

Rabbit Mountain Fire Silvicultural Habitat Restoration Decision Record

Rabbit Mountain Fire LSR Recovery
Environmental Assessment
DOI-BLM-OR-R050-2014-004-EA

Bureau of Land Management
South River Field Office, Roseburg District

Background

The Rabbit Mountain Fire LSR Recovery Environmental Assessment (EA) describes and analyzes a no action alternative (Alternative One) and one action alternative (Alternative Two). One component of the purpose and need of the EA is to initiate stand development on a trajectory to attain late-successional habitat characteristics through silvicultural habitat restoration (EA, p. 2). With respect to this component, the selected alternative is Alternative Two.

The analyses were conducted and the project designed to conform to management direction from the 1995 Roseburg District *Record of Decision and Resource Management Plan* (ROD/RMP) as amended prior to December 30, 2008.

Decision

It is my decision to authorize the Rabbit Mountain Fire Silvicultural Habitat Restoration project, which partially implements Alternative Two described in the EA (pp. 22-30). Forty-nine (49) units burned under moderate to high severity during the Rabbit Mountain Fire will be planted within the following legal descriptions, Willamette Meridian (see attached map):

- T31S, R7W, Sections: 19, 29, 31
- T31S, R8W, Sections: 15, 21, 22, 23 25, 27, 35
- T32S, R7W, Section: 5
- T32S, R8W, Sections: 1, 2, 3

The silvicultural habitat restoration areas total approximately 1,000 acres within the Late-Successional Reserve land use allocation in the Lower Cow Creek, West Fork Cow Creek, and Middle Cow Creek watersheds. Gross acres are approximations based on post-fire aerial photo analysis, soil and vegetation burn severity models, and subsequent ground reconnaissance. Gross acres may change as additional information and further field review refines the approximations. Up to 500 trees per acre will be planted using a variable spacing technique. Seedlings will be tubed and mulched, where deemed necessary, to increase the likelihood of survival. A mixture of approximately 50 percent minor species (incense-cedar, ponderosa pine, disease-resistant Port-Orford-cedar and disease-resistant sugar pine) and Douglas-fir will be planted to promote native species recovery. No felling of hazard trees will occur while planting. Stocking surveys will be completed prior to and after planting, as needed, to determine whether target stocking levels (≥ 200 trees/acre, well dispersed throughout an area) have been met (EA, p. 25).

Decision Rationale

Alternative Two will meet the objectives of initiating stand development on a trajectory to attain late-successional habitat characteristics through (1) accelerating the stand initiation phase; (2) restoring historical tree species composition through planting of minor tree species to complement the natural seeding of Douglas-fir; (3) maintaining the natural component of fire-created snags and downed wood; (4) creating landscape diversity through treatment of portions of the landscape (EA, p. 2). Alternative One will not accomplish these objectives (EA, p. 22).

Compliance with this decision will be ensured by frequent on-the-ground inspections by the project inspectors.

Based on the analysis of potential impacts contained in the EA, a Finding of No Significant Impacts (FONSI) has been prepared for the project with a determination that the project will not have a significant impact on the human environment; therefore, an Environmental Impact Statement will not be prepared.

Botany

Silvicultural habitat restoration has been determined to be a non-habitat disturbing activity for all BLM OR/WA special status or Survey and Manage vascular, non-vascular, or lichen species. Therefore, there will be no effect on any of these species (EA, p. 35).

Cultural Resources

The Rabbit Mountain Fire LSR Recovery project was surveyed for cultural resources, and 18 pedestrian surveys resulted in the identification of one historic mining shaft (OR-10-323) located approximately 200 feet or more upslope from any of the treatment areas (CRS No. SR1412, SR1405, SR1402, SR0114, SD9492, DW9301, 039304, 039207, 039102, 039008, 038818, 038816, 038806, 038801, 038719, 038703, 038614, 038514). The site is geographically separated from the silvicultural habitat restoration project, and there will be no chance of impact during project implementation. As a result, the project will have no effect on known cultural resources (EA, pp. 34-35).

The BLM has completed its National Historic Preservation Act Section 106 responsibilities under the 2012 National Programmatic Agreement and the 1998 Oregon Protocol (EA, pp. 34-35). In compliance with the Act, ground-disturbing activities will be halted if cultural resources are discovered until a BLM archaeologist can properly evaluate and document the resources.

Fish Species and Aquatic Habitat

Silvicultural habitat restoration will take place upslope of perennial streams, so no direct effect to fish or aquatic habitat is expected from this action (EA, p. 109).

Fire and Fuels Management

In areas that are away from viable seed sources, planting conifers will help increase the likelihood and speed of conifer reestablishment in the area. These conifers, over time, may shade out enough of the underbrush to reduce the continuity of understory vegetation, reducing the risk of a type conversion to hardwoods and shrubs (e.g. tanoak) that will burn more frequently and at higher intensity than conifer-dominated stands (EA, p. 53).

Soils

Planting conifers will accelerate the recovery of live vegetative ground cover to reduce soil erosion and improve soil productivity, with the subsequent addition of organic matter and litter to the soil, and the addition of coarse woody debris over the long term, as the forest regrows (EA, pp. 96 and 98).

Wildlife

No felling of any hazard trees will occur while planting, therefore there will be no loss or modification of habitat, nor critical habitats, and disturbance from chainsaws will not occur. No effects to the northern spotted owl (*Strix occidentalis caurina*), its critical habitat, or to marbled murrelet (*Brachyramphus marmoratus*) habitat are anticipated.

Monitoring

Monitoring the effects of the Rabbit Mountain Fire Silvicultural Habitat Restoration project will be conducted in accordance with provisions contained in the ROD/RMP, Appendix I (pp. 190-192, 195-198, 201, 202). Monitoring efforts will focus on consideration of the following resources: late-successional reserves, air quality, water and soil, wildlife habitat, fish habitat, and special status species (EA, p. 120).

Public Involvement and Response to Comments

The BLM initiated external scoping for this project on November 22, 2013. A total of 17 comment letters were received and considered during the scoping period. These comments were considered and addressed in the EA (pp. 6-13).

The EA was released for a 30-day public review and comment period beginning on October 14, 2014, and running through November 13, 2014. Comments were received from seven organizations. Responses to relevant comments not already addressed in the EA are included in this document as Appendix A.

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 (Steve Lydick) within 15 days of the publication date of the decision posted on the Roseburg BLM website (<http://www.blm.gov/or/districts/roseburg/plans/index.php>) on November 26, 2014.

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 December 11, 2014 (4:30 P.M.; PST), 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 South River Field Office will issue a protest decision.

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



Steve Lydick, Field Manager
South River Field Office

Date

11/24/2014

Appendix A
Response to Comments on
Rabbit Mountain Fire LSR Recovery Environmental Assessment
Relevant to the Rabbit Mountain Fire Silvicultural Habitat Restoration Project

A 30-day period for public review was provided with release of the EA on October 14, 2014. Comments were received from seven organizations. Comments specific to this silvicultural habitat restoration project are noted in italics and addressed below.

...this planting is to create a forest that will not be for commercial harvesting, as [sic] is expected to eventually provide old-forest habitat. Therefore, the planting specifications should reflect that different goal.

...the BLM should not replant on a grid, and should not assume that several entries of commercial thinning should take place. Fewer trees per acre should be planted.

Where absolutely necessary plan [sic] at low density and in a patchy mosaic.

The silvicultural habitat restoration project will result in a more balanced proportion of hardwoods, shrubs and conifers. Such an effect will initiate a stand trajectory to attain the desired late-successional habitat characteristics described in the South Coast-North Klamath Late-Successional Reserve Assessment (USDA, USDI 1998). Planting fire-resilient conifer species such as ponderosa pine, sugar pine, incense-cedar, Port-Orford-cedar, and Douglas-fir, using a variable spacing technique based on site-specific conditions, will accelerate stand re-initiation and restore historical tree species composition. This will also place stands on a trajectory toward desired future conditions (EA, pp. 44-45). In areas that are away from viable seed sources, planting conifers will help increase the likelihood and speed of conifer reestablishment in the area. Any future density management entries that may be proposed would focus on habitat development and not fiber production.

The BLM should also confirm that disease-resistant Port Orford Cedar and Sugar Pine trees would be replanted in abundance.

In areas identified for silvicultural habitat restoration treatments, planting will occur with a mix of approximately 50 percent minor species (ponderosa pine, incense-cedar, disease-resistant Port-Orford-cedar, and disease-resistant sugar pine) along with Douglas-fir.

We are opposed to reforesting areas that were previously not logged. In near-by BLM projects, old-growth is being clearcut to create high-quality early-seral habitat. It only makes sense to instead, embrace the best high-quality early-seral habitat where it is created naturally.

The EA failed to explain why high-quality early-seral habitat is so desirable where it needs to be created by logging, but is not desirable where it is created naturally. The decision must address this glaring omission.

The BLM does not need to be creating even-aged plantations by planting conifers in LSR LAUs; current high quality early seral habitat will develop into late-successional habitat naturally, and result in a multi-layered canopy, rather than an even aged canopy without multiple levels of structure important for wildlife.

Rely as much as possible on natural recovery processes.

Minimize conifer replanting.

We have concerns about "accelerating stand initiation phase;" This phase is already ongoing. Accelerating conifer establishment will come at the expense of stand diversity complexity down the road. This is contrary to the objectives for LSR and spotted owl recovery.

Accelerating stand initiation, or creating even aged plantations, when the stand will naturally regenerate and produce diverse range of conifers, is contrary to management direction for LSR.

Roughly 50 percent of the area burned under moderate and high severity in the Rabbit Mountain Fire will remain untreated. These areas have seed sources sufficiently close, and will be left to regenerate naturally. As described in the current conditions of the EA (p.29), stands that experienced moderate to high fire severity are dominated by sprouting hardwoods and shrubs. By planting areas that are not likely to regenerate naturally with conifer species due to a lack of seed sources would result in a more balanced proportion of hardwoods, shrubs and conifers as described in the EA (pp.44-45).

These lands were allocated as LSR to provide habitat for the northern spotted owl and other late-successional and old-growth forest-related species (ROD/RMP, p. 29). Alternative Two is consistent with recommendations of the 2011 Northern Spotted Owl Recovery Plan for habitat management (USDI FWS 2011, p. III-13; EA, p. 71). Planting will occur on approximately 1,000 acres of moderately and severely burned forests, away from natural seed sources, with a goal of establishing variably spaced and diverse nesting, roosting, foraging habitat 20 to 30 years sooner than natural regeneration (EA, p. 77). Treatment areas will be replanted where adequate regeneration standards are not met, with a mixture of conifer species, weighted heavily to pines, incense-cedar, and Port-Orford-cedar, should post-treatment inspection identify the need to re-establish conifer species (EA, p. 75).

Detrimental ecological effects of post-fire timber harvest include: ...medium-term fire risk due to creation of conifer plantations.

Planting a varying proportion of fire-resilient conifer species in areas that are away from viable seed sources will accelerate the stand initiation phase, and restore historical tree species composition, reducing the likelihood of stands converting to volatile shrub and hardwood stands that will burn more frequently and at higher intensity than conifer-dominated stands (EA, p. 53).

