

**Olalla-Camas Regeneration Harvest Plan
Environmental Assessment**
DOI-BLM-OR-R050-2014-0006-EA
South River Field Office, Roseburg District

“Draft” Finding of No Significant Impact

Overview

The Olalla-Camas Regeneration 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 environmental assessment analyzed two alternatives, No Action (Alternative One), and the Proposed Action (Alternative Two). Alternative Two would conduct regeneration harvest, as provided for in the 1995 ROD/RMP, on 867 acres of 60 to 90 year old stands that were previously thinned. The project would be solely implemented on lands allocated to the General Forest Management Area, and would not involve any entry into Riparian Reserves for the purpose of timber management or road construction.

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 located within the Upper Middle Fork Coquille Watershed Analysis Unit and portions of the East Fork Coquille, Olalla Creek-Lookingglass Creek and Clarks Branch-South Umpqua fifth-field watersheds, which collectively drain an area of approximately 315,500 acres. Portions of the lands in the project watersheds managed by the South River Field Office total approximately 55,130 acres (EA, p. 1), representing approximately 17.5 percent of the land base.

The 867 acres proposed for harvest represent slightly less than 1.6 percent of the lands in the project watersheds administered by the South River Field Office and less than 0.3 percent of all lands in the project watersheds, and as such 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)*

The proposed regeneration harvest could have potentially beneficial and adverse impacts, but these would not be significant as they would be consistent with the range and scope of effects associated with timber management that were described and analyzed in the 1994 Roseburg PRMP/EIS (Chapter 4), to which the EA is tiered.

The proposed regeneration harvest would provide timber for manufacturing, which in turn would provide local employment, wages to timber workers and employees in associated industries, and generate revenues for local, state and federal governments.

As described in the EA (p. 25), representation in forest age-classes 0 to 10 and 10 to 20 year age classes is almost non-existent on BLM-administered lands in the project watersheds. The proposed regeneration harvest would help develop a more desirable age-class distribution within the General Forest Management Area as described in the PRMP/EIS (Chapter 4-26 & 27), and consistent with management direction from the ROD/RMP (pp. 61 and 151), by converting 867 acres of 60 to 90 year old stands to age class 0 to 10, representing approximately 1.6 percent of the land base managed by the BLM in the project watersheds.

Grand fir is present at levels approaching 50 percent in most of the proposed harvest units, particularly in the Upper Middle Fork Coquille watershed analysis unit. This is in contrast with historical conditions where its representation was less than ten percent (EA, p. 22). Post-harvest, planting with a mixture of 75 percent Douglas-fir and 25 percent cedars and pines would increase species diversity within the stands and result in more adaptive stand conditions in response to drought, fire, etc. (EA, p. 27)

The proposed action could have both adverse and beneficial effects on species that are prey for the northern spotted owl. It would displace prey species such as flying squirrels and red tree voles that favor closed canopy forest conditions. However, populations of prey species such as woodrats and brush rabbits are expected to increase in numbers post-harvest due to development of open early-seral conditions. This could boost local prey availability if the increasing numbers of these small mammals move into adjacent forest edges and interior forest stands where they become available for capture (EA, p. 45).

The proposed action could directly affect some individual land bird species by removing conifer-dominated forest stands that may be used for nesting and foraging. The resulting creation of open early-successional habitat patches would also be favorable to other land bird species (Hagar and Friesen 2009). At the scale of the Northern Pacific Forests Bird Conservation Region, this proposed action would have no discernable effects on populations that are associated with mid-seral/mature forest habitat because mid-seral forest habitat is currently abundant on BLM lands in the vicinity, and the species of landbirds most closely associated with mid-seral forest (e.g. hermit warbler, winter wren, Wilson's warbler) are widely distributed in the Oregon Coast Range, and among the most common species in Pacific Northwest forests (EA, p. 47).

Potential adverse effects to species listed under the Endangered Species Act, and critical habitat designated for their survival and recovery are addressed below at 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. 74), the Olalla-Camas analysis area is located within Douglas County, Oregon. Douglas County completed fourteen Community Wildfire Protection Plans beginning in September 2004. Within the analysis area, Camas Valley/Tenmile, Upper Olalla, and Willis Creek have been identified as "Communities at Risk.". Land within a one-mile buffer of local fire district boundaries was identified for CWPP treatment areas. The BLM does not manage any land within the buffers of the Upper Olalla and Willis Creek CWPPs, but several proposed harvest units fall within the one-mile buffer of the Camas Valley/Tenmile CWPP.

Under Alternative Two – the Proposed Action, fuels treatments would be applied in strategic locations. Roads that see high levels of public use, BLM-administered lands adjacent to private properties, and yarding residues at landings would be targeted to reduce the volume of activity fuels. Fuels treatments such as hand and machine piling, lopping and scattering, slash pullback, and jackpot (spot) burning would break up the horizontal continuity. Decreasing activity fuels in strategic locations such as along roads and property lines would reduce the potential for human-caused ignitions and provide areas with lower fire intensity, rates of spread and flame lengths where fire can be successfully controlled by initial attack resources. (EA, p. 78).

There would be no cumulative effects to air resources, as the direct and indirect effects from the projects would be local and of short duration. No other effects to air quality in the project areas would be anticipated. Based on past experience with jackpot (spot) burning, and pile burning within this habitat type and adherence to smoke management plans, there are no expected cumulative effects on air quality from the planned fuels treatments.

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 discussed in the EA (p. 18), the project area does not contain any Areas of Critical Environmental Concern, prime or unique farmlands, parklands, wilderness, or Wild and scenic Rivers, either designated or proposed. Any wetlands that may be present would receive protection by establishment of Riparian Reserves, at a minimum, or by exclusion from the proposed action. No ecologically critical areas exist in proximity to any proposed harvest units.

The proposed action would not have an effect on any **cultural or historical resources**.

As described in the EA (pp. 18-19), cultural surveys have been completed for all of the proposed harvest units and any proposed road construction. Surveys completed in the winter of 2015 recorded two additional sites in the vicinity of the proposed project area. One consists of two rock engravings of dubious age first identified in 1997. The engravings are on a rock face above an existing road and would not be affected. The second is a site that was altered by initial road construction and previous harvest. The site will be further evaluated to determine its eligibility for listing on the National Register of Historic Places. If eligible, it would be avoided; if not eligible, it would not be managed for conservation. In this way, no historic properties would be impacted, and the BLM will meet its Section 106 responsibilities under the guidance of the 2012 National Programmatic Agreement and 2015 State Protocol.

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 documented in 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 through informal scoping and will be given a 30-day opportunity to review and comment on the EA.

A notice of project initiation was published on June 10, 2014 in the Roseburg District Quarterly Planning Update (Summer 2014), 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. 3)

Letters were sent to the Cow Creek Band of Umpqua Indians, the Coquille Indian Tribe, the Confederated Tribes of the Siletz, and the Confederated Tribes of Grand Ronde at the time of project initiation requesting identification of any special interests or legal rights in the lands in question. No responses were received. (EA, p. 3)

Timely informal scoping comments were received from one organization in July of 2014 and were addressed as warranted in the analysis. (EA, pp. 3 and 4) None of the comments identified any aspects of the proposed action that were highly controversial, in a scientific sense. Two other sets of comments were received in December and March 2015. These comments were not considered to have been filed in a timely manner. They were evaluated, however, and provided no information that would help to form the alternatives, or which was within the scope of the EA to consider and propose. (EA, p. 3)

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)*

The proposed project is not unique as the BLM has been conducting timber management in the area for more than 50 years. When professional experience is paired with the substantial body of literature on the subject, there is little uncertainty regarding the effects. The affected environment for each resource and the effects of the alternatives on those resources are fully analyzed in Chapter Three (EA, pp. 21-82).

Climate change and greenhouse gas emissions have been identified as an emerging concern. Secretarial Order No. 3226 (January 16, 2009) directs all Departments to “consider and analyze potential climate change impacts when undertaking long-range planning exercises.” (EA, p. 79)

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. (EA, p. 79)

The proposed action would result in the direct release of carbon. The amounts of carbon release would be undetectable, though, at only 0.0004 percent of annual U.S. emissions and 0.0001 percent of annual global emissions (EA, p. 81).

Based on modeling, the proposed action would result in the direct release of approximately 5,570 tonnes of carbon (EA, p. 81). A carbon-neutral condition, the resequstration of carbon directly released by the proposed action, would occur in approximately seven years (EA, p. 81). At 50 years, post-harvest, carbon storage would increase by approximately 45,670 tonnes over the present condition (EA, Table 3.18, p. 82).

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 was 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 their own 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 (pp. 18-19); Recreation and Off-Highway Vehicle Use (EA, p. 19); Visual Resources (EA, p. 19); Timber Resources (pp. 21-29); Wildlife (pp. 30-46); Botany (EA, pp. 47-49); Noxious Weeds and Non-Native Invasive Plants (pp. 49-51); Fish, Aquatic Habitat and Water Resources (pp. 51-69), Soils (pp. 69-73); Fuels Management (pp. 73-78); and Carbon Storage and Sequestration (pp. 79-82).

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 surveys have been completed for all of the proposed harvest units and any proposed road construction. Surveys completed in the winter of 2015 recorded two additional sites in the vicinity of the proposed project area. One consists of two rock engravings of dubious age first identified in 1997. The engravings are on a rock face above an existing road and would not be affected. The second is a site that was altered by initial road construction and previous harvest. The site will be further evaluated to determine its eligibility for listing on the National Register of Historic Places. If eligible, it would be avoided; if not eligible, it would not be managed for conservation. In this way, no historic properties would be impacted, and the BLM will meet its Section 106 responsibilities under the guidance of the 2012 National Programmatic Agreement and 2015 State Protocol.

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)*

The proposed harvest action would remove approximately 870 acres of conifer dominated stands, which predominantly function as dispersal habitat for northern spotted owls. The nine northern spotted owl sites affected by the proposed action would experience only minor reductions in the percentage of available dispersal habitat, primarily occurring at the periphery of those home ranges. No suitable habitat would be removed, and because the stands proposed for harvest are less than 100 years old and were previously thinned, resident northern spotted owls are less likely to rely on them compared to the older forest habitats. Minor reductions in dispersal habitat outside of core areas would not be expected to affect the viability of the home ranges of resident northern spotted owls. (EA, p. 43)

Harvest would result in the loss of dispersal habitat within the core area of three northern spotted owl sites which are currently habitat-limited with less than 50 percent suitable habitat in the core areas. Harvest would also remove approximately one acre of dispersal habitat within a nest patch (EA, p. 43). While dispersal habitat is less essential to site viability than suitable habitat, it can provide important connectivity between patches of suitable habitat, and foraging opportunities that can support occupancy and reproduction. Harvest actions that result in greater fragmentation of a home range and core area would further isolate existing suitable habitat patches and thereby reduce survival and reproduction due to increased energetic costs from increasing home range size, and increase the likelihood of interference competition with barred owls (EA, p. 44).

It is expected that barred owls would continue to occupy some historic northern spotted owl home ranges. Given the ability of the barred owl to out-compete the northern spotted owl for habitat and prey, and the greater fecundity of the barred owl, it is expected that barred owls would come to occupy additional territories in the vicinity of the proposed units, such that competitive interactions with northern spotted owls would continue and displacement of additional northern spotted owls is likely. For northern spotted owl sites where harvest units would reduce dispersal habitat within a core area or nest patch, the probability of loss of resident northern spotted owls is increased if barred owls are also present within the core area (EA, p. 45)

While consultation with the U.S. Fish and Wildlife Service has yet to be completed, the BLM anticipates that the proposed harvest would likely have an adverse effect on the northern spotted owl and would likely result in some level of incidental take.

Removal of 646 acres of dispersal habitat within Critical Habitat subunit KLW-1 would represent less than one percent of the portion of the subunit within the Roseburg District. Proposed harvest units are scattered within a localized area that includes 6,375 acres of BLM-administered lands in close proximity (i.e., BLM parcels within affected sections and adjoining sections). Currently 89 percent (5,650 acres) of the BLM-administered lands in this localized area provide dispersal quality or better habitat for northern spotted owls (i.e. mid-seral conifer-dominated stands >40 years old). The proposed harvest would not impair the overall intended function of the subunit because the localized area would still retain 78 percent dispersal habitat conditions post-harvest, and would continue to support for dispersal and connectivity between subunits.

While consultation with the U.S. Fish and Wildlife Service has yet to be completed, the BLM anticipates that the proposed harvest would likely have an adverse effect on Critical Habitat subunit KLW-1, but that this would not rise to the level of destruction or adverse modification.

No effects to **marbled murrelets** or critical habitat for marbled murrelets are expected. No suitable nesting habitat would be modified by the proposed timber harvest, and no Critical Habitat overlaps the proposed harvest units. No currently known marbled murrelet sites would be affected, and if any pre-disturbance surveys were to detect occupancy behavior within or adjacent to the proposed harvest units, then any occupied habitat would be reserved from harvest, and restrictions on the timing of harvest actions adjacent to newly established occupied habitat would ensure that there would be no effects to marbled murrelets. (EA, p. 45)

As discussed in the EA (p. 35), the U.S. Fish and Wildlife Service issued a proposal to list the West Coast distinct population segment (DPS) of the **fisher** as a threatened species under the Endangered Species Act on October 7, 2014 (Federal Register 79:60419-60443). At this time, the designation of critical habitat is “not determinable” for the West coast DPS of the fisher.

The proposed project area lies within the coastal Oregon sub-region of the proposed DPS, outside of the areas with known populations of fishers. Over the past 20 years, no high reliability fisher detections have occurred in the coastal Oregon sub-region of the DPS (north of the Rogue River and west of Interstate 5), leading the Service to conclude that fishers are likely extirpated from this sub-region (USDI/FWS 2014a, USDI/FWS 2014b).

This project would not be expected to affect the fisher because it is likely extirpated from the project area, and the proposed harvest units generally lack suitable habitat structure because of stand ages and the fact that the stands were previously thinned and possess minimal numbers of snags and down logs.

Two populations of the Federally-threatened **Kincaid's lupine** (*Lupinus oregonus* var. *kincaidii*) known to occur in the Olalla Creek-Lookingglass Creek watershed, but no road construction or timber harvest are proposed in the subwatersheds in which they are located. (EA, p. 47)

In the Middle Fork Coquille River, upstream migration by **Oregon Coast coho salmon** is blocked by Bradford Falls, near the mouth of Bear Creek, approximately two miles downstream from the nearest proposed harvest unit. In the East Fork Coquille River, upstream migration of Oregon Coast coho salmon is blocked at Brewster Canyon, more than 15 miles downstream of the project area (EA, p. 51). Given these facts and that full Riparian Reserves would be established on all streams within or adjacent to proposed harvest units (EA, pp. 10 and 61), and that these Riparian reserves would not be entered for timber management, 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 from timber harvest would be expected in these areas.

There is a single crossing over occupied reaches of the Middle Fork Coquille River on the Slater Creek Road, but implementation measures such as regarding of bridge approaches, ditching out road surface and ditchline flow onto undisturbed slopes, and installation of wattles over bridge scuppers would reduce potential sedimentation to negligible levels not discernible from background sediment levels (EA, p. 65).

In the Olalla Creek-Lookingglass Creek and Clarks Branch-South Umpqua watersheds, OC coho salmon are present in Olalla Creek and Rice Creek, respectively. As noted above, full Riparian Reserves, in which no timber management would occur, would be established on all streams within or adjacent to proposed harvest units (EA, pp. 10 and 61), 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 from timber harvest would be expected in these areas.

Timber haul for the two units in the Olalla Creek-Lookingglass Creek watershed would be seasonally restricted because of harvest method. No effects to fish or water quality would be expected, because absent substantial precipitation during the dry season there would be no mechanism for moving fine sediment from road surfaces into ditch lines and potentially into nearby stream channels. In the event that substantial precipitation were to occur during the dry season, timber hauling would be suspended until such time as the road systems are again dry enough to support haul without contributing sediment to nearby stream channels.

Along the lower reaches of Rice Creek, OC coho salmon are present adjacent to the proposed haul route, which crosses Rice Creek at several locations. The road surface is shaped such that the majority of surface run-off is directed to ditchlines along the road opposite to the stream location. This runoff is then ditched off into forested areas such that the potential input of sediment into Rice Creek is small and localized (EA, p. 66).

In order to further reduce potential of road runoff, the following project design features would be used (EA, p. 63):

- Active haul would be suspended during or prior to forecasts of substantial rain or if the haul route becomes adversely impacted;
- Straw bales, Terra tubes or similar sediment trapping devices would be placed in ditches above flowing streams if the ditch is observed carrying sediment-laden water;
- District fisheries and hydrology staff would monitor and inspect the haul route during use and make additional recommendations for sediment reduction.

While consultation with the National Marine Fisheries Service has not been completed, the BLM anticipates that the proposed harvest in Rice Creek would not likely have an adverse effect 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.

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. 19). 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. 18).

As discussed in the EA (pp. 18 and 50), 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 (EA, pp. 50-51). 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.

Steven D. Lydick
Field Manager
South River Field Office

Date