

South Umpqua River Watershed Harvest Plan Environmental Assessment

Treetop Flyer Commercial Thinning Decision Record

Bureau of Land Management
South River Field Office, Roseburg District Office
EA # OR105-08-02

Background:

The South Umpqua River Watershed Harvest Plan Environmental Assessment (EA 1) 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 management direction contained in the 1995 Roseburg District *Record of Decision and Resource Management Plan* (ROD/RMP). The Treetop Flyer Commercial Thinning project was analyzed as a part of Alternative Two, the proposed action (EA 1, pp. 5-16).

The Treetop Flyer Commercial Thinning project includes the thinning of Unit 30-3-15A. As described in Table 2-2 (EA 1, p. 8) thinning was planned with a combination of cable, ground-based and helicopter yarding. In light of escalating fuel prices, the high cost of helicopter yarding relative to more traditional methods of ground-based and cable yarding, and declining log values in 2008 and 2009 it was determined that plans to helicopter yard the top of the unit were not an economically viable yarding option.

In August, 2009, alternative access to Unit 30-3-15A was proposed and analyzed in the Alternative Access to Unit 5 of Treetop Flyer Commercial Thinning Environmental Assessment (DOI-BLM-OR-R050-2009-0008-EA (EA 2)).

Additional Information:

Specific to the thinning units:

- Units were evaluated for the presence of suitable habitat for Bureau Sensitive mollusks. Suitable habitat is not present and surveys were not necessary.
- No cultural resources were identified in field surveys.
- Botanical surveys were conducted and no Bureau Sensitive vascular plants, lichens, bryophytes or fungi were detected.

Specific to the alternative road analyzed in the Alternative Access to Unit 5 of Treetop Flyer Commercial Thinning EA:

- Botanical surveys for Bureau Sensitive and Survey & Manage vascular plants, lichens, bryophytes and fungi were conducted in association with the area of the previous regeneration harvest through which the proposed road would pass, including the late-seral stand in which the road would originate. These surveys were negative.
- No cultural resources were identified.

- On April 12, 2010, transect surveys for red tree voles were conducted within 180 feet either side of the proposed road right-of-way. Six trees with clumps of material were identified, three of these within the proposed clearing limits of the right-of-way. Trees identified as having potential red tree vole nests were climbed and materials gathered for examination. Climbers also looked for other possible nests not visible from the ground. No additional nests were observed, and an examination of the nest materials gathered determined that they were not red tree vole nests. No additional management requirements are indicated.
- No suitable habitat for Oregon shoulderband or Chace sideband snails was observed which would trigger the need for surveys.
- Foraging habitat, in the form of natural openings ten acres or larger are not present, and surveys for great gray owls are not required.

Decision:

It is my decision to authorize the Treetop Flyer Commercial Thinning project, completing implementation of Alternative Two (EA 1, pp. 5-16). Commercial thinning will be applied to six forest stands encompassing 170 acres, within the General Forest Management Area and Riparian Reserve land use allocations designated by the 1995 ROD/RMP.

Units are located in Sections 15, 21 and 23 of T. 30 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	22	30-3-21C
Unit 2	6	30-3-21B
Unit 3	11	30-3-21A
Unit 4	13	30-3-15B
Unit 5	95	30-3-15A
Unit 6	23	30-3-23A

The project will yield an estimated 2,385 thousand board feet of timber. Approximately 1,967 thousand board feet derived from the General Forest Management Area is creditable to the District's annual allowable sale quantity. The remaining 418 thousand board feet derived from Riparian Reserves is not chargeable to the annual allowable sale quantity.

All yarding will be accomplished with cable yarding equipment capable of maintaining a minimum of one-end log suspension. Landings will be spaced at 200-foot intervals, where practicable, to minimize the number of landings required, and to reduce the area subjected to soil disturbance and displacement.

Unit 1 has been reduced by two acres in area following a change in yarding methods from helicopter to cable. Approximately 17 acres of Unit 4 located upslope of Road No. 30-3-22.0, originally planned for helicopter yarding, were eliminated because they could not be safely yarded downhill. The portion of Unit 5, located southeast of Road No. 30-3-34.1 and St. John Creek was eliminated when helicopter yarding was eliminated as a viable yarding method.

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

- Felling and yarding of timber, except for clearing rights-of-way, is generally prohibited from April 15th to July 15th (barkslip period).
- Yarding and hauling of timber on Units 1, 2 and 6 is restricted to the period between May 15th and the onset of regular autumn rains, usually around mid-to-late October. Operations may be extended beyond October 15, subject to waiver, if weather conditions are favorable.
- Road construction and renovation, and thinning and density management operations within 65 yards of any unsurveyed suitable habitat, known nest sites, or known activity centers for northern spotted owls is prohibited from March 1st to July 15th, unless current year surveys indicate that owls are not present, are present but not attempting to nest, or nesting attempts have failed.

No unsurveyed suitable spotted owl habitat is present within 65 yards of Unit 4. Two years of surveys of suitable spotted owl habitat within 65 yards of Units 1, 2, 5 and 6 and all road rights-of-way have been completed. No owl occupancy has been documented. Seasonal restrictions on operations in these areas are waived until March 12, 2012, after which time, surveys will again be required if thinning operations have not been completed. Seasonal restrictions may be waived after June 15 if no spotted owl detections are made. This waiver would remain in effect until March 1 of the following calendar year.

Seasonal restrictions for all operations are required on Unit 3 because of the presence of nesting spotted owls in the vicinity. These restrictions will extend from March 1 through July 15 unless current year surveys indicate that owls are not present, are present but not attempting to nest, or that nesting attempts have failed.

Access will be primarily provided by existing roads, supplemented by permanent and temporary construction summarized below.

- A landing spur 330 feet (~ 0.06 miles) in length, will be constructed to provide yarding access for a portion of Unit 2. It will be decommissioned afterwards by subsoiling, covering with logging slash and blocking to vehicular traffic.
- A temporary, natural-surface road (No. 30-3-23.7) 906 feet (~ 0.17 miles) in length will be constructed to access a landing location suitable for yarding Unit 6. As the landing location is on private land, an easement was required. As a condition of the easement, the road will be retained, but will be water-barred and blocked to vehicular traffic upon completion of use.
- A forwarder trail will be used to move logs from landings on Unit 1 to Road No.30-3-21.0 for loading. This trail will be subsoiled, covered with logging slash and blocked afterwards.
- In re-designing Unit 5 to accommodate conventional cable yarding, construction of a temporary extension of Road No. 30-3-15.1 became unnecessary. In its place, one permanent, surfaced road (No. 30-3-15.3) 3,758 feet (~ 0.77 miles) in length will be constructed. It will be located primarily on a ridge-top and allow for uphill yarding of the unit. The environmental consequences of building this road were analyzed under Alternative Two (EA 2, pp. 5-10).

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.

Rationale for the Decision:

The South Umpqua River Watershed Harvest Plan EA analyzed two alternatives in detail, Alternative One, the alternative of No Action (EA 1, p. 5), and Alternative Two, the Proposed Action (EA, pp. 5-16).

Alternative Two will achieve the 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 1, p. 3), whereas Alternative One will not.

As described (EA 1, p. 23), because of the relatively small tree size (10.0-15.2 inches quadratic mean diameter), high tree density (~200 to 380 trees per acre), and lack of nesting structure the proposed thinning units are primarily spotted owl 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 1, 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 removal of suitable habitat. Units 1, 2 and 3 are located in the core area of a nest site located on BLM-managed lands in Section 21, T. 30 S., R. 3 W. As indicated in the U.S. Fish and Wildlife Service Biological Opinion (BiOp) on the Roseburg District Fiscal Year 2009-2010 Program of Activities (Ref. No. 13420-2009-F-0125), the core area of the Ash Creek home range (IDNO 4538) has an estimated 54 percent suitable habitat (BiOp, p. 63), which will remain unchanged by thinning. Approximately two acres of Unit 3 overlaps the Ash Creek nest patch (BiOp, p. 63). Impacts to owls were addressed in the Roseburg District Biological Assessment, and the U.S. Fish and Wildlife Service did not find this project likely to result in incidental take (BiOp, p. 76).

Construction of Road No. 30-3-15.3, providing access for thinning Unit 5 will:

- Provide access to approximately 35 additional acres for this commercial thin harvest entry,
- Provide better control of logs by uphill yarding thereby reducing stand damage and creating safer yarding conditions,
- Provide all weather access and locate the majority of the road (70-75%) to a stable ridgetop location,

- Extend the season of operability for planned harvest activity,
- Provide better access for future management activity, and
- Reduce the amount of “full bench and end haul” road construction that would have been required for the originally proposed mid-slope extension of Road. No. 30-3-15.1, and eliminate the need to decommission and ameliorate approximately one half mile of full bench road.

The road construction will remove approximately 1.5 acres of suitable spotted owl habitat from a small isolated forest stand located near the outer periphery of the St. Johns Creek home range. The percentage of suitable habitat within the core area would remain unchanged at 39 percent. The 29 percent suitable habitat in the entire home range would decline by 0.16 percent. This small change will not alter current usage of the home range.

As discussed (EA 1, 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 3.2 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 2009 Roseburg District Annual Program Summary and Monitoring Report (p. 75).

The construction of 0.77 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 that has been previously decommissioned.

Public Involvement & Response to Comment:

The BLM received comments from four organizations during development of the South Umpqua River Watershed Harvest Plan EA (EA 1). 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.

None of the comments were potentially relevant to the Treetop Flyer Commercial Thinning project.

Comments were also received on the Alternative Access to Unit 5 of Treetop Flyer Commercial Thinning EA (EA 2). Among them:

“[The] proposed road, described in Alternative Two, would originate in a 17 acre forest stand that is approximately 140 years old, with remnant components estimated at 230 years of age.” Does this mean that some older trees will need to be cut under the new proposed action, or the original plan (no action)? This is unclear.”

The road would require an average clearing limit of 60 feet which would vary with the steepness of side slopes and the need for curve widening. This would require the cutting of approximately 1.5 acres (EA 2, p. 3). Efforts have been made to locate the road to Unit 5 in a manner that minimizes the number of large trees that will be cut.

“[There] are ways to non-commercially treat those 35 acres, including the riparian reserves, to reintroduce biological diversity into a managed plantation. For instance, a safe number of trees could be killed yearly, for the next 10 years, which would go a long way toward introducing diversity as well as providing snag wildlife habitat.”

The stands proposed for thinning are in the Matrix allocations, adopted under the Northwest Forest Plan for commodity timber production, not for the application of non-commercial treatments with the purpose of “providing snag wildlife habitat.”

“[The] Alternative Access EA (page 1) states that the objective of the new road is to avoid downhill yarding. That does not make sense because downhill yarding is not allowed under the original EA anyway.”

There is no discussion in the South Umpqua River Watershed Harvest Plan EA indicating that downhill yarding is prohibited. Downhill yarding is not generally a desirable practice, as described in the Alternative Access to Unit 5 of Treetop Flyer Commercial Thinning EA (EA 2, p. 1).

“[Another] objective is to extend the logging/haul season. In other words, it would facilitate far more log trucks crossing fish-bearing streams, through riparian reserves, and traveling next to fish-bearing streams, further into the winter. The Alternative Access EA failed to consider this impact to streams.”

Extending the season of operability is an objective as it potentially increases the value of the timber and the financial return to taxpayers and the government.

Although they may vary slightly with yarding distance, daily production rates for cable yarding are in the neighborhood of two to four truckloads per day. This level of road use, even during periods of wet weather, is not considered likely to create sediment issues.

The Alternative Access to Unit 5 of Treetop Flyer Commercial Thinning EA was tiered to the South Umpqua River Watershed Harvest Plan EA which considered and addressed the potential effects of timber hauling on water quality (EA 1, pp. 31-32 and 64).

Monitoring:

Monitoring of the effects of this 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, Kevin Carson, within 15 days of the publication of the notice of decision/timber sale advertisement on August 17, 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:

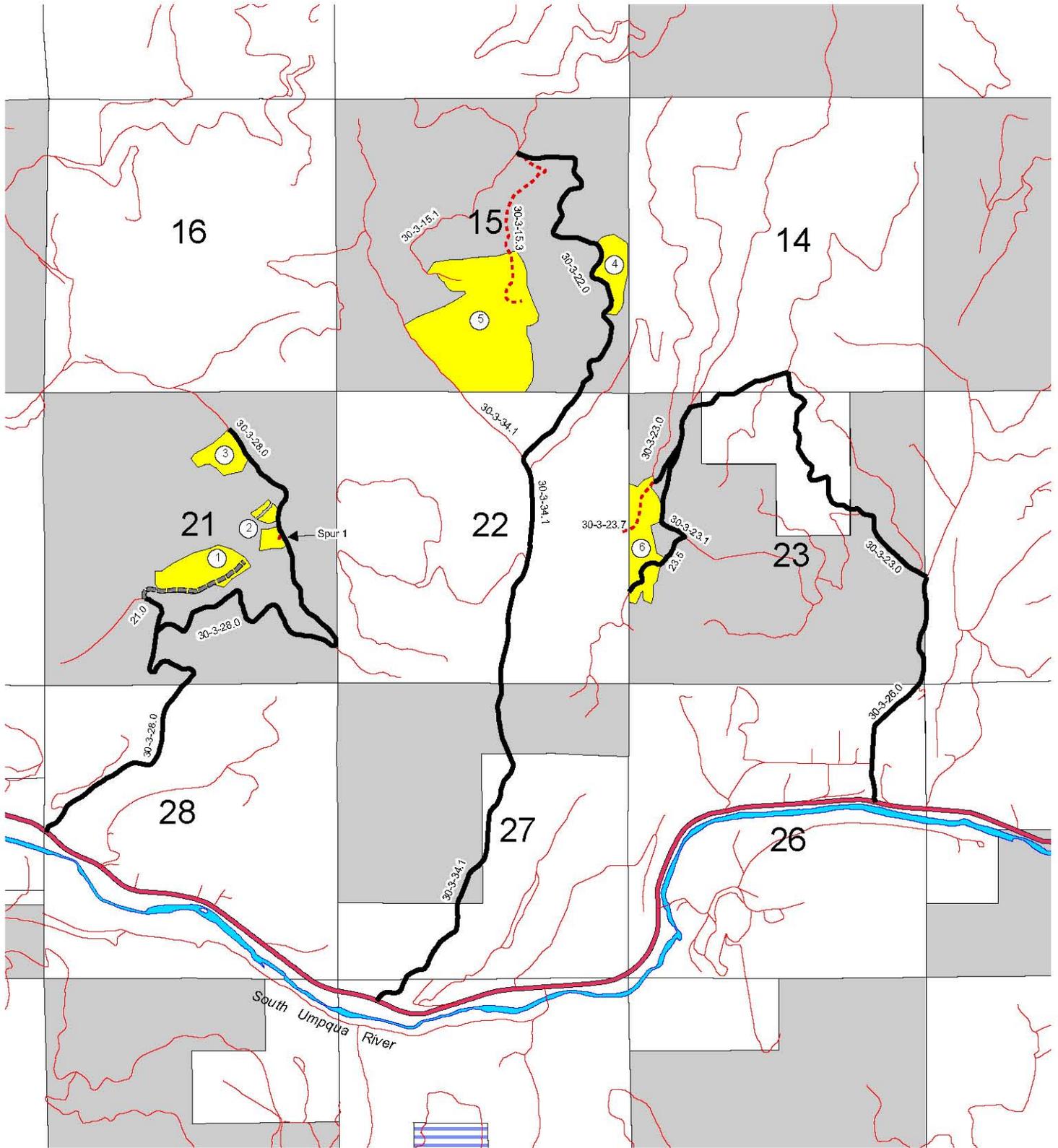


Kevin Carson
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8/16/10
Date

TREE TOP FLYER

Commercial Thinning



T30S, R3W

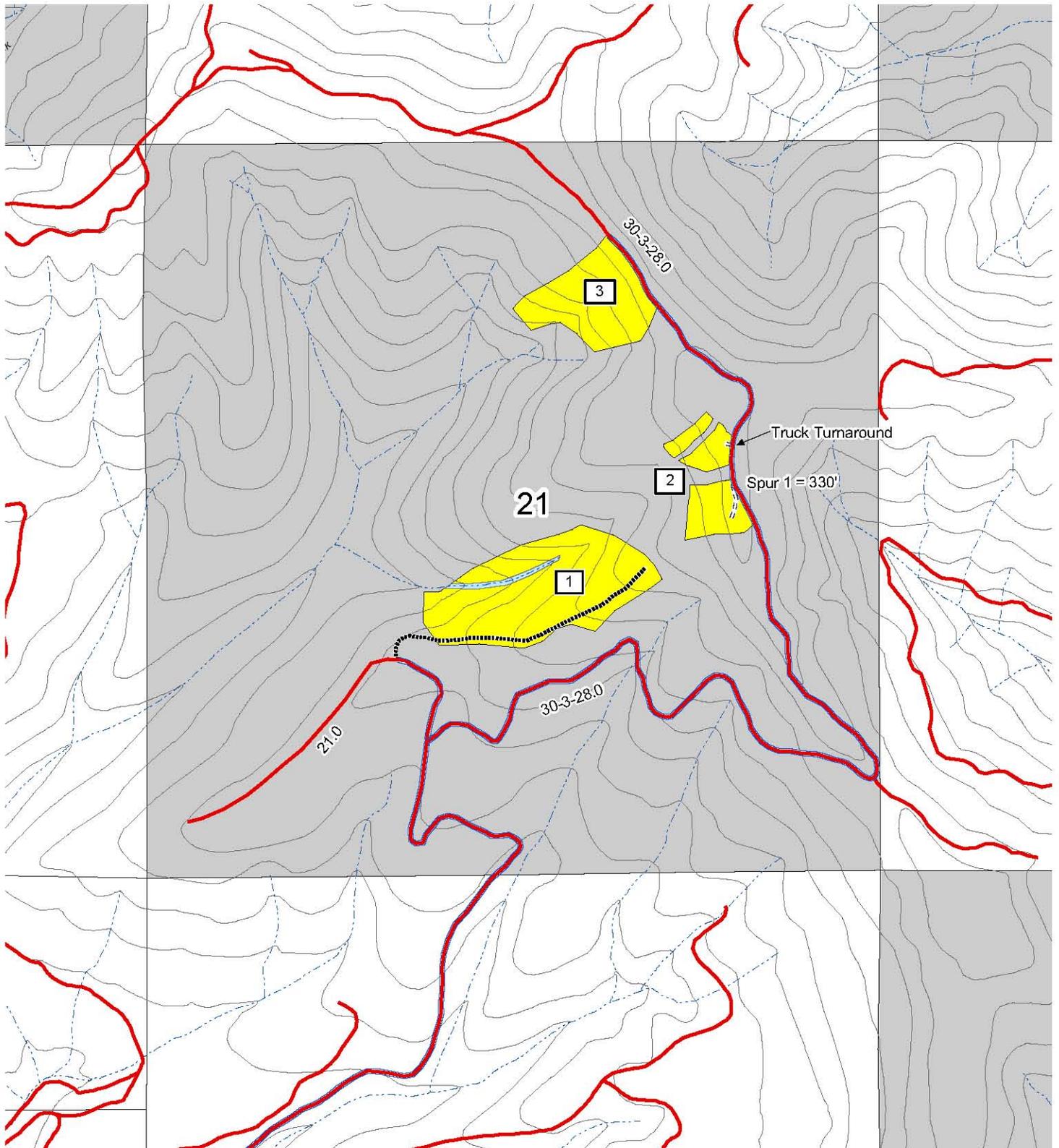
Willamette Meridian, Douglas Co., OR.



- State Highway
- Haul Route
- Existing Roads
- Road Construction
- Forwarder Swing Road
- Thinning Area
- South Umpqua River
- BLM (O&C) Land
- BLM (PD) Land
- Non-BLM Land

TREE TOP FLYER

Commercial Thinning



- Haul Route
- Existing Road
- Forwarder Swing Road
- Road to be Constructed and Decommissioned
- Streams
- 100ft Contours

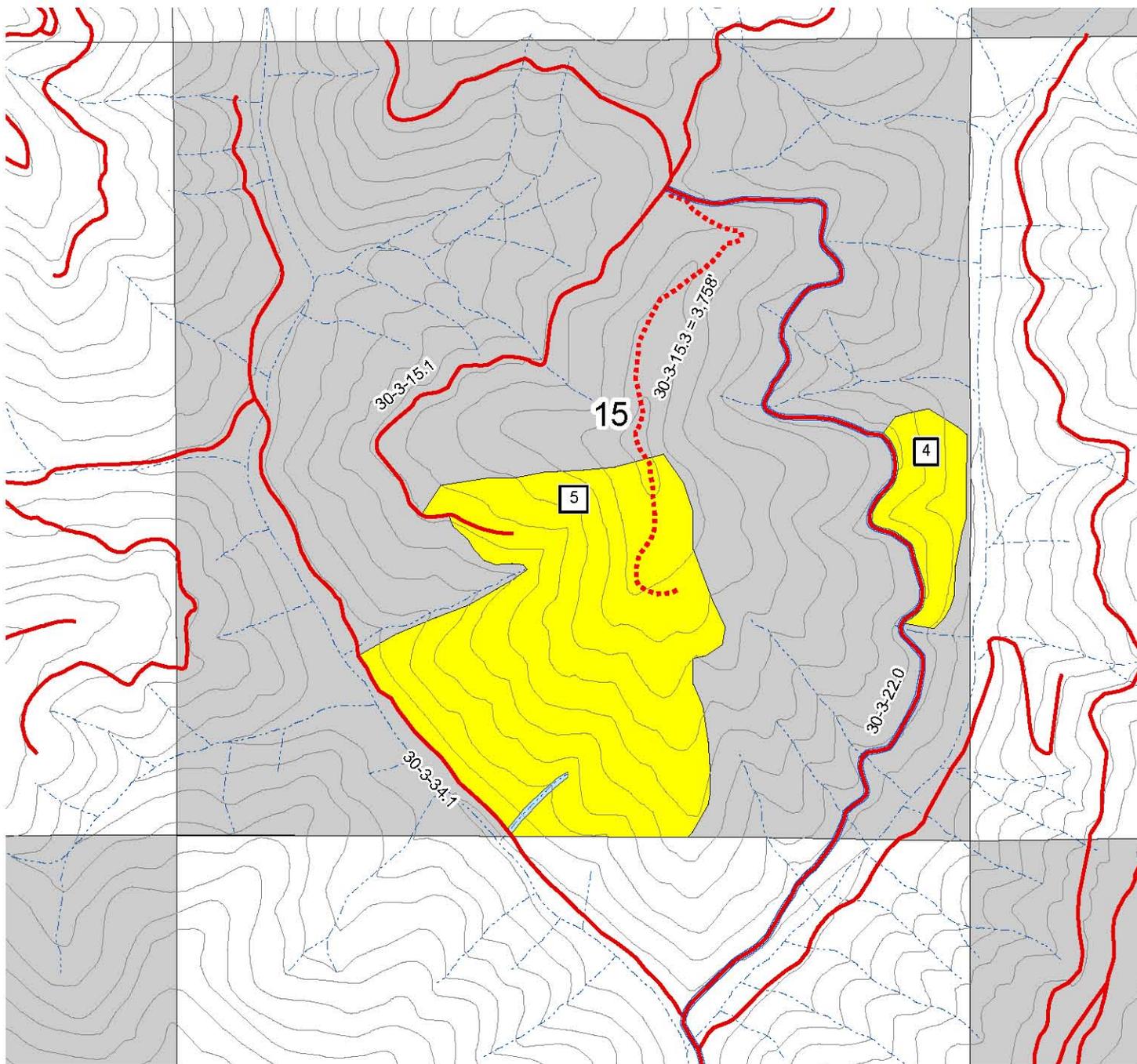
- No Harvest Area
- Thinning Area
- BLM (O&C) Land
- Non BLM Land

T30S, R3W

Willamette Meridian, Douglas Co., OR.

TREE TOP FLYER

Commercial Thinning



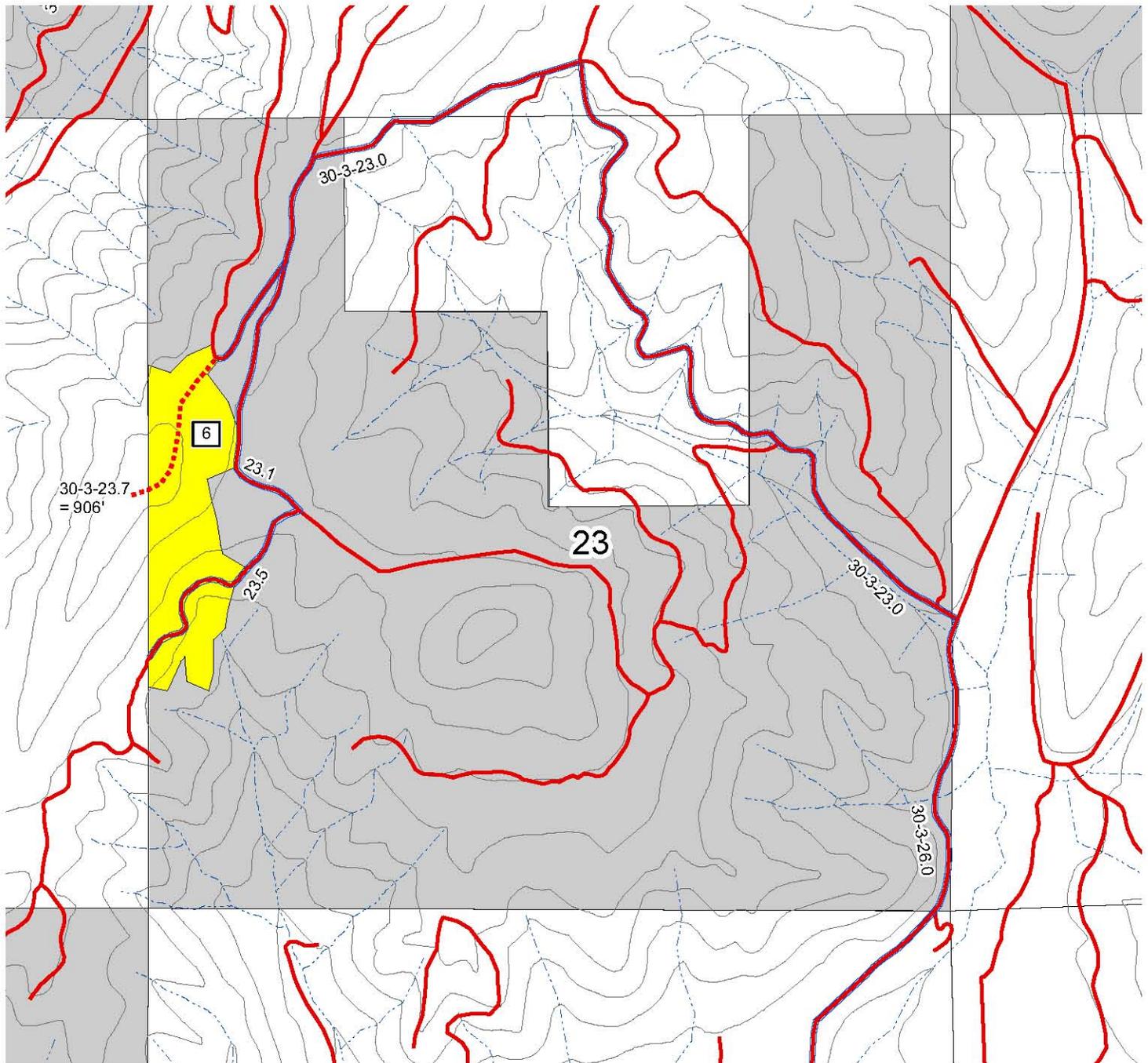
T30S, R3W

Willamette Meridian, Douglas Co., OR.

- Haul Route
- Existing Road
- Road to be Constructed and Rocked
- Streams
- 100ft Contours
- No Harvest Area
- Thinning Area
- BLM (O&C) Land
- Non BLM Land

TREE TOP FLYER

Commercial Thinning



T30S, R3W

Willamette Meridian, Douglas Co., OR.



- Haul Route
- Existing Road
- Road to be Constructed and Rockered
- Streams
- 100ft Contours
- Thinning Area
- BLM (O&C) Land
- Non BLM Land