Myrtle Creek Harvest Plan
Environmental Assessment

DOI-BLM-OR-R050-2013-0003-EA

South River Field Office, Roseburg District

"Draft" Finding of No Significant Impact

Overview

The Myrtle Creek Harvest Plan was designed to apply management direction from the 1995 Roseburg District *Record of Decision and Resource Management Plan* (ROD/RMP), which is tiered to the 1994 Roseburg District *Proposed Resource Management Plan/Environmental Impact statement* (PRMP/EIS).

The Myrtle Creek Harvest Plan Environmental Analysis (EA) considered a no action alternative (Alternative One) and two action alternatives. As described in the EA (pp. 21-25), **Alternative Two – Thinning and Variable Retention Harvest** would apply uniformly spaced thinning to 529 acres, variable density thinning to 1,005 acres, and variable retention harvest to approximately 334 upland acres (EA p. 36). **Alternative Three – Thinning Only** would apply uniformly spaced thinning to 782 acres, and a variable density thinning prescription to 1,086 acres in the Matrix and Riparian Reserves land use allocations (EA pp. 31 and 36).

Appendix A – Maps of the Myrtle Creek Harvest Plan project displays unit locations and land use allocations. The location of prospective units, as indicated by individual unit identification numbers (i.e. Unit 28-8-5A is located in Section 5, T. 28 S., R. 8 W.), and land use allocations are illustrated in Tables 2-1 and 2-2 (EA pp. 19 and 20).

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

Context

The project area is set the Myrtle Creek 10th-field watershed[1], as well as the Upper Deer Creek, Days Creek, and Roberts Creek 12th-field subwatersheds. Collectively, the watersheds drain an area of approximately 144,231 acres (EA, p. 1). Approximately 42,800 acres or 30 percent of the area is administered by the Bureau of Land Management (BLM) Roseburg District (EA, p. 1).

Both action alternatives propose to treat the same 1,868 acres; approximately one percent of all lands in the project watersheds, and 4.4 percent of BLM-administered lands in the project watersheds. This would not bear any regional, statewide, national or international importance.

Intensity

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

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1The U.S. Geological Survey implemented a new numbering/naming convention for hydrologic units (HUs). 5th-field watersheds are now designated as 10th-field HUs, and 6th-field subwatersheds as 12th-field HUs.

intensity.

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

   Both of the action alternatives could have potentially beneficial and adverse impacts, but they would not be significant as they would be consistent with the range and scope of those effects of timber management analyzed in the 1994 Roseburg PRMP/EIS, to which the EA is tiered.

   The application of uniformly spaced and variable density thinning proposed under each action alternative would improve tree health and vigor within the treated forest stands. Thinning would enhance the commercial value of timber in the Matrix land use allocations, and accelerate attainment of Aquatic Conservation Strategy objectives in the Riparian Reserves land use allocations (EA, pp. 48-60). Thinning would benefit Riparian Reserves by increasing light infiltration, because when a stream is enclosed by a conifer canopy, the ecosystem shifts to a low quality food base whereas a more open canopy provides greater diversity of nutrient inputs (EA, p. 105). A variety of land birds would also benefit from the establishment of diverse understory conditions (EA, pp. 84-85 and Table C-1).

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

   Variable retention harvest, under Alternative Two only, would create approximately 334 acres of complex early-successional habitat in the analysis area. A variety of land birds, game species and invertebrate species would benefit from canopy reduction that would lead to the establishment of diverse understory conditions (EA, pp. 84-85 and Table C-1).

   In 2013 the age class stage distribution of BLM forest lands analyzed was approximately 20 percent of early-seral forest, 29 percent of mid-seral forest, and 50 percent late-seral forest (EA, pp. 39 and 60). Due to fire exclusion and the limited amount of regeneration harvest (approximately 525 acres) in the analysis area for the past two decades, there has been an overall decline in the abundance of early-seral forest with a roughly equal increase in mid-seral forest and a gradual increase in mature and late-seral forest (EA, p. 59)

   Under Alternative Two, variable retention harvest would convert approximately 431 acres to the 0-30 year age class; approximately 396 acres from the 40-80 year age class; and 35 acres from the 90 and greater year age class (EA, p. 60). These shifts would make a small contribution toward achieving the desired balanced age class distribution while promoting development of early-seral habitat for pollinators, resident and migratory bird species, small mammals (EA, pp. 80, 84-85 and Table C-1), and large mammals (EA, Table C-1) dependent upon or associated with this successional stage of forest development.

   Variable retention harvest in Alternative Two would have additional beneficial economic effects, when compared to Alternative Three, by providing a wider range of log sizes and

grades that would allow for manufacture of specialty timber products.

Potential adverse effects to species listed under the Endangered Species Act, and critical habitat designated for their survival and recovery are addressed below at consideration *9.*

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

The proposed action is a timber management project that is located in a rural setting, removed from urban and metropolitan areas, on a landscape of Federal and private lands that are principally managed for timber production, and as such would not be expected to have any demonstrable effects on public health and safety.

As described (EA, p. 116), nineteen of the proposed harvest units are located in the Wildland Urban Interface as defined by the Douglas County Community Wildfire Protection Plans. Fuels reduction action s would be taken to reduce fire risk within these areas (EA, pp. 29-31 and 36).

There would be no cumulative or long-term effects on air quality associated with prescribed burning (EA, p. 119). As described in the EA (p. 119), pile burning would be accomplished in the autumn or winter months during unstable weather conditions when winds and atmospheric instability favor rapid smoke dispersion, and precipitation washes particulates from the air. Burning under an inversion or otherwise very stable conditions would be avoided to minimize the risk of smoke settling into the river drainage or along roadways and persisting for an extended period of time. Potential impacts to air quality within one-quarter to one mile of units would persist for one to three days and would be characterized by some haziness.

The EA (p. 119) explains that jackpot burning of variable retention harvest units under Alternative Two could result in longer burning phases exceeding 15-20 hours. However, burning when winds and atmospheric instability favor rapid smoke dispersion would still limit the duration and extent of impacts to air quality. In the event of a forecast inversion, aggressive mop-up would be employed to reduce the risk of an extended period of impacts to the local airshed.

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)*

Cultural resource inventories within proposed harvest units and locations of proposed road construction are incomplete. Surveys are scheduled for completion in 2014. Any cultural resources that may be located through the surveys would be appropriately managed either through avoidance or mitigation designed by the District Archeologist. In this way, no **cultural or historic resources** would be affected by this project (EA, p. 15).

As described in the EA (p. 15), cultural resource inventories within some proposed harvest units and locations of proposed road construction have been completed (CRS

Nos. SR1302, SR1303, SR1304 and SR1305). There are three documented (35DO86, 35DO111 and 35DO737) and three previously undocumented sites (OR-10-317, OR-10-318, and OR-10-319) present.

Four of the sites have not been formally evaluated and are assumed to be eligible for listing on the National Register of Historic Places (NRHP). Three of the unevaluated sites have been excluded from the project area through unit boundary modification and would not be affected. The fourth unevaluated site is scheduled to evaluated in 2014.

Two other sites (35DO737 and OR-10-319) are ineligible to be listed on the NRHP (EA, p. 15) and as a result require no further consideration.

As discussed in the EA (p. 35), the project area does not contain any **parklands or prime farmlands**. There are no **Wild and Scenic River** segments, either designated or proposed, in the project watersheds. **Wetlands** would be protected by establishment of Riparian Reserves, at a minimum, or by exclusion from the project. No ecologically critical areas exist in proximity to any proposed harvest units.

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 environmental effects of the project are within the scope of those considered in the 1994 Roseburg District PRMP/EIS. The BLM has conducted timber management across western Oregon for decades. Effects are expected to be consistent with those of the published literature cited in the EA, and are not expected to be highly controversial, in a scientific sense.

The public has had the opportunity to comment on this project. A notice of project initiation was published in the Roseburg District Quarterly Planning Update (Winter 2012), informing the general public of the nature of the proposed action. Letters were sent to landowners with property adjacent to BLM-administered lands where timber harvest is proposed, those whose property lies beside or astride identified haul routes, and those with registered surface water rights for domestic use located within one mile downstream of any proposed units. They were encouraged to share any concerns or special knowledge of the project area that they may have. (EA, p. 5)

Letters were sent to the Confederated Tribes of Grande Ronde, Confederated Tribes of Siletz Indians and Cow Creek Band of Umpqua Indians requesting identification of any special interests or legal rights in the lands in question. No responses were received (EA, p. 5).

Informal scoping comments were received from two organizations and one organization, and were given due consideration in this analysis (EA, pp. 5-9). While comments were received expressing disagreement with the BLM timber management program, none established scientific controversy over the outcome of the proposed action.

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 has been conducting timber management for many decades. When professional experience is paired with the substantial body of literature on the subject, there is little uncertainty regarding the effects. The environmental effects of all of the alternatives are fully analyzed in Chapter Three (EA, pp. 37-136).

Climate change and greenhouse gas emissions have been identified as an emerging resource concern by the Secretary of the Interior (Secretarial Order No. 3226; January 16, 2009), the OR/WA BLM State Director (IM-OR-2010-012, January 13, 2010), and by the general public through comments on recent project analyses.

The U.S. Geological Survey, in a May 14, 2008 memorandum (USDI USGS 2008) to the U.S. Fish and Wildlife Service, summarized the latest science on greenhouse gas emissions and concluded that it is currently beyond the scope of existing science to identify a specific source of greenhouse gas emissions or sequestration and designate it as the cause of specific climate impacts at a specific location.

As described (EA, pp. 122-124), both action alternatives would result in the direct release of carbon. The amounts of carbon release would be undetectable, though, at 0.0004 to 0.0006 percent of annual U.S. emissions and 0.0001 to 0.0002 percent of annual global emissions, depending on the alternative (EA, pp. 122-123).

Under Alternative Two, which includes variable retention harvest and thinning the direct release of carbon would be between 9,766 and 11,444 tonnes. In addition to the direct release from harvest there would be a release of between 550 and 600 tonnes of carbon over the first 50 years after treatment from the decay of logging slash and wood products. Taking into account the continued sequestration of carbon by retention trees, along with the growth of regeneration, re-sequestration of carbon directly released by harvest would occur in a little more than 8 years. In the first 50 years, post-harvest, carbon storage would increase between 256,384 and 343,640 tonnes, an increase of between 83 to 104 percent over the current condition (EA, p. 123).

Based on modeling of past thinning proposals, Alternative Three would result in the direct release of between 6,036 and 8,048 tonnes of carbon. Sequestration of carbon by the remaining trees would result in a carbon-neutral state, the period of time in which all carbon directly released is re-sequestered, in one to two years. In the first 50 years, post-harvest, carbon storage would increase between 151 to 203 tonnes per acre on the uniform and variable density thinning units, representing an increase in stored carbon of approximately 303,812 to 408,436 tonnes representing a 100 to 123 percent increase over the current condition. (EA, p. 123)

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 proposed action implements the decision made in the ROD/RMP to manage lands in the Matrix for sustainable timber production. The proposed action would implement the plan level decision and does not establish precedent or a decision in principle about future actions.

   The proposed action and alternatives to the proposed action were subject to a rigorous analysis of potential environmental consequences. The potential future preparation, auction and award of timber sale contracts associated with the preferred alternative would not set a precedent or a decision in principle about future actions or considerations, as any new proposals for timber management would be subject to site-specific evaluation and analysis.

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. As documented in the EA, no cumulatively significant effects to the following resources are predicted from implementation of the preferred alternative: Cultural and Historical Resources (p. 15); Recreation and Off-Highway Vehicle Use (EA, p. 12); Visual Resources (EA, p. 12); Botany (EA, p. 13); Noxious Weeds and Non-Native Invasive Plants (p. 14); Timber Resources (pp. 125-126); Wildlife (pp. 126-131); Fish, Aquatic Habitat and Water Resources (pp. 132-133), Soils (pp. 133-134); Fuels Management (p. 134); and Carbon Storage and Sequestration (pp. 135-136).

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, cultural resource inventories within proposed harvest units and locations of proposed road construction are scheduled for completion in 2014. Any cultural resources that re located through the surveys would be appropriately managed either through avoidance or mitigation designed by the District Archeologist. In this way, no cultural or historic resources would be affected by this project (EA, p. 15).

   As described in the EA (p. 15), cultural resource inventories within some proposed harvest units and locations of proposed road construction have been completed (CRS Nos. SR1302, SR1303, SR1304 and SR1305). There are three documented (35DO86, 35DO111 and 35DO737) and three previously undocumented sites (OR-10-317, OR-10-318, and OR-10-319) present.

Four of the sites have not been formally evaluated and are assumed to be eligible for listing on the National Register of Historic Places (NRHP). Three of the unevaluated sites have been excluded from the project area through unit boundary modification and would not be affected. The fourth unevaluated site is scheduled to evaluated in 2014.

Two other sites (35DO737 and OR-10-319) are ineligible to be listed on the NRHP (EA, p. 15) and as a result require no further consideration.

Any cultural resources that are located through future surveys would be appropriately managed either through avoidance or mitigation designed by the District Archeologist. In this way, no cultural resources would be affected by this project. If any objects of cultural value (e.g. historic or prehistoric ruins, graves, fossils, or artifacts) are found during the implementation of the selected alternative, operations would be suspended until the materials and site(s) have been evaluated to determine any appropriate mitigation action (EA, p. 15).

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 described (EA, p. 13), no Threatened or Endangered botanical species would be affected, as none were identified where suitable habitat exists.

As described (EA, pp. 77 and 86), no effects to the **northern spotted owl** from disturbance would be anticipated under either action alternative, as seasonal restrictions would be applied, when and where appropriate, as described in Chapter Two (p. 33). Effects would be solely associated with modification or removal of habitat.

Under both action alternatives, uniform thinning would result in more uniform growth at the stand level, with little height and diameter differentiation among the dominant and co-dominant canopy classes. Uniform thinning would promote some growth of grasses, forbs, shrubs, and hardwoods in the understory, but this would be of limited duration persisting for five to ten years before full canopy closure is reached again and the understory is again suppressed. This period of understory response to available light, water and nutrients would provide habitat for prey species. Development of habitat components providing for nesting, roosting and foraging habitat would occur in 40 to 50 years. (EA, p. 76)

Variable density thinning with gaps and openings would focus on the growth of selected trees, rather than on uniform growth across a stand. This would lead to crown expansion and differentiation in dominant trees, release of shade tolerant species, and development of multi-layered, multi-species stand configurations which would accelerate the development of suitable habitat characteristics by up to 20 years. The increase in vegetative diversity, structural heterogeneity and fine scale variation would promote development of high quality dispersal and suitable habitat. Treated dispersal habitat would develop into suitable habitat as canopy closure surpasses 60 percent (EA, p. 76-77).

Variable density thinning and gap creation would also foster understory development, including establishment of grasses forbs, shrubs and hardwoods that would persist for up to 20 years as a result of increased sunlight, and a longer period of time until full canopy closure is reached again. This would accentuate habitat conditions by increasing tree growth, understory flower and fruit production for prey species, maintaining more canopy connectivity, woody plant diversity, and spatial variability (EA, p. 77).

In heavily thinned stands, use may shift to untreated areas, lead to expansion of nonbreeding home range size, lead to reduced use of thinned areas, and a shift in foraging and roosting areas away from thinned areas near the nest tree (EA, p. 75).

Approximately 14 acres of thinning would be conducted in one nest patch. Recent occupancy records indicate the site was unoccupied in 2008, 2009, 2011 and 2012. In 2010 a pair was identified at the site and in 2013 a resident bird (pair status unknown) was identified. Thinning would occur in the core areas of eleven sites, seven of which are below the core area minimum suitable habitat viability threshold (EA, Table 3-20). Northern spotted owls at these sites would be most vulnerable to effects from thinning (EA, p. 78).

Thinning, particularly in areas of heavier thinning and gap creation associated with variable density thinning, may expose the northern spotted owl to a greater risk of predation from other raptors as they move across the landscape, which would persist for 10 to 20 years until the stands return to pre-thinning levels of canopy cover (EA, p. 75).

Under Alternative Two, variable retention harvest (334 acres) would create areas of retention aggregates, interspersed with areas of concentrated harvest with dispersed retention. Existing levels of canopy closure would be maintained in retention aggregates, but canopy closure outside of these areas would be reduced to between 10 and 20 percent, downgrading habitat function to unsuitable (EA, p. 77).

In variable retention harvest units, retained habitat components would contribute to future development of suitable habitat; providing the necessary habitat diversity such as multi-layered canopy, large trees and snags. Development of suitable habitat would occur as the stands regenerate. Treated areas would begin functioning as dispersal habitat in approximately 40 years. Suitable habitat would develop in approximately 60-80 years (EA, p. 77).

Effects to the northern spotted owl associated with thinning or removal of dispersal habitat under the action alternatives would be consistent with those described in the *Roseburg District proposed Resource management Plan/Environmental Impact Statement* (Chapter 4-62 to 65).

Variable density thinning in critical habitat would accelerate development of nesting habitat and hardwoods that would support prey populations. Until canopy closure, created gaps would be large enough to allow growth of grass, forbs and shrubs used by prey species. Northern spotted owls may initially reduce use of thinned stands, but

thinning would maintain habitat function and the critical habitat unit would continue to facilitate northern spotted owl movements between the western Cascades and coastal Oregon and the Klamath Mountains (EA, 81).

Variable retention harvest would remove 76 acres of dispersal habitat and 76 acres of suitable habitat within northern spotted owl critical habitat (EA, p. 81, Table 3-21). Untreated, thinned and "no-treatment" Riparian Reserve areas on federally-administered lands would continue to provide for dispersal and connectivity between critical habitat subunits. The BLM will consult with the U.S. Fish and Wildlife Service to ensure the function of KLE-2 would not be impaired by proposed actions (EA, pp. 81 and 127).

The fish-bearing portions of Myrtle Creek, Days Creek-South Umpqua and Deer Creek-South Umpqua watersheds within the analysis area are considered to be critical habitat and are occupied by **Oregon Coast coho salmon** (EA, *Appendix A – Maps*).

As described in the EA (p. 98), variable density thinning in Riparian Reserves would have no detectable direct effects to fishes inhabiting streams adjacent to or downstream of proposed harvest units because there would be no direct effects to the aquatic habitat. Many of the proposed units are located along ridges, well-removed from fish-bearing streams. On fish-bearing reaches that border proposed units, a minimum 60-foot wide, slope-distance, "no-treatment" area, measured from the edge of the stream, would be established on both sides of the stream. When taking into account changes in vegetation, or unstable soils and slopes, the "no-treatment" area widths generally exceeds 60 feet on larger perennial streams. The "no-treatment" areas would continue to prevent sediment from reaching streams, and would maintain streamside shade.

Variable retention harvest is not proposed adjacent to Oregon Coast coho salmon and other fish-bearing streams. Variable retention harvest in the uplands would have no effects as Riparian Reserves and "no-treatment" areas within them would prevent effects to fish (EA, p. 98).

There are approximately eight graveled haul route crossings on fish-bearing streams (Ben Branch, Rock, Weaver, Slide, Riser, and South Myrtle Creeks) inhabited by Oregon Coast coho salmon. Approximately 5.3 miles of the proposed gravel-surfaced haul route are located within Riparian Reserves in the analysis area. Any elevated levels of turbidity associated with road use would be small in magnitude and short in duration and would not typically exceed background turbidity levels during winter high flows (EA, p. 98)

No effects to the Oregon Coast coho salmon, critical habitat for the Oregon Coast coho salmon, or Essential Fish Habitat for the Oregon Coast coho and Chinook salmon would be expected from thinning, variable retention harvest or pile burning in upland areas (EA, p. 99). Thinning in Riparian Reserves could reduce future availability of large wood because trees would be removed which would reduce the pool of trees available for future recruitment (EA, p. 99). No discernable sedimentation would be expected under either action alternative from road maintenance/renovation, construction and decommissioning with application of Best Management Practices and project design features described in

Chapter Two of the EA (EA, p. 99).

In order to further reduce the potential for these effects, the following project design features would be used:

- Operations would be restricted to the dry season, typically mid-May through mid-October, when soils are least susceptible to compaction. (EA, p. 32).
- Use of native surfaced roads for timber hauling would be limited to the dry season, typically mid-May through mid-October (EA, p. 34).
- Ground covering vegetation in ditchlines in Riparian Reserves would be retained, except where sediment deposition or other obstructions require maintenance (EA, p. 34).
- Following road renovation actions, but prior to wet season haul, areas of potential sediment delivery (stream crossings) would be inspected by fisheries, hydrology, and/or engineering staff to determine if additional sediment control measures are warranted. These measures could include seasonal suspension of haul, or installation of such devices as silt fences, straw bales, geofabric rolls, or similar (EA, p. 34).
- Road conditions within Riparian Reserves and/or critical habitat for coho salmon would be periodically inspected by a fisheries biologist, hydrologist, and/or engineer to evaluate the effectiveness of sediment control measures. If improvements are required to increase their effectiveness, these actions would be implemented as soon as practicable (EA, p.34).
- The contract administrator would suspend operations before and after periods of rainfall that would result in road surface degradation or delivery of sediment generated from log haul to Riparian Reserves and/or critical habitat for coho salmon (EA, p. 34).

As a consequence, no effects to the Oregon Coast coho salmon, critical habitat for the Oregon Coast coho salmon, or Essential Fish Habitat for the Oregon Coast coho would be expected under either action alternative.

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 proposed action was designed in conformance with management direction from the Roseburg District Record of Decision and Resource Management Plan (ROD/RMP), which itself is in conformance with all applicable laws and regulations. Furthermore, the design features described within the EA ensure that the proposed action complies with all applicable laws (ROD/RMP p. 5).

With respect to environmental justice, the proposed action would be consistent with Executive Order 12898 which addresses Environmental Justice (EA, p. 11). No potential impacts to low-income or minority populations have been identified by the BLM

internally or through public involvement. Employment associated with the sales would involve local contractors who engage in similar 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. 5 and 15).

As discussed in the EA (p. 14), implementation of the Roseburg District Integrated Weed Management Program, in association with project design and contract provisions would minimize risk of introduction or spread of noxious weeds in association with road construction and timber harvest. Measures would include mulching disturbed areas and seeding with native grasses to discourage establishment of new weed populations and pressure washing or steam cleaning logging and road construction equipment prior to move-in to avoid introducing weeds from outside the project area. These actions would be consistent with the requirements of the Lacey Act; the Federal Noxious Weed Act of 1974, as amended; and Executive Order 13112, Invasive Species.

Finding

Based on the analysis of potential environmental impacts contained in the EA, I have determined that the proposed action would 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. I have further determined that the proposed action conforms to management direction from the Record of Decision and Resource Management Plan (ROD/RMP) for the Roseburg District, approved by the Oregon/Washington State Director on June 2, 1995.

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Steven D. Lydick Date
Field Manager
South River Field Office