

**White Castle Temporary Area Closure  
Environmental Assessment**

**United States**

**Department of the Interior**

**Bureau of Land Management**

**Roseburg District**

**South River Field Office**

**777 NW Garden Valley Blvd. Roseburg, OR 97471**

DOI-BLM-OR-R050-2013-0007-EA

U.S. Department of the Interior, Bureau of Land Management  
Roseburg District Office  
777 NW Garden Valley Blvd.  
Roseburg, Oregon 97470

This environmental assessment analyzes a proposed temporary closure of vehicular and pedestrian access to the White Castle Variable Retention Harvest contract area. The proposed action conforms with management direction provided in the 1995 Roseburg Record of Decision and Resource Management Plan (ROD/RMP), as amended prior to December 30, 2008.

The BLM is providing a 30-day period for public review and comment on this environmental assessment, and will accept comments until the close of business (4:30 PM, PDT) on August 30, 2013.

Comments on this environmental assessment, including the names and street addresses of respondents, will be made available for public review at the above address during regular business hours, 8:00 A.M. to 4:30 P.M., Monday through Friday, except holidays.

Before including your address, phone number, e-mail address, or other personal identifying information in your comment be advised that your entire comment, including your personal identifying information, may be made publicly available at any time. While you can ask us in your comment to withhold from public review your personal identifying information, we cannot guarantee that we will be able to do so. If you choose to submit any written comments, they should be directed to Steven Lydick, South River Field Manager, at the above address.

Submissions from organizations, businesses, and individuals identifying themselves as representatives or officials of organizations or businesses, will be made available for public inspection in their entirety.

In keeping with Bureau of Land Management policy, the Roseburg District posts Environmental Assessments, Environmental Impact Statements, Findings of No Significant Impact, and Decision Records/Documentations on the district web page under **Plans & Projects** at [www.blm.gov/or/districts/roseburg](http://www.blm.gov/or/districts/roseburg), on the same day on which an electronic notice of availability is transmitted to those individuals and organizations on the District's NEPA mailing list who have expressed an interest in project planning and analysis. Individuals desiring a paper copy of such documents will be provided one upon request. Individuals with the ability to access these documents online are encouraged to do so. Internet use reduces paper consumption and administrative costs associated with copying and mailing.

## **1.0 Background**

The Bureau of Land Management (BLM) does not usually restrict areas to public use during active timber sales since recreational public use of these areas is typically minor or non-existent. In this case, the White Castle Variable Retention Harvest project (USDI BLM 2013a, USDI BLM 2013b) was analyzed in the Roseburg Secretarial Demonstration Pilot Environmental Assessment (USDI BLM 2011), otherwise known as the Pilot EA, and has prompted considerable public interest. In June, 2013, timber sale protesters began camping in the White Castle Variable Retention Harvest project area (Action Area) with the stated intention of preventing harvest operations. Timber harvest operations are inherently dangerous while trees are being felled, yarded, loaded and hauled. According to the United States Department of Labor, by many measures, logging is the most dangerous occupation in the United States. The tools and equipment such as chain saws and logging machines pose hazards wherever they are used. As loggers use their tools and equipment, they deal with massive weights and irresistible momentum of falling, rolling, and sliding trees and logs. The hazards are more acute when dangerous environmental conditions are factored in, such as uneven, unstable or rough terrain; inclement weather including rain, snow, lightning, winds, and extreme cold and/or remote and isolated work sites where health care facilities are not immediately accessible. The combination of these hazards present a significant risk to both workers and visitors to the logging operation, regardless of the type of timber being logged, where it is logged, or the end use of the wood (USDL OSHA 2013; see <https://www.osha.gov/SLTC/logging/>).

The hazards faced by logging employees could be exacerbated by the presence of members of the public seeking to interfere with active operations. Due to these risks, the BLM is concerned for the welfare and safety of the operator's personnel and campers in the timber sale area. The only way to ensure the safety of all parties is to temporally restrict recreational public use. Road construction and harvest operations in many units are constrained by limited seasonal operations windows for this timber sale due the need to construct roads in the dry season and conduct operations outside of the northern spotted owl nesting season. In conjunction with the limited operations window, the contract has duration of only 36 months, creating an exigent need for safe conditions in the timber sale units so that operations may commence.

## **2.0 Proposed Action**

Under 43 CFR 8364.1, the Bureau of Land Management (BLM) proposes to temporarily restrict motorized and non-motorized public access to the contract vicinity of the White Castle Variable Retention Harvest project, hereafter known as the Action Area (Figure 1) for up to 24 months. Administrative use by the BLM and its contractors, U.S. Forest Service, Douglas Forest Protective Association, Oregon Department of Fish and Wildlife (ODFW), and access by parties with rights of reciprocal use would be permitted. Signs and temporary traffic barriers would be used to restrict public access to the 2,167-acre Action Area including approximately 15 miles of road within the area (Table 1).

## **3.0 Purpose and Need**

The purpose for this proposed action is to quickly implement a temporary closure of the Action Area to public use during active logging operations. The need for action results from the danger to timber sale protesters within harvest units of an active timber sale; risks to personnel engaged in timber harvest operations; and potential damage to roads, vehicles, and equipment. The temporary closure is necessary in order to minimize conflicts between timber sale operators and the protesters during harvest operations. There is an imminent need to implement the closure since logging operations may commence at any time and there is a limited operations window available for this timber sale due to the need to complete operations during the contract period (36 months).

## **4.0 Decision to be Made**

The South River Field Manager is the deciding official. The decision to be made is: *Whether or not to implement a temporary area closure to minimize user conflicts and protect people and property during implementation of the White Castle Variable Retention Harvest Project.*

## **5.0 Scoping and Issues**

The Council on Environmental Quality's implementing regulations for the National Environmental Policy Act (NEPA) directs agencies to encourage and facilitate public involvement in the NEPA process to the fullest extent possible (40 CFR 1500.2(d), 40 CFR 1506.6). This means that while some public involvement is required in the preparation of an environmental assessment (EA), the BLM has discretion to determine how much and what kind of public involvement works best for each individual EA (BLM, 2008, p. 76).

Through internal scoping, the project Interdisciplinary Team (IDT) brought forward one concern related to resources that had the potential of being affected by the proposed action: *What are the effects of the proposed action on people who recreate in the area?* The resource concerns related to this issue are analyzed in the Affected Environment and Environmental Consequences section of this EA.

Given the need to implement the area closure as quickly as possible and the limited scope and duration of the proposed temporary closure, the South River Field Office has chosen not to conduct external scoping for this action. Rather, public involvement for this EA will consist of a review of the EA and unsigned Finding of No Significance Impact (FONSI).

## **6.0 Conformance with Land Use Plans**

The temporary area closure conforms to the Roseburg District 1995 Record of Decision and Resource Management Plan (ROD/RMP) to:

*“Ensure the continued availability of Public Land for a diversity of resources dependent outdoor recreation while maintaining the commitment to manage Public Land consistent with the applicable laws, regulations, and principles of ecosystem management.”* (ROD/RMP p. 55); and

*“Manage recreation use on BLM-administered land to protect natural resources, provide visitor safety, and minimize conflicts among various uses* (ROD/RMP p. 55).”

## **7.0 Alternatives**

This section describes alternatives identified by the IDT. Refer to Figure 1 for specific Action Area location.

### **7.1 Alternative 1: No Action**

Under the No Action Alternative the White Castle temporary area closure would not be implemented and the area and roads would remain open for public recreation and administrative uses.



## 7.2 Alternative 2: Proposed Action – Temporary Area Closure

Use of the 2,167-acre Action Area, including approximately 15 miles of road (Table 1) within the area, would be restricted for up to 24 months. An additional 18.5 miles of road outside the Action Area would be affected (Table 2). The following persons are exempt from the identified closure:

- 1) Federal, State, or local law enforcement officers, while engaged in the execution of their official duties.
- 2) BLM, Forest Service or ODFW personnel, or their representatives while engaged in the execution of their official duties.
- 3) Any member of an organized rescue, fire-fighting force, or emergency medical services organization while in the performance of their official duties.
- 4) Any person in receipt of a written authorization of exemption obtained from the authorized officer.
- 5) Parties with rights of reciprocal use.

A combination of signs and removable barriers would be used along roads to notify the public of the closure. Following are the specifics of the restricted public access:

S½ SE¼ Section 23, Section 25, and NE¼ Section 26, T. 28 S. R 3 W., Willamette Meridian (W.M.)  
E½ Section 4, NE¼ W½ Section 4, N½ Section 31, Section 32, and SW¼, and Section 33, T. 28 S. R 2 W., W.M.

**Table 1: Roads within the proposed White Castle Action Area**

Road Number	Segment Length (miles)	Existing Road Management
28-2-31.9	0.23	Open Yearlong Single Lane Road – BLM
28-2-31.11	0.32	Open Yearlong Single Lane Road – BLM
28-2-32.1	3.69	Open Yearlong Single Lane Road – BLM
28-2-32.2	0.64	Open Yearlong Single Lane Road – BLM
28-2-32.3	0.58	Open Yearlong Single Lane Road – BLM
28-2-32.4	0.55	Open Yearlong Single Lane Road – BLM
28-2-32.5	0.30	Open Yearlong Single Lane Road – BLM
28-2-32.6	0.05	Open Yearlong Single Lane Road – BLM
28-3-25.0	1.02	Open Yearlong Single Lane Road – BLM
28-3-25.1	0.08	Open Yearlong Single Lane Road – BLM
28-3-25.2	0.32	Open Yearlong Single Lane Road – BLM
28-3-26.0	0.45	Open Yearlong Single Lane Road – BLM
28-3-26.2	1.28	Open Yearlong Single Lane Road – BLM
28-3-26.3	0.27	Open Yearlong Single Lane Road – BLM
28-3-35.0	1.05	Open Yearlong Single Lane Road – BLM
28-3-35.1	0.69	Decommissioned
29-2-3.9	0.04	Open Yearlong Single Lane Road – BLM
29-2-4.0	0.39	Open Yearlong Single Lane Road – BLM
29-2-4.1	0.28	Open Yearlong Double Lane Road – BLM
29-2-4.12	0.20	Open Yearlong Single Lane Road – BLM
29-2-4.2	0.12	Open Yearlong Single Lane Road – BLM
29-2-4.9	0.73	Open Yearlong Single Lane Road – BLM
29-2-4.10	0.91	Open Yearlong Single Lane Road – BLM
29-2-4.11	0.52	Open Yearlong Single Lane Road – BLM
29-3-11.1	0.23	Open Yearlong Single Lane Road – BLM
<b>Total</b>	<b>14.94</b>	

**Table 2: Affected roads that extend outside of the Action Area.** Roads extending outside of the restricted area boundary are not part of the temporary closure.

Road Number	Segment Length (miles)	Existing Road Management
1800305	0.39	Single Lane Road – Forest Service
1800307	0.83	Single Lane Road – Forest Service
1800312	0.18	Single Lane Road – Forest Service
1800330	1.44	Single Lane Road – Forest Service
1800340	0.60	Single Lane Road – Forest Service
1800350	0.53	Single Lane Road – Forest Service
2810852	0.80	Single Lane Road – Forest Service
2810900	3.52	Single Lane Road – Forest Service
2810910	1.63	Single Lane Road – Forest Service
2810912	0.51	Single Lane Road – Forest Service
2810915	0.27	Single Lane Road – Forest Service
2810920	0.28	Single Lane Road – Forest Service
2810925	3.12	Single Lane Road – Forest Service
2810930	0.82	Single Lane Road – Forest Service
2810931	0.51	Single Lane Road – Forest Service
2810940	0.55	Single Lane Road – Forest Service
2810945	0.35	Single Lane Road – Forest Service
2810950	0.15	Single Lane Road – Forest Service
2810952	0.81	Single Lane Road – Forest Service
28-3-26.3	0.10	Open Yearlong Single Lane Road – BLM
28-3-35.1	0.53	Decommissioned
29-2-15.1	0.51	Open Yearlong Single Lane Road – BLM
29-2-4.12	0.11	Open Yearlong Single Lane Road – BLM
Total	18.54	

## 8.0 Existing Conditions

The 2,167-acre Action Area is set within the Myrtle Creek, Little River, and Middle South Umpqua/Dumont Creek watersheds. Total forested Federal ownership in the watersheds is approximately 211,000 acres (Pilot EA, Table 3-2, p. 35), with approximately 56,700 acres of this total under BLM administration (Pilot EA, Table 3-3, p. 35).

Recreational users of the Action Area typically come from local communities including Roseburg, Green, Winston, Myrtle Creek, Riddle and Canyonville, Oregon which are about 20 air miles from the Action Area. There are about 284,000 acres of federal lands within 20 miles of these communities. Lands within the Action Area are predominately accessed by motorized vehicles, typically 4x4, full-sized vehicles, and Off-Highway Vehicles (OHVs defined as: Class I - ATV's, Class II - 4x4s, Class III - Motorcycles, Class IV - Side by Sides). Recreation is typically day use or short term camping. Recreational users can easily access other recreational opportunities of a like nature on other federal lands within 20 air miles of their communities.

Table 1 (above) identifies 26 inventoried road segments (15 miles) within the Action Area. An additional 18.5 miles of road outside of the Action Area would be affected because the roads begin within the Action Area, are identified in Table 2. These roads are used very little, if any, for non-motorized recreation (i.e. horses or bicycles). The Action Area is typically snow-covered during the winter and early spring months and recreational use is minimal or nonexistent.

The Action Area is within the South River Extensive Recreation Management Area (ERMA). Recreation management is one of several management objectives within an ERMA, where limited commitment of resources provides extensive and unstructured types of recreation. The primary types of recreation that would be affected by this temporary closure would be driving for pleasure, OHV use, hunting, fishing, recreational shooting, and dispersed camping. Other types of recreational activities that may occur within the Action Area include hiking, mountain biking, wildlife viewing, rock collecting, and winter recreation. These types of uses are considered to be very low within the Action Area.

Big and small game hunting occurs within the Action Area during hunting season. The Action Area is not part of a controlled hunting unit. Dispersed camping, usually associated with hunting also occurs within the Action Area.

Although there are no designated or managed OHV trails in the area, BLM personnel have observed OHV use, primarily on existing roads.

The majority of the access routes in the Action Area are single lane, gravel logging roads. A portion of the State of Oregon designated Myrtle Creek – Canyonville Tour Route is within the Action Area, specifically 1.8 miles of BLM Roads 28-3-35 and 29-2-4.9. The 68-mile tour route offers wildflower viewing in spring, vivid color viewing in the fall, and opportunities for travelers to view active forest management on BLM lands. Although this is a State of Oregon designated route, the BLM is not party to any agreements requiring any special management considerations pertaining to land management along the route.

Harvesting of special forest products such as cedar boughs, salal, and beargrass may occur within the Action Area. These products are typically harvested in the fall and early winter months with the exception of salal which can be harvested year round.

## **9.0 Environmental Consequences**

The proposed action would not cause any physical disturbance and therefore would have no effects to natural resources. There would be an interruption in the availability of recreational opportunities due to the area closure. This issue is analyzed in detail on the following pages.

### **Issue: What are the effects of the temporary area closure on people who recreate in the area?**

#### **Alternative 1: No Action**

Under Alternative 1, conflicts between timber operators and recreational users would create unsafe conditions and interrupted or delayed harvest operations. One of two scenarios is likely to occur:

- 1) The protesters succeed in preventing harvest because loggers would not harvest the units occupied by the protesters to avoid the possibility of harming the protesters, or
- 2) The loggers would proceed to harvest the units placing themselves and the protesters at risk of injury or death.

In scenario 1, if harvest is prevented, the purchaser would not be able to exercise their rights and obligations under the contract.

In scenario 2, the risk of injury or death would result from falling or rolling trees or contact with harvest equipment.

There would be no displacement of recreationists and the availability of a variety of recreational opportunities in the Action Area would be unaffected.

### **Alternative 2: Proposed Action – Temporary Area Closure**

The proposed action would affect approximately one percent of all Federal forests (U.S. forest Service and BLM) in the affected watersheds, and four percent of forested lands under BLM administration in the watersheds.

Under Alternative 2, user conflicts during logging operations would be minimized by allowing access to the Action Area only to logging contractors and other authorized users identified above in Section 7.2 to establish safe working conditions. Restricting access to other users would result in eliminating the presence of protesters in an active timber sale area, thereby eliminating exposure to falling trees and harvesting equipment. Loggers would be alleviated of concerns about protesters occupying harvest units and roadways which would allow them to concentrate on conducting harvest operations and free them from having to navigate around protesters to avoid injury.

Although recreational activities in the Action Area would be disrupted, the effects would be minor because there is typically a low level of existing use in this area and there is an abundance of similar recreational opportunities on adjacent and nearby public lands. Some of these like-kind opportunities on the BLM Roseburg District and neighboring Umpqua National Forest include abandoned rock quarries, old landing areas, and flat areas along roads that are available for dispersed camping. The proposed action would affect approximately 0.8 percent of the federal lands within 20 miles of the affected communities listed in section 8.0. Additionally, other appropriate venues have been and remain available in which to protest or express disagreement with the timber sale actions.

There are no other existing or proposed area closures on the Roseburg District, and there are numerous opportunities for recreational uses in the vicinity of affected communities. The Roseburg District ROD/RMP (p. 58) identifies 415,446 acres of off highway vehicle (OHV) use areas on existing roads and trails. The proposed action would affect approximately 0.5 percent of the acres identified for OHV use in the ROD/RMP. Alternative 2 would have no cumulative effects on recreation resources.

## **10.0 Consultation**

**Agencies and Organizations Contacted** include the U.S. Forest Service, Douglas Forest Protective Association, Association of O&C Counties, Seneca Jones Timber Company, and Oregon Parks and Recreation Department.

The proposed action was determined to have no effect on federally listed threatened or endangered species or their habitat, therefore consultation with the U.S. Fish and Wildlife Service and National Marine Fisheries Service is not required. There would be no modification or removal of northern spotted owl habitat. The proposed action would not create any circumstances that would affect water quality or Oregon Coast coho salmon habitat. No listed botanical species are known to occur in the area and the proposed action would not result in any ground disturbance with the potential to affect any unidentified populations.

The proposed temporary closure would not result in any ground disturbance nor allow for present and future activities that may affect historic properties. Therefore, no cultural resource inventory is required as stated in the 1998 Protocol, Appendix E. The BLM has met its Section 106 requirements as guided by the Protocol and 2012 National Programmatic Agreement.

### **11.0 List of Preparers**

Gary Basham	Botanist
Molly Casperson	Archeologist
Steve Clark	Fisheries Biologist
Roli Espinosa	Wildlife Biologist
Brennan Garrelts	Forester
Cathy Hillis	GIS
Michelle Roberts	NEPA Planner
Erik Taylor	Recreation

### **12.0 References**

USDI BLM. 2008. Bureau of Land Management National Environmental Policy Act Handbook H-1790-1. Office of the Assistant Director, Renewable Resources and Planning, Washington DC.

USDI BLM. 2011. Roseburg Secretarial Demonstration Pilot Project Environmental Assessment. DOI-BLM-OR-R050-2011-0006-EA. Bureau of Land Management, Roseburg District, Roseburg, OR. 240 pp.

USDI BLM. 2013a. White Castle Variable Retention Harvest Decision Bureau of Land Management, Roseburg District, Roseburg, OR. 35 pp.

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