

**Roseburg District Secretarial Demonstration Pilot Project
Environmental Assessment**

DOI-BLM-OR-R050-2011-0006-EA
South River Field Office, Roseburg District

“Draft” Finding of No Significant Impact

Overview

The Roseburg District Secretarial Pilot Project 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). Project design also included principles of ecological forestry developed by Drs. Jerry F. Franklin and K. Norman Johnson (*Applying Restoration Principles on the BLM O&C Forests in Southwest Oregon 2010*), and technical assistance from the U.S. Fish and Wildlife Service regarding the Northern Spotted Owl Recovery Plan.

The preferred alternative, Alternative Two, Sub-Alternative B would treat approximately 438 acres of forest stands, divided among eleven units. The proposed units are located in Section 17, T. 28 S., R. 3 W., Willamette Meridian (W.M.); Sections 23 and 25, T. 28 S., R. 3 W., W.M.; and Sections 31 and 32, T. 28 S., R. 2, W., W.M.

The project would apply variable retention harvest with dispersed retention on approximately 285 acres, retention of approximately 132 acres of aggregates representative of pre-harvest stand conditions, and variable density thinning on 21 acres of Riparian Reserves In Section 17, T. 28 S., R. 3 W., W.M.

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 within the Myrtle Creek, Little River, and Middle South Umpqua/Dumont Creek watershed analysis units. Total forested lands under Federal ownership in the watersheds are approximately 211,000 acres (EA, Table 3-2, p. 35), of which approximately 56,700 acres are under BLM administration (EA, Table 3-3, p. 35).

As the 438 acres proposed for treatment would only affect 0.2 percent of all Federal forests in the watersheds, and only 0.77 percent of forested lands under BLM administration in the watersheds, it does not bear any regional, statewide, national or international importance.

Intensity

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

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

The preferred alternative could have both 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.

Variable retention harvest would create approximately 285 acres of complex early-seral habitat, less than 20 years old, that is generally lacking on the Federal landscape in the project watersheds (EA, p. 35, Table 3-3; and pp. 43-47). This would, in turn support a wide array of bird species, large mammals, butterflies and moths, and small mammals dependent on this successional stage of forest development (EA, pp. 82, and 84-88).

Variable density thinning in Riparian Reserves in Section 17, T. 28 S., R. 3 W., W.M. would increase cover and plant diversity to levels exceeding pre-treatment conditions until canopy recloses (EA, p. 49). Numerous species of land birds would benefit from the establishment of diverse understory conditions (EA, pp. 90 and 91), as would many early-seral obligates (EA, p. 92).

Variable density thinning would also benefit the aquatic system. 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. 123).

The preferred alternative would also have beneficial economic effects by providing logging jobs, timber for manufacturing into needed wood products, generating revenues in support of county governments, and returning monies to the U.S. Treasury to defray, in part, the cost of management of the Federal lands (EA, p. 48).

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 preferred alternative is a timber management action that would not affect public health or safety as it would occur in an area of largely contiguous Federal forest lands, interspersed with industrial forest lands.

As described (EA, p. 140), portions of the project area located in the Myrtle Creek and Middle South Umpqua River/Dumont Creek are in the Wildland Urban Interface. The

area is located in Historical Fire Regime III where fire behavior can vary from severe crown fire to very light surface fire.

The area is currently Fire Regime Condition Class 3 representing a 50 percent departure from modeled reference conditions, indicating a greater risk for severe, stand replacing fire. Roadside activity fuels would be piled and burned to reduce ignition risk, and application of prescribed fire within harvested portions of the units would largely reduce the Fire Regime Condition Class from 3 to 1 (EA, pp. 142 and 143).

There would be no significant impacts on air quality associated with broadcast burning. As described in the EA (p. 144), burning would be accomplished consistent with the recommendations and requirements of the Oregon Smoke Management Plan. Side boards include burning under conditions that encourage complete combustion of smaller fuels within the initial burn period, and burning under conditions that will not generate impacts to Smoke Sensitive Receptor Areas, Class 1 airsheds or other areas sensitive to smoke.

State of Oregon smoke management restrictions limit or prohibit burning during periods of stable atmospheric conditions when residual smoke from previously burned units may become trapped by a surface inversion. Where surface inversions develop within 24 hours of unit ignitions, aggressive mop-up would be conducted to minimize the potential for residual smoke affecting 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)

As addressed (EA, p. 31), there are no Areas of Environmental Concern; prime farmlands; wilderness; or wild and scenic rivers in proximity to the proposed harvest units. Wetlands, in the form of a series of fens in Section 25, T. 28 S., R 3 W., W.M. would be protected by the establishment of Riparian Reserves (EA, pp. 31, 111, and 118).

As addressed below (8), cultural resource surveys have been conducted, resulting in the identification of three sites that were determined not to have cultural significance. Sites within the project area known to possess cultural significance would be avoided through unit location and design.

- 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)

In December of 2011, the Secretary of the Interior directed the BLM to apply the principles of ecological restoration as developed by Drs. Norman Johnson and Jerry Franklin. Besides demonstrating Drs. Johnson and Franklin's principles, the pilot projects would be used to identify challenges and barriers to current implementation of the Northwest Forest Plan and inform future land use planning.

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 at public meetings and through formal scoping (EA, p. 4). 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 all of the alternatives are fully analyzed in Chapter Three (EA, pp. 34-154).

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. 77-79), the preferred alternative would result in the direct release of carbon. The amounts of carbon release would be undetectable, though, at only 0.0003 percent of annual U.S. emissions and 0.00007 percent of annual global emissions. Modeling, displayed in Table 3-27 (EA, p. 153), indicates that the continued growth of trees in the retention aggregates and Riparian Reserves, combined with the growth of trees and other vegetation in the harvested areas will result in a carbon-neutral state in less than 18 years. Carbon-neutral refers to the point at which the harvested area has re-sequestered an amount of carbon equal to the direct and indirect release of carbon associated with timber harvest, broadcast burning, and sublimation of carbon from wood products and untreated logging residues. Fifty years post-harvest, on-site carbon storage would exceed current carbon storage by approximately 16,000 tonnes.

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, including the preferred alternative, 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 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. 31); Botany (EA, p. 32); Noxious Weeds and Non-Native Invasive Plants (p. 33); Timber Resources (pp. 40-50); Wildlife (pp. 79-92); Fish, Aquatic Habitat and Water Resources (pp. 115-124), Soils (pp. 133-137); Fuels Management (pp. 142-145); and Carbon Storage and Sequestration (pp. 148-150).

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 (EA, p. 31), inventories within the proposed harvest units and locations of proposed road construction have been completed. Three cultural resource sites were identified that would be affected by the project. An archaeological evaluation determined them to be ineligible for listing on the National Register of Historic Places.

There are five previously identified sites located within the project area (OR-10-296, OR-10-297, OR-10-298, OR-10-299, and 35DO88), all of which have been excluded from the proposed units by modification of unit boundaries. An additional site (35DO659) is located near the project area and would be avoided as well. As a consequence, there would be no effect to any eligible cultural or historic resources or National Register properties in the project area.

If any objects of cultural value (e.g. historic or prehistoric ruins, graves, fossils, or artifacts) are found during the implementation of the proposed action, operations would be suspended until the materials and site(s) have been evaluated to determine any appropriate mitigation action.

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, pp. 79 and 88), no effects to the **northern spotted owl** from disturbance would be anticipated, as seasonal restrictions would be applied, when and where appropriate, as described in Chapter Two (pp. 18 and 19). Effects would be solely associated with modification or removal of suitable and dispersal habitat.

There would be no effect on critical habitat for the northern spotted owl, as none presently exists within the project area (EA, p. 63).

The preferred alternative would affect five northern spotted owl home ranges, two of which are unoccupied (EA, Table 3-20, p. 59; and Figures 3-7 and 3-8, pp. 60 and 61).

The preferred alternative would remove 65 acres of dispersal habitat and modify an additional 13 acres of dispersal habitat in the unoccupied High Riser home range, affecting short and long term viability (EA, pp. 80 and 89). In the Lucky Buck home range, also unoccupied, effects would include removal of 14 acres and modification of five acres of dispersal habitat at the scale of the home range (EA, pp. 81 and 89). As no habitat modification would occur within the core area, the viability of this home range would remain unchanged.

Suitable habitat would be removed from within the home ranges of the Blue Oyster Cultus, Curtin Creek and Deadman Mountain home ranges, but the availability of suitable habitat at the home range scale would remain above the 40 percent viability threshold in all three cases (EA, pp. 80-82). Harvest would remove 42 acres from within the Curtin Creek core area (EA, p. 81), but suitable habitat levels within the core area would remain well above the 50 percent viability threshold.

There would be no direct effects to the **Oregon Coast coho salmon** (EA, pp. 113 and 121), critical habitat designated for its survival and recovery (EA, pp. 116 and 122), and Essential Fish Habitat for Oregon Coast coho salmon and Oregon Coast Chinook salmon (EA, pp. 116, 117 and 123). Indirect effects would exist associated with sediment, particularly on Buck Fork where drainage from County Road is a chronic source of sediment (EA, p. 108). Proposed drainage improvements to this road, in conjunction with the proposed action, would reduce or eliminate the transport of fine sediment to Stacey Gulch and from there to Buck Fork (EA, p. 113).

As described (EA, p. 32), no Threatened or Endangered botanical species would be affected, as none were identified where suitable habitat exists

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. 31). 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. 31).

As discussed (EA, p. 33), implementation of the Roseburg District *Integrated Weed Management Program*, in association with project design and contract provisions (EA, p. 22) 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.

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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Date