Middle South Umpqua/Dumont Creek
Commercial Thinning and Density Management
Environmental Assessment

EA# OR105-08-08
South River Field Office, Roseburg District

Finding of No Significant Impact

Overview

Planning, design, and analysis for the Middle South Umpqua/Dumont Creek Commercial Thinning and Density Management project was conducted consistent with the management objectives, management direction, and Best Management Practices of the 1995 Roseburg District *Record of Decision and Resource Management Plan* (1995 ROD/RMP).

Two alternatives were considered and analyzed in the Middle South Umpqua/Dumont Creek Commercial Thinning and Density Management EA, consisting of Alternative One (No Action) described on page 4 of the EA; and Alternative Two (Proposed Action) described at pages 4-9. Alternative Two proposed thinning and density management of 288 acres (EA, p. 6, Table 2-1). Based on further field reconnaissance and analysis, Units 29-2-21A, 29-2-33A, and 30-2-11A were dropped from the proposed action. The forest stands to be treated, totaling approximately 160 acres, are located in Sections 3, 9, and 15, T. 30 S., R. 2 W., Willamette Meridian.

Both context and intensity must be considered in determining significance of the environmental effects of agency action (40 CFR 1508.27):

Context

The action is a site-specific commercial thinning and density management treatment on approximately 160 acres located entirely within the Middle South Umpqua/Dumont Creek fifth-field watershed, which encompasses approximately 97,634 acres. As this is an intermediate treatment that does not modify forest age class and affects less than 0.25 percent of the total watershed area, it does not bear any regional, statewide, national or international importance.

Intensity

The Council on Environmental Quality includes the following ten considerations for evaluating intensity.

1. *Impacts may be both beneficial and adverse.* - 40 CFR 1508.27(b) (1)

   Thinning and density management will improve tree health and vigor, enhance commercial timber value in the Matrix land use allocations, and accelerate development of late-successional forest conditions in Riparian Reserves and Late-Successional Reserves (EA, pp. 30-32).

While commercial thinning and density management may result in a decline in use of the stands by northern spotted owls in the short term, it will accelerate development of suitable habitat in Riparian Reserves and the unmapped Late-Successional Reserve (EA, p. 35). It will also increase resilience and the ability of the stands to withstand natural events that may include insect and disease attack, wind storms, and wildfire.

Commercial thinning will also provide timber for manufacturing which will provide employment, wages to timber workers and employees in associated industries, and generate tax revenues for local, state and federal governments.

2. *Degree to which the proposed action affects public health or safety.* - 40 CFR 1508.27(b) (2)

The vegetation treatments will not affect public health or safety because it will comply with state safety laws and regulations, and occur in a landscape removed from residential centers and dominated by Federal and industrial forest land. Further, as described in the EA (p.51), fuel loads will be managed so that there will be no substantial increase in fire risk in the area.

3. *Unique characteristics such as proximity to historic or cultural resources, park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas.* - 40 CFR 1508.27(b) (3)

As addressed in the EA (p. 10), there are no Areas of Environmental Concern; prime farmlands; wetlands; wilderness; or wild and scenic rivers in proximity to the commercial thinning and density management units.

Cultural clearances have been conducted. No archaeological resources were identified in the following units: 30-2-3A, 30-2-15A, and 30-2-15D. A site located near Unit 30-2-3B was evaluated and determined not to possess significant cultural value. Sites located in or near Units 30-2-9C and 30-2-15C have not been evaluated, but will not be affected because the first site will be buffered and the second site is not sufficiently close to unit boundaries to be affected by operations.

4. *The degree to which the effects on the quality of the human environment are likely to be highly controversial.* - 40 CFR 1508.27(b) (4)

The BLM conducts thinning and density management regularly across western Oregon. There is a wide body of literature describing the effects of such forest management activity. The effects of this project are expected to be consistent with those described in published literature cited in the EA, and are not expected to be highly controversial.

5. *The degree to which the possible effects on the human environment are highly uncertain or involve unique or unknown risks.* - 40 CFR 1508.27(b) (5)

This project is not unique as the BLM regularly conducts thinning and density management. When pairing professional experience with the substantial literature on the topic, there is little uncertainty regarding the effects of the proposed action. The environmental effects are fully analyzed in Chapter 4 of the EA (pp. 28-51).

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.* - 40 CFR 1508.27(b) (6)

   The advertisement, auction, and award of timber sale contracts allowing harvest from discrete areas, based on a site-specific analysis of effects and decisions made on a sale-by-sale basis in consideration of relevant information, is a well-established practice. It does not establish a precedent for future actions, nor represent any decision in principle about future considerations, as any new proposals would be subject to same site-specific evaluation, analysis, and authorization.

7. *Whether the action is related to other actions with individually insignificant impacts but cumulatively significant impacts.* - 40 CFR 1508.27(b) (7)

   The interdisciplinary team considered the proposed action in the context of past, present, and reasonably foreseeable actions. No cumulatively significant effects to resources are predicted, as discussed in Chapter 4 of the EA (pp. 28-51).

8. *The degree to which the action may adversely affect districts, sites, highways, structures, or objects listed in or eligible for listing in the National Historic Register or may cause loss or destruction of significant scientific, cultural, or historical resources.* - 40 CFR 1508.27(b) (8)

   As discussed above, surveys for cultural and historic resources are complete. No resources have been found warranting mitigation.

9. *The degree to which an 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.* - 40 CFR 1508.27(b) (9)

   As identified in the EA (p. 14), seven northern spotted owl home ranges will be affected to varying degrees by the commercial thinning and density management.

   No effect to spotted owls from noise disruption is expected because all activities will meet the minimum disruption distances from any known occupied spotted owl site or unsurveyed suitable habitat, as established by the U.S. Fish and Wildlife Service, or be seasonally restricted from March 1st to July 15th to ensure spotted owls do not abandon nests or fledge prematurely.

   Because of relatively small tree size, high tree density, and lack of nesting structure the units consist exclusively of dispersal-only and unsuitable habitat. Effectiveness monitoring surveys and status of spotted owls in the project area indicate that no unsurveyed suitable habitat will be affected within approximately 0.25 miles of any proposed unit. Thinning will reduce vertical and horizontal cover. Use of thinned stands by spotted owls will likely decrease until canopy cover returns to pre-treatment levels in 10-20 years, but some level of continued use is still expected because post-project canopy cover will exceed 40 percent and the quadratic mean diameter of the stands will exceed 11 inches diameter breast height, figures widely used as a threshold for dispersal function (EA, pp. 34-35).

One Known Owl Activity Center (Rondeau Butte) would be most affected because thinning would occur within the core area and within 300 meters of the nest site, both of which are below the 50 percent suitable habitat threshold for home range viability. The site was last occupied in 2003, by a pair of non-reproducing spotted owls, and has been unoccupied since. Because there is little existing suitable habitat and only sporadic occupation, thinning in proximity to the activity center won't appreciably affect the probability of use by spotted owls.

In its Biological Opinion (Ref. No. 13420-2009-F-0125), the U.S. Fish and Wildlife Service found that the action was likely to adversely affect spotted owls but not likely to result in "incidental take" because even though the project "includes a finding that implementation of the proposed action has the potential to cause biological effects to the spotted owl that conform to the regulatory definition of take, the mere potential for take is not a legitimate basis for a take exemption."

Habitat capable of supporting the Federally-threatened Kincaid's lupine (*Lupinus sulphureus* ssp. *kincaidii*) was surveyed with negative results.

As described in the EA (p. 18), the Federally-threatened Oregon Coast coho salmon is present in the Middle South Umpqua/Dumont Creek fifth-field watershed. Critical Habitat for coho salmon in proximity to the proposed project area includes portions of Dompier Creek, Deadman Creek and the South Umpqua River, but steep waterfalls and stream gradients limit Critical Habitat to reaches more than 1.5 miles downstream from the nearest unit. Essential Fish Habitat for coho salmon is coincident with critical habitat.

Direct effects to fish species from timber harvest and log hauling can result from addition of fine sediment to streams resulting in a temporary increase in turbidity (EA p. 40). As described in the EA (p. 41), no direct effects on sediment are expected.

"No-harvest" buffers on all streams within or adjacent to units will remain vegetated and non-compacted, providing sufficient filtering capacity. Any sediment generated from thinning or density management activities will be intercepted by the vegetated strips and not reach adjacent stream channels. Trees in the buffers will also provide root strength sufficient to maintain bank stability, protect eroding banks and prevent additional sediment from entering streams and accumulating in gravel.

Indirect effects from road construction and renovation, timber hauling and road decommissioning could reduce spawning success and egg and alevin survival where fine sediments reach streams and accumulate in gravels. Project design features and Best Management Practices described in the EA (p. 42) will arrest the mechanism for sediment transport or minimize the risk for delivery of fine sediment so that any effects will be short-term and so small as to not be measurable at the project level scale.

As discussed in the EA (pp. 40-41), it was concluded that the project will not adversely affect Essential Fish Habitat for coho or chinook salmon, or Critical Habitat for coho salmon.

10. Whether the action threatens a violation of Federal, State, or local law or requirement imposed for the protection of the environment. . - 40 CFR 1508.27(b) (10)

The commercial thinning and density management was designed in conformance with management direction from the 1995 ROD/RMP which is in conformance with all applicable laws and regulations. Furthermore, project design features described within the EA ensure that the action complies with all applicable laws.

With respect to environmental justice, the action is consistent with Executive Order 12898 which addresses Environmental Justice (EA, p. 10). No potential impacts to low-income or minority populations have been identified by the BLM internally or through public involvement. Employment associated with the commercial thinning and density management will provide employment for local contractors who engage in similar types of work throughout Douglas County.

Correspondence with local Native American tribal governments has not identified any known unique or special resources in the project areas which provide religious, employment, subsistence or recreation opportunities (EA, p. 10).

As discussed in the EA (p. 27), implementation of project design and contract provisions will minimize risk of introduction or spread of noxious weeds in association with road construction and timber harvest. As described in the EA (p. 9), disturbed areas will be mulched and seeded with native grasses to discourage establishment of new weed populations and logging and road construction equipment will be pressure washed or steam cleaned prior to move-in to avoid introducing weeds from outside the project area. These actions are consistent with the requirements of the Lacey Act; the Federal Noxious Weed Act of 1974, as amended; and Executive Order 13112, Invasive Species.

Findings

Based on the analysis of potential environmental impacts contained in the EA, I have determined that the timber harvest will not have any significant impact on the human environment within the meaning of Section 102(2)(c) of the National Environmental Policy Act of 1969, and an environmental impact statement is not required.

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2/22/10
Date