

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

**Susan Creek Stew WUI
Environmental Assessment**

Decision Document

SECTION 1 – THE DECISION

Decision

It is my decision to authorize the Susan Creek Stew WUI (Wildland Urban Interface) Proposed Action Alternative as described in the Susan Creek Stew WUI Environmental Assessment (EA) in Chapters 1 and 2 (NEPA#: EA #OR – 104 – 08 – 06; pgs. 4-8). The Project Design Features that will be implemented as part of the Susan Creek Stew WUI are described on page 8 of the Susan Creek Stew WUI EA.

The Susan Creek Stew WUI project will occur along the Susan Creek Road system (including road numbers: 26-2-14.0, 26-2-14.3, 26-2-14.4, 26-2-15.0, and 26-2-23.0) and adjacent to the Susan Creek Mobile Home Park in the Middle North Umpqua Watershed in Sections 13 and 14 of T. 26 S., R. 2 W., Willamette Meridian (Fig. 1).

This project is within the Matrix (18 acres) and Riparian Reserve (RR) (6 acres) Land Use Allocations under the 1995 *Roseburg District Record of Decision and Resource Management Plan* (1995 ROD/RMP). The Susan Creek Stew WUI will fell and remove approximately 21 standing dead or dying hazard trees and remove 19 down trees along the Susan Creek road system to provide for the safe ingress and egress in the WUI, reduce the public safety hazards (trees that are likely to fall into facilities, block access, etc.) and reduce both light and heavy fuels along both the Susan Creek road system and the Susan Creek Mobile Home Park. The trees (approximately 17.0 thousand board feet) and other heavy fuels will be removed from the project site and the roadside fuels (brush) will be either chipped and blown back into the forest to decompose upon the forest floor or chipped and removed from the project site if a buyer can be found.

Updated Information

The updated information, described below, has been considered but does not alter the conclusions of the analysis. The following new information has arisen since the EA was originally published on September 29, 2009.

1) Survey and Manage

The Susan Creek Stew WUI 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. The Susan Creek WUI project is consistent with the 2001 Record of Decision and Standards and Guidelines for Amendments to the Survey and Manage, Protection Buffer, and other Mitigation Measures Standards and Guidelines, as incorporated into the Roseburg District Resource Management Plan.

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.) (Coughenour, J.), 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.

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.

The project may proceed even if the District Court sets aside or otherwise enjoins use of the 2007 Survey and Manage Record of Decision. This is because the Susan Creek WUI project meets the provisions of the last valid Record of Decision, specifically the 2001 Record of Decision and Standards and Guidelines for Amendments to the Survey and Manage, Protection Buffer, and other Mitigation Measures Standards and Guidelines (not including subsequent Annual Species Reviews). Details of the project surveys are described below:

- A. Wildlife: A GIS and field analysis, as well as a literature and protocol review, was completed for Survey & Manage Species to determine the need to complete pre-project clearance surveys for all components of the Susan Creek Stew project.

In summary, it was determined that pre-project clearance surveys were not required for Great Gray Owl (*Strix nebulosa*), Chase Sideband (*Monadenia chaceana*), Crater Lake Tightcoil (*Pristoloma articum crateris*), Oregon Shoulderband (*Helminthoglypta hertleini*) and Oregon Red Tree Vole (*Arborimus longicaudus*).

The Susan Creek WUI project is outside the range for the Chase Sideband and Crater Lake Tightcoil species. A Geographic Information System (GIS) analysis of the project area showed no habitat for the Great Gray Owl or Oregon Shoulderband.

Although the project area is within the distribution range and contains suitable habitat for the Oregon Red Tree Vole, additional triggers for determining the need to conduct pre-project surveys are not present. These triggers are the removal or modification of individual conifer crowns, including activities that may isolate nest trees or alter the microclimate within the stand.

The trees and snags proposed for removal are either dead or dying with inadequate live crown to provide nest habitat for the red tree vole. Removal of these trees will not modify the overstory conifer canopy of the stand, isolate nest trees or alter the microclimate within the stand. Therefore, the project will not prevent the remaining stand from continuing to function in its current capacity as red tree vole habitat.

The one tree with a partial live crown proposed for removal was surveyed for red tree voles on April 6, 2010 and no nest structures within the crown, resin ducts or snapped twigs were observed. Additionally, the tree is isolated from adjacent tree crowns and no nest structures were observed in the nearby trees. The removal of this tree will not prevent the remaining stand from continuing to function in its current capacity as red tree vole habitat.

B. Botany:

A search was conducted for sites of Survey and Manage botanical species already known and documented in regional data bases to identify which species to survey. Field surveys were conducted (June 30, 2010) using Survey and Manage protocol established for botanical species.

The following species of lichens were identified as being in the same sections (T.26S, R.2W, sections 14 and 15) as the Susan Creek Stew DUI Project, but the sites where lichens are located will not be impacted (because they are too far away) as the project is currently designed:

<i>Calicium viride</i>	frog stubble lichen
<i>Chaenotheca ferruginea</i>	rusty pin lichen
<i>Chaenotheca furfuraceae</i>	flaky pin lichen
<i>Dermatocarpon luridum</i>	brook lichen

- 2) **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 previous, recent analyses.**

Forests store carbon, which affects atmospheric concentrations of carbon dioxide and greenhouse gases, and thereby affects global climate. Forest management can provide a source of carbon (e.g. through deforestation and conversion to non-forest lands), or it can store carbon (e.g. through forest growth or afforestation) (Final EIS, 2008; pg. 220). Forster et al. 2007 (pgs. 129-234), incorporated here by reference, 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.^a The U.S. Geological Survey, in a May 14, 2008 memorandum 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.^b That memorandum is incorporated here by reference.

The 2008 Final EIS (pgs. 488-490) described current information on predicted changes in regional climate and is incorporated here by reference. That description concluded that the regional climate has become warmer and wetter with reduced snowpack and that continued change is likely. That description also concluded that changes in resource impacts as a result of climate change would be highly sensitive to specific changes in the amount and timing of precipitation, but specific changes in the amount and timing of precipitation are too uncertain to predict at this time. Because of this uncertainty about changes in precipitation, it is not possible to predict changes in vegetation types and condition, wildfire frequency and intensity, streamflow, and wildlife habitat.

^a Forster, et. al. (2007). Changes in Atmospheric Constituents and in Radiative Forcing. Pg. 131.

^b U.S.G.S. Memorandum #2008438-DO. (May 14, 2008). The Challenges of Linking Carbon Emissions, Atmospheric Greenhouse Gas Concentrations, Global Warming, and Consequential Impacts. Pg. 2.

Compliance and Monitoring

The Susan Creek Stew WUI conforms with the 1995 Roseburg District Record of Decision and Resource Management Plan (1995 ROD/RMP).

Compliance with this decision will be ensured with bi-annual (IM-OR-2003-037, March 23, 2009) on the ground inspections by the Fuels Management Officer's representative and 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 Susan Creek Stew WUI EA (pg. 8) will, protect special status plant and animal species, and minimize soil compaction. I have reviewed the resource information contained in the EA and the updated information presented in this decision.

By implementing this decision, fuel loading will be modified from the Fuel Model 10 designation to Fuel Model 8. Fires characterized by Fuel Model 10 are at the upper limit of control by direct attack. They represent “fires that burn in the surface and ground fuel with greater fire intensity” and “dead-down fuels include greater quantities of 3-inch or larger limbwood . . . that create a large load of dead material on the forest floor. Crowning out, spotting and torching of individual trees is more frequent in this fuel situation.” Fuel Model 8 is the target condition and is represented by “slow-burning ground fires with low flame lengths. . .” and only occasional “jackpots” and heavy fuel concentrations. Within Fuel Model 8 fuels pose a fire hazard only in the most severe weather conditions^c and allow control by direct attack.

The Healthy Forests Restoration Act (HFRA) provides authority to expedite vegetation on lands that are at risk of wildland fire; have experienced wind throw, blowdown, or ice storm damage; are currently experiencing disease or insect epidemics; or are at imminent risk of such epidemics because of conditions on adjacent lands and is the basis for the Community Wildfire Protection Plan (CWPP) (EA, pg. 4). In addition, the Healthy Forest Initiative (HFI) status afforded by the CWPP (http://www.co.douglas.or.us/planning/Wildfire_Plans/default.asp) allowed the use of the Joint Counterpart Regulations to facilitate consultation (EA, pg. 16-17) on the Susan Creek WUI project.

This decision recognizes that impacts could occur to some of resources; however, the impacts to resource values will not exceed those identified in the 1994 *Final - Roseburg District Proposed Resource Management Plan / Environmental Impact Statement* (1994 PRMP/EIS). This decision promotes the safety of the Wildland Urban Interface by reducing existing fuels and removing hazard trees from the project area. Timber commodities resulting from silvicultural treatments are an incidental consequence of this action whose effects to the environment are within those anticipated and already analyzed in the 1994 PRMP/EIS.

^c Anderson, Hal E. (April 1982). Aids to Determining Fuel Models for Estimating Fire Behavior. Pgs. 11 and 13.

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 as stated in the EA (pg. 6):

- Consider safety of adjacent landowners (Interagency Standards for Fire and Fire Aviation Operations, NFES 2724, 2010. pp. 01-9). Coordinate fire management activities in rural interface areas with local governments, agencies, and landowners (pg. 75).
- Remove trees along rights-of-way if they are a hazard to public safety (1995 ROD/RMP, pg. 30, 69).
- Fell trees in Riparian Reserves when they pose a safety risk. Keep felled trees on site when needed to meet Aquatic Conservation Strategy and Riparian Reserve objectives (1995 ROD/RMP, pgs. 28 and 56).
- Use minimum impact suppression methods for fuels management in accordance with guidelines for reducing risks of large scale disturbances (1995 ROD/RMP, pg. 76).
- Reduce hazards through methods such as prescribed burning, mechanical or manual manipulation of forest vegetation and debris, removal of forest vegetation and debris, and combinations of these methods (1995 ROD/RMP, pg.77).
- O&C lands “shall be managed, except as provided in section 1181c of this title, for permanent forest production, and the timber thereon shall be sold, cut, and removed in conformity with the princip[le] of sustained yield for the purpose of . . . protecting watersheds, regulating stream flow, and contributing to the economic stability of local communities and industries, . . .” (43 USC § 1181a)

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.

The implementation of this project will not have significant environmental effects beyond those already identified in the 1994 PRMP/EIS. The Susan Creek Stew WUI project does not constitute a major federal action having significant effects on the human environment; therefore, an environmental impact statement will not be prepared.

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 Susan Creek Stew WUI EA via the 2008 Planning Updates (Spring, Summer, Fall, and Winter), 2009 Planning Updates (Spring, Fall, and Winter), and, during a 30-day public comment period (September 29, 2009 - October 28, 2009). Comments were received as a result of the public comment period.

Upon reviewing the comments, the following topics warrant additional clarification specific to the Susan Creek Stew WUI project: (1) Cumulative Impact of the Tioga Bridge Project on the Susan Creek WUI project, (2) Consider topping trees, (3) Reducing Fire Hazard, (4) Trees should not be sold or removed, (5) Visual and Wild and Scenic requirements, (6) Cultural Resources and other surveys and (7) ATV use on public lands.

1) Cumulative Impact of the Tioga Bridge Project on the Susan Creek WUI project:

The EA failed to consider the cumulative impacts with the Susan Creek Tioga Bridge project. For instance, additional old growth trees could be cut for the Tioga Bridge project (for access and for hazard trees), as well as additional impacts to Susan Creek water quality and cultural resources

“Cutting additional trees for the Tioga Bridge project” will not alleviate the hazard presented by trees and snags to be felled in the Susan Creek WUI project. All the trees and snags to be felled in the Susan Creek WUI project are considered hazard trees (EA, pg. 22). Removal of hazard trees is Roseburg District policy as mandated in the RMP on page 31.

The EA, pg 7 states water quality related issues were considered but eliminated from further analysis “because only selective vegetation would be removed to reduce fuel hazards and all heavy equipment would stay on the roadway. No impact to water quality or water resources is expected as a result of this project”. Without an impact at the project level, there will therefore be no cumulative impact with other projects on water quality.

A “No Effect” determination was made concerning Cultural Resources. Inventories have been conducted (EA, pg. 7) resulting in four sites recorded. Since the project is only surface-disturbing removal of hazard trees in areas where there are no recorded sites, there are no impacts to cultural resources.

In conclusion, because there will be no impact at the project level, there will be no cumulative degradation of habitat, water quality, or cultural resources to Susan Creek as a result of the Susan Creek WUI project or combined with the Tioga Bridge project.

2) Consider topping trees:

The EA tells us an objective of the project is to “Consider topping of trees as an alternative to felling.” But the EA never develops an alternative to meet that objective. Alternatives are the heart of NEPA, and are required when important resources are at stake. Large old growth trees are an important resource but, the EA simply mentions that trees of this size would be felled, along with trees 8”, as if there are no ecological differences between 8” and 56” trees. The large trees in this area could be over 400 years old.

The EA claims there is no wildlife use of any of the large dead and dying trees. None. This is hard to believe. Dead trees usually attract insects, which in turn attract woodpeckers, which in turn provide homes for cavity nesters. None of this is happening in large dead trees anywhere in the project area?

The EA stated on page 5 as an objective to “Remove trees along rights-of-way if they are a hazard to public safety. Consider leaving material on site if available coarse woody debris is inadequate. Consider topping of trees as an alternative to felling” (1995 ROD/RMP, pg. 30). It also stated as an objective to “Fell trees in Riparian Reserves when they pose a safety risk. Keep felled trees on site when needed to meet Aquatic Conservation Strategy and Riparian Reserve objectives (1995 ROD/RMP, pgs. 28 and 56).”

The objective in question states that topping is an alternative to felling. After a hazard tree analysis was performed on the 21 trees considered for topping or felling, it became clear that the trees were already in such a state of decay that they would present a hazard to a faller trying to top the trees. There are additional snags and dead/dying trees in the untreated

portion of the stand (EA, pg. 16) surrounding the project area that may provide current and future nest sites as they decay and break off. The EA qualified the potential use of the identified hazard trees by spotted owls as nest trees.

The objective of topping these hazard trees was considered (EA, pgs. 5, 22), and topping was rejected for safety concerns. In addition, retention of the felled trees was considered but rejected due the amount of existing down woody debris already present in the project area.

3) Reduction of fire hazard vs. removal of danger trees:

The EA failed to differentiate between removing fine fuels and brush that are fire hazards, and removing large trees whose boles are not fire hazards. . . . The EA claims that “dead and dying” trees will be cut down, but never defines “dying”. . . . The BLM should have described the actual condition of large-old growth trees – are they going to die within a year, or within 100 years? How far from the road are they? Could they be limbed and top[p]ed instead of removed? . . . On page 13 there is a picture titled “Example of Desired Fuel Conditions”. It is not clear what is desired in this picture. The background shows a dense, fire-prone young tree plantation. What is desired about this? The foreground shows brush growing in a hot, dry, sunny location. Is that “desired

There are two concepts at issue here. First, the amount of fuel material currently available on the ground and fuels available as ladder fuels, as shown on page 11 (Figure 1) of the EA. This project creates a defensible space of 50 feet on either side of the road surface (the escape route) and a potential fire front within the forest. Second, the removal of dead and dying trees which will likely fall across the road (the escape route) or on vehicles as they travel Susan Creek road. This project will reduce the likelihood of a tree falling and blocking the road (escape route) at a critical moment, a fire front threatening the road, or heavy fuels holding intense heat along the road.

The first issue is described and analyzed in the affected environment (EA, pgs. 9 - 11, 13 - 14). It states that scattered wind-thrown and dead trees occur singly or in clumps throughout the project area. The EA further states that due to insect kill, the “present risk for wildfire in the WUI of the project area” will “be considered moderate based on existing fuels load” and that the “stand characteristics, and understory vegetation . . . could contribute to fire spread.” As fuel loading in the area naturally increases, over time the effectiveness of the road diminishes as an escape route and the potential of a roadside fire start increases. Additionally the increased fuel loading will increase fire intensity making escape more difficult in case of fire (EA, pg. 11).

The second issue concerns the danger of standing trees that are likely to fall into the road, structure(s) or property as they naturally decay or during disturbance events such as windstorms. The trees selected for felling and removal do not represent all standing trees that are likely to fall into existing facilities, but only those that represent an existing hazard to those facilities. The lack of treatment allows the likelihood of trees falling into the road, structures, or property, over time, and potentially reduces ingress for emergency vehicles and egress for residents.

4) Trees should not be sold or removed:

The EA states (page 4), “Merchantable trees, identified for removal, would be sold to help offset costs of the project.” This statement conflicts with another EA statement: “The trees, if merchantable, would be sold or removed (e.g. logs for restoration, barriers, etc.) from the project area to reduce hazardous fuel levels.” Which is it, will the trees be sold to offset the costs of the project, or sold to reduce fuel levels? Will all the merchantable trees be sold, or will some be removed for restoration, and if the latter, what restoration, where, and how many trees would be used for restoration instead of sold?

The BLM is required by law to “comply with Section 1 of the O&C Act (43 USC § 1181a) (EA, pg. 5) which stipulates that O & C Lands be managed “. . . for permanent forest production, and the timber thereon shall be sold, cut, and removed . . .” which directs that the timber be sold at reasonable market prices, if possible. If the trees are not able to be sold they may be utilized in some other manner to benefit the public good and the environment. The intent of the statements found on pages 4 and 5 is to remove potential fuels from the project area by first offering any usable material to the operator as logs or biomass. If the material is unsalable, it will be chipped and blown back onto the forest floor to quickly degrade into the duff layer or will either be used as material in potential restoration projects.

Objectives to “Keep felled trees on site when needed to meet Aquatic Conservation Strategy and Riparian Reserve objectives” and “Consider leaving material on site if available coarse woody debris is inadequate” have both been fulfilled. Coarse woody debris is adequate and keeping all trees on site is not required to meet the ACS conditions. This is demonstrated generally on page 24 of the EA and specifically in Table C-1 (Individual Aquatic Conservation Strategy Objective Assessment on pages 24-28). At this time, there are no current or planned stream restoration projects in the vicinity of the Susan Creek Stew WUI project that could use logs of this size and condition. In addition, based upon the restorative nature of the action, this project will not retard or prevent attainment of ACS objectives; it will actually speed attainment of these objectives. (EA, pg. 24-28).

5) Visual and Wild and Scenic Requirements:

This project does not comply with RMP requirements for Visual Resource Management of Class I or Class II lands. Class I lands require the BLM to: “Provide for natural ecological changes in Visual Resource Management Class I areas. Some very limited management activities may occur in these areas. The level of change to the characteristic landscape would be very low and must not attract attention.”^d Cutting down 56” DBH trees, with no alternatives considered, does not comply with Class I requirements. Even if it is managed as Class II: “for low levels of change to the characteristic landscape. Management activities may be seen but should not attract the attention of the casual observer”, cutting down 56” DBH trees with no alternatives considered still does not comply.

The Roseburg District Visual Resource Management (VRM) Classes are discussed in the Resource Management Plan (RMP) on page 38, and are designated by both of the following:

- All lands that are adjacent to (within ¼ mile of) developed recreation sites, state and federal highways, state scenic waterways, and rivers designated under the federal Wild and Scenic Rivers Act, will be shown as VRM II.
- General forest lands will be designated as VRM IV.

^d RMP page 51.

The attached project area map (Figure 1) shows the VRM II and the VRM IV lands, the Oregon State Scenic Waterway, The Federal Wild & Scenic Corridor the State Highway 138. Portions of the all of these areas fall within the VRM II classification.

With VRM Class II landscape, alterations caused by management activities may be seen, but should not attract attention, and scenic quality should be retained. This class generally includes areas with high to moderate scenic qualities and high sensitivity levels. The level of change to the characteristic landscape should be slight. With VRM Class II, the BLM must use timber management objectives that employ single tree selection, uneven-aged harvest, retention of shelter-wood overstory trees or group selection management in “seen” areas. Fire suppression and fuels management standards will be established to meet VRM II objectives. This is accomplished through the selection of the hazard trees within this project. Changes in any of the basic elements (form, line, color, texture) caused by a management activity should not be evident in the characteristic landscape.

The Susan Creek Stew WUI Project proposal to reduce the hazardous fuels in the project area will comply with the VRM guidelines for Class II & IV designated lands. By eliminating excessive roadside brush and removing hazard trees, the BLM will be meeting the VRM II objectives and improve the natural forest environment as well as scenic quality.

No specific visual management constraints will apply to lands for VRM Class IV objectives. Activities may attract attention and is a dominant feature in the landscape but should still repeat the form, line, color, and texture of the characteristic landscape.

6) Cultural Resources and other surveys:

The area along Susan Creek has rich cultural resources. Within a mile of here some of the oldest sites in the entire Umpqua watershed have been discovered. The EA failed to assure the public that potential cultural resources in the project area were surveyed for and protected.

Cultural resource inventories conducted in the vicinity of the proposed project over the years have resulted in the recordation of four archaeological sites within the project area. None of the sites will be impacted because only non-surface disturbing activities, such as hand-brushing and chipping will occur on the sites (EA, pg. 7). A “No Effect” determination was made. Compliance with Section 106 of the National Historic Preservation Act under the guidance of the 1997 National Programmatic Agreement and the 1998 Oregon Protocol has been documented with a Project Tracking Form dated March 16, 2009 (EA, pg. 17).

7) ATV use on public lands:

Increased ATV use will occur on public land where forests near roads are cleared of brush. The EA failed to describe the potential increase in off-road ATV use, which could be especially problematic because of the rich cultural resources in the area.

The RMP allows for existing roads and trails to be used for OHV use. The 1994 FSEIS states that “[m]otorized use will be ‘limited to existing roads and trails’ to meet objectives of resource protection, safety of users and minimization of conflicts among various uses . . .” (The *Final Supplemental Environmental Impact Statement (FSEIS) on Management of*

Habitat for Late-Successional and Old-Growth Related Species Within the Range of the Northern Spotted Owl, pg. 2-44). This decision does not permit or authorize the additional use of trails or roads OHVs. Use of OHVs outside of existing roads and trails is not permitted and is subject to citation by law enforcement.

The remaining comments did not raise substantive issues that will influence my selection of the Action Alternative for The Susan Creek Stew WUI portion of the Susan Creek Stew WUI EA, as updated above.

SECTION 4 – PROTEST PROCEDURES

The decision described in this document is a decision related to the Healthy Forests Restoration Act. Parties adversely affected by this decision may appeal under 43 CFR §4.410. Appeals of the decision must be filed with the authorized officer (Max Yager) within 30 days of publication of the notice in *The News-Review*, Roseburg, Oregon.

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

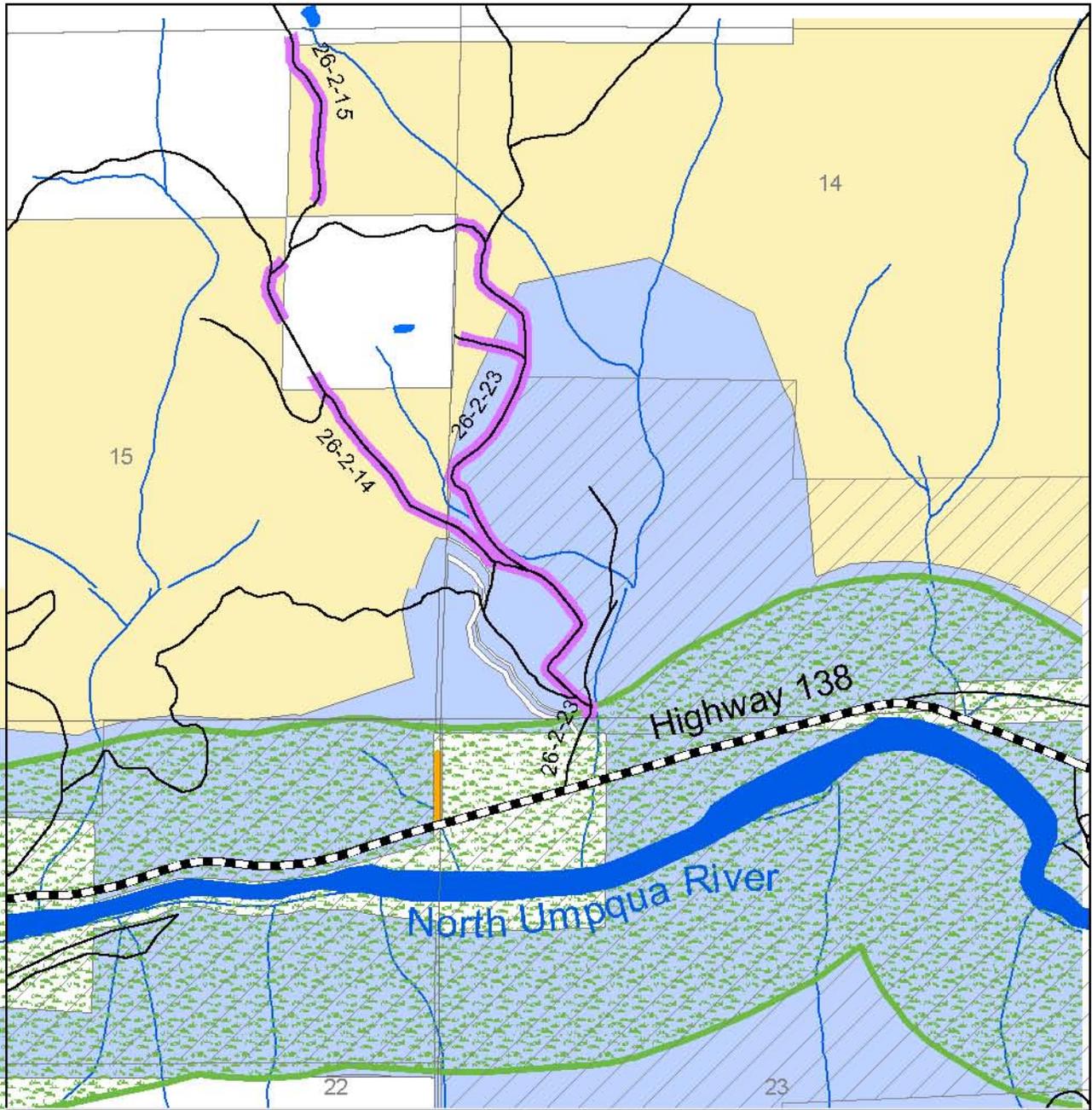
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Figure 1

R 2 W

T 26 S



Legend

Highway

Public Road

River

Susan Creek MH Park Buffer

Susan Creek Road Buffers

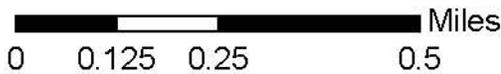
Federal W&SR Corridor

Oregon State Scenic Water Way

Visual Resource Management

VRM 2 - Largely retain the existing character of the landscape

VRM 4 - Modification of the character of the landscape is allowed



September 9, 2010



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