IN REPLY REFER TO:
1790 (ORL040)

DECISION RECORD #4
FOR
SOUTH GERBER FOREST HEALTH TREATMENTS ENVIRONMENTAL ASSESSMENT (EA) #OR-014-04-06
PROJECT: Adobe West Timber Sale

INTRODUCTION
The effects of the Adobe West Timber Sale were analyzed in the South Gerber Forest Health Treatments EA # OR014-04-06. This assessment analyzed multiple proposed actions across watersheds with implementation proposed over a five to ten year period. It was anticipated that separate Decision Records would be prepared at the time specific projects were proposed. This Decision Record applies only to the Adobe West Timber Sale (See Map 1) including associated activities. The timber sale is scheduled to be sold November 28, 2012. I may be making further decisions in the future based on the other proposed actions outlined in the South Gerber EA.

The Klamath Falls Resource Area (KFRA) interdisciplinary team designed the Adobe West Timber Sale based on: (a) resource conditions in the project area, (b) the results of monitoring the previous decade of timber harvest activities, and (c) meeting the purpose and need as identified in the South Gerber EA. The proposals presented and evaluated in the South Gerber EA reflect what the interdisciplinary team determined to be the best balance and integration of resource conditions, resource potentials, competing management objectives, expressed interests of the various publics, and the concerns of surrounding communities.

PLAN CONFORMANCE
This project has been designed to comply with the land use allocations, management direction, and objectives of the 1995 Klamath Falls Resource Management Plan (1995 RMP).

DECISION
It is my decision to implement Alternative 1, the Preferred Alternative, proposed in the South Gerber EA. As part of this action Best Management Practices (BMPs) in Appendix D of the
KFRA ROD/RMP and the Project Design Features (PDFs) in Appendix B of the EA will be applied. The approved action will result in the implementation of the Adobe West Timber Sale (see Map 1) within the analysis area, specifically:

**Timber Harvesting:**
- Approximately 1,225 acres of commercial forest land and juniper woodland will be thinned using a variable Density Management prescription. No patch cuts or regeneration harvests are planned as part of the Adobe West Timber Sale. Figure 1 shows the distribution by diameter class of trees designated for harvest and retention (based on timber cruise and precruise plots).
- Approximately 1.7 million board feet (MMBF) will be harvested
- Within the unit boundaries, all junipers over six feet tall, except those exhibiting older juniper characteristics, will be cut and yarded concurrently with the commercial timber harvesting operations.
- All harvesting will be done with ground based equipment utilizing designated skid trails.

**Roads:**
- No new permanent road construction is planned for the Adobe West Timber Sale
- Approximately 3.4 miles of existing roads will be renovated. Work will include blading, reshaping, compacting, ditch and drainage cleaning, and brushing.

**Riparian Reserves:**
- Less than ten acres of BLM land within the riparian reserves (RRs) will be thinned using a Density Management prescription. These acres are included in the total density management treatment acres listed above.
- Intermittent streams will be buffered and protected as described in the PDFs (Appendix B) of the South Gerber EA and the BMPs in Appendix D of the RMP. Specifically, operational boundaries will be delineated to establish no-mechanical-equipment-entry zones in RRs to protect thermal regimes and prevent erosion in RRs.
- The objectives of the Aquatic Conservation Strategy (ACS) will be met with implementation of the PDFs and BMPs.
Figure 1: Comparison of Take versus Leave Trees Per Acre by Diameter Class for Adobe West Timber Sale

![Graph showing comparison of take versus leave trees per acre by diameter class.](image)

**Wildlife Management:**
- Implement the PDFs described in Appendix B of the South Gerber EA and the BMPs applying to timber harvesting in the KFRA ROD/RMP, Appendix D, for all actions conducted in the Adobe West Timber Sale Area.
- Northern Goshawk: Two years of surveys were completed for northern goshawks in the Adobe West Timber Sale area. No northern goshawks were detected. If a site is located in the future, a buffer and seasonal restriction will be implemented (page 38 KFRA RMP).
- Special Status, Threatened and Endangered Species – The management actions/directions as described on pages 38 and 39 of the RMP will be applied.

**Fuel treatments:**
- All trees designated for harvest will be whole tree yarded to the landings with tops and limbs attached
- Slash accumulations will be piled and utilized or burned or left for wildlife habitat
- Portions of the sale area may be underburned to further reduce fuel loads if post-harvest conditions warrant under burning

**Monitoring**
The KFRA has issued an Annual Program Summary and Monitoring Report (APS) on a yearly basis since the signing of the 1995 RMP. The APS documents the results of annual timber sale monitoring as well as on-going monitoring of other resources. The 2011 APS, Table E on page 91, lists all the sales that have been sold and those that have been monitored through fiscal year
2011. Monitoring related to timber harvesting has included the following: soil effects, stand attribute changes (basal area, trees per acre, species composition, structure), numbers and spacing of skid trails, coarse woody debris and snag requirement compliance, establishment and adherence to riparian reserve buffers, threatened and endangered species buffers, cultural resources buffers, and seasonal use restrictions. The Adobe West Timber Sale will have some or all of these attributes monitored.

**Mitigation**
All PDFs described in Appendix B of the South Gerber EA and all BMPs in Appendix D of the RMP that pertain to timber harvesting will be implemented. No additional mitigation was deemed necessary and thus none was described in the EA or in this decision record.

**Resources Not Present**
The following resources are not present within the proposed Adobe West Timber Sale Area: prime and unique farmlands, mining claims, paleontological resources, hazardous materials, road less areas, wilderness areas, and wilderness study areas.

**Environmental Consequences**
Implementation of the proposed action is consistent with the effects analyzed in the South Gerber EA and the RMP. The PDFs from the South Gerber EA and the BMPs from the RMP will minimize the effects to the affected resources and result in no impacts greater than those described in the EA and the RMP.

**RATIONALE FOR SELECTION OF ALTERNATIVE 1**
The decision to implement this proposal, Alternative 1, meets the purpose and need identified in the EA and furthers the intent established in the RMP to harvest timber and protect other resource values.

Alternative 2, the No Action Alternative, is rejected because it does not meet the resource management objectives for the Matrix lands identified in the RMP and the Northwest Forest Plan. In addition, beneficial economic opportunities from timber harvesting would be foregone and no thinning or fuels reduction benefits would be realized.

**CONSULTATION AND COORDINATION**
No threatened or endangered species listed under the Endangered Species Act of 1973, as amended, occur within the project area or would be affected from the Adobe West timber sale. Therefore the BLM has made a “No Effect” determination for all threatened and endangered species for the Adobe West Timber Sale. Due to this determination, the BLM is not required to conduct Section 7 consultation with the U.S Fish and Wildlife Service.

**PUBLIC INVOLVEMENT**
The KFRA requested public comments on the South Gerber EA on two different occasions. The first was an initial scoping letter dated February 5, 2004 that outlined the proposed treatments for the analysis area. Comments were received from four individuals or groups. Upon completion
of the EA, the public was again notified on January 13, 2005 and allowed to comment during a formal thirty (30) day public comment period. Again, three comment letters were received. The following provides responses to the main issue topics raised in the comments:

**Roads**  
**Comment:** No new road construction, particularly in roadless areas.  
**Response:** No new permanent road construction is planned in the Adobe West timber Sale. Approximately 3.4 miles of existing roads will be renovated. Renovation includes blading, compacting, ditch and drainage cleaning and brushing. In compliance with the Federal Land Policy and Management Act of 1976, the BLM inventories roadless areas 5,000 acres or more in size. There are no roadless areas on BLM land within the project area. Current average road density within the proposed contract areas is estimated at between one and two miles per square mile. No road construction is planned in roadless areas.

**Comment:** Limit or don’t construct temporary roads.  
**Response:** Temporary road construction will be limited to 0.25 miles or less. These short spur roads will be needed to access landing sites. Any new temporary spur roads will be blocked and/or obliterated upon completion of Timber Sale activities.

**Comment:** Avoid damage to roads during inclement weather.  
**Response:** Project activities and road use are seasonally limited to the dry season when soil moisture at a six inch depth is less than 20 percent (typically June 1 to October 15) thereby reducing potential effects. Harvest activities will be allowed if winter logging conditions exist and the roads are snow covered or frozen.

**Comment:** Adverse impacts from roads to streams, soils, wildlife, hydrology, vegetation (noxious weeds), tree growth, and increased spreading of diseases should be addressed.  
**Response:** The EA discusses road-related environmental effects to the above resources on pages 11, 12 and 19.

**Aquatic Conservation Strategy (ACS)**  
**Comment:** Proposed action is contrary to the requirements of Aquatic Conservation Strategy (ACS).  
**Response:** Aquatic species and habitats are limited in the project area. The objectives of the ACS include maintaining and restoring the species composition and structural diversity of plant communities in riparian areas (RMP page 7). Riparian Reserve buffers, BM Ps, and PDFs as described in the proposed action, are expected to maintain and restore the plant communities in the area thereby reducing negative effects and meeting ACS objectives. Water quality would not be reduced because implementation of BMPs and PDFs, including riparian buffers, will minimize impacts. The cumulative effects of this project and recent nearby restoration treatments are designed to improve, protect, and restore watershed functions in the project area and in the adjacent watershed. This project is consistent with meeting the ACS objectives.

**Vegetation**  
**Comment:** Do not cut trees over 12” DBH.  
**Response:** The RMP (page E-3) specifies that “…trees in all size classes are eligible for thinning in order to reduce stocking to site capacity.” While retaining all trees over 12” DBH may be
desirable by some of the public, there is no basis for an arbitrary tree diameter limit for this project. The bulk of the trees to be removed are between 8” and 18” diameter classes (see Figure 1 above). The KFRA monitors stand structure and forest conditions on an annual basis (2011 APS pages 81-94). As verified by monitoring past projects (2011 APS) uneven-aged conditions and stand diversity is expected to be retained.

Comment: Retain all large snags.
Response: As described in the EA (Appendix B, page 3), a minimum of 1.4 snags per acre will be retained to meet the 60% optimum cavity nesting habitat in the area. In addition, because this is a density management harvest where approximately 1/4 to 1/3 of the trees are removed, recruitment trees will be available to meet future snag and down woody debris requirements. No snags have been designated for commercial removal, however some green trees marked for removal may die prior to harvest. All snags not considered a safety hazard will be reserved.

Comments: Patch cut size violates the RMP. Patch cuts are the same as clear cuts. Retention of diversity in the stand including mistletoe trees is necessary.
Response: Although the RMP allows for patch cuts up to four acres in size, no patch cuts are planned in the Adobe West sale area. Density management/thinning is done at variable densities and includes leaving thermal clumps to provide habitat diversity (pages 23-24 of the EA). In addition, some mistletoe trees, dead topped trees and large limbed trees will be reserved for wildlife and diversity purposes.

Comment: Thinning should be done at variable densities and carefully.
Response: Stand precruise and cruise data indicate that the forested stands in the Adobe West Timber Sale are stocked with trees ranging in diameter at breast height (DBH) from one inch to 36 inches plus. The data also indicates that trees ranging from one inch to 36 inches plus will remain after harvest is completed. The density management/thinning will concentrate primarily on the smaller (8 to 18 inch DBH) trees (see Figure 1 above). Trees of all diameters will be reserved in order to maintain a variable density uneven-aged timber stand. During sale layout and marking, small areas (one to five acres in size) were identified for implementation of variable density treatments. Some will be thinned to approximately 100 square feet of basal area (BA) while others will be thinned to approximately 40 BA.

NEPA
Comment: Inadequate site-specific analysis of direct, indirect, and cumulative impacts.
Response: The South Gerber EA tiers to the RMP. The assessment addressed direct, indirect, and cumulative effects of each action associated with the proposed timber sale and fuel treatments. The cumulative effects discussion in the EA addressed past, present and reasonably foreseeable future actions on BLM land, and on adjacent Forest Service and private lands. Therefore, the effects are fully and adequately analyzed.

Comment: An EIS instead of an EA should be written.
Response: The implementation of this project will not have significant environmental effects beyond those already identified in the RMP. The proposed action does not constitute a major federal action having significant effects on the human environment; therefore, an environmental impact statement will not be prepared.
Comment: Inadequate description of mitigation measures.
Response: Mitigation measures are described in Chapter 3, Affected Environment and Environmental Consequences section of the EA. The described mitigation measures and the BMPs and PDFs provided in Appendix B of the EA are sufficient to protect resources and minimize potential environmental effects.

Comment: Inadequate range of alternatives considered.
Response: Four alternatives were considered and two were analyzed. The rationale for dropping two alternatives from further analysis can be found on page six of the EA. Despite there being only two alternatives analyzed and documented in detail, the range of alternatives considered was adequate.

Wildlife
Comment: Inadequate analysis of impacts on wildlife.
Response: The KFRA RMP/EIS, to which the South Gerber EA is tiered, considers at length the effects of timber management on wildlife. The EA (pages 23-29) describes the current situation and anticipated effects to wildlife specific to the project area.

Grazing
Comments: Consider impacts on forest health from livestock grazing/Cumulative effects not addressed. Livestock grazing must be eliminated.
Response: Rangeland Health Standards Assessments completed for all allotments in the project area as part of the Gerber-Willow Valley Watershed Analysis (July, 2003) show that current levels of livestock grazing are appropriate to meet all five standards for Rangeland Health, which would also apply to “forest health”. The cumulative effects of grazing on timber resources and management were not specifically addressed in the EA because grazing is not an issue of concern for this area. Current levels of grazing have no measurable effect on timber resources, especially coniferous species. The KFRA ROD/RMP recognizes and provides for livestock grazing as a legitimate use of the public lands (page 46-48 and Appendix H).

Fire and Fuels
Comments: Thinning and fuels reduction should focus on smaller trees and ladder fuels, particularly trees less than 12.”
Response: Thinning and fuels reduction efforts for this project do focus on ladder fuels and primarily smaller trees. The majority of trees designated for harvest are 8” to 18” DBH (see Figure 1 above).

Comments: Don’t focus on reducing canopy fuels.
Response: Canopy levels will be reduced from the proposed thinning but this is not the focus of the project. The project does focus on reducing stocking levels and maintaining forest health and tree vigor.

Comments: Ensure long-term recruitment of future old-growth.
Response: The treatments are expected to maintain future old-growth recruitment (see vegetation discussion above) and estimated canopy closure of 40 percent or more in stands that
are currently densely stocked. The average diameter of the post-harvest stand will be greater than the current average stand diameter.

Comments: Harvesting will actually increase wildfire severity and risks.  
Response: In addition to removing a portion of the smaller diameter trees (ladder fuels, see Figure 1), the proposed timber harvest includes whole-tree yarding, which will minimize the generation of surface fuels. Subsequent fuel treatments include underburning to consume accumulated fuels. The overall effect of the proposed action is expected to modify the present fuel condition class to more closely resemble historic conditions, thereby benefiting multiple resources. As a result of all actions proposed including harvesting, the wildfire severity and risk is not increased.

Juniper Management
Comment: There is limited scientific evidence supporting western juniper encroachment of historic rangelands.  
Response: There are a variety of objectives for juniper management but the emphasis in this project area is fuels reduction, rangeland health, and forest health. Appendix H of the RMP discusses the type of vegetative improvements proposed in the different allotments. Page H-69 states that vegetative control would consist of cutting or burning juniper to improve resiliency of native grasses, forbs, and shrubs. Page 56 of the RMP discusses the cutting and yarding of up to 1,000 acres per year of juniper woodlands to improve forest and range land ecosystem and watershed conditions. Research has increasingly validated the benefits of treating invasive western juniper; (Western Juniper Its Impact and Management In Oregon Rangeland, Oregon State University Extension Service, February 1993, Bedell, Eddleman, Deboodt, Jacks.; Range Field Day 1999 Progress Report Juniper Woodlands: History, Ecology, and Management, Agricultural Experiment Station, Oregon State University, Special Report 1002, June 1999; Western Juniper in Eastern Oregon, Gedney, Azuma, Bolsinger, McKay, United States Department of Agriculture, Forest Service, Pacific Northwest Research Station, General Technical Report -464, November 1999). The effects of invasive western juniper are discussed in the Gerber Watershed Analysis and the literature cited above. The effects of the proposed actions to treat some of the invasive juniper within the Adobe West Timber Sale area are analyzed in the South Gerber EA and are within those analyzed the RMP. Therefore, the decision is to treat the juniper as proposed.

Salvage Harvesting
Comment: The cumulative effects of salvage harvesting were not considered.  
Response: There is no salvage harvest planned under the Adobe West timber Sale. No snags or dead trees were designated for removal. Some trees may have died after they were originally marked to remove. The number of such trees is expected to be minor.

CONCLUSION

Consideration of Public Comments
I have reviewed the public comments summarized above and have discussed them with the interdisciplinary team of specialists on my staff. The EA and this DR contain the requisite site specific information to implement the proposed action. The comments received do not provide any substantially new information or new analysis, nor do they identify substantial new data gaps
that would indicate additional analysis is needed. Finally, the comments do not identify any significant new data which would alter the effects described in the EA. I am confident that the South Gerber EA, including responses to public comments contained in this DR, in addition to the more comprehensive analysis done in the RMP to which the EA is tiered, represents a thorough analysis of potential effects associated with the Adobe West Timber Sale.

**Plan Consistency**

Based on the information in the South Gerber EA and in the record, I conclude that this action is consistent with the Klamath Falls Resource Area Resource Management Plan. The action will help to move this portion of the landscape towards the desired future condition considered in development of the RMP. The actions will comply with the Endangered Species Act, the Native American Religious Freedom Act, cultural resource management laws and regulations, and Executive Order 12898 (Environmental Justice). This decision will not have any adverse effects to energy development, production, supply and/or distribution (per Executive Order 13212).

**Finding of No Significant Impact**

No significant impacts were identified. No impacts beyond those anticipated in the RMP would occur. Refer to the Finding of No Significant Impact available at the KFRA office or on the web.

**Summary**

In consideration of public comments, the consistency with the RMP and the finding that there would not be any significant impacts, this decision authorizes implementation of activities associated with the Adobe West Timber Sale.

As outlined in 43 CFR § 5003 Administrative Remedies at § 5003.3 (a) and (b), protests may be made within 15 days of the publication date of a notice of sale. Publication of such notice in The Klamath Falls Herald and News, Klamath Falls, Oregon constitutes the decision date from which such protests may be filed. Protests shall be filed with the authorized officer and contain a written statement of reasons for protesting the decision.

43 CFR 5003.3 subsection (b) states: “Protests shall be filed with the authorized officer and shall contain a written statement of reasons for protesting the decision.” This precludes the acceptance of electronic mail or facsimile protests. Only written and signed hard copies of protests that are delivered to the Klamath Falls Resource Area office will be accepted.

/s/ Donald J. Holmstrom

Donald J. Holmstrom, Manager
Klamath Falls Resource Area
Lakeview District, Bureau of Land Management

10/30/12
Date
Timber Sale: Adobe West
Willamette Meridian
T.41S., R.14.5E., Sec. 1, 2, 3, 10, 11, 12, 13
T.41S., R.15E., Sec. 7 and 18

Legend
- Contract Area
- Pasture Fences
- Section Lines
- Township Range Lines
- Roads
- Density Management Units (DM)
- 40 BA DM patches
- 100 BA DM patches
- Reserve Areas; BLM

Unit 1 - 279 ac
Unit 2 - 892 ac
Unit 3 - 21 ac
Unit 4 - 33 ac
1,225 acres total

Boundaries are flagged, posted and painted in orange. Cut trees are painted with green in Units 1-3, with blue in Unit 4.

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