significant impacts.**

Cumulative environmental effects are “the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions” (40 CFR § 1508.7). Analysis was conducted for this project and no significant cumulative impacts were identified greater than those addressed and anticipated in the 2008 FEIS. Analysis was performed at multiple scales and included current conditions, current actions, and foreseeable future actions on both private and Federal lands (EA p. 23-84).

**8. The degree to which the action may adversely affect districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places or may cause loss of destruction of significant scientific, cultural or historical resources.**

The project archaeologist surveyed the Project Area for cultural and historic resources. The action will not affect objects listed on the National Register of Historic Places, nor will it cause destruction of significant scientific, cultural or historical resources because none were identified. Implementation of Alternative 2 of the Doubleday Fire Salvage project will not prevent the opportunity to research and measure impacts of salvage logging on fire-killed trees. The fire affected over 451 acres of BLM-administered lands and only a portion of these acres (220) is proposed for salvage. Research could be conducted in the remaining, unsalvaged acres affected by the fire.

**9. The degree to which the action may adversely affect an endangered or threatened species or its habitat that has been determined to be critical under the Endangered Species Act of 1973.**

There are no designated Critical Habitat Units for the spotted owl within the Project Area or the two fifth field watersheds containing the Project Area, as described in the Federal Register (73 FR 157:47326-47374). The BLM has determined the effects to spotted owls as a result of the implementation of salvage treatments within dispersal habitat will be “No Affect” to northern spotted owls for the following reasons:

- spotted owls should continue to use available nesting, roosting, and foraging, and dispersal habitat, after implementation of the proposed action in the same manner as they did before;
- canopy cover would be maintained at 60 percent or greater in nesting, roosting, and foraging habitat because these stands would not be entered;
- canopy cover would be maintained at 40 percent or greater in dispersal habitat because no live trees would be removed in these stands;
- decadent woody material, such as large snags and down wood, would remain after treatment, as required by Medford BLM’s management guidelines;
- all multi-canopy, uneven-aged tree structure that was present pretreatment would remain post-treatment; and
- no spotted owl nest trees would be removed and a seasonal restriction for activities within 0.25 miles of nest trees would be implemented.

The BLM has determined the effects to coho salmon or coho critical habitat will be “no affect” for the following reasons:

- limited acres of salvage (220 acres over 1,200 acres);
- PDFs to limit soil movement and disturbance; and
- the distance to coho salmon and coho critical habitat (at least 1.5 miles to coho critical habitat).

The project area is within the range of one plant species, *Fritillaria gentneri*, listed as endangered under the ESA. However, the BLM has determined the salvage harvest would be “no affect” to *Fritillaria gentneri* because the units do not contain suitable habitat for this species and no sites were discovered during surveys.

#### **10. Whether the action threatens a violation of Federal, State, or Local law or requirements imposed for the protection of the environment.**

The selected alternative does not violate any known Federal, State, or local environmental protection laws. The Doubleday Fire Salvage project is designed to comply with the Medford District Resource Management Plan (EA p. 6-7).

Within the Doubleday Fire Salvage Water Resource analysis area, three streams are included on the Oregon Department of Environmental Quality (DEQ) 2004/2006 303(d) list for exceeding water quality criteria. In the Lower South Fork Big Butte Creek sixth field watershed, Doubleday Creek (river mile 0 to 3.4) and Hukill Creek (river mile 0 to 3.6) are listed for exceeding the stream temperature criteria. In the Salt Creek-Long Branch sixth field watershed, Salt Creek (river mile 0 to 9) is listed for exceeding the *E. coli* criteria. All three streams have listed portions within the Doubleday Fire Salvage Project Area. No streams in the Water Resources analysis area are on the DEQ’s 303(d) list as water quality limited for sedimentation (EA p. 49).

Required project design features are an integral part of the Doubleday Fire Salvage project. They incorporate the Management Direction of the 1995 Medford District Resource Management Plan (as allowed by the 2008 ROD/RMP) and ensure that the project conforms to applicable laws including the Oregon and California Lands Act of 1937 (O&C Act), Federal Land Policy and Management Act of 1976 (FLPMA), National Environmental Policy Act (NEPA) of 1969, the Endangered Species Act (ESA) of 1973, the Clean Water Act of 1987, Safe Drinking Water Act of 1974 (as amended 1986 and 1996), Clean Air Act of 1990, and the Archaeological Resources Protection Act of 1979. A listing of the required project design features, and the objectives to be accomplished through the application of project design features, is included in *Doubleday Fire Salvage EA* (p. 16-18).

**Finding**

I have determined the Doubleday Fire Salvage project does not constitute a major Federal action having a significant effect on the human environment and therefore, an environmental impact statement is not necessary and will not be prepared. This conclusion is based on my consideration of the Council on Environmental Quality's criteria for significance (40 CFR §1508.27), with regard to the context and the intensity of the impacts described in the EA, and on my understanding of the project, review of the project analysis, and review of public comments. As previously noted, the analysis of effects has been completed within the context of the 2008 Medford District Record of Decision and Resource Management Plan (2008 ROD/RMP) and the project is designed based on management direction from the 1995 Medford District Resource Management Plan (1995 ROD/RMP) as allowed by the 2008 ROD/RMP for transition projects. , The analysis is tiered to the 2008 Final Environmental Impact Statement for the Revision of the Resource Management Plan of the Western Oregon Bureau of Land Management (2008 FEIS). This conclusion is consistent with those plans, and the anticipated effects are within the scope, type, and magnitude anticipated and analyzed in the FEIS. The analysis of project effects has also occurred in the context of multiple spatial and temporal scales as appropriate for different types of impacts and the effects were determined to be insignificant.



Donald K. Hoffheins  
Butte Falls Field Manager

4/8/09  
Date