

Thin Air Commercial Thinning Decision Document

South Umpqua River Watershed Harvest Plan Environmental Assessment

EA # OR105-08-02

Bureau of Land Management
South River Field Office, Roseburg District Office

Background:

On July 16, 2009 the U.S. Department of the Interior, withdrew the Records of Decision (2008 ROD) for the Western Oregon Plan Revision and directed the BLM to implement actions in conformance with the resource management plans for western Oregon that were in place prior to December 30, 2008.

The South Umpqua River Watershed Harvest Plan Environmental Assessment (EA) proposed and analyzed approximately 236 acres of regeneration harvest, 897 acres of Matrix commercial thinning with density management in associated Riparian Reserves, and 574 acres of density management in Late-Successional Reserves. The analysis was conducted consistent with and conforms to management direction contained in the 1995 Roseburg District *Record of Decision and Resource Management Plan* (ROD/RMP) as amended prior to December 30, 2008. The Thin Air Commercial Thinning project was analyzed as a part of Alternative Two, the Proposed Action, described in the EA (pp. 5-16).

Decision:

It is my decision to authorize the Thin Air Commercial Thinning project, continuing implementation of Alternative Two described in the South Umpqua River Watershed Harvest Plan EA. Six units, totaling 326 acres, will be commercially thinned. The lands are allocated as General Forest Management Area, Connectivity/Diversity Block, and Riparian Reserve by the 1995 ROD/RMP. An additional three acres, located principally within or constituting portions of unit boundaries, will be cleared for road rights-of-way.

Units are located in Sections 25, 27 and 35, T. 29 S., R. 3 W., Willamette Meridian. Sale unit numbers and their corresponding EA designations are as follows.

Sale Unit	Acres	EA Unit Designation
Unit 1	13	29-3-27C
Unit 2	184	29-3-27B
Unit 3	37	29-3-27A
Unit 4	47	29-3-35A
Unit 5	18	29-3-35B
Unit 6	27	29-3-25A

Total harvest volume is 2,873 thousand board feet. Approximately 2,098 thousand board feet will be derived from the General Forest Management Area and Connectivity/Diversity Block land use allocations and is creditable toward the District's annual allowable sale quantity. The remaining 785 thousand board feet derived from Riparian Reserves is not chargeable to the annual allowable sale quantity.

Units 2 and 3 have been reduced in size by a combined 40 acres from what was proposed in the South Umpqua River Watershed Harvest Plan EA (p. 8). This reflects the decision to employ traditional cable and ground-based harvest systems in lieu of helicopter yarding. The decision was based on depressed log values, uncertainty about future fuel prices and the inherently high cost of helicopter yarding. Cable yarding will be accomplished with equipment capable of maintaining a minimum of one-end suspension. Ground-based harvest will be limited to the dry season, typically mid-May to mid-October, and will be accomplished with harvester/forwarder equipment operating on slopes of 35 percent or less.

Access will be primarily provided by existing roads, supplemented by permanent and temporary construction, and renovation of both system and non-system roads as summarized below.

- Road No. 29-3-26.3, a total of 2,315 feet (~ 0.44 miles) in length, will be constructed, surfaced and retained as part of the permanent transportation system. It originates on Seneca Jones Timber Company lands in Section 26, T. 29 S., R. 3 W., W.M. and provides access to the top of Unit 2.
- A total of 1,327 feet (~ 0.25 miles) of temporary construction, designated as Road No. 29-3-35.4, Segment B will provide access to Unit 5. It will be decommissioned as described in the South Umpqua River Watershed Harvest Plan EA (p. 14).
- Road No. 29-3-25.0 (0.70 miles) and a portion of Segment F2 of Road No. 29-3-27.0 will be renovated and surfaced to access Unit 6 and retained as part of the permanent transportation system.
- An unnumbered non-system road 1,380 feet (~ 0.26 miles) in length will be renovated to provide yarding access in Unit 4. It will be decommissioned after use.

As discussed in the South Umpqua River Watershed Harvest Plan EA (p. 15), the South Umpqua River fifth-field watershed is designated as a Tier 1 Key Watershed. The ROD/RMP (p. 20) directs that existing road mileage in Key Watersheds is to be reduced. If this is not practical though, at a minimum, there should be no net increase in road mileage.

Since implementation of the ROD/RMP in 1995, the BLM and parties to reciprocal rights-of-way agreements have constructed 2.9 miles of permanent road. Over the same period of time, this has been offset by closure or full decommissioning of 7.7 miles of existing road, as reported in the 2006 Roseburg District Annual Program Summary and Monitoring Report and described in the EA (p. 15).

The construction of 0.44 miles of permanent road does not conflict with management direction from the ROD/RMP as the total permanent construction is still more than offset by the road mileage previously decommissioned.

Implementation of this decision is subject to the following seasonal restrictions (EA, pp. 13-14):

- Felling and yarding of timber in commercial thinning units, except for clearing rights-of-way, is generally prohibited from April 15th to July 15th (barkslip period).
- Yarding and hauling of timber on unsurfaced roads is restricted to the period between May 15th and the onset of regular autumn rains, usually around mid-to-late October.

All logging and road construction equipment, excluding log trucks and crew transport, will be pressure washed or steam cleaned prior to mobilization in and out of the project area to minimize the risk of introducing soil from outside the project area that may be contaminated with noxious weed seed or other propagative materials. Any equipment removed during the life of the contract must be cleaned before being returned to the project area.

Portions of Units 1 and 2 south of Road 29-3-33.0 are located within the Wildland Urban Interface. Logging slash within 50 feet of the road proceeding southwest from its junction with Road No. 29-3-27.0 will be hand piled and burned.

Public Involvement & Response to Comment:

The BLM received comments from four organizations during development of the South Umpqua River Watershed Harvest Plan EA. During the period for public review and comment on the EA, timely comments were received from four organizations and 13 individuals. Nine additional comments were submitted that were untimely, as they were received after the close of the period for public comment.

Many of the comments were expressions of philosophical opposition to the regeneration harvest proposed in the EA. Comments that did address specific aspects of the analysis did not provide new or relevant information that the BLM should have considered, or issues that were within the capacity of the EA to address.

Only one comment potentially relevant to the Thin Air Commercial Thinning project was received that warrants discussion. It was suggested that:

“The EA should analyze the effects of harvest proposed in Section 25, T. 29 S., R. 3 W. on the roadless values of the 3000+ acre Coffee Creek unroaded area, and drop these units from proposed harvest.”

As was discussed in the South Umpqua River Watershed Harvest Plan EA (p. 17), the area has been evaluated for wilderness characteristics on two occasions, the most recent in 2006. It was determined that there were no wilderness characteristics present, and other uses were emphasized as a priority. Consequently, this is not a subject open to review or analysis in the context of the environmental assessment.

Additional Information:

- The units were evaluated for the presence of suitable habitat for Bureau Sensitive mollusks and surveys of suitable habitat were completed. Two sites occupied by Chace sideband snails (*Monadenia chaceana*) were identified in Unit 2. Thinning will maintain a minimum of 40 percent canopy cover consistent with conservation recommendations for maintaining viable habitat and microclimatic conditions for the species.
- Surveys for cultural resources identified a previously undetected site. Unit boundaries have been modified to exclude the site and protect it from any disturbance associated with thinning operations.
- Botanical surveys were conducted and no Bureau Sensitive vascular plants, lichens, bryophytes or fungi were detected.
- Units 1, 2 and 5 are not within 65 yards of any known owl activity centers or unsurveyed habitat and require no seasonal restrictions. Two consecutive years of protocol surveys of suitable northern spotted owl habitat in proximity of Units 3, 4 and 6 have been conducted and have not detected any spotted owl occupancy. Seasonal restrictions for these units are waived through February 29, 2012, after which time seasonal restrictions will be reinstated unless the units are cleared by additional surveys.

Rationale for the Decision:

The South Umpqua River Watershed Harvest Plan EA considered and analyzed two alternatives in detail: Alternative One, No Action, and Alternative Two, the Proposed Action. Alternative Two will achieve the stated objectives of: promoting tree survival and growth; achieving a balance between wood volume production, wood quality, and timber value at harvest; assuring high level of timber productivity; and controlling stocking levels and establishing and managing non-conifer vegetation in Riparian Reserves (EA, p. 3), whereas Alternative One will not.

As described in the EA (p. 23), because of the relatively small tree size (10.5-12.3 inches quadratic mean diameter), high tree density (~ 200 to 315 trees per acre), and lack of nesting structure the commercial thinning units are dispersal-only and unsuitable habitat.

Removal of trees from the suppressed and intermediate canopy layers and limited removal of co-dominant and dominant trees will result in reduced vertical and horizontal cover (EA, p. 52). Spotted owls are expected to continue using the stands, however, because post-project canopy cover will exceed 40 percent and the quadratic mean diameter of the stands will exceed 11 inches diameter breast height, figures accepted as a threshold for dispersal function. Use by owls would likely be less, however, until canopy cover returns to pre-thinning levels in 15-20 years.

The project will not result in disruption/disturbance to any nesting spotted owls, or directly affect owls through the removal of suitable habitat. It is considered likely to adversely affect spotted owls, though. Portions of Units 2 and 3 are located in the core area of an estimated nest site located on privately-managed timberlands to the east in Section 26, T. 29 S., R. 3 W. The core area has less than 50 percent suitable habitat. Unit 2 also overlaps the estimated nest patch. Because use of these stands is likely to be less, as described above, the U.S. Fish and Wildlife service has determined that thinning under these circumstances may potentially harm owls by reducing their reproductive success.

As described in the South Umpqua River Watershed Harvest Plan EA (pp. 61), no direct effects to any fish species, including the Federally-threatened Oregon Coast coho salmon, are anticipated. As further addressed in the EA (pp. 62-68) any effects on aquatic habitat, including critical habitat for coho salmon, Essential Fish Habitat for coho salmon, and water quality would be negligible and discountable in magnitude at the project level.

Appendix D of the EA documents consistency of the proposed action with Aquatic Conservation Strategy objectives at the project and watershed scales.

Monitoring:

Monitoring of the effects of the Thin Air Commercial Thinning project will be done in accordance with provisions contained in the ROD/RMP, Appendix I (p. 84-86 and 190-191 and 193-199), focusing on the effects on: Riparian Reserves, Matrix, Air Quality, Water and Soils, Wildlife Habitat; Fish Habitat; and Special Status Species Habitat.

Protest Procedures:

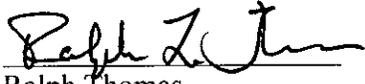
The decision described in this document is a forest management decision and is subject to protest by the public. In accordance with Forest Management Regulations at 43 CFR Subpart 5003 Administrative Remedies, protests of this decision may be filed with the authorized officer, Ralph L. Thomas, within 15 days of the publication of the notice of decision/timber sale advertisement on August 18, 2009, in *The News-Review*, Roseburg, Oregon.

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. The authorized officer shall, at the conclusion of the review, serve the protest decision in writing to the party or parties. Upon denial of protest, the authorized officer may proceed with the implementation of the decision as permitted by regulations at 43 CFR § 5003.3 subsection (f).

If no protest is received by the close of business (4:30 P.M., PDT) within 15 days after publication of the decision notice, 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:



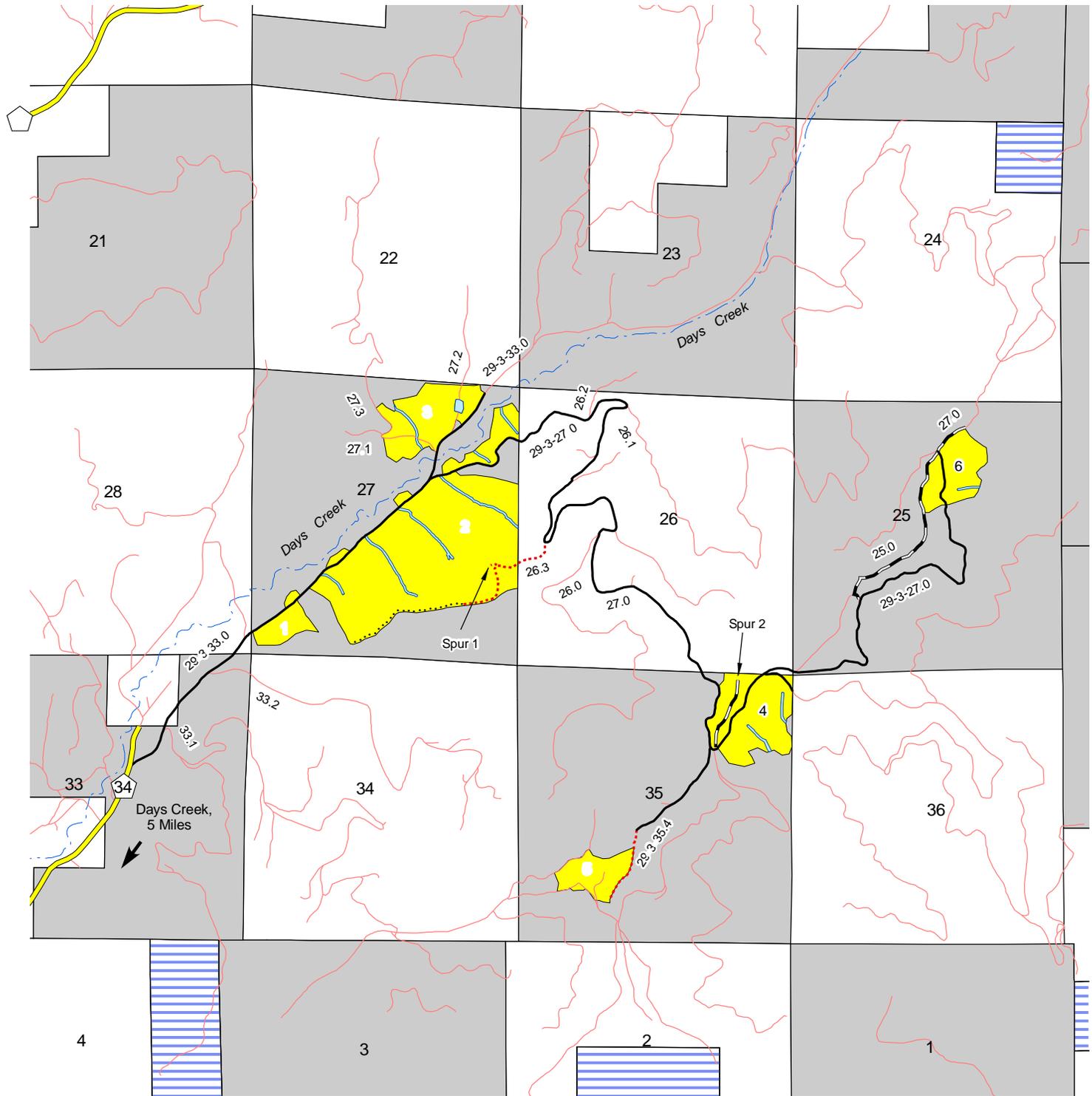
Ralph Thomas
Field Manager
South River Field Office
(541) 464-3203

8/17/09

Date

THIN AIR

Commercial Thinning

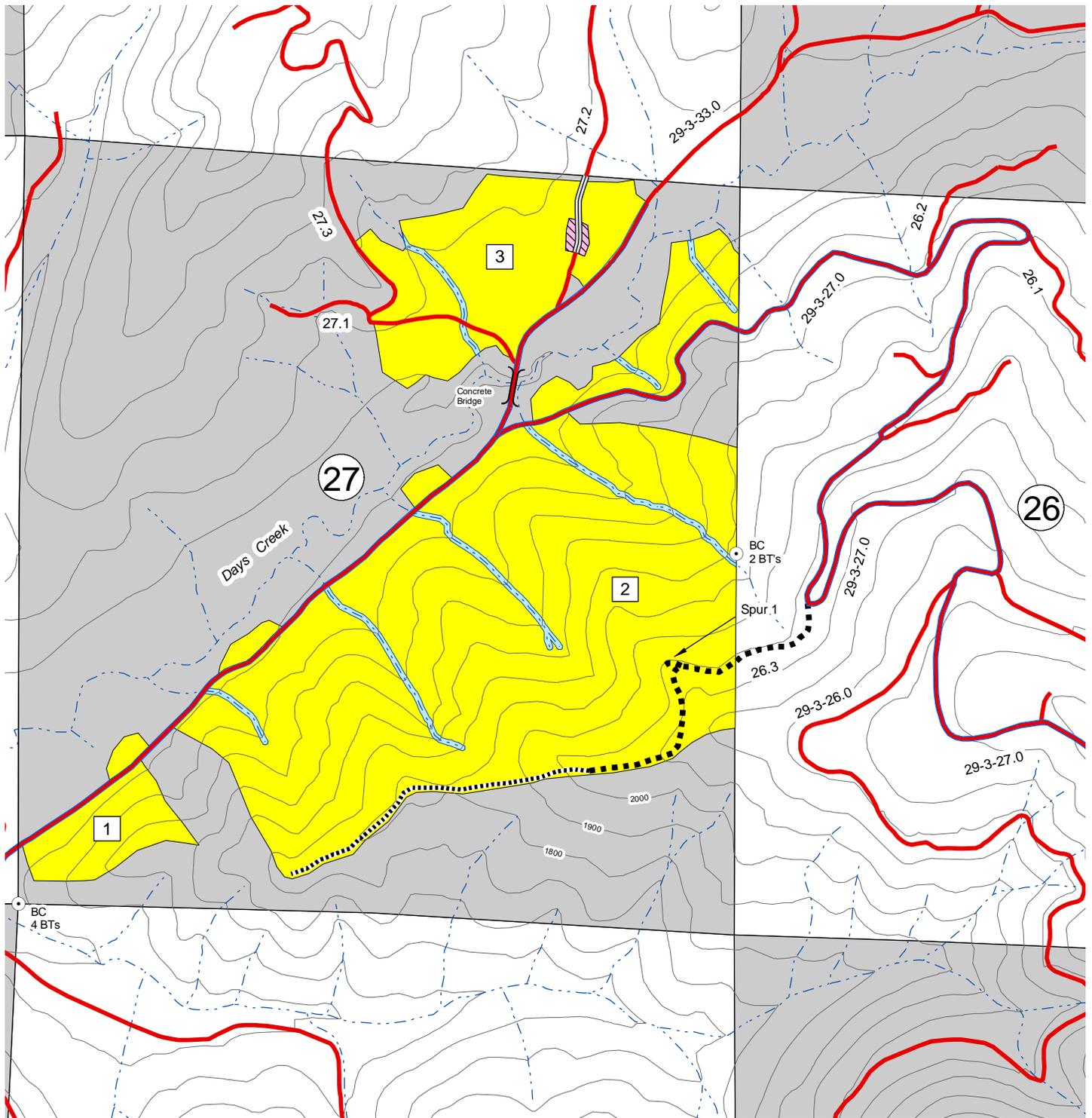


T29S, R3W
Willamette Meridian, Douglas Co., OR.

- Paved Highway
- Existing Road
- Haul Route
- Road to Construct
- Optional Forwarder Trail
- Thinning Area
- No Harvest Area
- BLM (O&C) Land
- BLM (PD) Land
- Non-BLM Land

THIN AIR

Commercial Thinning



T29S, R3W

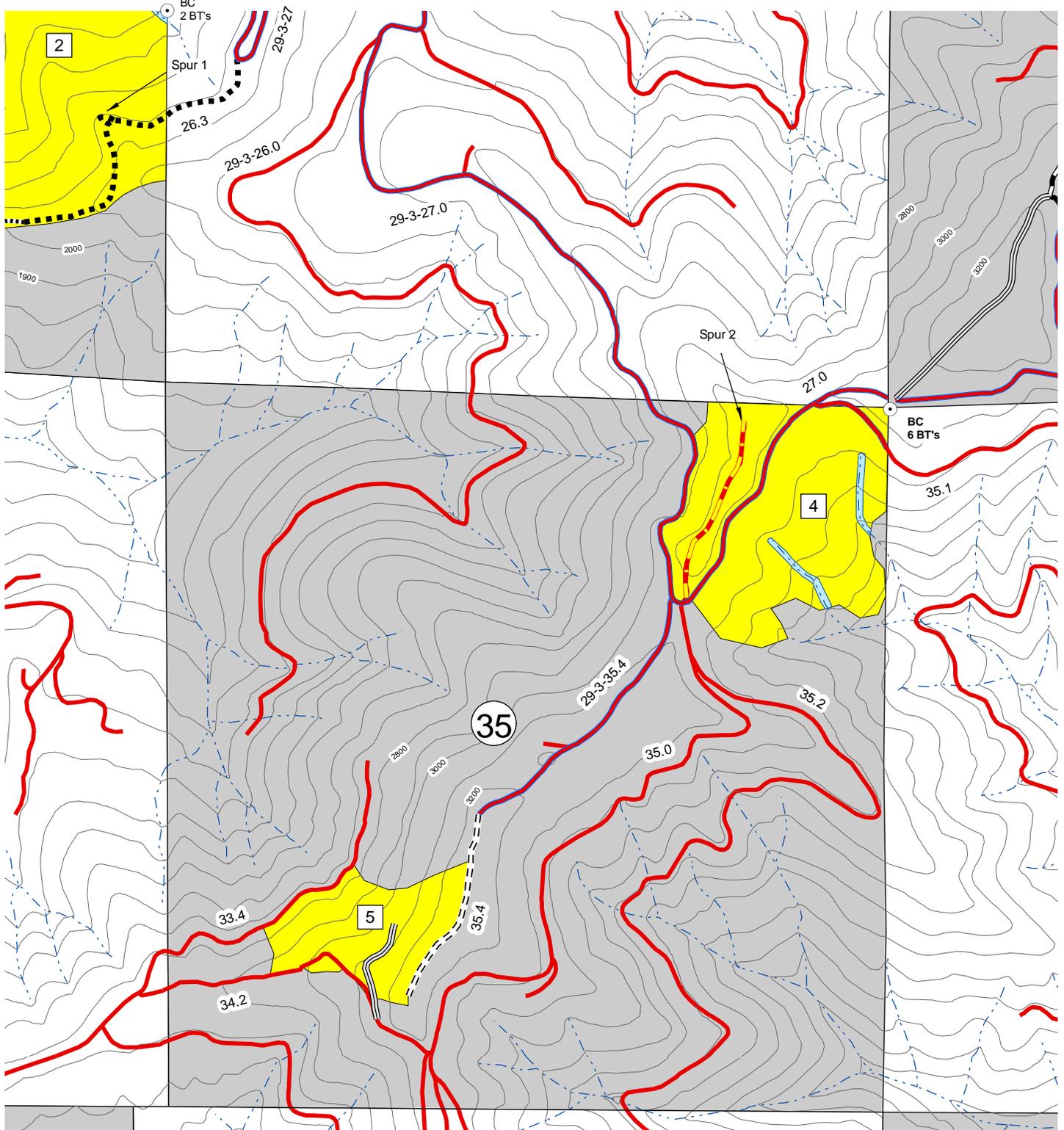
Willamette Meridian, Douglas Co., OR.

- Existing Road
- Haul Route
- Unusable Road
- Yarder/Forwarder Swing Road
- Road to be Constructed, Rocked
- Stream
- 100' Contour Line

- Thinning Area
- No Harvest Riparian Area
- No Harvest Area
- BLM (O&C) Land
- Non-BLM Land

THIN AIR

Commercial Thinning



- Existing Road
- Haul Route
- Unusable Road
- Road to be Constructed, Rocked
- Road to be Constructed, Decommissioned
- Road to be Renovated, Decommissioned
- Stream
- 100' Contour Line

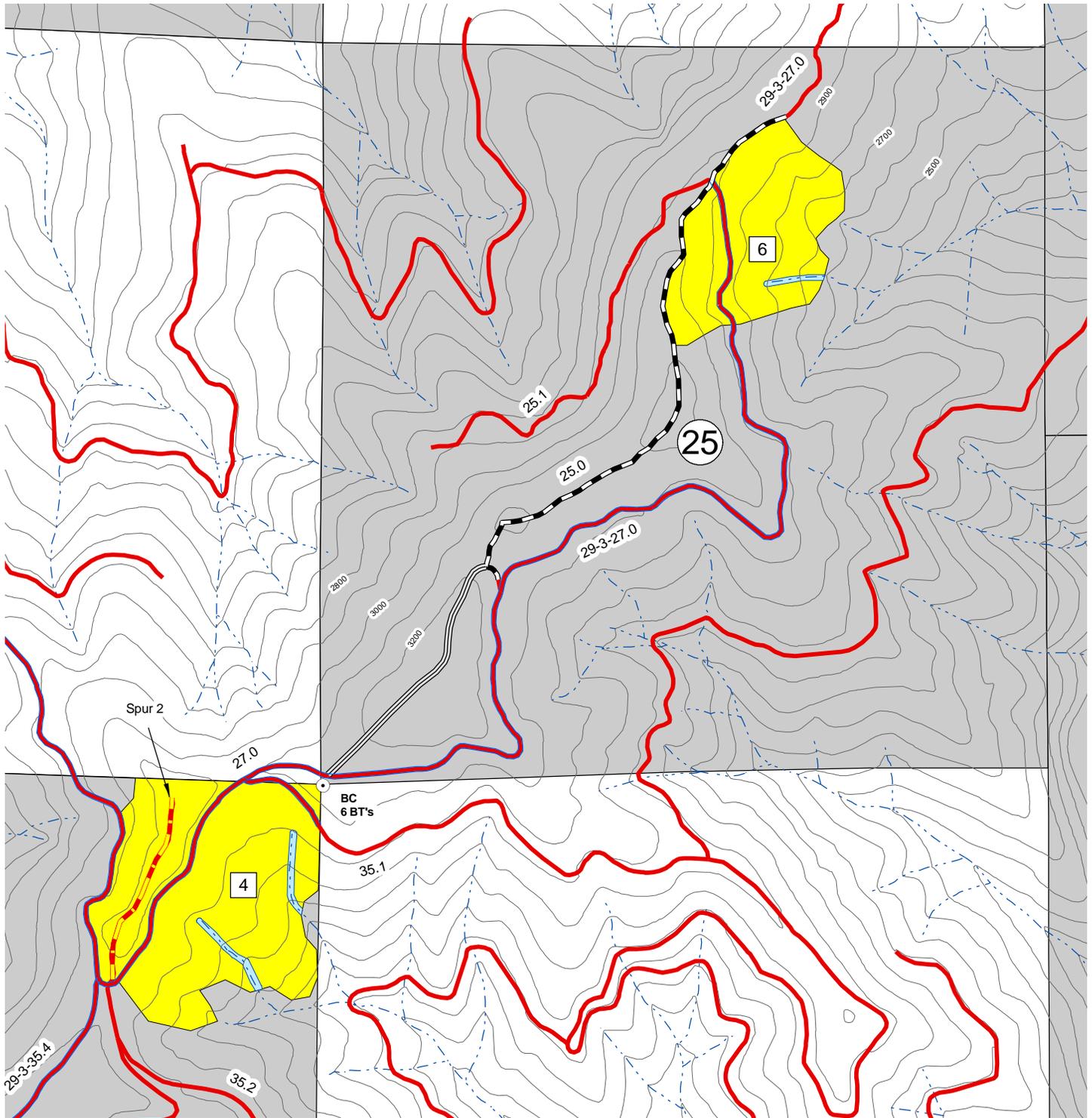
- Thinning Area
- No Harvest Riparian Area
- BLM (O&C) Land
- Non-BLM Land

T29S, R3W

Willamette Meridian, Douglas Co., OR.

THIN AIR

Commercial Thinning



-  Existing Road
-  Haul Route
-  Unusable Road
-  Road to be Renovated
-  Road to be Renovated, Decommissioned
-  Stream
-  100' Contour Line

-  Thinning Area
-  No Harvest Riparian Area
-  BLM (O&C) Land
-  Non-BLM Land

T29S, R3W

Willamette Meridian, Douglas Co., OR.