FY 2000 Commercial Thinnings (Bear Buck and Off Little River)

EA# OR-104-00-07

Decision Document

An Interdisciplinary (ID) Team of the Swiftwater Field Office, Roseburg District, Bureau of Land Management has analyzed the proposed **FY 2000 Commercial Thinnings** project. This analysis and the "Finding of No Significant Impact" (FONSI) was documented in Environmental Assessment (EA) No. OR-104-00-07. The thirty day public review and comment period was completed on April 6th, 2001. One letter with comments was received as a result of public review.

This proposal is in conformance with the *"Final - Roseburg District Proposed Resource Management Plan / Environmental Impact Statement* (PRMP/EIS) dated October 1994 and its associated *Roseburg District Record of Decision and Resources Management Plan* (RMP) dated June 2, 1995.

The EA analyzes the implementation of the "Proposed Action Alternative". The proposed action involves the commercial thinning of second growth forest in the Upper Coast Fork of the Williamette River, Elk Creek and Little River Watersheds located in Sections 23 and 27, T21S R4W; and Section 7, T27S R2W; W.M. Harvest activities will occur on 180 acres (144 acres for Bear Buck and 36 acres for Off Little River) and harvest approximately 7.0 MMBF of timber (3.8 MMBF for Bear Buck and 3.2 MMBF for Off Little River).

The following objectives will be met by this proposal:

1. "Produce a sustainable supply of timber and other forest commodities " (RMP, pg. 33).

2. Improve stand health by reducing the excess stocking in the forest stand to increase the growth and vigor of the remaining individual trees (RMP, pg. 149).

3. Implement ecosystem management as outlined in the RMP (pg. 18).

<u>Decision</u>

It is my decision to authorize the implementation of the Proposed Action Alternative as outlined above. This decision incorporates the following changes from the EA:

1. The final acreage of Unit 23A (Bear Buck) is 91 acres vice 93 noted in Appendix C. This was not the result of any on-the-ground changes but reconciliation with more current traverse data.

2. A red tree vole was found in the road right-of-way of Unit 27A (Bear Buck) reducing the unit by four acres. This site necessitates the dropping of the temporary spur which precludes cable logging of the unit. This unit will now be helicopter logged instead. Helicopter logging will not necessitate dry season logging as described on page 6, paragraph 2b. Helicopter logging will now occur on 53 acres or 29% of the project.

3. Unit 7A (Off Little River) was reduced by five acres due to a red tree vole site found subsequent to public review of the EA. The four mollusk sites were dropped due to change in status under the Survey and Manage ROD.

4. The EA estimated seven acres of road right-of-way. The final figure is eight acres. Right-of-Way ground-based logging continues to occur on 4% of the project as specified in the EA.

5. The EA on page 6 describes no overwintering of bare subgrade as a design feature to reduce sedimentation from new road construction. The EA then further describes provisions for overwintering. The EA was referring to the three spurs in Unit 23A (Bear Buck Unit #1) only. These spurs will be overwintered with features designed to minimize sedimentation then decommissioned after use.

It is my determination that these changes would not result in environmental effects beyond those already analyzed in the EA therefore additional analysis would not be necessary and the analysis described in the EA would be adequate. The Revised Exhibit C shows the changes in unit acreage and unit configuration.

The sale date is planned for November 27, 2001 and the project would be expected to commence in the summer of 2002. The project design features for this alternative are listed on pages 5-8 of the EA. These features have been developed into contract stipulations and will be implemented as part of the timber sale contract.

The following specifics should be noted as the result of sale layout:

A total of 7975 ft. (1.5 mi.) of temporary road will be constructed. A total of 2.4 mi. of existing road will be renovated (i.e. brought back it its original design). Two hundred feet of existing road (Off Little River T.S.) will be decommissioned (subsoiled, mulched and seeded, and blocked from traffic).

Decision Rationale

The Proposed Action Alternative meets the objectives for lands in the Matrix and Riparian Reserve Land Use Allocations and follows the principles set forth in the *"Roseburg District Record of Decision and Resources Management Plan"* (RMP), the *"Final Supplemental Environmental Impact Statement (FSEIS) on Management of Habitat for Late-Successional and Old Growth Forest Related Species Within the Range of the Northern Spotted Owl"* (Feb. 1994) and the Record of Decision (ROD) for that plan dated April 13, 1994.

Section II of the EA describes two alternatives: a "No Action" alternative and a "Proposed Action" alternative. The No Action alternative was not selected because the EA did not identify any impacts of the Proposed Action that would be beyond those identified in the EIS. The No Action alternative would not meet the objective of producing a sustainable supply of timber and other forest commodities.

Cultural clearance with the State Historical Preservation Office was completed and resulted in a "No Effect" determination.

Consultation with U.S. Fish and Wildlife Service for this project has been completed. The Biological Opinion (May 31, 2001) concluded that the action is " . . . not likely to adversely affect spotted owls, murrelets and their critical habitat".

Judge Hogan of the US District Court (District of Oregon) ruled in Alsea Valley Alliance v. NMFS that the National Marine Fisheries Service (NMFS) decision to list the coho salmon was arbitrary and unlawful. As a result of the September 10, 2001 ruling, consultation with NMFS is not required because no listed species are affected.

This decision is based on the fact that the Proposed Action Alternative implements the Management Actions / Directions of the RMP. The project design features as stated in the EA would protect the Riparian Reserves, minimize soil compaction, limit erosion, protect slope stability, wildlife, air, water quality, and fish habitat, as well as protect other identified resource values. This decision recognizes that impacts will occur to these resources, however, the impacts to resource values would not exceed those identified in the PRMP/EIS. The Decision provides timber commodities with impacts to the environment at a level within the bounds of the PRMP/EIS.

Comments were solicited from affected tribal governments, adjacent landowners and affected State and local government agencies. No comments were received. During the thirty day public review period, comments were received from Umpqua Watersheds, Inc. None of the comments provided new information which should be considered in this decision. Several comments warrant clarification:

! <u>The BLM could have included a Riparian Reserve restoration component to the project such as snag creation.</u> Biologists on the Level 1 team have been very cautious in referring for consultation any activity within the Riparian Reserves in light of the present difficulty in obtaining Biological Opinions from the regulatory agencies. Perhaps in the future certain restoration activities such as snag creation or patch openings within the Riparian Reserve will be more favorably received.

! <u>Tractor skidding would not be in compliance with the RMP because of the additional compaction it would cause. The EA allows tractor skidding in non-compliance with the RMP. You must be in compliance with the RMP now, not only at final harvest.</u>

This comment resulted from a statement in the soils report stating that "Technically, this [tractor skidding] would not be in compliance with the RMP". The Soil Scientist made this statement based on his assumption that soil productivity losses from past and present compaction could not exceed one percent. His supposition was that because past compaction exceeded one percent any additional new compaction would already be beyond the standard and therefore not in compliance with the RMP.

The RMP (pg. 62) specifies that ground-based yarding systems would be designed to result in a less than one percent productivity loss. The RMP (pg. 35) further states that the objective for water and soils is to "Improve and/or maintain soil productivity" and (pg. 62) that "**Upon final harvest**, all compacted trails, **including skid trails from previous entries**, will be tilled ...[emphasis added]". Therefore the RMP permits ground-based yarding as long as the standard of "improve and/or maintain" is met after

final harvest. The RMP does not require that the productivity loss requirement be applied to each entry, however it must be applied at final harvest. The RMP assumes base-line conditions when the RMP was signed (June 1995). This is shown by the objective to "maintain" soil productivity. For example, if a previously entered harvest unit had ground-based yarding resulting in a 5% productivity loss, that loss carried to final harvest would meet the RMP standard to "maintain" soil productivity.

The residual compaction and productivity loss resulting from ground-based yarding will be analyzed at final harvest and a plan developed to meet the RMP standard to maintain soil productivity. The plan will include identification of areas of natural recovery as well as subsoiling remaining areas of compaction.

! <u>The roads needed for this project are excessive. The EA never analyzed how seven acres of permanent deforestation would contribute to the hydrology of the watersheds. The EA never analyzed that these roads would exacerbate the noxious weed problem. Why didn't the BLM consider helicopter logging?</u>

Logging planning and engineering were done with the goal to minimize the amount of road construction. Excessive roads increase the cost of logging, therefore the layout foresters seek to minimize road construction whenever possible.

The effects of temporary roads **were** analyzed (pg. 13). The hydrology section cites measures to restore the hydrologic function such as subsoiling and revegetation. The District Geotechnical Engineer was asked to evaluate the hydrologic effects of temporary roads and concluded: "Construction of the temporary road does not pose any risk of negative impacts to the area - no mass wasting, sediment delivery or **changes to the surface or subsurface hydrolgic routing** [emphasis added] are anticipated [Geotechnical Review, Appendix F (Analysis File)]." The EA never maintains that road building has no effects but that there would be no significant effects beyond those identified in the FEIS.

The EA (pg.13) very clearly states that there is potential to spread noxious weeds due to road construction. The EA has not ignored this impact.

A helicopter logging alternative in lieu of building roads was not considered because the roading option was less costly. Helicopter logging uses great amounts of fuel and is therefore more expensive than conventional logging. Helicopter logging is only considered when there is no other way to access the timber or there are over riding environmental considerations that would be best mitigated through the use of helicopter. The analysis of this project did not show any overriding environmental considerations that would necessitate helicopter logging. The EA (pg. 4) discloses that helicopter logging will occur on 16% of the project area. As the result of changes addressed previously, this percentage will increase to nearly one third of the sale area. Although a pure helicopter alternative was not made a part of this analysis, the use of helicopter **was** considered and used for a significant portion of the proposed action alternative.

! <u>The EA should give clearer direction to protect existing snags.</u>

The EA (pg. 7) explains that any snags deemed a hazard to worker safety could be felled. This is normally accomplished after negotiation between the sales administrator and the operator. Logging operations are subject to OSHA safety inspections and the operator could be fined for unsafe working conditions if snags are allowed to remain that could injure workers. Not all snags need to be felled but normally only those near landings. Since this is a second growth stand, the numbers of snags is very low and few if any would need to be felled.

! The EA was not clear whether or not helicopter landings are being built, or are currently existing.

The two helicopter landings are indicated on the Appendix C map. These landings are on private lands and are existing openings.

! Several items of confusion were noted concerning the Exhibit C map.

The revised Exhibit C map should clear up any areas noted in the public response comments.

Compliance and Monitoring

Monitoring will be conducted as per the guidance given in the ROD and the RMP.

Protest and Appeal Procedures

Forest Management Regulation 43 CFR 5003.2 states that "[w]hen a decision is made to conduct an advertised timber sale, the notice of such sale shall constitute the decision document." This notice will be placed in *The News Review* and constitute the decision document with authority to proceed with the proposed action. As outlined in Federal Regulations 43 CFR, 5003.3, "Protests of ... Advertised timber sales may be made within 15 days of the publication of a ... notice of sale in a newspaper of general circulation." Protests shall be filed with the authorized officer (Jay K. Carlson) and shall contain a written statement of reasons for protesting the decision. Protests received more than 15 days after the publication of the notice of sale are not timely filed and shall not be considered. Upon timely filing of a protest, the authorized officer shall reconsider the decision to be implemented in light of the statement of reasons for the protest and other pertinent information available to him/her. The authorized officer shall, at the conclusion of his review, serve his decision in writing to the protesting party. Upon denial of a protest ... the authorized officer may proceed with the implementation of the decision.

For further information, contact Jay K. Carlson, Field Manager, Swiftwater Field Office, Roseburg District, Bureau of Land Management, 777 NW Garden Valley Blvd; Roseburg, OR. 97470, 541 440-4931.

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Jay K. Carlson, Field Manager Date
Swiftwater Field Office

APPENDIX C (Revised)

INDIVIDUAL UNIT DESCRIPTION

Project Summary Table

EA Unit	Project Area	Acres	Yarding System (ac.)			Fuel Treat.	Remarks
			Aerial	Cable	Ground		
23A	1	91		OES (85)	ROW (<6)	P&BL	Bear Buck (Conn.)
23B	4	27	27			"	"
23C	2 & 3	4	4			"	"
27A	5	22	22			"	"
7A	1	20		OES (19)	ROW (1)	"	Off Little River (AMA)
7B	2	9		OES (9)		"	"
7C	3	7		OES (6)	ROW (<1)	"	"
Total	-	180	53	119	8	-	

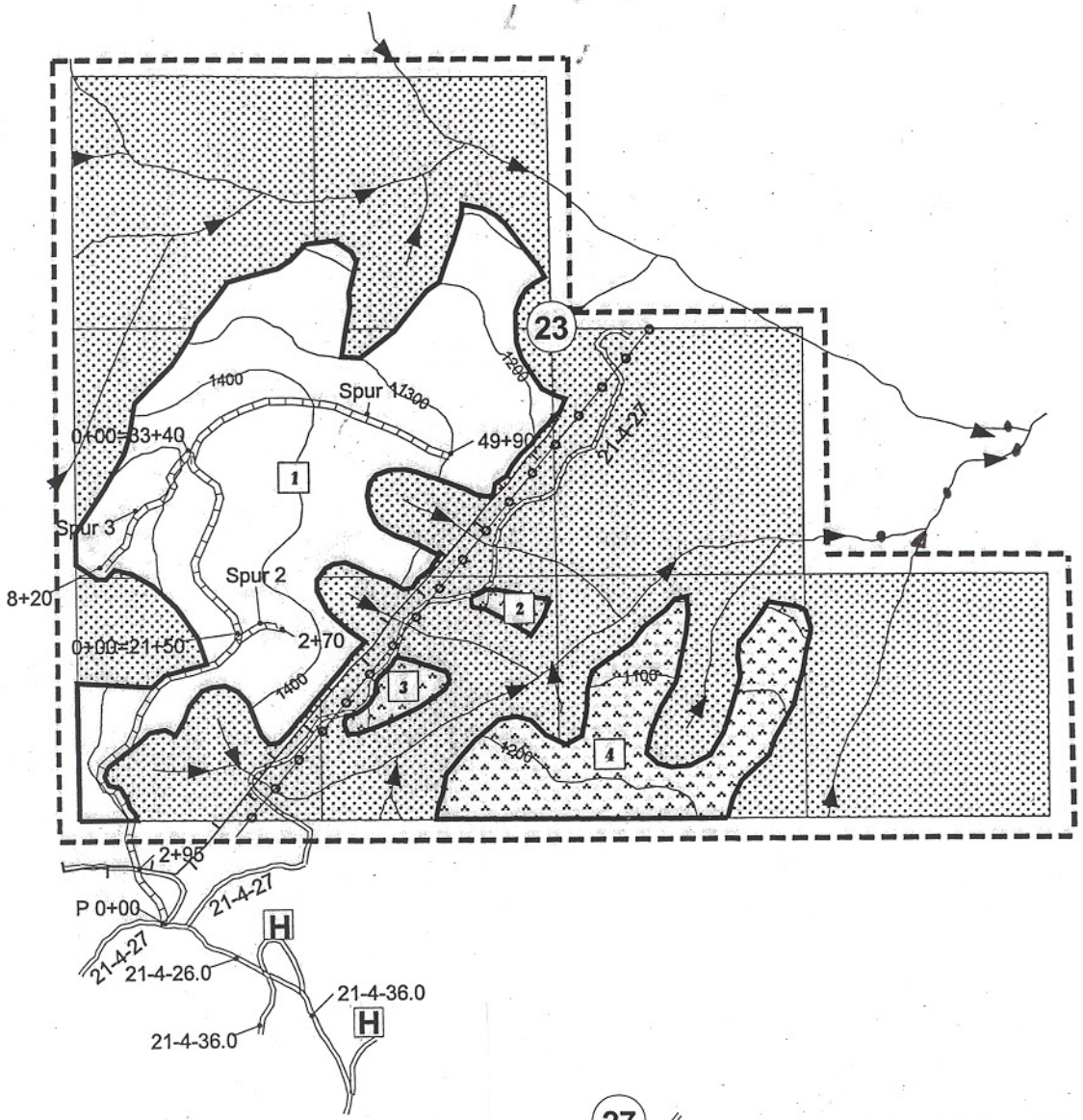
Yarding System
OES = Cable Yard, One End Suspension Required
ROW = Ground Based, Yarding of Road Right of Way Timber

Fuel Treatment
P&BL = Pile and Burn Landings

LEGEND

- Proposed Harvest Area- Cable Yarding
- Proposed Harvest Area- Aerial Yarding
- Young Growth Forest (>80 years)
- Mature and/or Old Growth (>80 years)
- Wetland (less than 1 acre)
- H Helispot (Aerial Yarding Landing)
- Road to be Decommissioned
- Existing Road
- Temporary Spur -To Be Constructed, Used & Decommissioned
- Boundary - Unit
- Boundary of Project Area
- Stream
- Stream - Fish Bearing

APPENDIX C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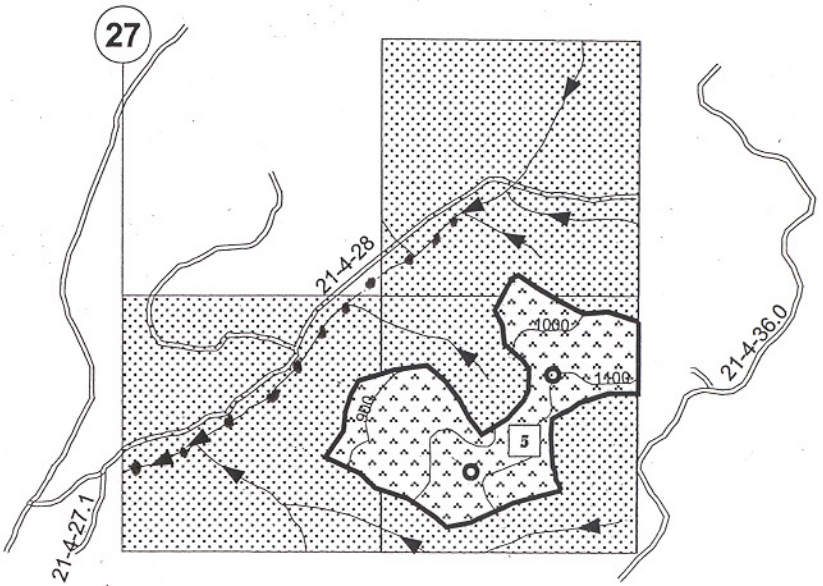
27
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1400
900
5
21-4-36.0
21-4-27.1

APPENDIX C

Scale: 1"= 1000 Ft.