

**Decision Record  
for  
Doubleday Fire Salvage  
EA # DOI-BLM-OR-M050-2009-0015**

## **Background**

The Butte Falls Resource Area is proposing to salvage a portion of the trees burned in the 2008 Doubleday Fire. Salvage would occur on up to 220 acres of BLM-administered matrix lands in the Big Butte Creek and Little Butte Creek fifth field watersheds. Trees proposed for salvage would include trees either blown down during the 2008 windstorms or burned during the Doubleday Fire with more than 70 per-cent crown scorch (for Douglas-fir, ponderosa pine, sugar pine, and incense cedar) or more than 40 per-cent crown scorch (for white fir). Timber would be harvested using tractor and skyline yarding systems. No salvage is proposed in the 74 acres of riparian reserves or 102 acres of known northern spotted owl activity centers located within the fire perimeter. Slash from the salvage activities would be lopped and scattered or hand piled and burned. Road work associated with the salvage harvest would include road renovation, road improvement, temporary spur road construction, road realignment and fully decommissioning. The timber salvage would help meet the Medford District annual sale quantity goals established through the Medford District Resource Management Plan and the Northwest Forest Plan.

The BLM began work on this project prior to 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). 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.

The BLM completed the environmental analysis for this project and published the *Doubleday Fire Salvage Environmental Assessment* (EA) on March 4, 2009. The legal notice for public comment on the EA was published in the *Medford Mail Tribune* on March 4, 2009 and *Upper Rogue Independent* on March 3, 2009. Publishing of the legal notice in the *Medford Mail Tribune* started a 30-day public comment period that ended April 3, 2009.

NOTE: There is a correction to Figure D-2, page 148 of the EA. The percentages for owl habitat should read as follows: Predisturbance, NRF 28%, Dispersal 62%, Capable 10%; Postdisturbance, NRF 10%, Dispersal 35%, Capable 55%; and Post Salvage, NRF 10%, Dispersal 35%, and Capable 55%.

## Decision

My decision is to implement Alternative 2 as analyzed in the Doubleday Fire EA with the exception of excavator piling. After input from the public and discussion with the Fire and Fuels specialist it was determined the salvage could be implemented without the use of an excavator to pile the logging slash in the tractor units. The slash will be lopped and scattered, which should benefit soil productivity and not contribute significantly to fire hazard in the near future. If slash exceeds 15 tons per acre, it will be handpiled to reduce the amount of coarse woody debris present as a fuel base under regenerating vegetation. My decision will implement actions in locations described below and all required Project Design Features (PDFs), as described in the EA. PDFs were developed using the Best Management Practices (BMPs) identified in the 1995 ROD/RMP (p 151-175).

The project is located on matrix lands in Township 35 South, Range 2 East, Sections 23 and 27, Willamette Meridian, Jackson County, Oregon.

### My Decision is to

1. Salvage trees either blown down during the 2008 windstorms or burned during the Doubleday Fire with more than 70 per-cent crown scorch (for Douglas-fir, ponderosa pine, sugar pine, and incense cedar) or more than 40 per-cent crown scorch (for white fir) on approximately 220 acres of BLM-administered matrix lands.
2. Renovate 14 miles of road.
3. Improve 0.42 miles of BLM road #35-2E-23.6.
4. Realign BLM road #35-2E-23.6 by fully decommissioning 600 feet of road and constructing 900 feet of road in a more favorable location.
5. Construct 1.5 miles of temporary spur roads.
6. Rebuild a pump chance in Township 35 South, Range 2 East, section 27 to allow it to retain its original water storage volume.

### Decision Rationale

My decision to authorize the proposed action is in conformance with the *Medford District Record of Decision and Resource Management Plan* (2008 ROD/RMP), December 30, 2008 (EA p. 6-7). The 2008 ROD/RMP allowed for transition projects meeting specific criteria to be implemented consistent with the management direction of either the 1995 Medford District Resource Management Plan (1995 RMP) or the 2008 RMP, at the discretion of the decision maker (see 2008 ROD/RMP, pp. 3-4). This transition from the old resource management plan to the new resource management plan avoids disruption of the management of BLM-administered lands and allows the BLM to utilize work already begun on the planning and analysis of projects. As explained in the EA (p. 1-2), this project meets the requirements designated in the 2008 ROD/RMP (p. 5-6) for such transition projects.

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 proposed action complies with all applicable standards and guidelines. This action takes into consideration cumulative impacts of past harvesting and silviculture practices on nearby private and Federal lands. All required Threatened and Endangered (T&E), Special Status Species (SSS), and cultural surveys were completed and mitigation was applied, where appropriate.

This action meets the purpose and need, identified in the EA, to salvage trees burned in the 2008 Doubleday Fire. Salvage would occur on up to 220 acres of BLM-administered matrix lands in the Big Butte Creek and Little Butte Creek fifth field watersheds. Timber sales resulting from this decision will produce revenue for the Federal government and contribute approximately 2 million board feet of timber toward the Medford District's 2009 Allowable Sale Quantity of 57 million board feet. Road renovation of 14 miles of road used to haul timber will reduce the potential for sediment production and reduce the sediment delivery to streams from these roads.

In preparing the EA, the BLM analyzed in detail the impacts of the proposed action for the following issues: soil erosion; soil productivity; sedimentation; water quality in the Ginger Springs Municipal Watershed; insects; and economics. The BLM determined the impacts will be within those analyzed 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) or were otherwise not significant. Discussion of those impacts can be found in the EA available at the Medford District Office, 3040 Biddle Road, Medford, Oregon or on the Internet at <http://www.blm.gov/or/districts/medford/> under "Plans and Projects".

I did not select Alternative 1 (the No Action alternative) because it did not meet the identified purpose and need. Alternative 1 would not recover the revenue for the Federal government from approximately 2 million board feet of blowdown and fire-killed timber currently existing on BLM matrix lands. In addition, the risk of mortality for live, standing Douglas-fir would be high for three to four years due to high populations of Douglas-fir bark beetles.

I have chosen Alternative 2 because it most completely meets the identified purpose and need for the following reasons:

- The Doubleday Fire Salvage project is located on BLM-administered lands subject to the requirements of the O&C Lands Act which directs that O&C lands be managed for "permanent forest production . . . in accord with sustained-yield principles" (1995 ROD/RMP p. 17). The Medford District 1995 ROD/RMP established certain land use allocations designed to address "the need for a sustainable supply of timber and other forest products that will help maintain the stability of the local and regional economies and contribute valuable resources to the national economy on a predictable and long-term basis" (1995 ROD/RMP p. 16-17). The 1995 ROD/RMP (p. 38) allocated matrix lands for "produc[ing] a sustainable supply of timber." Implementing this decision contributes an estimated 2 million board feet (MMBF) of timber from these matrix lands toward the Medford District Allowable Sale Quantity, thus meeting the timber resource objectives in the Medford District RMP (1995 ROD/RMP p. 17, 72-73) and one of the purposes identified for this project (EA p. 5). The objective for salvage harvest on matrix lands is

to recover the economic value of dead and dying trees and reestablish the forest stand for long-term forest production. Salvage harvest on matrix lands is not undertaken to enhance or accelerate the natural recovery of these areas; however, salvage harvest is designed to limit the impacts to the natural recovery processes while meeting the overall purpose of recovering the economic value of the dead trees. Land use allocations within the Doubleday Fire area, such as northern spotted owl activity centers and riparian reserves, that would not be salvaged will provide biological diversity through the natural recovery process.

- Actions will reduce the potential for sediment production on up to 14 miles of road that would be used to haul timber. Natural surfaced roads in the Project Area contribute sedimentation to streams. Therefore, before timber is hauled on these roads, the timber sale purchaser must apply crushed rock to roads with depleted surface rock. The 1995 ROD/RMP specifies minimizing sediment delivery to streams from roads by surfacing inadequately surfaced roads (1995 ROD/RMP, 163).
- A portion of BLM road #35-2E-23.6 would be realigned to eliminate excessive grade (20 percent grade), and a through-cut section of road. This would improve road grade and drainage, and reduce erosion. The road would be relocated to a stable location with a gentler slope. In addition the road would receive a rocked surface in this area and at other critical locations to reduce sediment runoff. Direction in the 1995 ROD/RMP is “To minimize soil erosion, water quality degradation . . .” by locating roads on stable positions (1995 ROD/RMP, 157).
- An existing pump chance on a tributary to Salt Creek would be renovated to provide at least 500 gallons of water for fire suppression. The existing pump chance is leaking and requires improvement for year round storage. Direction in the 1995 ROD/RMP is to improve existing fire suppression facilities by managing sites where water is pumped for fire suppression (1995 ROD/RMP, 90).

## Consultation and Coordination

Section 7(a)(2) of the Endangered Species Act (ESA) states that each Federal agency shall, in consultation with the Secretary, insure that any action they authorize, fund, or carry out is not likely to jeopardize the continued existence of a listed species or result in the destruction or adverse modification of designated critical habitat.

The BLM determined the project will have “No Effect” on the Northern Spotted Owl or designated critical habitat. No nesting, roosting and foraging habitat would be entered for salvage and no live trees would be removed in dispersal habitat.

The BLM determined that the project will not affect coho salmon or their habitats. The BLM does not anticipate any change in sediment deposition, water temperature, in-stream large wood or large wood recruitment, or peak flows as a result of this project. Therefore the proposed action would have “No Effect” to Southern Oregon/Northern California coho salmon or their critical

habitat. There would be “No Effect” on Essential Fish Habitat (EFH) (Magnuson-Stevens Act) for coho salmon and Chinook salmon (*O. tshawytscha*).

The BLM determined the project will have “No Effect” on *Fritillaria gentneri* because the units do not contain suitable habitat for this species and no sites were discovered during surveys.

The Klamath Tribes, the Confederated Tribes of the Siletz, and the Confederated Tribes of the Grand Ronde were notified of this project during the scoping process for the EA.

Jackson County Commissioners, Oregon Department of Fish and Wildlife, and Oregon Department of Forestry were also notified during scoping and the EA public review period.

## Public Involvement

The Butte Falls Resource Area mailed a scoping letter to a total of 40 individuals, businesses, organizations, tribes, and government agencies on December 16, 2008 to initiate scoping for the Doubleday Fire Salvage project. Scoping recipients had either requested to be notified of such projects, were government entities, or owned land in the Project Area. A total of four comment letters were received from adjacent land owners, private citizens, timber companies, organizations, and environmental groups concerning the proposed salvage project.

A formal public comment period for the EA was held from March 4 to April 3, 2009. The public was notified through a newspaper notice in the *Medford Mail Tribune* and the *Upper Rogue Independent*. Letters and copies of the EA were sent to 50 individuals, organizations, and government entities. The BLM received two letters containing comments on the EA.

## Response to Public Comment

The following are the BLM responses to the substantive comments received on the *Doubleday Fire Salvage EA*:

### New Road Construction

**Comment:** “*Our primary concern regarding this project involves the construction of up to 1.5 miles of spur temporary roads on post fire soils in the planning area. While we recognize the logistical difficulties in developing yarding systems (particularly cable) without the benefit of additional road access, we believe that the impacts of new road construction in these sensitive watersheds will be both adverse and significant.*”

**Response:** The BLM addressed these concerns by designing temporary roads to be constructed in stable locations (i.e., flat uplands, on or near ridge-tops, or gentle sideslope) and out of riparian areas. Construction of temporary roads will be limited to the dry season (generally May 15 to October 15). All temporary roads will be ripped, vegetated with native plant seed, protected with weed-free mulch, and blocked upon completion of use. If log hauling on a temporary road is not completed in the same year the road is constructed, the road will be blocked before the rainy season, generally October 15 (EA p. 16-17).

The Aquatic Conservation Strategy (ACS) was addressed in the Doubleday Fire Salvage EA. The project would maintain all Aquatic Conservation Strategy objectives in the short- and long-term at both the site and watershed scales because there would be no salvage within riparian reserves across both fifth field watersheds and PDFs would be implemented. This project would have very limited effects on the aquatic environment and would allow riparian reserves to continue to recover, function, and protect Project Area streams (EA p. 167).

**Comment:** *“It does not appear that the EA discloses the (short or long-term) impacts of new road construction within the transient snow zone”.*

**Response:** The impacts on erosion and sedimentation from constructing 1.5 miles of temporary road and relocating approximately 900 feet of existing road were analyzed in detail in the EA (p.54-56). The impacts of building roads and their effects on the transient snow zone (TSZ) was not analyzed in detail because the fire removed the majority of the canopy. Typically the reason to analyze changes in the TSZ is to determine if peak flows would be significantly increased. These new temporary roads are located within the burned area where the canopy is no longer intact and very few live green trees exist (approximately 25 trees). The live trees that do exist and would need to be removed for the road right-of-way are scattered across the landscape throughout the burned area and are not providing a continuous canopy that is needed to reduce runoff from rain on snow events in the transient snow zone. Therefore, the removal of these remaining live trees would not affect peak flows at the 6<sup>th</sup> field watershed scale, therefore this was not analyzed in detail (EA p. 55). The temporary roads would be ripped and revegetated within the same season (EA p. 51 and 55).

**Comment:** *“The greatest surface erosion from roads occurs during the construction phase and first year after”.*

**Response:** The BLM does not disagree with this statement. The erosion rates cited in tons/sq.mi./year (from Potyondy et al. 1991) is indicative of how erosion rates are expected to decrease over time after initial construction. The BLM does not dispute this and acknowledges the effects of road construction on page 46 of the EA. However, the actual values used for the example quantifying erosion rates do not reflect the actual values of the soils found in the Doubleday Fire Salvage Project area. The soils used in the example cited were conducted in soils with highly decomposed and erodible granitic parent materials of the Idaho batholith. There are no granitic soil types in this project area (EA p. 40). In addition, the application of BMPs and PDFs such as designated skid trails, scattering logging and blowdown debris on bare soil areas, and seasonal restrictions for heavy equipment operation would minimize surface disturbance, help protect the disturbed soil surface, and help keep runoff and sedimentation on-site (EA p. 47).

**Comment:** *“Soil erosion and compaction (as always occurs with roads) causes long-term loss of soil productivity.”*

**Response:** Permanent roads as part of the transportation system are not intended for productive uses such as plant growth. The project objective is to minimize new permanent road construction where feasible. The permanent road proposed for construction is approximately 900 feet to

realign an existing entrenched road (35-2E-23.6) that will improve drainage and reduce potential sediment in the future (EA p. 47).

The ripping of temporary roads after use does not ameliorate 100 percent of the loss in soil productivity in the short-term. It does decompact the soil to the extent that infiltration is increased, runoff is reduced, potential sedimentation is reduced, and enough of the soil productivity lost during construction is regained to facilitate reestablishment of native vegetation which will aid in maintaining soil productivity in the long-term (EA p. 47).

**Comment:** *“The loss of topsoil and attendant loss of soil productivity is permanent”.*

**Response:** See response above.

**Comment:** *“The removal of trees and other vegetation (as always occurs with roads) causes long-term loss of soil productivity”.*

**Response:** The permanent realignment would convert lands capable of supporting conifer forests to nonforested lands and would no longer contribute to future conifer growth. Approximately 900 feet of permanent road construction would convert less than 0.2 acres of forested land to nonforested lands. This impact would be mitigated by fully decommissioning 600 feet of the existing entrenched road or about 0.1 acres. The road would be ripped, recontoured, seeded with native grasses or others as appropriate, mulched, and planted to reestablish vegetation (EA p. 56). Cross drain culverts, road fills in stream channels, and potentially unstable fill areas would be removed to restore the natural hydrologic flow. The construction and fully decommissioning of roads would provide a net loss of about 0.1 acres of forest land to nonforest status (EA p. 39).

Approximately 1.5 miles of temporary spur road would be constructed on approximately 2.5 acres of forested land. Following harvest activities, temporary roads would have the road bed tilled, mulched, and planted to reestablish conifer species. Removal of the compacted surface would restore site productivity and provide suitable growing conditions for planted conifers (EA p. 39).

**Comment:** *“Road obliteration does not immediately stop severely elevated soil erosion from roads”.*

BLM acknowledges the short-term effects of ripping roads (fully decommissioning). The EA describes the possible effects of these actions under short-term scenarios, but also details why these effects are expected to be moderated by the design features of the project, the location of the temporary roads, and the topography of the project area (EA p. 46-47).

In general, the greater long-term benefit of reduced soil erosion, increased infiltration, and decreased runoff and subsequent sedimentation from road fully decommissioning and/or obliteration far exceeds the risk of possible short-term localized soil erosion this action may be subject to. This is especially true at the landscape (5<sup>th</sup> field watershed) scale (EA p. 47).

**Comment:** ‘ *“Temporary” roads have enduring impacts on aquatic resources*’.

**Response:** While it may be true that “temporary” roads can have impacts on aquatic resources, it is not expected that the temporary roads built for the Doubleday Fire Salvage would have long-term impacts on aquatic resources. These temporary roads would be located on the flat uplands, on or near ridge-tops, and away from stream channels to prevent sediment from reaching streams. The roads would be decommissioned after use by ripping the road surface, seeding, mulching, and consequently reducing erosion to a negligible level (EA p. 54-55). These temporary roads were designed to minimize environmental consequences by locating the roads in stable locations away from stream channels and these roads would be rehabilitated after use with mitigation measures designed to minimize sedimentation to streams thereby reducing any long-term impacts to aquatic resources.

**Comment:** *“Roads and increased sedimentation cause longterm negative impacts on a variety of aquatic biota, including imperiled salmonids; this is already a widespread problem in the West”.*

**Response:** Road construction and increases in erosion and poor drainage have had impacts to the aquatic habitats throughout the west. The EA describes the watersheds as impacted by historical road construction. Literature cited on roads and increases in sediment to aquatic habitats all rely on road placement to alleviate sedimentation of streams. “Locate roads to take advantage of natural log-landing areas, such as flatter, higher, drier, and more stable terrain with good access to the timber to be removed. Good landing locations can also reduce the amount of necessary roading” (Furniss et al. 1991). The roads proposed for construction in this project are outside of Riparian Reserves and other than the realignment portion would be built and closed within the same season. This includes ripping, seeding and mulching. In addition, these proposed roads have been located in areas which will improve road drainage and decrease the current amount of erosion.

**Comment:** *“... [We support] the construction of roads to improve access for fuels reduction treatments and early initial response to wildfires, we do not support the decommissioning of any permanent roads. Getting into the habit of decommissioning permanent roads on a landscape that is prone to catastrophic wildfires is careless and not beneficial to the continued health of the forest”.*

**Response:** All of the existing road system will remain intact. Only about 600 feet of old road would be fully decommissioned but would be replaced by 900 feet of new road in a more environmentally favorable location. The 1.5 miles of temporary road to be constructed would be decommissioned following completion of the project. The roads are necessary for efficient removal of timber, but if left intact would add to an already high density of roads in the watersheds.

## **Slash Piling**

**Comment:** *“Our understanding is that mechanical slash piling often results in adverse impacts on soils as it requires extensive ground-based mechanical access to the majority of the acres*

*within harvest units. The degree of resulting soil damage and compaction depends on the soil type and moisture...”*

**Response:** Excavator piling was included as an option in the analysis because it is an economical and effective way to treat logging slash on tractor acres. This decision will not authorize excavator piling because of the concern voiced by the public of additional impacts to soils due to excavator piling on tractor acres. Slash disposal will be lopped and scattered, which should benefit soil productivity and not contribute significantly to fire hazard in the near future. If slash exceeds 15 tons per acre, it will be handpiled to reduce the amount of coarse woody debris present as a fuel base under regenerating vegetation.

### **Inadequate Range of Alternatives**

**Comment:** *“We are surprised that the BLM chose to only develop and consider one action alternative. This is a particularly interesting decision in that the agency acknowledged (EA page 8) that soil erosion, soil productivity, sedimentation, water quality, insects and economics were “relevant issues” to “provide a basis for comparing the environmental effects of the alternatives and aid[ing] the decision making process”.*

**Response:** The range of alternatives considered in an EA is largely dependent on the purpose and need for the project. The range of alternatives in the Doubleday Fire Salvage EA was appropriate to the scope and context of the purpose and need for the project in light of the analysis in the 2008 FEIS, to which the EA is tiered. The 2008 FEIS analyzed a suitable range of alternatives. The Council on Environmental Quality Regulations for implementing the National Environmental Policy Act (40CFR Parts 1500-1508) specifically encourage tiering to eliminate repetitive discussions of the same issues for site-specific projects. The agency can therefore appropriately limit the range of alternatives for implementing a site specific action to those fulfilling the requirements of the National Environmental Policy Act (NEPA).

During development of the EA, the ID Team considered an alternative using normal practices for tractor yarding from the 1995 ROD/RMP. This alternative would have restricted tractor operations to slopes less than 35 percent. Using the 35 percent slope restriction, this alternative would have allowed 188 acres of tractor yarding and 31 acres of skyline yarding. Salvage harvest under this alternative would have required approximately 1.0 miles of temporary spur road construction. Due to public concerns addressed in previous fire salvage proposals and scoping comments regarding issues relating to impacts of fire and salvage logging on soils, the ID Team eliminated this alternative from detailed analysis.

### **Green Tree Logging**

**Comment:** *“Interestingly the EA doesn’t disclose or analyze the impacts of any green tree logging. Does the BLM contend that the proposed 1.5 miles of new road construction will not require the removal of any live trees?..... We contend that the removal of live trees for road construction and for salvage (scorch) will result in impacts to the hydrology, wildlife and recovery of the project area that are not disclosed or analyzed in the EA”.*

**Response:** The analysis of impacts to hydrology included removal of trees for site specific road construction and salvage logging. No discernable differences in the impacts from the harvesting of green or dead trees for road construction were determined by the project hydrologist because the temporary roads are located within the burned area where the canopy is no longer intact and very few live green trees exist. Specifically the EA addresses the impacts to the water resources of the proposed road construction in Alternative 2:

- “Temporary roads would be located on the flat uplands, on or near ridge-tops, and away from stream channels to prevent sediment from reaching streams. The roads would be decommissioned after use by ripping the road surface, seeding, and mulching and consequently reducing erosion to a negligible level” (EA p. 54-55).
- “With the use of PDFs, the road relocation would not contribute to stream sedimentation and is expected to reduce the amount of sediment that occurs from this road in the long-term. All temporary roads would be ripped, seeded with native grasses, and mulched to minimize erosion and sedimentation” (EA p. 56).

Permanent and temporary roads would be constructed. The permanent roads would convert lands capable of supporting conifer forests to nonforested lands and would no longer contribute to future conifer growth. Approximately 900 feet of permanent road construction would convert less than 0.2 acres of forested land to nonforested lands. This impact would be mitigated by fully decommissioning (ripped, recontoured, mulched, and planted to reestablish conifer species) 600 feet of the old entrenched road or about 0.1 acres. The construction and fully decommissioning of roads would provide a net loss of about 0.1 acres of forest land to nonforest status.

Approximately 1.5 miles of temporary spur road would be constructed on approximately 2.5 acres of forested land. Following harvest activities, temporary roads would have the road bed ripped, seeded, mulched, and planted to reestablish conifer species. Removal of the compacted surface would restore site productivity and provide suitable growing conditions for planted conifers (EA p. 39).

The EA does address removal of live trees in addressing the impacts of road construction on wildlife. “Temp spur roads were not constructed in NRF habitat. Although temporary roads would be constructed in dispersal habitat, construction would not alter dispersal habitat. The BLM has determined the effects to spotted owls as a result of the implementation of salvage treatments within dispersal habitat will be a “No Affect” to northern spotted owl for the following reasons: 1. 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; 2. Canopy cover would be maintained at 60 percent or greater in nesting, roosting, and foraging habitat because these stands would not be entered; 3. Canopy cover would be maintained at 40 percent or greater in dispersal habitat because no live trees would be removed in these stands; 4. decadent woody material, such as large snags and down wood, would remain after treatment, as required by Medford BLM’s management guidelines, and; 5. All multi-canopy, uneven-aged tree structure that was present pretreatment would remain post-treatment” (EA p. 142).

**Comment:** “...Unfortunately, the translation of this science into marking guidelines for salvage logging has been and is still the subject of considerable controversy. Hence it is virtually certain

*that many of the scorched trees that the BLM intends to salvage would have in fact survived the fire event but for proposed salvage activities”.*

**Response:** The *Guidelines for Selecting Fire Injured Trees that are Likely to be Infested by Insects in Southwest Oregon Forests*” provides an estimate of the likelihood of tree mortality based on experience and research. Given the inherent biological and environmental complexities, such as prefire tree vigor, genetics, site quality, and postfire weather conditions, the accuracy of the guidelines is less than 100 percent (EA p. 102).

A review of fire mortality research (Fettig et al. 2007; Parker et al. 2006; Hood et al. 2007; Hood and Bentz 2007; Scott et al. 2002; Ryan and Reinhardt 1988) determined that *Guidelines for Selecting Fire Injured Trees that are Likely to be Infested by Insects in Southwest Oregon Forests* (Goheen 2001) was appropriate in selecting fire-injured trees that would be at a high risk of insect infestation/mortality within the next four years. Because of the difficulty of determining the extent of cambium mortality, the guidelines were modified to avoid over estimating tree mortality. The upper crown scorch threshold would be used as the sole criteria for judging trees expected to have a high probability of mortality. This modification will likely underestimate tree mortality within the next four years with any additional mortality increasing the snag and coarse woody debris amounts (EA p. 102).

To the extent possible the marking guidelines have been modified to avoid overestimating the trees expected to die.

**Comment:** *“As discussed by Lindenmayer, Noss, and others, (Lindenmayer et al. 2004, Beschta et al. 2004, Lindenmayer and Noss 2006, Noss and Lindenmayer 2006) ecosystems on sites damaged by the passage of fire are in a stressed condition and are the least able to withstand further disturbance. All trees that have a chance of surviving are needed to play critical roles in natural site regeneration. They should be preserved, even if a few will later die. They provide site adapted seed sources for new trees, shade for seedlings that is critical under the xeric conditions of most western forests, and a host of benefits to wildlife. If a few later succumb, they will provide snag habitat useful to wildlife. (Cf. e.g. Hutto 2006.) Furthermore, even dead trees can play an important role in natural site restoration, as outlined by the above authors. A discussion of these considerations should be a part of your NEPA documentation related to your selection of marking criteria”.*

**Response:** The BLM Silviculturist used *“Guidelines for Selecting Fire Injured Trees that are Likely to be Infested by Insects in Southwest Oregon Forests”* (Goheen 2001) (EA p. 105). From the guidelines, a 70 percent crown scorch threshold for Douglas-fir, ponderosa pine, sugar pine, and incense cedar and a 40 percent crown scorch threshold for white fir was selected to identify trees with a high probability of mortality. These high probabilities of mortality parameters are consistent with the findings and recommendations in the literature and research cited (EA p. 105).

The compound effects of wind damage, fire damage and an active beetle population has increased the risk of mortality of fire injured trees. Only those trees most likely to die are proposed for salvage (EA p. 105-108). The objectives of the marking guidelines are to minimize

the removal of trees that have a chance of surviving (EA p. 102). The benefits of dead trees, snags and coarse woody debris are acknowledged and documented in the EA Section 3.3.5.2, page 38; Section A.1.3, page 97; Section A.4.1, page 111; and Section A.4.2 page 119.

### **Soil Compaction and Cumulative Impacts**

**Comment:** *“As acknowledged above, all 107 units proposed for post-fire tractor yarding are currently in excess of the compaction levels authorized by the 1995 ROD/RMP. Hence it is unfortunate that the BLM is proposing additional tractor yarding, road construction and excavator piling activities..... The EA does not provide a thorough cumulative impacts analysis of the impacts of proposed logging (on resource values like soil and water) in combination with other federal logging and private logging activities in the same watershed”.*

**Response:** The BLM addressed cumulative effects to soil and water in section 3.4 and 3.5 respectively in the EA. Past impacts (prefire) to the soil resource within the fire area were primarily the result of timber harvest activities, such as road and landing construction, and ground disturbance from mechanical timber harvesting and fuels treatments. All of these activities contribute in varying degrees to soil productivity losses and potential sedimentation increases from compaction, displacement, and erosion (EA p. 41).

The concern of the “107 units” of tractor yarding in excess of the compaction levels authorized by the 1995 ROD/RMP is confusing. The EA stated, “Based on field reconnaissance estimates by the project soil scientist, all 107 **acres** of the proposed tractor yarding units in this project currently have existing compaction levels greater than 12 percent” (EA p. 41).

The EA acknowledges tractor yarding conducted prior to 1980 resulted in existing compaction levels that exceed the 1995 Medford District RMP/ROD standard of maintaining less than 12 percent disturbance in a given tractor harvest unit. Because prior to the 1980s, conventional tractor yarding methods typically did not use methods such as designated skid roads spaced at least 150 feet apart to reduce soil productivity losses from compaction, past practices typically did not rip compacted skid trails (EA p. 41). Using designated skid roads at 150' average spacing, ripping all skid roads (including existing), and ripping the 1.5 miles of temporary spur road would result in a net reduction of compaction and an increase in soil productivity on the skid trails within the 107 acres proposed for tractor yarding (EA p. 46).

### **Inappropriate Logging Unit**

**Comment:** *“Page 62 of the EA indicates that “[o]ne timber salvage area has slopes greater than 50% next to riparian reserves. This area is in the headwaters area of Ginger Creek.” The hydrological and soils impacts of steep slope post-fire logging near riparian reserves in a municipal watershed necessitate the completion of an EIS for this project”.*

**Response:** As stated in the EA “Large woody debris recruitment would not be affected by timber harvest activities because riparian reserves would continue to contribute to large woody debris levels. One timber salvage area has slopes greater than 50 percent next to riparian reserves. This area is in the headwaters area of Ginger Creek. It would be unlikely trees would be

transported from the upland harvested area through the riparian reserve to Ginger Creek” (EA p. 62). There are approximately 4 acres of steeper slopes adjacent to, but outside Riparian Reserves. These areas have fully intact Riparian Reserves. Although the fire burned through the Riparian Reserve, most large trees survived, with the duff layer staying intact. There is no active slumping within the timber sale unit and none adjacent to the unit within the Riparian Reserve. Therefore, it would be highly unlikely for sediment to move through this Riparian Reserve from the timber unit to Ginger Creek. These steeper slopes within the timber units are considered a low zone of influence so municipal water quality would remain at current conditions. Therefore, these timber units and the steeper portions of them are completely appropriate for timber removal without risk to the municipal water supply. As a result, the effects on the municipal watershed would not be significant (FONSI p. 4) and thus an EIS is not necessary.

## Fire and Fuels

**Comment:** *“The bulk of our scoping comments of 1/17/09 and the supporting literature regarding fire and fuels were not addressed in the EA. For instance, in the response to comments (EA page 112) the BLM acknowledges the findings of the 2006 Donato study regarding forest regeneration but does not respond to his findings regarding the impacts of post-fire salvage logging and fire risk and hazard. Similarly, while page 81 of the EA contemplates the use of mechanical excavators for slash treatment, the EA contains no analysis of the impacts of machine piling on soil and water resource values”.*

**Response:** The BLM acknowledges “immediately following salvage activities and prior to slash disposal, fire behavior potential would increase from the current potential fire behavior due to increased surface fuels. A reduction in potential fire behavior would occur within 1 to 5 years following slash disposal treatments, prior to the regeneration of shrubs, grasses, and trees (EA p. 82).

The Fuels Specialist referenced Thompson et al. (2007) in their analysis addressing *impacts of post-fire salvage logging and fire risk and hazard*. The EA states, “Natural regeneration or tree planting in the fire area would result in a temporary (15 years or more) rise in the likelihood of high severity reburn. Thompson et al. (2007) conducted a study on reburn severity in managed versus unmanaged forests. While they found that plantations burned with somewhat higher severity than naturally generated areas, they concluded that “. . . young forests, whether naturally or artificially regenerated, may be vulnerable to positive feedback cycles of high severity fire, creating more early-successional vegetation and delaying or precluding the return of historical mature-forest composition and structure” (EA p. 82).

## Black Backed Woodpeckers

**Comment:** *“In our scoping comments of 1/17/09 we explicitly asked the BLM to disclose the impacts of post-fire snag removal on Black Backed Woodpeckers and we attached a peer-reviewed paper by Richard Hutto regarding the subject. Hence we are perplexed that the agency elected not to discuss the impacts of the project on this species”.*

**Response:** The black backed woodpecker is not present on the BLM state sensitive list (USDI Bureau of Land Management Oregon and Washington State Director's Special Status species List; Date: January 2008). The BLM Wildlife Specialist addressed species of concern on pages 145 and 146 of the EA. Like the black backed woodpecker there is evidence olive-sided flycatchers respond positively to burned landscapes following wildfires (Smucker et al. 2005; Hutto 2006), salvage of 220 acres is not expected to impact the persistence of the species as it is relatively abundant and breeds throughout North America, and 51 percent of the Project Area on Federal land would be left undisturbed (EA p. 145).

With 220 acres proposed for salvage, 51 percent of the Federal land in Project Area would be left to provide snags for cavity-dependent species. As directed by the 1995 Medford ROD/RMP (USDI 1995, 40), snags sufficient to support species of cavity nesting birds will be maintained at 40 percent of potential population levels on areas that average no larger than 40 acres. Considering the woodpecker species suspected in the area, such as white-headed woodpeckers, the number of snags required for the 40 percent level is an average of 1.2 per acre (Neitro et al. 1985, 145). To meet the 1995 ROD/RMP requirements to provide for at least a minimum of 40 percent of the cavity user level, 2 dead trees per acre would be reserved within each 40-acre block. No scorched green trees would be cut on 39 acres of spotted owl dispersal habitat. Clumps of scorched green trees would provide recruitment for additional snags within the next few years. On 231 acres of BLM-administered lands within the fire perimeter, no trees would be cut, providing additional habitat for cavity nesters. As these burned trees fall, they will supplement the current downed wood component. Maintaining at least 2 snags per acre would satisfy the RMP requirement to maintain white-headed woodpeckers at their 100 percent level (EA p. 146).

### **Conclusion to Public Comment**

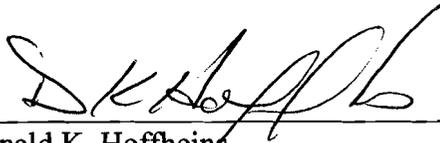
Overall comments received varied from support of action Alternatives 2 to recommendations that a lesser amount of salvaging should be considered. Nonsubstantive comments, those comments considered to be differences of opinion concerning management of public lands, were not considered. There were challenges to the overall management direction of the BLM-administered lands, with some advocating that natural processes should be allowed to develop future forest stands versus the management direction of the Medford District Resource Management Plan. These disagreements to the fundamental differences of managing BLM lands are appropriate when raised during development of land use plans, but are outside the scope of the *Doubleday Fire Salvage EA*. This EA is specific to the amount of timber to be salvaged and how it should be implemented based on the direction provided by the O&C Act and the Medford District RMP. This Decision addresses the effects of the salvage of fire-killed and windthrown timber on matrix lands.

**Administrative Remedies**

This decision is a forest management decision. Administrative remedies are available to persons who believe that they will be adversely affected by this Decision. Administrative recourse is available in accordance with BLM regulations and must follow the procedures and requirements described in 43 CFR § 5003 - Administrative Remedies.

In accordance with the BLM Forest Management Regulations 43 CFR § 5003.2(a and b), the effective date of this decision, as it relates to an advertised timber sale, will be when the first Notice of Sale appears in a newspaper of general circulation in the area where the lands affected by the decision are located. This newspaper is the *Medford Mail Tribune*. Publication of the first Notice of Sale establishes the effective date of the decision for those portions of this Decision Record included in the advertised timber sale. The effective date of this decision establishes the date initiating the protest period provided for in accordance with 43 CFR § 5003.3. Any protest must be submitted in a signed hard copy delivered to the physical address of the advertising BLM office.

Publication of this notice establishes the date initiating the protest period provided in accordance with 43 CFR § 5003.3. While similar notices may be published in other newspapers, the date of publication in the *Medford Mail Tribune* will prevail as the effective date of this decision.



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Donald K. Hoffheins  
Butte Falls Field Manager

4/08/09

Date