

**Finding of No Significant Impact
for the
Revised Fire Resiliency Project
DOI-BLM-OR-M080-2010-003-EA**

Introduction

The Medford District Bureau of Land Management, Glendale Resource Area (BLM) Fire Resiliency Project Environmental Assessment (EA) was made available for public comment on April 8, 2011. The need of the project is to improve forest health, provide economic benefits and reduce the fire hazard within the Fire Resiliency Project Planning Area.

Based on the context and intensity of the impacts analyzed in the Revised EA (p. 21-63), I have determined that Alternative 2 with the associated best management practices and 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 Fire Resiliency Project will not have any significant effects beyond those described in the broader analyses conducted and disclosed in the environmental impact statements for the Medford District Resource Management Plan and the Northwest Forest Plan, 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.

The Glendale Resource Area initiated planning and design for this project to conform and be consistent with the Medford District's 1995 RMP. Following the March 31, 2011 decision by the United States District Court for the District of Columbia in Douglas Timber Operators et al. v. Salazar, which vacated and remanded the administrative withdrawal of the Medford District's 2008 ROD and RMP, we evaluated this project for consistency with both the 1995 RMP and the 2008 ROD and RMP. Based upon this review, the selected alternative contains some design features not mentioned specifically in the 2008 ROD and RMP. The 2008 ROD and RMP did not preclude use of these design features, and the use of these design features is clearly consistent with the goals and objectives in the 2008 ROD and RMP. Accordingly, this project is consistent with the Medford District's 1995 RMP and the 2008 ROD/RMP.

In making this finding, I considered the following criteria, suggested by the Council on Environmental Quality, for evaluating the intensity or severity of the impacts of the activities proposed in the Fire Resiliency project.

Context. Alternative 2 includes site-specific actions directly involving approximately 910 acres of BLM (Bureau of Land Management) administered land that by itself does not have international, national, region-wide, or state-wide importance. Alternative 2 is located within the Matrix and Riparian Reserve land use allocations and within the boundaries of the South Umpqua Sub-basin, in the Middle Cow Creek and Lower Cow Creek Watersheds

The discussion of the significance criteria that follows applies to the intended actions and is within the context of local importance. Chapter 3 of the Revised EA details the effects of Alternative 2. None of the effects identified, including direct, indirect and cumulative effects, are considered to be significant and do not exceed those effects described in the Medford District Resource Management Plan/Final Environmental Impact Statement (June 1995).

Intensity. The following discussion is organized around the Ten Significance Criteria described in 40 CFR 1508.27.

1. Impacts that may be both beneficial and adverse. The predicted environmental effects of Alternative 2, most noteworthy, include:

- a) Hazardous fuels reduction activities would occur on approximately 910 acres. Density management thinning of commercial sized trees on Matrix and Riparian Reserve lands would reduce the probability of fire spreading from the crown of one tree to the next. To achieve this objective, density management thinning would focus on trees greater than eight inches DBH. Larger trees would generally be those selected for retention, as they tend to be more fire resilient due to their thicker bark and higher crowns. Thinning of understory vegetation (brush and small trees) would generally be limited to material less than eight inches diameter at breast height (DBH). Vegetation up to twelve inches DBH would be cut in two units (1-3R and parts of 1-1L).

Under Alternative 2, surface and ladder fuels would be reduced, through understory thinning. Under the treatments proposed in the Proposed Action, flame lengths would be below the 4 foot threshold for direct attack suppression and fuel models would be reduced. Modeling results for the Proposed Action showed a general reduction in crown bulk density relative to stand conditions under the No Action Alternative. Crown base heights would also be raised under Alternative 2. These changes to the fuel complex would result in surface flame lengths (2 ft) that would not be able to reach into the bulk of the aerial fuels, reducing the potential for crown fire initiation and high severity, stand-replacement fires.

- b) Alternative 2 proposes 432 acres of density management that would result in an estimated 42.8 acres of soil compaction and displacement over new and existing footprints and would reduce soil productivity by an estimated 3.5%. Best Management Practices in the 1995 RMP (p. 166) describe the use of designated skid roads within stands to limit soil compaction to less than 12% of the harvest area. The analysis of skid trail compaction/displacement that was projected in GIS averaged approximately 1.2% compaction per density management unit. Total compaction/ displacement associated with new and existing temporary routes, tractor skid trails, landings and cable yarding corridors would account for an average of approximately 9.9% per unit. The Fire Resiliency Project would be below 12% compaction and 5% productivity loss as analyzed in the 1994 Medford District FEIS RMP. Each proposed density management unit would be below 12% compaction and 5% productivity loss.
- c) Erosion from the combined hauling actions of the Rattlesnake restoration project, Rueben Fuels Project, Wolf Pup and the proposed Fire Resiliency Project would be consistent with, and within the magnitude of, the impacts that were discussed for hauling in the direct and indirect impacts of Alternative 2, and would be consistent with the analysis and conclusions

provided in the 1994 Medford RMP EIS. Sedimentation resulting from these actions is discussed further in Section 3.4, Cumulative Impacts to Water Quality. There are no overlapping actions from any federal or non-federal projects that would occur within the proposed treatment units.

d) **Water Quality: Stream Sedimentation.** Given the magnitude, dispersed locations, extent, and short term nature of each of the water quality impacts that would occur during these projects, having multiple projects occur within the same watershed during the same time period would not cumulatively change the magnitude of impacts, or the extent that was analyzed for the direct and indirect effects of each individual project. Logically it can be concluded that negligible increases in sediment from these activities would contribute to the overall amount of sediment entering streams from past, present, and future impacts within these sub-watersheds, but sediment from these actions would be within ODEQ water quality standards, the Clean Water Act, and is within the scope of anticipated effects to aquatic resources analyzed in the Medford District PRMP EIS (USDI 1994).

e) See effects to Endangered Species Act (ESA) threatened and endangered species in criteria # 9 below.

2. The degree to which the selected alternative will affect public health or safety. Public health and safety would not be affected. The Planning Area is not located within a Class I designated airshed or non-attainment area. The impact of smoke on air quality is expected to be localized and of short duration. Particulate matter would not be of a magnitude to harm human health, affect the environment, or result in property damage. The general policy for prescribed burning on the Medford District is to notify residents prior to seasonal burning through news releases.

Dust created from vehicle traffic on gravel or natural-surfaced roads and logging operations would be localized and of short duration. As such, Alternative 2 is consistent with the provisions of the Federal Clean Air Act.

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. There are no park lands, prime farm lands, wetlands, or ecologically critical areas in Alternative 2. There are no developed recreation sites that would be affected by the Alternative 2 (see Appendix 2). The area is open to dispersed recreation use, as is most of the Glendale Resource Area. Alternative 2 would have a neutral effect on dispersed recreation in the Resource Area.

Required cultural survey of the planning area was completed for the Fire Resiliency Project. The State Historic Preservation Office (SHPO) concurred that the project would have no effect to significant cultural resources referred to as Historic Properties in the National Historic Preservation Act (NHPA).

4. The degree to which the effects on the quality of the human environment are likely to be highly controversial. The effects of Alternative 2 on the quality of the human environment are

adequately understood by the interdisciplinary team to provide analysis for the decision. There are no highly controversial effects from Alternative 2. A complete disclosure of the predicted effects is contained in Chapter 3 and Appendix 2 of the EA.

5. The degree to which the possible effects on the human environment are highly uncertain or involve unique or unknown risks. The effects of Alternative 2 are not unique or unusual. The BLM has experience with hazardous fuel reduction projects and have found the effects to be reasonably predictable. The environmental effects to the human environment are fully analyzed in Chapter 3 of the EA. There are no predicted effects on the human environment which are considered to be highly uncertain or involve unique or unknown risks. Public scoping and comments received on the Fire Resiliency Project did not identify unique or unknown risks.

6. The degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration. Alternative 2 does not set a precedent for future actions that might have significant effects nor does it represent a decision in principle about future consideration. Alternative 2 would meet the 1995 Medford District Resource Management Plan (RMP) to “Reduce both natural and activity based fuel hazards through methods such as prescribed burning, mechanical or manual manipulation of forest vegetation and debris, removal of forest vegetation and debris, and combinations of these methods” (p.91). Any future projects would be evaluated through the National Environmental Policy Act (NEPA) process and would stand on their own as to environmental effects.

7. Whether the action is related to other actions with individually insignificant but cumulatively significant impacts. The interdisciplinary team evaluated Alternative 2 in context of past, present and reasonably foreseeable actions. Significant cumulative effects outside those already disclosed in the *Medford District Resource Management Plan/Final Environmental Impact Statement (1995)* are not predicted. A complete disclosure of the effects of the Proposed Action is contained in Chapter 3 of the EA.

8. The degree to which the action may adversely affect districts, sites, highways, structures, or other objects listed in or eligible for listing in the National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historical resources. A cultural survey was completed within the proposed ground disturbing activity locations for the Fire Resiliency Project Area. Alternative 2 would not adversely affect districts, sites, highways, structures, or other objects listed in or eligible for listing in the National Register of Historic Places, nor would Alternative 2 cause loss or destruction of significant scientific, cultural, or historical resources.

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. OC Coho Salmon are within the Middle Cow Creek Watershed. Thinning, yarding, landing construction and rehabilitation, temporary route construction and reconstruction (including route decommissioning), road maintenance, hauling, and activity fuel treatments would have no effect on OC coho salmon (ESA-Threatened) and coho critical habitat (CCH). The closest coho presence and CCH in streams (Bear Creek) of the Fire Resiliency Planning

Area is approximately 800 ft from the closest thinning unit.

Marbled murrelet – Threatened

Alternative 2 does not occur within the known range of the marbled murrelet. Suitable inland marbled murrelet habitat including old-growth trees with multiple platforms containing moss, lichen or mistletoe (McShane et. al. 2004) may occur up to 10km east of the western hemlock zone and the known range (Zone A). The Proposed Action would not remove or downgrade suitable murrelet habitat, and does not occur within designated marbled murrelet critical habitat.

Spotted owl – Threatened

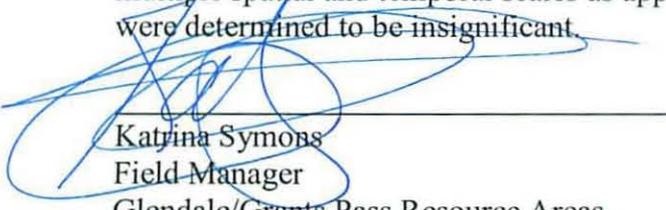
Alternative 2 (including the Project Design Features) avoids disturbance to nesting spotted owls and impacts to the prey community. Alternative 2 would maintain suitable and dispersal habitat for the northern spotted owl (Threatened). No thinning would occur in Recovery Action 32 (RA 32) habitat which is “substantially all of the older and more structurally complex multilayered conifer forests on Federal lands outside of MOCAs [Managed Owl Conservation Areas]” (U.S. Fish and Wildlife Service 2008b, 34).

Plants - There would be no anticipated effect from the Alternative 2 on any federally listed plant.

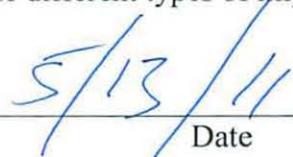
10. Whether the action threatens a violation of Federal, State, or local law or requirements imposed for the protection of the environment. Alternative 2 does not violate any known federal, state, or local law or requirement imposed for the protection of the environment. Furthermore, the Proposed Action is consistent with applicable land management plans, policies, and programs (EA, Chapter 1.5).

Finding

I have determined the Fire Resiliency Project does not constitute a major federal action having a significant effect on the human environment; 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 Medford District’s Resource Management Plan and the Northwest Forest Plan. This conclusion is consistent with those plans and the anticipated effects are within the scope, type, and magnitude of effects anticipated and analyzed in those plans. 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.



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Date