

**U.S. Department of the Interior
Bureau of Land Management
Roseburg BLM District, Oregon**

**Off Your Walker
Commercial Thinning**

Decision Document

SECTION 1 – THE DECISION

Decision

It is my decision to authorize the Off Your Walker portion of the Proposed Action Alternative as described in the Third Elk Commercial Thinning Environmental Assessment (EA) in Chapters 1 and 2 (NEPA#: DOI-BLM-OR-R040-2009-0022-EA; pgs. 3-10) and as modified in the Off Your Walker DNA (NEPA# DOI-BLM-OR-R040-2011-003-DNA). The Project Design Features that will be implemented as part of Off Your Walker are described on pages 5-12 of the Third Elk Commercial Thinning EA. These project design features have been developed into contract stipulations and will be implemented as part of the timber sale contract.

Off Your Walker Commercial Thinning will occur on four units (approximately 284 acres) of mid-seral, second-growth forest between 34-57 years old located in the Elk Creek Watershed in Sections 11 and 13, T. 23 S., R. 4 W., Willamette Meridian (Figure 1). In addition, approximately 5 acres will be removed for the development of spur roads and rights-of-ways.

This project is within the General Forest Management Area and Riparian Reserve Land Use Allocations under the 1995 *Roseburg District Record of Decision and Resource Management Plan* (1995 ROD/RMP). Off Your Walker will provide approximately 5,102,000 board feet (5.102 MMBF) of timber available for auction.

Updated Information

The updated information, described below, has been considered, but does not alter the conclusions of the analysis.

1) Unit Configuration:

Detailed in Table 1, approximately 170 acres of Off Your Walker are in the General Forest Management Area and approximately 119 acres are Riparian Reserve Land Use Allocations (Table 1). In addition, approximately 4 acres within the General Forest Management Area and 1 acre in Riparian Reserve on BLM-administered lands will be removed for the development of spur roads and rights-of-ways.

Table 1. Off Your Walker Yarding Methods & Land Use Allocations.

Unit	EA Unit	Cable Yarding (acres)		Ground-Based Yarding* (acres)		Total Harvest (acres)	Roads/Right-of-Ways (acres)		
		Riparian Reserve	GFMA	Riparian Reserve	GFMA		Riparian Reserve	GFMA	**Private
1	11A	9	6	4	1	20	0.2	0.2	0.15
2	11B	0	0	0	6	6	0	0	
3	11C	1	2	6	16	25	0	0	
4	13A	71	98	27	37	233	1	4	
Total		81	106	37	60	284	1	4	0.15

* Up to 10 acres of additional, incidental ground-based yarding may occur.

** Private ROW's are not included in Total Acres.

Approximately 139 acres will be excluded (net difference) from the final unit configuration of Off Your Walker as compared to what was described in the EA (428 acres) for the following reasons:

- Approximately 96 acres will be excluded from thinning due to “no-harvest” stream buffers.
- Approximately 23 acres will be excluded because they are existing roads.
- Approximately 17 acres will be excluded because they are in areas with low volume and are not currently considered suitable for thinning.
- Approximately 4 acres will be excluded because the stand is beyond optimum thinning age.
- Approximately 1 acre (net) will be added as a result of refinements and adjustments in map accuracy from GPS locations of unit boundaries.

Within Off Your Walker, there will be approximately 97 acres that will be ground-based yarded and 187 acres that will be cable-yarded (formerly 7 acres were proposed as ground-based only and 421 acres were proposed as a combination of ground-based and cable-yarding in the EA, pg. 5).

2) Roads and Spurs:

The roads and spurs in Off Your Walker are numbered as shown below in Table 2: *Off Your Walker Roads & Spurs*. There will be approximately 5,589 feet of spur road constructed (formerly 16,330 feet were proposed in the EA (pg. 9). Spur OYW 1 was dropped from the decision because the unit could be harvested from Spur OYW 2 (now assigned as an extension of the 23-4-2.3 road) and Spur OYW 3 (now Spur 2). Spurs OYW 4, OYW 5, OYW 7, OYW 12, OYW 13, OYW 15, and OYW 16 were excluded because they were not needed to access areas that are no longer part of the Off Your Walker commercial thinning or the areas were accessible by other roads or spurs. There will be no permanent spur roads constructed in Off Your Walker (as indicated in the EA, pg. 10).

Table 2. Off Your Walker Roads & Spurs¹

Road/Spur #			New Construction	Renovation	Surfacing		Decommissioning	
(in the EA)	(in DNA)	(in Decision)	(feet)	(feet)	Existing	Proposed	(feet)	How Decommissioned
23-4-3.5	N/A	23-4-3.5	0	Maintenance only	Rock	Rock	0	None
23-4-10.1B	N/A	23-4-10.1 Segments A, B, C*	0	2,900	Rock	Rock	0	None
N/A	23-4-10.1 D, E	23-4-10.1 D, E* ⁺	0	2,220	Native	Native	2,220	Water-bar, mulch, block
23-4-11.0	N/A	23-4-11.0*	0	270	Rock	Rock	0	None
			0	510	Native	Native	510	Water-bar, mulch, block
23-4-11.2	N/A	23-4-11.2*	0	1,060	Rock	Rock	0	None
N/A	23-4-11.5	23-4-11.5* ⁺	0	550	Rock	Rock	0	None
23-4-11.4	N/A	23-4-11.4	0	650	Rock	Rock	0	None
N/A	23-4-2.3	23-4-2.3 ⁺	0	505	Native	Native	505	Water-bar, mulch, block
Spur OYW 2	N/A	23-4-2.3	429	0	Native	Native	429	Water-bar, mulch, block
23-4-11.6	N/A	23-4-11.6*	0	1,870	Rock	Rock	0	None
23-4-11.7	N/A	23-4-11.7	0	800	Native	Native	800	Water-bar, mulch, block
N/A	23-4-13.3	23-4-13.3* ⁺	0	3,000	Native	Native	3,000	Water-bar, mulch, block
N/A	23-4-14.0	23-4-14.0* ⁺	0	650	Native	Native	650	Water-bar, mulch, block
23-4-23.1	N/A	23-4-23.1*	0	8,900	Native	Native	8,900	Water-bar, mulch, block
23-4-24	N/A	23-4-24. 0*	0	6,675	Native	Native	6,675	Water-bar, mulch, block
Spur OYW 3	N/A	Spur 2	350	0	Native	Native	350	Water-bar, mulch, block
Spur OYW 6	N/A	Spur 3	210	0	Native	Native	210	Water-bar, mulch, block
N/A	Spur 4	Spur 4 ⁺	260	0	Native	Native	260	Water-bar, mulch, block
Spur OYW 8	N/A	Spur 6	280	0	Native	Native	280	Water-bar, mulch, block
Spur OYW 9	N/A	Spur 7	290	0	Native	Native	290	Water-bar, mulch, block
Spur OYW 10	N/A	Spur 11	1,940	0	Native	Native	1,940	Water-bar, mulch, block
N/A	Spur 8	Spur 8* ⁺	225	0	Native	Native	225	Water-bar, mulch, block
Spur OYW 11	N/A	Spur 9	170	0	Native	Native	170	Water-bar, mulch, block
Spur OYW 14	Spur 5	Spur 5	700	790	Native	Native	1,490	Water-bar, mulch, block
	Spur 10	Spur 10	735	0	Native	Native	735	Water-bar, mulch, block
N/A	Spur 12	Spur 12* ⁺	0	500	Native	Native	500	Water-bar, mulch, block
TOTAL			5,589	31,850			30,139	

¹Approximately 19,747 feet of existing roads would be maintained for Off Your Walker in addition to the roads and spurs described in the table.

* Roads or Spurs in Riparian Reserve LUA

+ Roads or Spurs not specifically analyzed within the Third Elk Environmental Assessment were analyzed in the Determination of NEPA Adequacy DOI-BLM-OR-R040-2011-003-DNA that tiers to the Third Elk EA (DOI-BLM-OR-R040-2009-0022-EA).

Approximately 31,850 feet of existing road will be renovated (formerly 39,260 feet were proposed in the EA, pg. 10). Renovation includes road work that brings a road back to its original design, and may include clearing and grubbing, brushing, blading of the driving surface, and the placement of additional road rock. Typically, brushing and blading are considered as road maintenance, but when performed under a timbersale contract these same activities are categorized as road renovation.

Approximately 24,550 feet of existing roads and 5,589 of temporary spurs in Off Your Walker will be decommissioned by water-barring, mulching the road surface with logging slash or straw if logging slash is not available, and blocking with trench barriers. The Third Elk EA on page 9 identified 33,080 feet of existing roads and 16,330 feet of temporary spurs to be decommissioned. Less decommissioning is authorized in this decision because there is 7,410 feet less road renovation and 10,741 feet less new road/spur construction needed than what was proposed in the EA. Additionally, portions of roads originally analyzed as native surface roads (EA, pg. 10) are, in fact, rock roads. These pieces of road are approximately 1,120 feet of existing rock road and will not be decommissioned.

3) Silvicultural Prescription Addition:

Small portions of Riparian Reserve or uplands less than one acre or less than 100 feet in width will be treated with the dominant prescription in the immediate area. It is not practical to treat smaller areas differently than the predominant prescription in the immediate area. Even with this type of prescription, the majority of the sale is a mosaic of different prescriptions with 120 or 80 square feet of basal area of retention.

4) Northern Spotted Owls:

Based on clearance surveys completed in 2009 and 2010 following the *Protocol for Surveying Proposed Management Activities that may Impact Northern Spotted Owl* (USFWS, 1992), there are no known spotted owl activity centers (i.e. nest sites) within 65 yards of the Off Your Walker unit boundaries. Therefore, disturbance or disruption to spotted owls would not be expected to occur because nesting owls are not known to be present. There are currently no restrictions for the northern spotted owl in Off Your Walker through March 1, 2013. Beyond this date, harvest activities (e.g. falling, bucking, and yarding of timber) within 65 yards of suitable habitat or spotted owl activity centers (i.e. nest sites) would be seasonally restricted from March 1st through July 15th unless current calendar year surveys indicate: 1) spotted owls not detected, 2) spotted owls present, but not attempting to nest, or 3) spotted owls present, but nesting attempt has failed. Waiver of seasonal restrictions would be valid until March 1st of the following year.

Compliance and Monitoring

Compliance with this decision will be ensured by frequent on-the-ground inspections by the Contracting Officer's Representative. Monitoring will be conducted as per the direction given in Appendix I of the 1995 ROD/RMP.

SECTION 2 – THE DECISION RATIONALE

The Project Design Features described in the Third Elk Commercial Thinning EA (pgs. 5-12) will minimize soil compaction, limit erosion, protect slope stability, protect wildlife habitat, protect fish habitat, protect air and water quality, as well as protect other identified resource values. I have reviewed the resource information contained in the EA and the updated information presented in the Determination of NEPA Adequacy February 14, 2011 and this decision.

Chapter 2 of the EA describes two alternatives: a "No Action" alternative and a "Proposed Action" alternative. The No Action alternative was not selected because it did not meet the following objectives in the Third Elk Commercial Thinning EA (pgs. 2-3):

- Comply with Section 1 of the O&C Act (43 USC § 1181a) which stipulates that O & C Lands be managed "... for permanent forest production, and the timber thereon shall be sold, cut, and

removed in conformity with the principal of sustained yield for the purpose of providing a permanent source of timber supply, protecting watersheds, regulating stream flow, and contributing to the economic stability of local communities and industries, and providing recreational facilities...”

- Select logging systems based on the suitability and economic efficiency of each system for the successful implementation of the silvicultural prescription, for the protection of soil and water quality, and for meeting other land use objectives (1995 ROD/RMP, pg. 61). Also, provide a harvest plan flexible enough to facilitate harvesting within a three year timber sale contract.
- Seek a balance between reducing the risk of wildfire and a fuel profile that supports land allocation objectives (1995 ROD/RMP, pg. 78).
- Within the Riparian Reserves, apply silvicultural treatments to restore large conifers in Riparian Reserves (1995 ROD/RMP, pg. 21) and perform density management to help forest stands develop late-successional characteristics and attain forest conditions that contribute to the Aquatic Conservation Strategy (1995 ROD/RMP, pgs. 153-154).

The implementation of this project will not have significant environmental effects beyond those already identified in the 1994 PRMP/EIS. Off Your Walker Commercial Thinning does not constitute a major federal action having significant effects on the human environment; therefore, an environmental impact statement will not be prepared. This decision is in conformance with the Roseburg District’s 1995 ROD/RMP, as amended. The analysis supporting this decision tiers to the 1994 PRMP/EIS.

Survey & Manage

The Off Your Walker Commercial Thinning project is consistent with Court Orders relating to the Survey and Manage mitigation measure of the Northwest Forest Plan, as incorporated into the Roseburg District’s 1995 ROD/RMP.

On December 17, 2009, the U.S. District Court for the Western District of Washington issued an Order in *Conservation Northwest, et al. v. Rey, et al.*, No. 08-1067 (W.D. Wash.) (Judge Coughenour), granting Plaintiffs’ motion for partial summary judgment and finding a variety of NEPA violations in the BLM and USFS 2007 Record of Decision eliminating the Survey and Manage mitigation measure. Previously, in 2006, the District Court (Judge Pechman) had invalidated the agencies’ 2004 RODs eliminating Survey and Manage due to NEPA violations. Following the District Court’s 2006 ruling, parties to the litigation had entered into a stipulation exempting certain categories of activities from the Survey and Manage standard (hereinafter referred to as “Pechman Exemptions”).

Judge Pechman's Order from October 11, 2006 directs: "Defendants shall not authorize, allow, or permit to continue any logging or other ground-disturbing activities on projects to which the 2004 ROD applied unless such activities are in compliance with the 2001 ROD (as the 2001 ROD was amended or modified as of March 21, 2004), except that this order will not apply to:

- (a) Thinning projects in stands younger than 80 years old (emphasis added);
- (b) Replacing culverts on roads that are in use and part of the road system, and removing culverts if the road is temporary or to be decommissioned;
- (c) Riparian and stream improvement projects where the riparian work is riparian planting, obtaining material for placing in-stream, and road or trail decommissioning; and where the stream improvement work is the placement of large wood, channel and floodplain reconstruction, or removal of channel diversions; and
- (d) The portions of project involving hazardous fuel treatments where prescribed fire is applied. Any portion of a hazardous fuel treatment project involving commercial logging will remain subject to the survey and management requirements except for thinning of stands younger than 80 years old under subparagraph (a) of this paragraph.”

Following the Court's December 17, 2009 ruling, the Pechman exemptions are still in place. Judge Coughenour deferred issuing a remedy in his December 17, 2009 order until further proceedings and did not enjoin the BLM from proceeding with projects. Nevertheless, I have reviewed the Off Your Walker Commercial Thinning project in consideration of both the December 17, 2009 and October 11, 2006 Orders. Because the Off Your Walker project entails no regeneration harvest and entails thinning only in stands 34-57 years old, I have made the determination that this project meets exemption "a" of the Pechman Exemptions (October 11, 2006 Order) and therefore may still proceed to be offered for sale even if the District Court sets aside or otherwise enjoins use of the 2007 *Survey and Manage Record of Decision* since the Pechman Exemptions would remain valid in such case. The first notice for sale will appear in *The News-Review*, Roseburg, Oregon on February 22, 2011.

SECTION 3 – PUBLIC INVOLVEMENT

The BLM solicited comments from affected tribal governments, adjacent landowners, affected State and local government agencies, and the general public on the Third Elk Commercial Thinning EA, which included the Off Your Walker project, during a 30-day public comment period (May 24 – June 23, 2010). Comments were received as a result of the public comment period.

Upon reviewing the comments, the following topics warrant additional clarification specific to the Off Your Walker project: (1) Carbon Storage, (2) Roads, (3) Northern Spotted Owls and (4) Soil Productivity Losses.

1) Carbon Storage

Comments were received regarding the Carbon Storage analysis presented in the EA that questioned: (a) the cause and effect relationship between greenhouse gases and climate change, (b) the individual components that were used to estimate carbon release, sequestration, and net balance over time, and (c) why the action alternative was modeled for 50 years and the No Action Alternative was modeled for 100 years.

- (a) As cited in the EA (pg. 33), Forster, *et al.* 2007 (pgs. 129-234), reviewed scientific information on greenhouse gas emissions and climate change and concluded that human-caused increases in greenhouse gas emissions are extremely likely to have exerted a substantial warming effect on global climate. In addition, the EA further cites a U.S. Geological Survey memorandum (USDI USGS, 2008) to the U.S. Fish and Wildlife Service that 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. Given this uncertainty, the analysis in the EA focused on calculating greenhouse gas emissions and carbon storage, in the context of carbon release and sequestration.
- (b) The methodology used in the calculations to estimate the net carbon balance was described in the Third Elk EA (pgs. 60-64) under *Appendix E: Carbon Storage/Release Analytical Methodology*. As part of the assumptions for the Carbon Storage analysis, it was recognized there is considerable variety available in the scientific literature regarding the quantitative measures and additional factors that may be used in calculating carbon storage that can influence the outcome of this analysis (EA, pg. 60). However, the methodology described in Appendix E provides a consistent means to compare the relative effects of the alternatives considered in the Third Elk Commercial Thinning EA and not necessarily the absolute amount of carbon that would be stored or released under the alternatives. The sources of

carbon release and/or sequestration that were considered and presented for the Third Elk Carbon Storage analysis are explicitly detailed in Appendix E.

- (c) Lastly, both the No Action and Proposed Action Alternatives from the Third Elk Commercial Thinning EA had Carbon storage modeled out to 100 years. However, the last row, which had the estimates for +100 years, was erroneously omitted from Table 11 (Carbon Storage in Third Elk Commercial Thinning under the Proposed Action Alternative) on page 36 of the EA. The complete Table 11 is presented below (Table 3). Regardless of the omission of Table 11 in the EA, the analysis of Carbon storage included a discussion of the effects of the proposed action alternative out to 100 years (pgs. 35-36); e.g. Third Elk combined would, on average, sequester 2,069 tonnes of carbon per year from the atmosphere under the Proposed Action Alternative over the 100 years following harvest. The net carbon balance would more than double from 117,124 tonnes currently to 305,740 tonnes in 100 years after harvest (EA, pg. 36).

Table 3. (Complete Table 11 from the EA, pg. 36) Carbon Storage in Third Elk Commercial Thinning under the Proposed Action Alternative.

Time Step	Carbon Storage						
	Standing, Live Trees (tonnes)	Other Than Live Trees (tonnes)	Logging Slash (tonnes)	Wood Products (tonnes)	Fossil Fuels (tonnes)	Slash Burning (tonnes)	Net Carbon Balance (tonnes)
Current Condition	67,422	49,702	0	0	0	0	117,124
Harvest Time (0 years)	33,925	49,702	14,485	16,433	-256	-269	114,021
+10 years	54,036	49,702	12,113	15,074	0	0	130,925
+20 years	75,032	49,702	10,321	14,405	0	0	149,460
+50 years	139,090	62,357	6,383	13,304	0	0	221,134
+100 years	223,473	67,024	2,872	12,371	0	0	305,740

2) Roads

Comments were received that questioned the need for the amount of new road/spur construction as proposed in the EA and inquired about the permanence of “temporary” roads. Additionally, comments expressed concern that these “temporary” roads would be used by off-highway vehicles (OHVs).

As stated in the *Updated Information* previously, there will be no new, permanent roads constructed in Off Your Walker. Off Your Walker will have 5,589 feet of temporary spur roads constructed, while in the EA (pg. 9) 16,330 feet of temporary road construction was proposed and analyzed. Spurs and roads identified as “new construction” in this Decision (i.e. Spurs 2 through Spur 12; Table 2) will be decommissioned by water-barring, mulching with logging slash (or with straw if logging slash is not available), and blocking with trench barriers (EA, pgs. 8-9, 23, 26). In addition, the 23-4-2.3, 23-4-11.7, 23-4-13.3, 23-4-14.0, 23-4-23.1, and 23-4-24.0 roads will be decommissioned in the manner stated above.

Based on 1995 ROD/RMP guidance (pg. 133), temporary roads (i.e. those not needed for continued resource management) would be “put to bed” using methods, such as blocking, ripping, seeding, mulching, fertilizing, and water-barring. These methods are examples of tools used to undertake “putting a road to bed” but the ROD/RMP does not require using all of these methods to accomplish this. The roads and spurs that will be built as temporary construction in Off Your Walker Commercial Thinning will be put to bed using such methods (as described previously).

Concerns were expressed about the extent of new road proposed in Riparian Reserves on Off Your Walker. Approximately 2,758 feet (more than a half mile) of new road construction in Riparian Reserves was proposed and analyzed in the Third Elk EA for Off Your Walker Commercial Thinning and approximately 19,130 feet were proposed to be renovated. However, under this Decision approximately 1,307 feet (about a quarter mile) of road will be constructed in Riparian Reserves and approximately 16,650 feet will be renovated. Renovation will include brushing, blading of the driving surface, and potentially the placement of additional road rock. Typically, brushing and blading are considered as road maintenance but when performed under a timbersale contract these same activities are categorized as road renovation. The road construction in Riparian Reserve on Spur 2 was analyzed in the EA except for 20 feet at the end of the spur. The additional 20 feet allows the road and stream crossing to occur in a lesser impacting location by straightening the spur to directly access Unit 1. The stream crossing is one of five crossings analyzed in the EA (pgs. 26-27). The crossings analyzed for EA Spur OYW 4 (Off Your Walker DNA, pg. 2), Spur OYW 13, and Spur OYW 14 were dropped from Off Your Walker because they were no longer needed to access the units. The road construction in Riparian Reserve on Spur 8 is necessary to access the steeper ground above the existing road to the west. The RMP states [f]or each existing or planned road, meet ACS by . . . “[m]inimizing road and landing locations” (RMP, pg. 73) in Riparian Reserves.

Approximately 30,139 feet of roads and spurs will be decommissioned and closed to motorized traffic including OHV upon completion of the Off Your Walker Commercial Thinning. Water-barring, mulching the road surface with logging slash and/or blocking with trench barriers is expected to discourage potential OHV traffic from using temporary roads that have been “put to bed.”

This decision does not permit or authorize the additional use of trails or temporary roads by OHVs. Use of OHVs outside of existing roads and trails is not permitted and is subject to citation by law enforcement. In addition, the Off Your Walker project will be monitored based on 1995 ROD/RMP guidance and law enforcement will continue to investigate reports of illegal activities as they have done historically. Monitoring will be ensured by on-the-ground inspections by the Contracting Officer’s Representative. Monitoring will be conducted as per the direction given in Appendix I of the 1995 ROD/RMP. From January 2009 through November 2010, BLM rangers and Douglas County law enforcement officers contracted by the BLM issued 22 citations, 233 warnings, and made 10 arrests in connection with OHV-related infractions (pers. comm., J. Szympruch, BLM District Ranger, 2010). Law enforcement officers will continue to patrol popular OHV use areas as they have done historically and citations, warnings, and arrests are expected to continue at approximately these historical rates.

3) Northern Spotted Owls

Comments were received that the EA does not explain the potential negative effect of logging on the quality of spotted owl dispersal habitat, snags, and coarse woody debris.

As stated in the EA (pg. 18), though the quality of dispersal-only habitat within the proposed units may be temporarily reduced by commercial thinning, the capability of the habitat to function for dispersing spotted owls would be maintained. Vertical and horizontal cover would be reduced within the proposed units through the reduction in canopy cover with varying levels of residual tree density. These stands are expected to continue functioning as dispersal habitat because post-treatment canopy closure would be maintained between 46 and 80 percent and the quadratic mean diameter would be approximately 13.2-16.2 inches for Off Your Walker (Table 5 in the EA, pg. 15). Canopy closure exceeding 40 percent and an average tree diameter exceeding

11 inches are figures widely used as minimum criteria describing functioning dispersal habitat (Thomas, *et al.* 1990).

The EA states (pgs. 5-6) conifer and hardwood snags would be reserved from cutting unless they are a safety concern. Snags felled for safety reasons in the Riparian Reserve would be retained on site as coarse woody debris. Existing coarse woody debris in decay classes 3, 4, and 5 would be retained in the GFMA, which Off Your Walker is in, and all coarse woody debris would be retained in the Riparian Reserve.

The residual stands following harvest will provide a pool of candidate trees for future snag and coarse woody debris recruitment. Additional coarse woody debris and snags would be created incidentally through the harvest operations (e.g. damage leading to broken-out tops or individual tree mortality) or through weather damage (e.g. wind and snow break).

As stated in the EA (pgs. 15-16), though it is expected fewer snags would develop over time when compared to the No Action Alternative, the snags (and subsequently coarse woody debris) developed post treatment are expected to be larger snags with more resiliency and limb structure (Reukema, 1987) than snags that develop under a more competitive stand condition (Nietro, 1985). Spotted owls and their prey base (flying squirrels and other small mammals) benefit more from larger snags and coarse woody debris (Thomas, *et al.* 1990). A large number of small snags and small woody debris would not be as beneficial as large snags and large woody debris. Continued suppression would also lead to a reduction in the hardwood and shrub components, which would further simplify the vegetative composition of the stands. Thinning would result in increased diameter growth, improved stem and root strength, cessation of crown recession, release of understory vegetation and increased potential for new tree and shrub understory regeneration (Bailey 1996; Bailey and Tappeiner 1998; Bailey, *et al.* 1998; Oliver and Larson 1996). Also, reducing the canopy closure would allow sunlight to reach the forest floor to encourage establishment and/or further development of an understory and vertical stratification of canopy layers (Hayes, *et al.* 1997).

4) Soil Productivity Losses

Comments were received concerning soil productivity losses of “acceptable levels” in Riparian Reserves, fragile soils, and wet areas as related to road building and ACS.

This comment refers to the wet area that was identified in the EA (pg. 23) within proposed Unit 13A (now Unit 4) and proposed Spur OYW 14 (now Spurs 5 and 10). During project refinement of Off Your Walker, this wet area was excluded because of a combination of riparian buffers and low timber volume. The design of proposed Spur OYW 14 was altered from a single spur to two spurs (i.e. Spur 5 and Spur 10) to avoid the identified wet area.

The remaining comments did not raise substantive issues that would influence my selection of the Action Alternative for the Off Your Walker portion of the Third Elk Commercial Thinning EA, as updated above.

SECTION 4 – PROTEST PROCEDURES

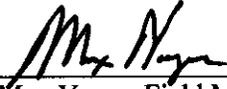
The decision described in this document is a forest management decision and is subject to protest by the public. In accordance with Forest Management Regulations at 43 CFR Subpart 5003 Administrative Remedies, protests of this decision may be filed with the authorized officer (Max Yager) within 15 days of the first publication date of the notice of decision notice/timber sale advertisement in *The News-Review*, Roseburg, Oregon on February 22, 2011.

43 CFR § 5003.3 subsection (b) states: "Protests shall be filed with the authorized officer and shall contain a written statement of reasons for protesting the decision." This precludes the acceptance of electronic mail (email) or facsimile (fax) protests. Only written and signed hard copies of protests that are delivered to the Roseburg District office will be accepted. The protest must clearly and concisely state which portion or element of the decision is being protested and the reasons why the decision is believed to be in error.

43 CFR § 5003.3 subsection (c) states: "Protests received more than 15 days after the publication of the notice of decision or 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 project decision to be implemented in light of the statement of reasons for the protest and other pertinent information available to him. The authorized officer shall, at the conclusion of the review, serve the protest decision in writing to the protesting party(ies). Upon denial of a protest, the authorized officer may proceed with the implementation of the decision as permitted by regulations at 5003.3(f).

If no protest is received by the close of business (4:30 P.M.; Pacific Time Zone) within 15 days after first publication of the decision notice on February 22, 2011, this decision will become final. If a timely protest is received, the project decision will be reconsidered in light of the statement of reasons for the protest and other pertinent information available, and the Swiftwater Field Office will issue a protest decision.

For further information, contact Max Yager, Field Manager, Swiftwater Field Office, Roseburg District, Bureau of Land Management, 777 NW Garden Valley Blvd; Roseburg, OR. 97471, (541) 440-4930.

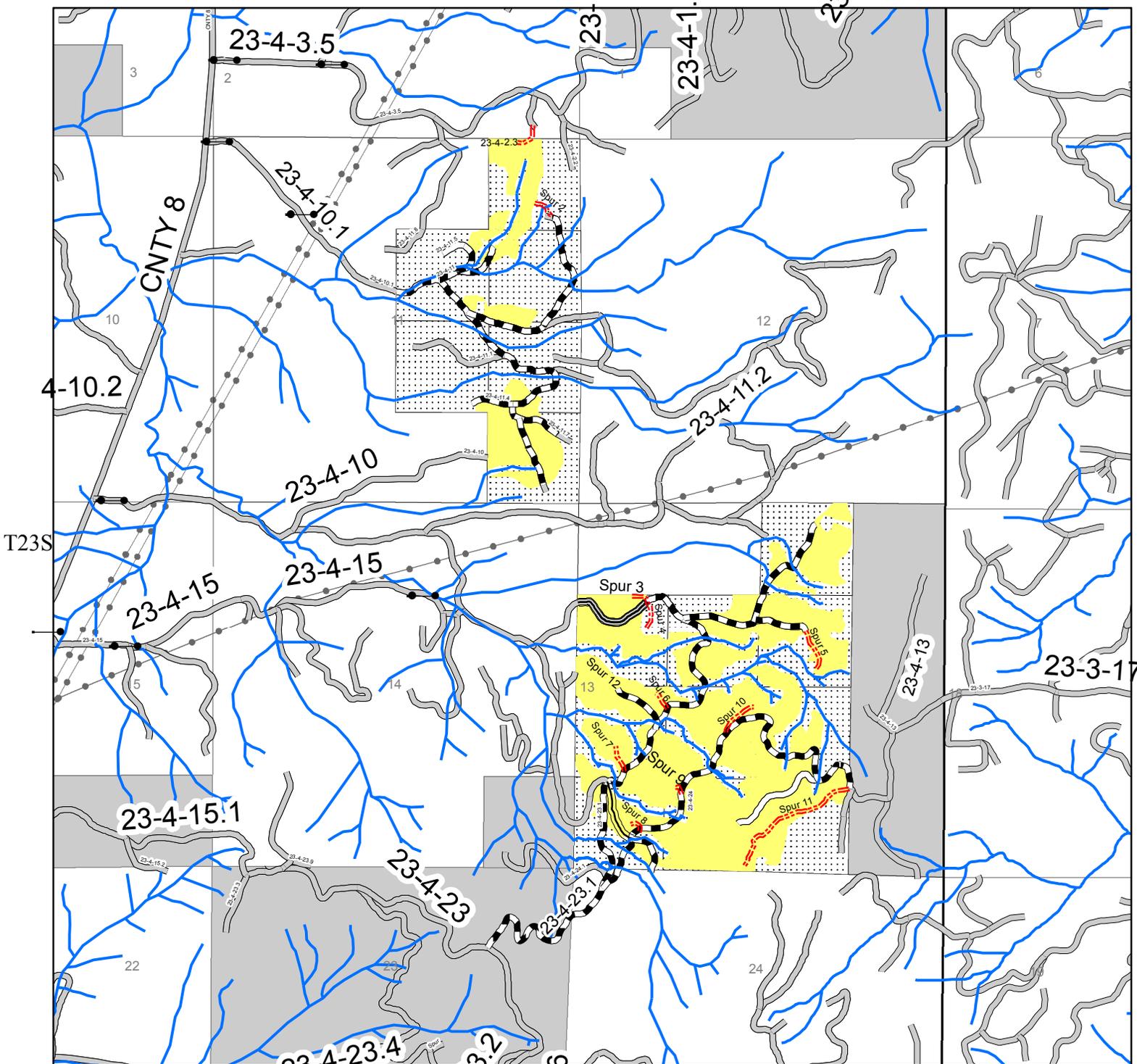


Max Yager, Field Manager
Swiftwater Field Office

2-16-2011
Date

Off Your Walker Vicinity Map

R4W



0 1,000 2,000 3,000 4,000 Feet

1:24,000



Legend

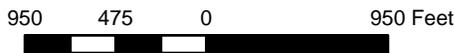
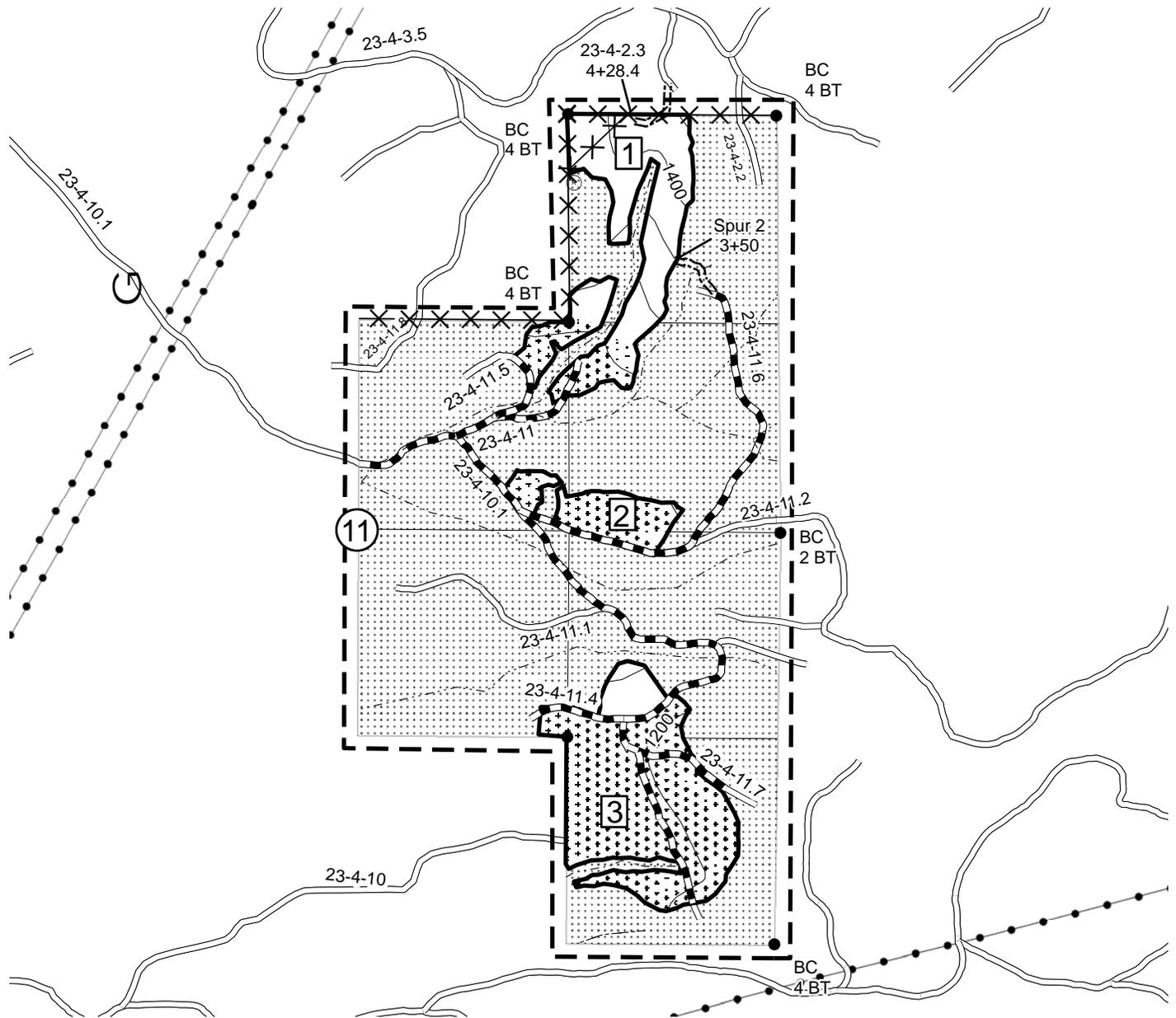
- Units
- Existing Roads
- Spurs
- Renovate
- Undrivable
- Gate
- Streams
- Township/Range
- Section
- BLM Administered Land
- Transmission Line



No warranty is made by the Bureau of Land Management as to the accuracy, reliability or completeness of these data for individual or aggregate use with other data. Original data were compiled from various sources. This information may not meet National Map Accuracy standards. This product was developed through digital means and may be updated without notification.

Roseburg District
Bureau Of Land Management
777 Garden Valley Blvd.
Roseburg, Oregon 97470

District	Township	Range	Section	Meridian
ROSEBURG	23S	4W	11	WILLAMETTE
Off Your Walker CT				

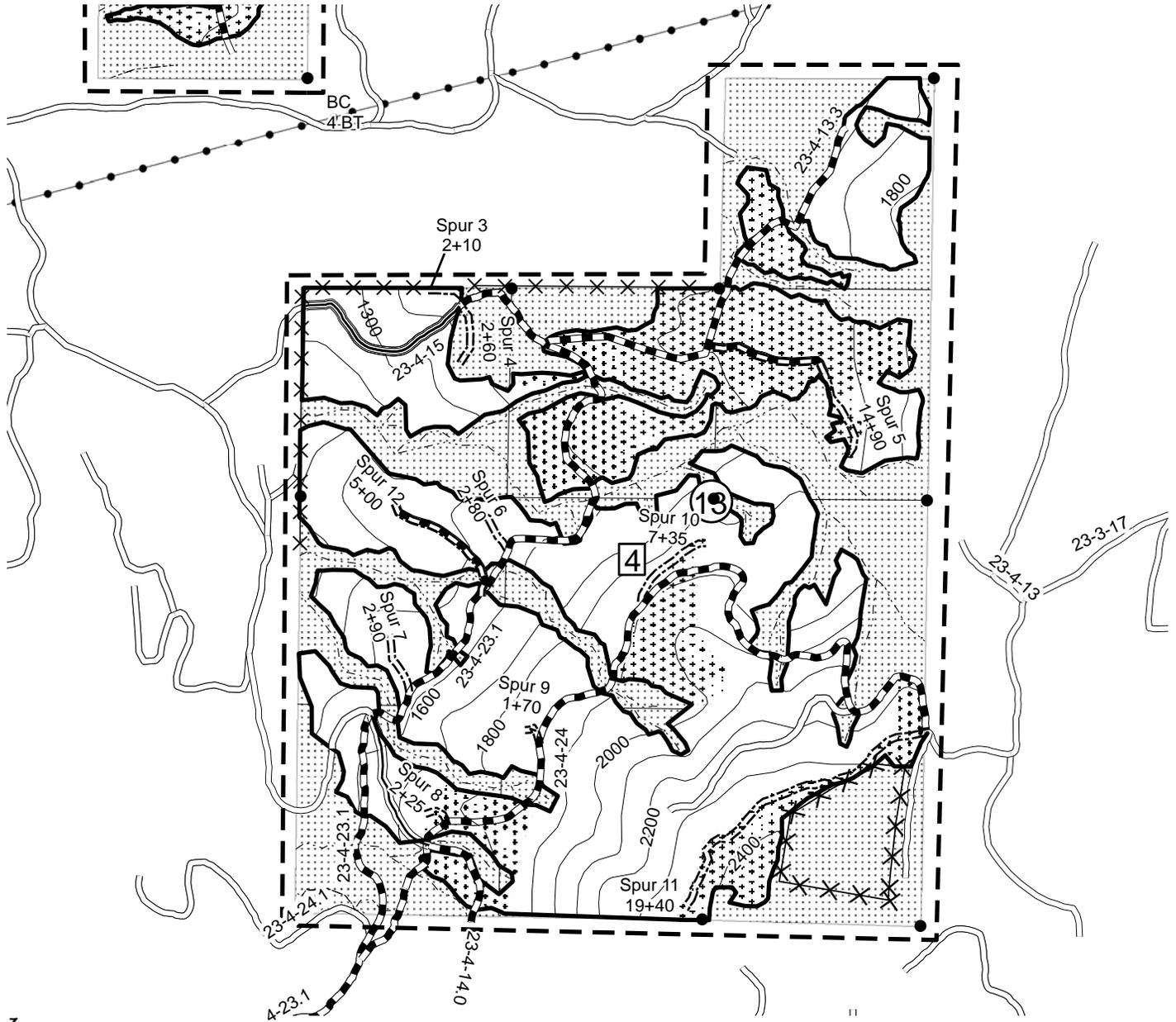


Scale 1" = 1000 Ft

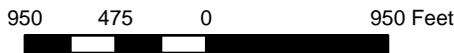


- | | | | |
|---|-------------------------------------|--|------------------------|
|  | Harvest Area - Ground Based Yarding |  | Existing Road |
|  | Harvest Area - Cable Yarding |  | Road to be Renovated |
|  | Reserve Area |  | Spur To Be Constructed |
|  | Boundary of Cutting Area |  | Transmission Line |
|  | Boundary of Contract Area |  | Fence |
|  | Found Corner |  | Stream |
| | |  | Gate |

District	Township	Range	Section	Meridian	
ROSEBURG	23S	4W	13	WILLAMETTE	Off Your Walker CT



7



Scale 1" = 1000 Ft



- | | | | |
|---|-------------------------------------|---|------------------------|
|  | Harvest Area - Ground Based Yarding |  | Existing Road |
|  | Harvest Area - Cable Yarding |  | Road to be Renovated |
|  | Reserve Area |  | Spur To Be Constructed |
|  | Boundary of Cutting Area |  | Transmission Line |
|  | Boundary of Contract Area |  | Fence |
|  | Found Corner |  | Stream |
| | |  | Gate |