

# Gordon Creek Thinning I Timber Sale

Re-Issue of Final Decision and Decision Rationale

Environmental Assessment Number (EA) # OR080-07-05

February 2010

United States Department of the Interior  
Bureau of Land Management, Oregon State Office  
Salem District, Cascades Resource Area  
Gordon Creek 6<sup>th</sup> field Watershed.  
Multnomah County Oregon

Willamette Meridian,  
T. 1 S. R. 5 E.,  
Section 11, SW<sup>1</sup>/<sub>4</sub> SW<sup>1</sup>/<sub>4</sub>,  
Section 13,  
Section 15, N<sup>1</sup>/<sub>2</sub>, N<sup>1</sup>/<sub>2</sub> SE<sup>1</sup>/<sub>4</sub>

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As the Nation's principal conservation agency, the Department of Interior has responsibility for most of our nationally owned public lands and natural resources. This includes fostering economic use of our land and water resources, protecting our fish and wildlife, preserving the environmental and cultural values of our national parks and historical places, and providing for the enjoyment of life through outdoor recreation. The Department assesses our energy and mineral resources and works to assure that their development is in the best interest of all people. The Department also has a major responsibility for American Indian reservation communities and for people who live in Island Territories under U.S. administration.

**BLM/OR/WA/AE-009/036-1792**

## A. Introduction

This document is an update of the *Gordon Creek Thinning I Timber Sale Final Decision and Decision Rationale* that was issued April 28, 2009 and will be called the *Gordon Creek Thinning I Timber Sale Re-Issue of Final Decision and Decision Rationale* (Revised DR). The April 2009 DR can be found in section K of this revised DR. The following Gordon Creek NEPA documents are incorporated here by reference.

Date Issued	Document	Public Review Period
9/26/2007	Gordon Creek Thinning EA and FONSI (referred in the revised DR as 2007 EA)	09/26/2007-11/16/2007
03/17/2009	Gordon Creek Thinning Revised EA and FONASI (referred in the revised DR as 03/2009 Revised EA) <sup>1</sup>	03/18/2009-04/06/2009
04/28/2009	Gordon Creek Thinning I Timber Sale Decision Rationale (referred in the revised DR as April 2009 DR)	04/29/2009-05/14/2009 (1 <sup>st</sup> Protest Period )
11/25/2009	December 2009 Gordon Creek Thinning Revised EA and FONASI (referred in the revised DR as the 12/2009 Revised EA) <sup>2</sup>	12/02/2009-12/19/2009

<sup>1</sup>The 03/2009 Revised EA incorporated and revised the 2007 EA clarifying the proposed action and the associated effects of the proposed action.

<sup>2</sup>The 12/2009 Revised EA incorporated and republished the 03/2009 Revised EA replacing the analysis on carbon and climate change with an updated site specific analysis on carbon storage and climate change.

In December 2009, BLM updated the 03/2009 Revised EA to address comments about Carbon Sequestration and Climate Change. The 12/2009 Revised EA was in direct response to comments about the Carbon analysis received during the administrative protest period for the April 2009 DR. The 12/2009 EA was made available for additional public review December 2, 2009. The Revised DR constitutes the BLM's final decision with regard to the Gordon Creek EAs (2007 EA, 03/2009 Revised EA, 12/2009 Revised EA). This decision is based on site-specific analyses in the 12/2009 Revised EA, the 03/2009 Revised EA, the 2007 EA, the supporting project record, public comment, and management direction (Revised DR sections B through K). The Revised DR responds to comments concerning Carbon Sequestration and Climate Change received during the 12/2009 EA comment period, and reviews and affirms the Finding of No Additional Significant Impact signed November 25, 2009.

The Gordon Creek thinning project has been divided into three timber sales. Gordon Creek Thinning I is the first of these timber sales. This decision is limited to the Gordon Creek Thinning I timber sale, which is located in the T. 1 S., R. 5 E., Section 11, SW $\frac{1}{4}$  SW $\frac{1}{4}$ ; Section 13; Section 15, N $\frac{1}{2}$ , N $\frac{1}{2}$  SE $\frac{1}{4}$ , W.M.

## B. Decision

I am reaffirming my decision to implement the Gordon Creek Thinning I as a timber sale consisting of five of the fourteen units of the proposed action described in the 12/2009 Revised EA (12/2009 EA pp. 11-39) and the April 2009 DR (Revised DR section K). The units I will implement in the Gordon Creek Thinning I timber sale are 11E, 13A, 13B, 15A, and 15B (Revised DR section K: Table 3). This decision is hereafter referred to as the "selected action" in this revised DR.

Selected Action: EA units 11E, 13A, 13B, 15A, and 15B of the EA proposed action have been selected to form the Gordon Creek Thinning I timber sale. This timber sale is a proposal to thin approximately 780 acres of 52-74 year old mixed conifer stands. The selected action has not changed from the April 2009 DR and is further described in Revised DR section K - #2.0<sup>1</sup>.

### **C. Alternatives Considered**

The alternatives considered have not changed from the April 2009 DR. Revised DR section K - #3.0 describes the alternatives considered in the Gordon Creek EAs.

### **D. Decision Rationale**

After reviewing the site specific Carbon Storage/ Climate Change analysis described in the 12/2009 Revised EA and my review of the EA comments received on Carbon Storage and Climate Change, I have found no new information that would lead me to change my April 2009 Decision. Revised DR section K - #4.0 describes my decision rationale. The analysis showed there is no significant new information related to environmental concerns or bearing on the proposed actions or its effects.

After reviewing the 12/2009 EA public comments, we acknowledge that the no action alternative stores more carbon than the action alternatives and that the thinning action continues to store carbon, though not at the same rate as the no action alternative. However, there is no new information presented that would substantially alter the analytical conclusions in the EA.

### **E. Compliance with Direction**

This section supersedes the April 2009 DR, section 5.0 (Compliance with Direction)(Revised DR section K - #5.0).

As stated in the 12/2009 Revised EA section 1.3, the analysis in the Gordon Creek Thinning Revised EA is site-specific, and supplements and tiers to analyses found in the *Salem District Proposed Resource Management Plan/Final Environmental Impact Statement*, September 1994 (RMP/FEIS).

The proposed commercial thinning activities in the project area have been designed to conform to the following documents, which direct and provide the legal framework for management of BLM lands within the Salem District: **1/** *Salem District Record of Decision and Resource Management Plan*, May 1995 (RMP); **2/** *Record of Decision for Amendments to Forest Service and Bureau of Land Management Planning Documents within the Range of the Northern Spotted Owl and Standards and Guidelines for Management of Habitat for Late-Successional and Old-Growth Forest Related Species within the Range of the Northern Spotted Owl*, April 1994 (the Northwest Forest Plan, or NWFP); **3/** *Record of Decision and Standards and Guidelines for Amendments to the Survey and Manage, Protection Buffer, and other Mitigation Measures Standards and Guidelines*, January 2001 (2001 ROD); **4/** *National Fire Plan (NFP)*, August 2000.

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<sup>1</sup> Revised DR section K-#2.0 = April 2009 DR section 2.0

The RMP/FEIS includes the analysis from the *Final Supplemental Environmental Impact Statement on Management of Habitat for Late-Successional and Old-Growth Forest Related Species within the Range of the Northern Spotted Owl*, February 1994 (NWFP/FSEIS). The RMP/FEIS is amended by the *Final Supplemental Environmental Impact Statement for Amendments to the Survey and Manage, Protection Buffer, and other Mitigation Measures Standards and Guidelines*, November 2000.

## **Survey and Manage**

The Gordon Creek Thinning I project is consistent with court orders relating to the Survey and Manage mitigation measure of the Northwest Forest Plan, as incorporated into the Salem 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. Previously, in 2006, the District Court (Judge Pechman) had invalidated the agencies' 2004 RODs eliminating Survey and Manage due to NEPA violations. Following the District Court's 2006 ruling, parties to the litigation had entered into a stipulation exempting certain categories of activities from the Survey and Manage standard (hereinafter "Pechman exemptions").

Judge Pechman's Order from October 11, 2006 directs: "Defendants shall not authorize, allow, or permit to continue any logging or other ground-disturbing activities on projects to which the 2004 ROD applied unless such activities are in compliance with the 2001 ROD (as the 2001 ROD was amended or modified as of March 21, 2004), except that this order will not apply to:

- A. Thinning projects in stands younger than 80 years old (emphasis added):
- B. Replacing culverts on roads that are in use and part of the road system, and removing culverts if the road is temporary or to be decommissioned;
- C. Riparian and stream improvement projects where the riparian work is riparian planting, obtaining material for placing in-stream, and road or trail decommissioning; and where the stream improvement work is the placement large wood, channel and floodplain reconstruction, or removal of channel diversions; and
- D. The portions of project involving hazardous fuel treatments where prescribed fire is applied. Any portion of a hazardous fuel treatment project involving commercial logging will remain subject to the survey and management requirements except for thinning of stands younger than 80 years old under subparagraph a. of this paragraph."

Following the Court's December 17, 2009 ruling, the Pechman exemptions are still in place. 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. Nevertheless, I have reviewed the Gordon Creek Thinning I project in consideration of both the December 17, 2009 and October 11, 2006 order.

Because the Gordon Creek Thinning I project entails no regeneration harvest and entails thinning only in stands less than 80 years old, I have made the determination that this project meets Exemption A of the Pechman Exemptions (October 11, 2006 Order). Therefore this project may still proceed even if the District Court sets aside or otherwise enjoins use of the 2007 Survey and Manage Record of Decision since the Pechman exemptions would remain valid in such case.

## **F. Public Involvement/ Consultation/Coordination**

Public Involvement prior to the 12/2009 Revised EA is described in Revised DR section K -# 6.0. Consultation remains the same (DR section K - #6.0). The BLM made the 12/2009 Revised EA and FONASI available for additional public comment from December 2, 2009 to December 19, 2009. Five comment letters were received during this comment period. Responses to the public comments can be found in section J of this Decision Rationale.

## **G. Conclusion**

This section supersedes the April 2009 DR, section 7.0 (Compliance with Direction) (Revised DR section K - #7.0).

I reaffirm that the selected action would not have effects beyond those already anticipated and addressed in the RMP EIS for the following reasons. I have reviewed the information in the 12/2009 Revised EA and FONASI, the 12/2009 EA public comments, and the revised DR. I have determined that change to the Findings of No Additional Significant Impact (EA #OR080-07-05 FONASI – pp. v-x) covering the Gordon Creek Thinning I timber sale is not necessary because there is no significant new information in the 12/2009 Revised EA or public comments on the 12/2009 EA that leads me to believe the analysis, data or conclusions related to environmental effects of the proposed action are in error or that the selected action needs to be altered. My response to the 12/2009 EA comments can be found in revised DR section J.

### **Administrative Review Opportunities**

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 5003, protests of this decision may be made within 15 days of the publication of a notice of decision in a newspaper of general circulation. The notice for this decision will appear in the *Sandy Post* newspaper on February 24, 2010.

Protests are limited to the Carbon Storage, Carbon Emissions, and Climate Change analysis found in the 12/2009 Revised EA.

The protest must clearly and concisely state the reasons why the decision is believed to be in error. Any objection to the project design or my decision to go forward with this project must be filed at this time in accordance with the protest process outlined above. If a timely protest is received, this decision will be reconsidered in light of the statements of reasons for the protest and other pertinent information available and the BLM shall serve a decision in writing on the protesting party (43 CFR 5003.3).

The BLM will combine the responses to the protest points on the Gordon Creek Decision received on the April 2009 with the responses to the protest points received during this current protest period into a single protest decision.

**Implementation Date**

If no protest is received within 15 days after publication of this Decision Record (Gordon Creek Thinning I Timber Sale DR) this decision will become final. For additional information, contact Rudy Hefter (503) 375-5671, Cascades Resource Area, Salem BLM, 1717 Fabry Road SE, Salem, Oregon 97306.

Approved by: Cindy Enstrom  
Cindy Enstrom  
Cascades Resource Area Field Manager

2/22/2010  
Date

## H. Selected Action by Section

The selected action has not changed from the April 2009 DR. Revised DR sections A, and K- # 2.0 and #8.0 describe the selected action for the Gordon Creek Thinning I Timber Sale.

## I. Maps

The selected action not changed from the April 2009 DR. Revised DR sections A, and K- # 2.0 and #8.0 describe the selected action for the Gordon Creek Thinning I Timber Sale. Revised DR section K – 9.0 shows the maps of the Selected Action.

## J. Response to EA Comments

Response to 2007 EA and 03/2009 Revised EA comments can be found in Revised DR section K – 10.0. The following is the response to the site specific Climate Storage/Climate Change analysis found in the 12/2009 Revised EA.

### **Response to December 2009 Revised EA Comments on Carbon Storage /Climate Change.**

I have received comments for the revised Gordon Creek EA (December 2009) that provided additional analysis pertaining to carbon sequestration and climate change. My response to comments will only address those comments that pertain to the carbon/climate analysis. In some cases the comments have been quoted directly from commenter's responses and in some cases they have been paraphrased.

- 1. Comment:** *The EA relies on the carbon analysis in the WOPR EIS – an EIS that has been withdrawn and declared legally indefensible. This is not proper. BLM still lacks a program-level NEPA analysis of its logging program and how all that logging affects carbon and climate.*

**Response:** The BLM did not tier to the 2008 FEIS (aka WOPR EIS) nor has this EIS been deemed legally indefensible. There were lawsuits associated with the Record of Decision/Resource Management Plan and associated EIS, however, there was never an opinion declaring the EIS “legally indefensible” or otherwise invalid. The new Secretary of the Interior chose to withdraw the 2008 Record of Decision, due to BLM’s failure to complete section 7 consultation under the Endangered Species Act. The 2008 Final EIS was not withdrawn and remains available for use.

The BLM used the carbon methodology described in the 2008 FEIS because that is the best analysis and methodology available to BLM at this time. The EA used numbers associated with the No Action Alternative in the 2008 FEIS, which by definition is management under the 1995 ROD and the Northwest Forest Plan, including the cumulative effects analysis. Therefore the commenter has not demonstrated why using the carbon analysis as it pertains to the parcels managed under the 1995 RMP and the Northwest Forest Plan is improper.

2. **Comment:** *Logging forests like Gordon Creek should be avoided unless there is a very compelling need, BLM has not provided one.*

**Response:** BLM has provided the rationale for the project in the purpose and need. Commenter apparently disagrees with BLM's legal mandates as described in the 1995 ROD and the Northwest Forest Plan. Further, the commenter has failed to describe what it is about the purpose and need for this project that does not fit within the guidelines provided by the 1995 ROD.

3. **Comment:** *BLM cannot ignore the local incremental causes of climate change because all of the causes are both spatially dispersed and incremental in nature, and the cumulative effect of all these individual local decisions results in a problem of global proportions. This indicates the need for an EIS because the problem is significant and BLM is contributing to it and has no other NEPA analysis that it can tier to.*

**Response:** BLM has addressed the potential local incremental impacts of the project that may result in net emissions or net storage of greenhouse gases (EA, pp.138-142). The EA also addresses the cumulative impact of the projects carbon release and sequestration and presents the incremental effect of the proposed action on greenhouse gas levels within the context of effects of past, present, and reasonably foreseeable future actions at multiple spatial scales on page 141. As described in the EA, the analysis has determined that the project's carbon net emissions is so temporary and small that it was determined to be not significant. While anthropogenic-caused greenhouse gases contribute to climate change, it is beyond the scope of existing science to identify this project's greenhouse gas emissions as a measurable cause of specific climate impacts as outlined by the U.S. Geological Survey in its report described on page 136 of this EA.

4. **Comment:** *The logged forest will not have caught up to the amount of carbon stored in the forest in 2040 it is left unlogged.*

**Response:** We agree with this comment. EA Table 16, page 140 shows that the no action alternative stores more carbon than the action alternatives at year 2040. Table 16 also shows that for the action alternatives, there is a net increase in carbon storage at year 2040. Although carbon has been removed, carbon storage still continues in the stands thinned by the selected action.

5. **Comment:** *BLM cannot limit the temporal scope of the analysis by saying that the carbon losses and climate impacts of logging will be erased in 30 years because the extra carbon in the atmosphere will be contributing to adverse climate impacts over the 30 years and the unlogged forest will store far more carbon at the end of 30 years. For every year that logging results in extra carbon in the atmosphere, there needs to be mitigation.*

**Response:** As described in the EA, the analysis has determined that the project's carbon net emissions is so temporary and small that it was determined to be not significant (EA, pp. viii, x). Moreover the commenter cites no scientific opinion, report or otherwise to support the viewpoint that could connect carbon emissions from this project to a measurable adverse impact to climate.

Instead, the EA articulated how the U.S. Geological Survey described how, although scientific information on greenhouse gases are extremely likely to have exerted a substantial effect on global climate, it is beyond the scope of existing science to identify how a project's greenhouse gas emissions as a measurable cause of specific climate impacts (EA p. 136). Therefore, as described in the EA, the BLM identified the greenhouse gas emissions and storage associated with this project, but this project in and of itself or cumulatively could not measurably affect climate change.

There is no legal, regulatory or policy basis to provide for carbon above other ecosystem services including timber. Commenter offers no specifics regarding potential mitigation to which the agency can respond. Mitigation measures are not required where impacts are not significant. *Robertson v. Methow Valley Citizens Council*, 490 U.S. 332, 359 (1989).

6. **Comment:** *Logging causes very long-term climate impacts that should be considered significant in a NEPA context and trigger an EIS.*

**Response:** This is a generic unsupported opinion. Global climate change is a complicated issue. As described in the EA, the incremental effect of the proposed action on greenhouse gas levels within the context of effects of past, present, and reasonably foreseeable future actions at multiple spatial scales the analysis has evidenced that the project's carbon release contribution is so small that it was determined to be not significant (EA, pp. vi, x). At this time, there is no science available to analyze how the carbon release associated with this project will have a measurable effect on climate change (EA, p. 136).

7. **Comment:** *The proper scale of comparison is 350ppm. The EA compares carbon emission from logging Gordon creek to the current annual global emissions of CO2 from all sources. These are a misleading comparisons which serve to minimize the significance of the amount of carbon in the stands in this project and the amount of GHG emissions caused by logging.*

**Response:** Commenter asserts that experts (with none cited) contend that the atmosphere has a threshold of 350 ppm and that the current level is 390 ppm. These numbers are global numbers. There is no difference between the comparison BLM has used or making a comparison against the asserted global parts per million. The fact remains that the emissions from the Gordon Creek project are very small to the point of being undetectable. Implementing the Gordon Creek project would not raise the assumed 390 ppm any detectable amount.

8. **Comment:** *BLM must do all it can to mitigate and reverse climate change in order to meet its legal obligations.*

**Response:** There is no legal mandate for BLM to avoid or minimize emissions, store more carbon, or "mitigate and reverse climate change."

9. **Comment:** *The EA should at least disclose that there is strong physical science basis for thinking that thinning would be likely to increase the decay rate of dead wood.*

**Response:** This is an unsubstantiated opinion. The commenter cites no scientific opinion, report or otherwise to support this viewpoint. BLM has searched for available scientific literature on this issue and is unaware of any science that would support commenter's viewpoint.

10. **Comment:** *Certain stands in the matrix should be removed from the timber base to offset the loss of carbon storage in the current proposal.*

**Response:** Changes in land use allocations are part of the Resource Management Planning process. Considering changes in land use allocations is outside the scope of this project.

11. **Comment:** *BLM must use the best available science.*

**Response:** BLM has fully considered the best available science (EA, pp. 135,136). BLM has considered the sources utilized in the carbon/climate analysis for the WOPR analysis, sources presented by commenters, and others. Commenter does not point to any "available science" that BLM did not consider.

12. **Comment:** *Climate change is expected to increase winter/spring flooding and summer drought and in conjunction with nearby clear cutting in the next 5-10 years, stream temperatures and sediment can be expected to change even if BLM takes the "no action" alternative.*

**Response:** Future changes in flooding and drought patterns and private land harvesting patterns from global warming are speculative and commenter offers no basis upon which to conclude otherwise, but their own personal conjecture. BLM has applied best management practices to protect aquatic resources and soils during project implementation (EA pp. 21-25, 29-32).

Other comments and concerns raised during the December comment period include concerns about fuel treatments, questioning fuels related benefits of thinning, and effects of private logging on stream temperatures. These comments have been addressed in the April 2009 Decision Rationale (revised DR section K) and are out of the scope with regard to comments on carbon storage, carbon emissions and Climate change.

One commenter (Oregon Wild) included the 12/17/2009 court order from Judge Coughenour regarding Survey and Manage species. Our compliance with Survey and Manage direction is described in revised DR section E, above.

## K. April 2009 Decision Rationale

### Gordon Creek Thinning I Timber Sale

Final Decision and Decision Rationale

Environmental Assessment Number (EA) # OR080-07-05

April 2009

United States Department of the Interior  
Bureau of Land Management, Oregon State Office  
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Gordon Creek 6<sup>th</sup> field Watershed.  
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**BLM/OR/WA/AE-009/036-1792**

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## 1.0 Introduction

The Bureau of Land Management (BLM) has conducted an environmental analysis for the Gordon Creek thinning project, which is documented in the *Gordon Creek Environmental Assessment and Finding of No Significant Impact* (2007 EA) and the associated project file. The decision maker signed a Finding of No Significant Impact (FONSI) on September 26, 2007 and the BLM then made the 2007 EA and FONSI available for public review from September 26, 2007 to October 26, 2007, which was extended to November 16, 2007 (see *DR section 6.2*).

Based on public comment, the BLM revised the 2007 EA, which became the *Gordon Creek Thinning Revised Environmental Assessment and Finding of No Additional Significant Impact* (EA). The decision maker signed the Finding of No Additional Significant Impact (FONASI) on March 17, 2009. ***In this Decision Rationale (DR), the original EA (September 2007) will be called the 2007 EA and the Revised EA (March 2009) will be called the EA.*** The 2007 EA and the EA are incorporated by reference in this DR.

The Gordon Creek thinning project has been divided into three timber sales. Gordon Creek Thinning I is the first of these timber sales. This decision is limited to the Gordon Creek Thinning I timber sale, which is located in the T. 1 S., R. 5 E., Section 11, SW $\frac{1}{4}$  SW $\frac{1}{4}$ ; Section 13; Section 15, N $\frac{1}{2}$ , N $\frac{1}{2}$  SE $\frac{1}{4}$ , W.M. This decision is based on site-specific analyses in the EA, the 2007 EA, the supporting project record, public comment, and management direction (*DR sections 5.0, 6.0 and 7.1*).

## 2.0 Decision

I have decided to implement the Gordon Creek Thinning I as a timber sale consisting of five of the fourteen units of the proposed action described in the EA (EA pp. 12-31). The units I will implement in the Gordon Creek Thinning I timber sale are 11E, 13A, 13B, 15A, and 15B (DR Table 3)<sup>2</sup>. The following is a summary of the decision, hereafter referred to as the “selected action” in this DR. The selected action will:

### 2.1 Timber Harvest

Harvest approximately 792 acres (*DR section 8.0*, DR Table 3). This harvest includes:

- Thinning 780 acres within the following 2005 RMP Land Use Allocations (LUA)
  - 699 acres within the General Forest Management Area (GFMA) portion of the Matrix LUA,
  - 81 acres within the Riparian Reserve LUA. Approximately 3 of these acres will be thinned to a lower density (four  $\frac{1}{2}$  acre and one 1 acre low density canopy gaps) in unit 5 (EA unit 13B) (See maps 1 and 2).
- Clearing 12 acres of vegetation within the road rights-of-way accessing sections 13 and 15 (DR Table 3).

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<sup>2</sup> DR Table 3 and Maps 1 and 2 (*DR section 9.0*) show the selected action by section and the crossover between EA and Timber sale units.

## **2.2 Logging Systems**

- Harvest approximately 723 acres of thinning (Units 1-5) plus 12 acres Right-of-Way (described above) using ground-based yarding.
- Harvest approximately 57 acres of thinning (Units 3 and 5) using skyline yarding.

## **2.3 Road Work and Haul**

- Construct approximately 2.2 miles of new road to accommodate skyline logging equipment and log transport.
- Improve approximately 0.8 mile of road to the minimum standard necessary for hauling, including spot rocking, blading, and brushing, curve alignment, and tree removal.
- Block and stabilize all newly constructed and improved natural surface roads (3 miles – see bullets 1 and 2). Stabilizing entails installing water-bars or other shaping of roads for drainage, placing woody debris, and/or seeding. These roads are behind locked gates. Trench and berm road blocks will be used to block these roads.
- Seed and fertilize approximately 9 acres of natural surface roads adjacent to harvest units.
- Renovate and maintain approximately 6.2 miles of existing road. Renovation may include blading and shaping of roadway and ditches, small slide/slump repairs, clearing brush from cut and fill slopes, cleaning or replacing culverts, and applying rock surfacing material to depleted surfaces.
- Install 30 linear feet of new culvert material.

## **2.4 Fuels Treatments**

- A total of 214 acres in units 2, 3, 4, and 5 will have treatment of the thinning slash following harvest. The areas to be treated are located within the unit area, generally along roads and property lines.
- Within 30 feet of the edge of each landing all tops, broken pieces, limbs and debris over 1 inch and longer than 3 feet will be piled and covered. Piles will be 20 feet minimum distance from residual trees. Piles will be burned in compliance with the Oregon Smoke Management Plan after thinning operations have been completed and fall rains have begun.

## **2.5 Controlling Public Access**

The Gordon Creek Thinning I Timber Sale contract will require the purchaser through contract obligation to secure the area while timber sale operations are active by locking or controlling access at the existing gate system that currently secures the area. When operations are not active in section 13, BLM will cooperate with the City of Portland to ensure the gates that control access to the communication site and the Bull Run Watershed in section 13 are secured to prevent unauthorized access (EA pp. viii, 119, 122, 126, 127, 131).

## **2.6 Special Forest Products**

The BLM will sell permits for collecting Special Forest Products (SFP) (RMP p. 49) from the harvest units if there is a demand for the products, and collection would not interfere with proposed project operations. Special Forest products are products that can be found in the forest and can include: edible mushrooms, firewood, posts and poles, and transplants of native plants.

Access to the area will be controlled through the Special Forest Product permit requirements.

## 2.7 Design Features

Project Design Features described in EA section 2.3.4 (EA pp. 20- 31) will be addressed in the timber sale contract.

## 3.0 Alternatives Considered

1. No Action (EA p. 34): No timber management actions would occur. Only normal administrative activities and other uses (e.g. road use, programmed road maintenance, harvest of special forest products on public land) would continue on BLM within the project area.
2. Original Proposed Action (2007 EA pp. 16-23; **EA pp. 32-33, 35-38**): The original proposed action was for the BLM to commercially thin 1805 acres including: 1800 acres of 50 to 72 year-old timber stands; and one 5 acre stand, 115 years old. Approximately 1305 of these acres are in the GFMA portion of the Matrix LUA, and 500 acres in the Riparian Reserve LUA.
3. Proposed Action (**EA pp. 12-31, 32-33**): This is a revision of the original proposed action described above. The BLM proposes to commercially thin 1724 acres of overstocked 52-74 year old forest stands. Approximately 1324 of these acres are in the GFMA portion of the Matrix LUA, and 400 acres in the Riparian Reserve LUA. EA Sections 2.6 (Tables 4 and 5, EA p. 33), and 2.9 (EA p. 35-38) show the changes in the proposed action from the 2007 EA. These changes were based on further field work and public comment and included: dropping all except five low density canopy gaps, extending the logging operating season, and providing options for fuel treatment methods.
4. Alternative 2 (2007 EA p. 23; **EA pp. 32-33**): The silvicultural prescription is the same as for the original proposed Action and Alternative 3, but considers helicopter logging instead of skyline and ground based logging on approximately 575 acres to minimize road construction and renovation compared to the original Proposed Action (EA p. 33).
5. Alternative 3 (2007 EA p. 24; **EA pp. 32-33**): The silvicultural prescription is the same as for the original Proposed Action and Alternative 2, but considers helicopter logging instead of skyline and ground based logging on approximately 200 acres to reduce road construction and renovation compared to the original Proposed Action (EA p. 33).
6. Selected Action (*DR sections 2.0, 8.0, DR Table 3*): EA units 11E, 13A, 13B, 15A, and 15B of the Proposed Action, #3, above have been selected to form the Gordon Creek Thinning I timber sale. This timber sale is a proposal to thin approximately 780 acres of 52-74 year old mixed conifer stands.

## 4.0 Decision Rationale

I used the following factors in selecting the alternative that best meets the purpose and need and decision factors described in EA sections 1.2 (EA pp. 1-4) and DR Table 1. This section compares the alternatives with regard to the Decision Factors described in EA section 1.2.3 and the project objectives in EA section 1.2.2.

**Table 1: Comparison of the Alternatives by Decision Factors and Project Objectives**

<b><i>Decision Factors and Project Objectives</i></b>	<b><i>Comparison of Alternatives</i></b>
<p>a. Provide timber resources and revenue to the government from the sale of those resources (objectives 1 and 2);</p> <p>b. Reduce the costs both short-term and long-term of managing the lands in the project area objectives 1 and 2); and</p> <p>c. Provides safe, cost-effective access for logging operations, fuels management and fire suppression (objectives 2, 6, and 7)</p>	<p>The No Action Alternative would not meet this factor since no timber sale would take place. All action alternatives would provide timber resources to the market. Alternative 2 would be the least cost effective, providing the least revenue, with the most logging costs. Alternative 3 would fall between the other action alternatives. The difference between the alternatives is the economic viability of helicopter logging systems compared to skyline and ground based logging systems. (Table 5, EA p. 33).</p> <p>The Proposed Action would be the most cost effective alternative, providing the greatest revenue with the least logging costs. The selected action consists of units 11E, 13a, 13b, 15a, and 15b of the proposed action.</p>
<p>d. Reduce competition-related mortality and wildfire risk, and increase tree vigor and growth (objectives 1 and 7)</p>	<p>The No Action Alternative would not meet this decision factor. All action alternatives would meet this factor. (EA pp. 46, 48, 60, 118, 126, 127, 141).</p>
<p>e. Protect the City of Corbett’s water supply (objective 3)</p>	<p>The units in the selected action are outside the area affecting the City of Corbett’s water supply (EA p. 150).</p>
<p>f. Reduce erosion and subsequent sedimentation from roads (objectives 3 and 6)</p>	<p>All alternatives meet this criterion. Under the action alternatives, roads would be maintained, reducing the risk of erosion and sedimentation associated with the existing road system. New road construction and improvement would not cause sedimentation. (EA pp. vi, 3, 23-27, 70-77, 78-80)</p>
<p>g. Provide for the establishment and growth of conifer species while retaining structural and habitat components, such as large trees, snags, and coarse woody debris (objectives 4 and 5);</p> <p>h. Promote the development of healthy late-successional characteristics in the Riparian Reserve LUA (objective 4)</p>	<p>Under the No action alternative, stand health and tree growth rates would decline if stands are not thinned. Competition would result in mortality of smaller trees and some co-dominant trees in the stands. This alternative retains existing elements, but does not enhance conditions to provide these elements for the future stand. Trees would continue to grow slowly until reaching suitable size for large woody debris, snags and late successional habitat</p> <p>All Action Alternatives would meet decision factors g and h. Stand health and tree growth rates would be maintained as trees are released from competition. The alternatives retain the elements described under “no action” on untreated areas of the stands in the project area and encourage development of larger diameter trees and more open stand conditions in treated areas. These conditions add an element of diversity to the landscape not provided on BLM lands under the No Action alternative. (EA pp. vii, viii, 13, 15, 27, 36, 53, 57, 60, 108-111, 116, 118, 137, 141).</p>

<i>Decision Factors and Project Objectives</i>	<i>Comparison of Alternatives</i>
i. Establish a defensible area for use during extended fire suppression activities and possibly reduce the overall size of a wildfire (objective 7). j. Reduce potential human sources of wildfire ignition by controlling access (objective 7).	All alternatives meet Decision Factors i and j. However, under the No Action Alternative, dense forest stands with high crown densities are more susceptible to a high intensity, stand replacement wildfire that escapes initial attack and could threaten the public and other resources. Under the Action Alternatives, managed, thinned forest stands are less prone to catastrophic wildfires. Fires that do start tend to be easier to control in managed stands. See (EA pp. viii, 20, 30, 124, 126, 141).

Considering public comment, the content of the Gordon Creek EA, the supporting project record, and the management direction contained in the RMP, I have decided to implement the selected action as described in DR section 2.0. The following is my rationale for this decision.

1. No Action Alternative: This alternative was not selected because it does not meet the project objectives or delays the achievement of the project objectives described in EA section 1.2 (EA pp. 2-4) and DR Table 1 (*DR section 4.0*).
2. The Original Proposed Action: The original Gordon Creek proposed action was not selected because further field work and public comment resulted in changes to this alternative. See the description of the proposed action, above (*DR section 3.0*, bullet # 3).
3. Proposed Action
  - Units in sections 1, 3, 9, and 11 (except unit 11 E) were not selected because I plan to implement them in the Gordon Creek Thinning II and Gordon Creek Thinning III timber sales, which will be documented in separate Decision Rationale documents at a later time.
  - EA units 11E, 13A, 13B, 15A, and 15 B have been selected as the Gordon Creek Thinning I timber sale, documented in the selected action.
4. Alternative 2: Alternative 2 was not selected because this alternative would be the least cost effective, providing the least revenue, with the most logging costs compared with the other action alternatives (EA pp. 33).
5. Alternative 3: Alternative 3 was not selected because this alternative would be less cost effective, providing less revenue, with more logging costs than the Proposed Action or the Selected Action (EA pp. 33).
6. Selected Action: The selected action implements the Gordon Creek Thinning I Timber Sale described in the DR section 2.0. The Selected Action
  - Meets the purpose and need of the project Gordon Creek EA section 1.2 (EA pp. 2-4), and all decision factors as shown in DR Table 1 (*DR section 4.0*).
  - Is consistent with the Salem District Record of Decision and Resource Management Plan and related documents which direct and provide the legal framework for management of BLM lands within the Salem District (EA pp. 4-8, *DR sections 5.0, 7.1.1*).
  - Is responsive to concerns for an economically efficient project (*DR section 10.12*).
  - Is responsive to public input (*DR sections 10.8, 10.12*).

- Decreases potential for stand replacement fires and improves fire suppression opportunities by treating slash along open roads and providing controlled access for fire suppression with gated roads (EA p. vii, 29, 30, 124-127).
- Incorporates new information on northern spotted owl (EA pp. 7-8).
- Would not contribute to the expansion of invasive/nonnative weed populations (EA pp. vi, 28, 55).
- Would not have significant impact on the affected elements of the environment beyond those already anticipated and addressed in the RMP EIS (EA FONASI, pp. v-ix).
- Uses the minimum transportation system to facilitate implementation of the project (*DR section 2.3*).
- Would have no effects on ESA listed fish or their occupied habitat (*DR section 6.3*).

## 5.0 Compliance with Direction

The analyses documented in the Gordon Creek Thinning EA (original and revised EAs) are site-specific and supplements analyses found in the *Salem District Proposed Resource Management Plan/Final Environmental Impact Statement*, September 1994 (RMP/FEIS). This project was designed under the *Salem District Record of Decision and Resource Management Plan*, May 1995 (RMP) and related documents which direct and provide the legal framework for management of BLM lands within the Salem District which are incorporated by reference in the EA (EA pp. 4-8). All of these documents may be reviewed at the Cascades Resource Area office. This project also meets the criteria for a transition project as described in the *Record of Decision and Resource Management Plan- Salem District*, December, 2008 (2008 ROD/RMP pp. 5-6) (*DR section 7.1.1*).

## 6.0 Public Involvement/ Consultation/Coordination

### 6.1 Scoping

The Gordon Creek project (along with the Beeline and McDowell projects) was included in the 2007 Timber Sale thinning scoping letter sent out to federal, state and municipal government agencies, nearby landowners, tribal authorities, and interested parties on the Cascades Resource Area mailing list on September 29, 2006. Twenty-six (26) comment letters/emails/postcards were received during the scoping period. The BLM also conducted one field trip with Corbett Water Bureau on June 4, 2007. Field trip attendees included members of the Corbett Water Bureau staff, Corbett Water Board, Corbett Community Association, and Oregon Wild.

### 6.2 EA Comment Periods and Comments

BLM made the 2007 EA and FONSI available for public review from September 26, 2007 to October 26, 2007. The decision maker extended the comment period to November 16, 2007 in order to incorporate comments received at the Gordon Creek open house, held in Corbett, OR on November 7, 2007. Eleven people attended the open house, including representatives of the Corbett Water Bureau, Corbett Water Board, and the Corbett Community Association.

One hundred eighty-two (182) comment letters/emails/postcards were received during the original EA comment period. Based on the comments, the BLM revised the Gordon Creek EA. Sections 1.4.2 and 1.4.3 (EA pp. 8-11) of the revised EA (March 2009) address the topics raised in the original comments.

The BLM made the revised EA and FONASI available for additional public comment from March 18, 2009 to April 6, 2009. Five comment letters were received during this comment period. Responses to the public comments can be found in section 10.0 of this Decision Rationale. The scoping and EA comment letters/emails/postcards are available for review at the Salem District BLM Office, 1717 Fabry Rd SE, Salem, Oregon.

### 6.3 ESA Section 7 Consultation

#### 1. U.S. Fish and Wildlife Service

The BLM submitted the Gordon Creek Thinning Project, which includes all three timber sales, for informal consultation with U.S. Fish and Wildlife Service (USFWS) as provided in Section 7 of the Endangered Species Act (ESA) of 1973 (16U.S.C. 1536 (a)(2) and (a)(4) as amended) during the FY2009/2010 consultation process.

The *Biological Assessment of NLAA Projects with the Potential to Modify the Habitat of Northern Spotted Owls Willamette Planning Province - FY 2009-2010* (BA) was submitted by the BLM in August 2008. Using effect determination guidelines, the BA concluded that the Gordon Creek Thinning project, may affect, but is not likely to adversely affect the northern spotted owl due to the modification of dispersal habitat (BA, pp. 21-23). The *Letter of Concurrence Regarding the Effects of Habitat Modification Activities within the Willamette Province, FY2009-2010* (LOC) associated with the Gordon Creek Project was issued by the USFW in October 2008 (reference # 13420-2008-I-0140).

The LOC concurred that the habitat modification activities described in the BA, including the Gordon Creek Thinning project is not likely to adversely affect spotted owls and are not likely to adversely affect spotted owl Critical Habitat (LOC, p. 31). This applies to the Gordon Creek Thinning I timber sale as well as the other two timber sales that constitute the EA proposed action. Furthermore, the proposed action is not likely to diminish the effectiveness of the conservation program established under the NWFP to protect the spotted owl and its habitat on federal lands within its range including designated spotted owl critical habitat (LOC, p. 31).

The selected action, described in this DR (*DR section 2.0*), has incorporated the applicable General Standards that were described in the BA (p. 6-7) and LOC (LOC, pp. 12-14). This includes a seasonal restriction within disruption distance of known spotted owl sites during the critical nesting season, and monitoring/reporting on the implementation of this project to the U.S. Fish and Wildlife Service.

#### 2. NOAA Fisheries (NMFS)

The selected action (Gordon Creek Thinning I timber sale) would have “no effect” on Lower Columbia River (LCR) coho salmon, LCR Chinook salmon, or LCR Steelhead trout. As a result, consultation with NOAA Fisheries on the project effects is not required.

Potential effects of the project on listed fish species are related to changes in stream shade and large woody debris (LWD) levels from tree thinning, and sediment inputs associated with road construction/decommissioning, and timber haul.

The 60' stream protection zones on perennial streams and maintaining 50-60% canopy closure in the secondary shade zone of these streams would prevent any decrease in stream shade that would result in an increase in stream temperature (EA, pp. 70, 86). LWD recruitment to project area streams is expected to improve long term as a result of accelerated tree growth resulting from reducing tree density in Riparian Reserves (EA, p. 86). However, LWD would be unlikely to move downstream to listed fish habitat because of the small size of project area streams and distance to listed fish habitat (EA, pp. 81-82).

The selected action incorporates road construction on flat to gently sloping ground with no hydrologic connectivity to streams, and no stream crossings. Thus, no pathway would exist for delivery of sediment to streams generated by road construction or use (EA, p. 71). Upon project completion these roads would be closed, stabilized, and revegetated. Site specific monitoring would be used to suspend log hauling whenever conditions would potentially introduce sediment into streams, therefore log hauling would not impact listed fish habitat (EA, pp. 72, 87-88). The determination of "no effect" is based on the distances from proposed project units ( $\geq 2.5$  miles) to ESA listed fish habitat and on the factors stated above that would prevent increases in sediment input, stream turbidity, temperature, and changes in LWD supplies to stream reaches potentially occupied by ESA listed fish species (EA pp. 70-72, 82, 86-88).

## **7.0 Conclusion**

### **7.1 Review of Finding of No Significant Impact**

I have determined that change to the Findings of No Significant Impact (EA #OR080-07-05 FONASI – pp. v-ix) covering the Gordon Creek Thinning I timber sale is not necessary because I've considered and concur with information in the EA and FONASI and this Decision Rationale. I reviewed the EA comments and saw no new information in the comments that lead me to believe the analysis, data or conclusions are in error or that the selected action needs to be altered. The selected action would not have effects beyond those already anticipated and addressed in the RMP EIS.

#### **7.1.1 Plan Conformance for Transition Projects**

This decision is in conformance with the *Record of Decision and Resource Management Plan-Salem District*, December, 2008 (2008 ROD/RMP). The analysis supporting this decision supplements the analysis described in the *2008 Final Environmental Impact Statement for the Revision of the Resource Management Plan of the Western Oregon Bureau of Land Management* (2008 Final EIS).

Revision of a resource management plan necessarily involves a transition from the application of the old resource management plan to the application of the new resource management plan. A transition from the old resource management plan to the new resource management plan avoids disruption of the management of BLM-administered lands and allows the BLM to utilize work already begun on the planning and analysis of projects.

The 2008 ROD / RMP allowed for such projects to be implemented consistent with the management direction of either the 1995 resource management plan or the Approved Resource Management Plan attached to the Record of Decision, at the discretion of the decisionmaker (2008 ROD/RMP pp. 5-6)

This project meets the requirements designated in the 2008 ROD for such transition projects:

1. A decision was not signed prior to the effective date of the 2008 ROD.
2. Preparation of National Environmental Policy Act documentation began prior to the effective date of the 2008 ROD.
3. A decision on the project will be signed within two years of the effective date of the 2008 ROD.
4. Regeneration harvest would not occur in a late-successional management area or deferred timber management area.
5. There would be no destruction or adverse modification of critical habitat designated for species listed as endangered or threatened under the Endangered Species Act.

Since the planning and design for this project was initiated prior to the 2008 ROD, it contains certain project design features that are not consistent with the management direction contained in the 2008 RMP. Table 2 shows the design features for this project that are consistent with the 1995 RMP but not consistent with the 2008 RMP.”

**Table 2: Difference between the Gordon Creek Thinning I Project Design Features (designed under the 1995 RMP) and the 2008 RMP Project Design Features**

Design Feature	Gordon Creek Thinning I T.S. (1995 RMP)	2008 RMP
Width of the Riparian Reserve LUA on fish bearing streams <sup>1</sup>	Two site potential trees or 440 feet	One site-potential tree height or 220 feet
Width of the Riparian Reserve LUA on non-fish bearing perennial streams <sup>1</sup>	One site-potential tree height or 220 feet	Half of one site-potential tree height or 110 feet
Width of the Riparian Reserve LUA on intermittent streams <sup>1</sup>	One site-potential tree height or 220 feet	Half of one site-potential tree height or 110 feet
Stream protection zone on intermittent streams <sup>1</sup>	25 feet (EA p. 14)	35 feet (2008 ROD/RMP p. 38)

<sup>1</sup>on each side of the stream channel

The 2008 ROD anticipated these inconsistencies and projected they would not alter the analysis of effects in the associated final environmental impact statement. The implementation of this project will not have significant environmental effects beyond those already identified in the Final EIS/ RMP for the reasons described in the Findings of No Additional Significant Impact (EA FONASI, pp. v-xi). The selected action does not constitute a major federal action having significant effects on the human environment; therefore, an environmental impact statement will not be prepared.

## 7.2 Administrative Review Opportunities

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 5003, protests of this decision may be made within 15 days of the publication of a notice of decision in a newspaper of general circulation.

This notice of decision will be published in the *Sandy Post* newspaper on April 29, 2009. To protest this decision a person must submit a written protest to Cindy Enstrom, Cascade Field Manager, 1717 Fabry Rd SE, Salem, Oregon 97306 by the close of business (4:30 p.m.) on May 14, 2009. The planned sale date is May 27, 2009.

The protest must clearly and concisely state the reasons why the decision is believed to be in error. Any objection to the project design or my decision to go forward with this project must be filed at this time in accordance with the protest process outlined above. If a timely protest is received, this decision will be reconsidered in light of the statements of reasons for the protest and other pertinent information available and the BLM shall serve a decision in writing on the protesting party (43 CFR 5003.3).

## 7.3 Implementation Date

If no protest is received within 15 days after publication of this Decision Record (Gordon Creek Thinning I Timber Sale DR) this decision will become final. For additional information, contact Rudy Hefter (503) 375-5671, Cascades Resource Area, Salem BLM, 1717 Fabry Road SE, Salem, Oregon 97306.

Approved by: Cindy Enstrom  
Cindy Enstrom  
Cascades Resource Area Field Manager

4/28/2009  
Date

## 8.0 Selected Action by Section

Table 3: Selected Action by section

EA Unit	Timber Sale Unit	Acres by Unit	Acres by Section					Total	Section	Low Density Canopy Gaps
			Thinning by LUA				Clearing Road R--OW			
			Skyline Yarding		Ground Based Yarding		Ground Based Yarding			
			Riparian Reserve	Matrix	Riparian Reserve	Matrix	Matrix			
11E	3	12	3	0	3	6	0	12	11	0
13A	4	40	19	35	18	383	7	462	13	5 low density canopy gaps for a total of 3 acres in Unit 5 (13B)**
13B	5	422*								
15A	2	292***	0	0	38	275	5	318	15	0
15B	1	26								
Total Acres		792						<b>792</b>		
Total thinning Acres by LUA		Matrix	0	35	0	664	0	699		
		Riparian	22	0	59	0	0	81		
Total Thinning Acres			57		723		0	780		
Total Road Right-of-way clearing acres			0		0		12	12		
Total Acres by Yarding Method		Skyline	57		0		0	57		
		Ground Based	0		723		12	735		

\* 415 acres of thinning, 7 acres of road r-o-w

\*\* included in the thinning acres

\*\*\* 287 acres of thinning, 5 acres of road r-o-w

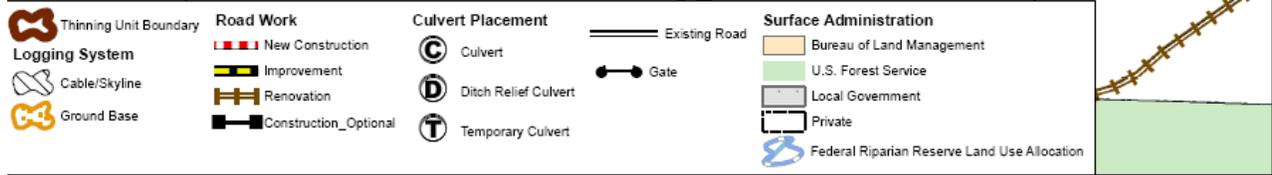
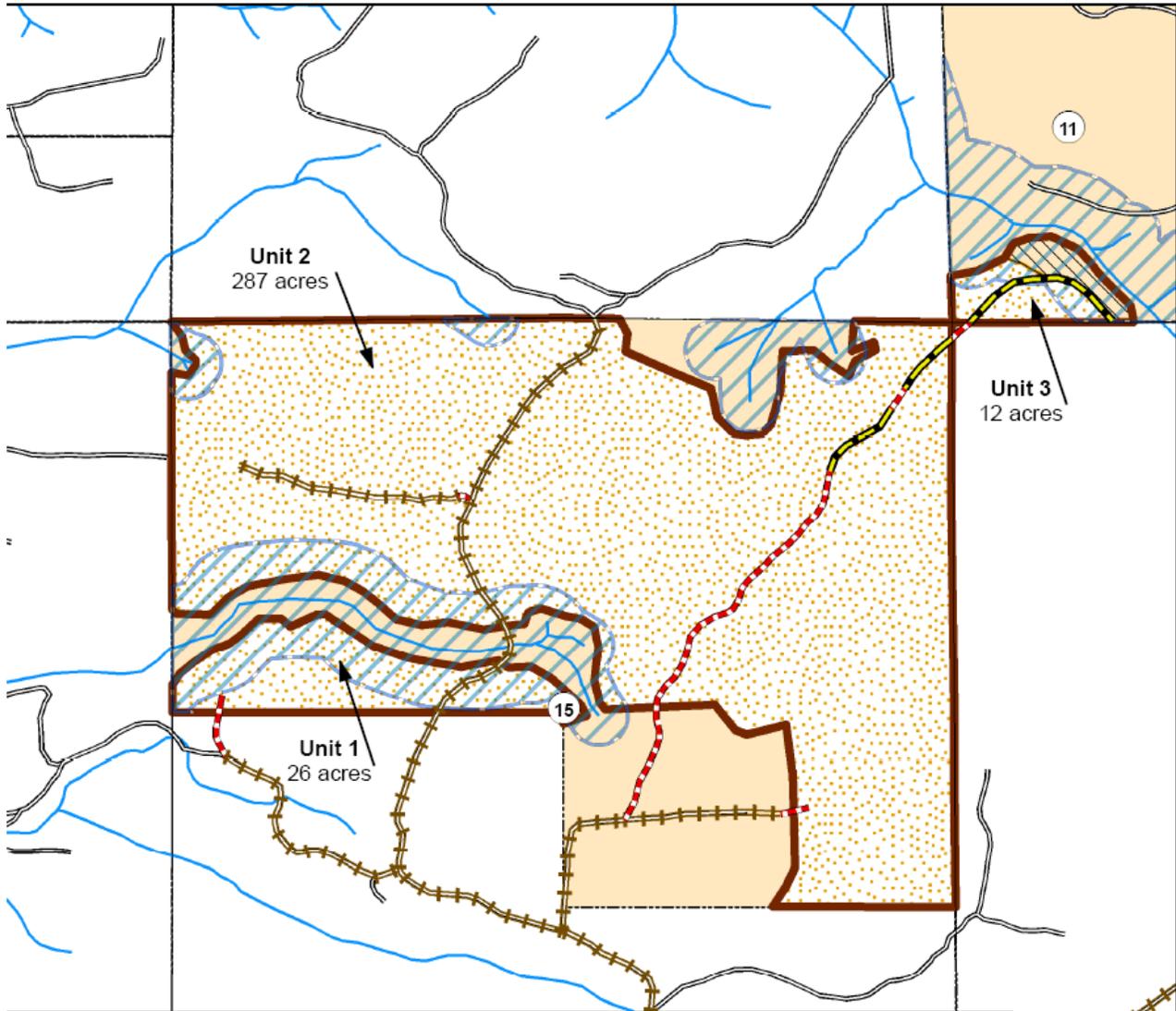
# 9.0 Maps

## 9.1 Map 1 - Sections 11 and 15

### GORDON CREEK THINNING I TIMBER SALE SELECTED ACTION Decision Rationale EA No. OR080-07-05

#### Logging & Transportation Systems/Riparian and Water Resources

Sec. 11, 13 & 15 T. 1 S., R. 5 E., W.M.



United States Department of the Interior  
Bureau of Land Management  
Salem District Office  
Cascades Resource Area  
1717 Fabry Road S.E.  
Salem, Oregon 97306

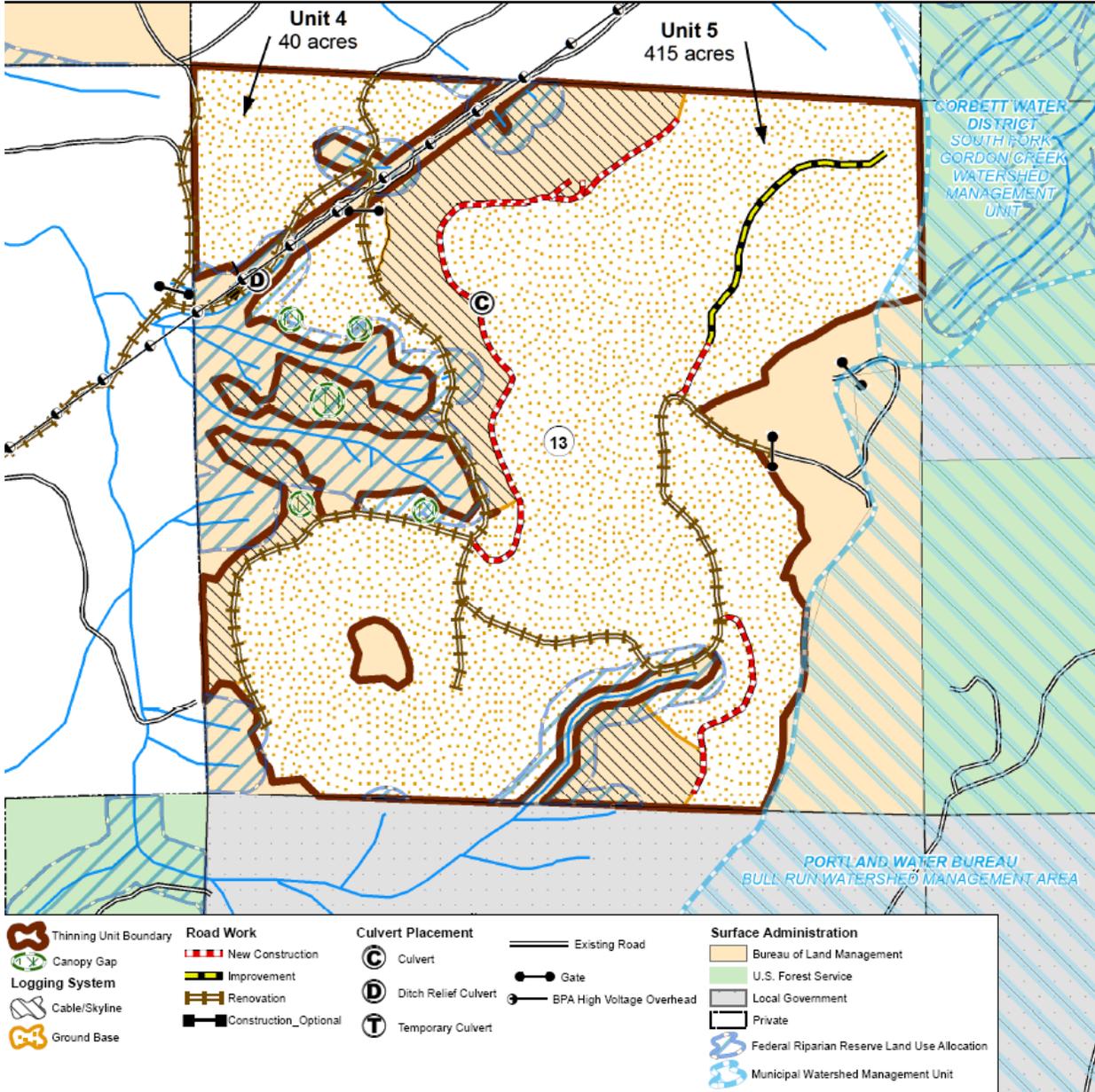
4/24/2009 Cascades Resource Area GIS

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9.2 Map 2 – Section 13

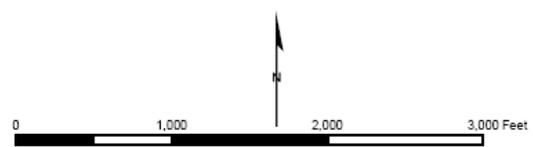
**GORDON CREEK THINNING I TIMBER SALE SELECTED ACTION**  
**Decision Rationale** EA No. OR080-07-05  
**Logging & Transportation Systems/Riparian and Water Resources**

Sec. 11, 13 & 15 T. 1 S., R. 5 E., W.M.



United States Department of the Interior  
 Bureau of Land Management  
 Salem District Office  
 Cascades Resource Area  
 1717 Fabry Road S.E.  
 Salem, Oregon 97306

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## **10.0 Response to EA Comments**

After reviewing the comments I received following the EA comment period (September 26-November 16, 2007), I revised the Gordon Creek EA (*DR sections 2.0 and 6.0*) and provided an additional two week review period (March 18 – April 6, 2009) to which I received additional comments. The Gordon Creek Thinning I timber sale consists of a portion of the area that was analyzed in the EA (EA units 11E, 13A, 13B, 15A, 15B). My response to comments will address only those comments that pertain to the Gordon Creek Thinning I timber sale. Having reviewed all of the comments I have summarized them into the following categories: 1/BLM Land Use Allocations, 2/Water Quality, 3/Facilities Protection and Security of the Bull Run Watershed, 4/Road Densities/Road Construction, 5/ESA Listed Species-Fish, 6/ Cumulative Effects Analysis 7/ Riparian Management and Aquatic Conservation Strategy, 8/ Late –Successional Forest/Dead Trees/ Old Growth / Variable Density Thinning, 9/ ESA Listed Species-Northern spotted Owl, 10/Special Status Species (excluding ESA threatened/ endangered species) , 11/ Windthrow, 12/ Economic Viability of timber sale, 13/ Invasive Non-Native Plants, 14/ Carbon Storage/Climate Change, 15/Access to Stands during Comment Period, 16/Spotted Owl Recovery Plan/WOPR, 17/ Range of Alternatives.

### **10.1 BLM Land Use Allocations**

I received comments expressing disagreement with BLM management objectives for Matrix and Riparian Reserve Land Use Allocations. Specific comments and recommended alternatives to the Proposed Action and Action Alternatives were often based in the commenters' preferred management objectives. Land use objectives and alternatives proposed include: protect areas that remain intact, restore areas that have been degraded, conservation of carbon, provide additional buffer for Bull Run (section 13) focus on restoration not commodity extraction, defer logging instead of producing an even flow of timber, manage for decadence, manage to develop old growth characteristics, and manage for owl habitat and prey species.

Changing land use allocations is outside the scope of this project and is an RMP level decision process. The project is in compliance with the 2008 RMP, qualifying as a transition project that follows the 1995 RMP, and all applicable laws, regulations and policies. 1995 RMP objectives applicable to this project are described in EA section 1.2.2 (EA pp. 2-3). Conformance with land use plan, statutes, regulations and other plans is described in EA section 1.3 (EA pp. 4-5). Relevant statutes and authorities are listed and described in EA sections 1.3.5 (EA p. 8) and 3.1 (Table 6, EA pp. 39-41). The project has been designed to implement both long and short term timber management objectives while providing for water quality and habitat in the Matrix LUA and to enhance wildlife habitat characteristics while protecting water quality in the Riparian Reserve. Riparian Reserve treatments will be accomplished by logging according to the terms of the contract.

### **10.2 Water Quality (EA Issues 1 and 3)**

I received comments that expressed concern about impacts to the area's water quality. I have broken out the specific concerns affecting water quality and will address them separately. Water quality was identified as Issue 1 in the EA, while Riparian Management and ACS objectives were identified in Issue 3 (EA p. 9).

**Water Quality:** The EA fully addressed project design that would retain or enhance the existing shade component on all streams in sections 13 and 15. During final on the ground layout I applied buffers that met or were wider than the minimums required for retaining existing shade. The risk of stream sedimentation is low because, the terrain is generally flat to gently sloping (less than 35 percent, never exceeding 60 percent<sup>3</sup>) so there is little to no risk for soil movement or erosion. Undisturbed soil and vegetation in the stream protection zones (SPZ) will filter any potential sediment before it reaches any streams. Runoff from existing roads will be diverted away from streams or sediment will be trapped. Project design features include a contract requirement prohibiting operations when they would generate sediment that could enter streams. The new road construction has no connectivity to live stream sources (EA pp. vi, 3, 8, 20-32, 70-77, 78-80).

**Thinning in the Riparian Reserve LUA and ACS objectives:** I received comments concerned that the project may not meet ACS objectives. This concern was addressed as Issue 3 in the EA. The EA fully addressed how the project would meet ACS objectives. Some commenter's disagreed with BLM's assessment but did not present evidence that BLM was in error. See response 10.7.

#### ***Fire Risk to Bull Run Watershed***

Concern was expressed regarding the fire risk that would be created by logging debris (slash) in the southeast corner of section 13 adjacent to the Bull Run Watershed. The concern is that if a fire started it would have the potential to move into the Bull Run Watershed possibly having a negative or adverse effect on water quality. The risk of a large fire occurring on BLM managed land in section 13 that would impact the Bull Run Watershed is low because: east winds (winds coming from the east) are the predominant wind event that would affect large fire behavior in the area. Since the Bull Run watershed is east of the project area, east winds would push any wildfire in the project area away from the Bull Run Watershed; the fuel models resulting from thinning are not likely to develop into large fires with rapid rates of spread that resist control; and there is adequate access for firefighting resources to control a fire in section 13 before it could enter the Bull Run Watershed (EA pp. viii, 20, 30, 124, 126, 141).

Several commenters also pointed out that the fire return interval for stand replacement fires is very long thus the likelihood of a stand replacement fire that would adversely affect the Bull Run Watershed is very low. The reduced crown density that would result from the thinning would additionally reduce the risk of a crown fire burning into the Bull Run Watershed (EA pp. 124, 126, 127).

In addition to the above references, these topics are also addressed in the following EA sections: **2.0** (Alternatives and Project Design Features) - pp. 11-12, 21-27, 31; 35-38, **3.2** (General Setting) - pp. 42-46; **3.3.2** (Hydrology) – 61-80; **3.3.3** (Fisheries) – pp. 80-92; **3.3.4** (Soils) - pp. 92-100; **3.3.6** (Fire Hazard/Risk) - pp. 119-127; and **3.3.7** (Rural Interface, including public safety) - pp. 127-133.

### **10.3 Facilities Protection and Security of Bull Run Watershed (EA Issue 1)**

I received comments expressing concern regarding the potential for unauthorized access to the Bull Run Watershed increasing potential vandalism and fire starts (EA Issue 1, p. 9).

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<sup>3</sup> Less than 5 % of the sale area is between 35% and 65% slope (Table 8, EA pp. 94).

The EA addressed this issue. Access to the general vicinity of the Gordon Creek Thinning I project area is controlled by privately owned gates. Access to the road leading to the Bull Run Watershed and the City of Portland communication facility is controlled by two gates jointly managed by BLM and the City of Portland. An additional gate into the communication facility compound is under the exclusive control of the City of Portland. New roads within ¼ mile of the Bull Run Watershed boundary are behind one of the two gates jointly controlled by BLM and the City of Portland. These two new roads will be closed and made impassible following timber harvest operations.

The Gordon Creek Thinning I Timber Sale contract will require the purchaser through contract obligation to secure the area by locking or controlling access at the existing gate system that currently secures the area. When operations are not active in section 13, BLM will cooperate with the City of Portland to ensure the gates that control access to the communication site are secured to prevent unauthorized access (*DR section 2.5*).

#### **10.4 Road Densities/Road Construction (EA Issue 1)**

There was concern that new road construction in addition to the existing roads would have adverse effects on water quality. The EA fully addressed the impacts of the new road construction on sediment movement, water quality and peak flows (EA pp. 61-80). The BLM designed the proposed road system for the Gordon Creek Thinning I timber sale to balance management (purposes for the LUA as described in the RMP), environmental (protection of resources), operational (safe and feasible logging) and economic (successful timber sale and value of timber at harvest) objectives. Three action alternatives were analyzed. The analysis of the Proposed Action demonstrated that all objectives will be achieved with the road system designed to use the most economical logging system of the three Action Alternatives.

Preventing erosion and resulting sedimentation into streams is a critical element in BLM's design and use of roads. Locations and road designs are selected to prevent potential erosion. In addition to location and design, the BLM employs a variety of erosion and sediment control measures, including rock, mulch, debris, seeding, sediment traps, waterbars and potentially other methods designed specifically for individual sites to ensure that the project meets or is more stringent than ODEQ standards and the Clean Water Act. These roads would be closed, stabilized and revegetated. The terrain in the Gordon Creek Thinning I project area is generally flat to gently sloping. New roads are located away from streams and potentially unstable slopes and have no connectivity to live stream courses (EA pp. vi, 3, 8, 20-32, 70-77, 78-80). Also, see response 10.2, Water Quality, including EA references.

#### **10.5 ESA Listed Species-Fish (EA Issue 1)**

Concerns were raised that the project could have adverse effects to Endangered Species Act (ESA) Listed fish species particularly coho salmon and steelhead. Concerns regarding listed fish species were identified as Issue 1 in the EA. The EA fully analyzed the potential effects to all fish species in the streams affected by the Gordon Creek I project.

The proposed action will have no direct effects to listed fish. No actions are proposed within the channels, or that would directly affect the channels of any stream reaches which may be inhabited by listed fish. No thinning in the Riparian Reserve LUA is closer than 2.5 miles of occupied listed fish habitat.

All intermittent channels are located 2.7 to 3 miles upstream of listed fish habitat. Perennial streams will have 60 feet wide buffers, and intermittent channels will have buffers of 25 feet or more in which no activities or equipment are permitted, thereby preventing changes to stream temperature and sediment delivery. Stream crossings associated with the haul route are 3.0 miles upstream from listed fish habitat. Hauling will be monitored and suspended whenever conditions would potentially introduce sediment into streams. Any sediment moving off the road is unlikely to be detectable (as elevated turbidity) more than 0.5 mile downstream of the road crossing.

LWD supplies will improve long term on project area streams as the result of accelerated tree growth in Riparian Reserves. However, LWD is unlikely to move to listed fish habitat because of the small size of project area streams and distance to listed fish habitat ( $\geq 2.5$  miles) See DR sections 6.3 and 10.1 and 10.2, including EA references. In addition to the above references, this topic is also addressed in the following EA sections: **2.0** (Alternatives and Project Design Features) - pp. 11-12, 21-27, 31; 35-38, **3.2** (General Setting) - pp. 42-46; **3.3.2** (Hydrology) – 61-80; **3.3.3** (Fisheries) – pp. 80-92; **3.3.4** (Soils) - pp. 92-100.

## **10.6 Cumulative Effects Analysis (EA Issue 2)**

Some commenters expressed concern about the adequacy of certain cumulative effects aspects. Specifically, concerns were raised regarding the scale utilized to assess impacts to spotted owls, retention of late successional forest at the watershed scale and the use of roads by private landowners concurrent with activities on BLM land during all seasons of activity. The EA fully addressed the potential for cumulative impacts (EA pp. ix, 9, 39-41, 60, 78-80, 91, 99, 116-118, 126, 133). Concerning retention of late-successional forest at the watershed scale, the Gordon Creek Thinning I timber sale does not propose to treat any late-successional stands therefore, there will be no direct or cumulative impact on the acres of late-successional forest type in the watershed (EA pp. vi, 10, 37). In regards to activities on private land utilizing the area's road system concurrently with activities on BLM, I do not anticipate any adverse cumulative impacts. BLM staff will be monitoring on site conditions for potential negative impacts such as sediment entering waterways during implementation of the Gordon Creek Thinning I timber sale. If the potential adverse impacts were the result of road use singularly due to BLM activities or cumulatively due to road use by other entities, BLM would suspend operations on BLM land, implement mitigation measures or both.

## **10.7 Riparian Management and Aquatic Conservation Strategy (EA Issue 3)**

Commenters have voiced doubts as to whether thinning in the Riparian Reserve LUA will support the attainment of Aquatic Conservation Strategy objectives. BLM has revised the EA to include an expanded discussion of the proposed action relative to ACS Objectives. The commenter asserts that science does not support the conclusion that thinning does results in larger diameter trees sooner than would develop in unthinned stands and/or that larger diameter trees do not provide the resources for larger size snags and down logs when they die. This is not supported by information presented in the comments. The EA documents the rationale that thinning does contribute to meeting ACS Objectives (EA pp. 135-139).

In addition to the above references, these topics are also addressed in the following EA sections: **1.2** (Purpose and Need) pp. 2-4, **2.0** (Alternatives and Project Design Features) - pp. 12-15, 27-27-29, 31; 35-38, **3.2** (General Setting) - pp. 42-46; **3.3.1** (Vegetation) – pp. 46-61; **3.3.2** (Hydrology) – 61-80; **3.3.3** (Fisheries) – pp. 80-92; **3.3.4** (Soils) - pp. 92-100, **3.3.5** (Wildlife) – pp. 100-119.

#### **10.8 Late –Successional Forest/Dead Trees/ Old Growth / Variable Density Thinning (EA Issues 3 and 4)**

**Changing Land Use Allocations:** Commenters suggest that BLM manage the Gordon Creek Thinning I area to develop old growth characteristics for old growth dependant species including greater numbers of dead trees and some suggest using variable density thinning or no management action. BLM’s land management is directed by the O&C Act, FLPMA and the Salem District RMP. The RMP specifies land use allocations with associated objectives (EA pp. 2-5, 8, 9-10.)

Several commenters refuse to accept BLM’s management direction and the project’s associated purpose and need. The Gordon Creek Thinning I project area falls within the Matrix and Riparian Reserve LUA (1995 RMP). For the Matrix LUA, management for development of old growth is not an objective (1995 RMP, pp. 20-22). See response 10.1.

**Protection of Old Growth, Snags and Down Wood:** The project has been designed to protect all legacy features (old growth trees, large snags, large CWD) as long as they do not pose a safety hazard under OSHA regulations. BLM does not disagree that thinning “captures future mortality”. The majority of this future mortality would consist of the smaller suppressed trees that the project is targeting for removal (EA pp. 12-15). The EA fully analyzed the effects of thinning on dead wood. Science has demonstrated that the larger snags receive greater wildlife use (EA, page 104, Table 10). The project identified a shortage of large diameter snags (greater than 20” dbh) in Riparian Reserve LUA. Therefore, based on the purpose and need I have decided it is important to accelerate the development of larger trees in a shorter period of time in the Riparian Reserve LUA.

**Variable Density Thinning:** I received conflicting comments concerning variable density treatments. Some comments advocated for applying variable density thinning treatments while other comments suggested that variable density thinning treatments were not appropriate. The original project design called for implementing 6 canopy “gaps” of 2.5 acres each in Matrix. As a result of public comment and to be more consistent with RMP objectives for GFMA I have decided not to implement creation of the canopy gaps in the Matrix LUA (EA p. 35). Numerous low density canopy gaps (≤1.0 acre each, comprising 5-15 percent of the treated Riparian Reserve) were proposed in the Riparian Reserve in the original proposed action (2007 EA). As a result of public comment, I have decided to implement only five of these canopy gaps for diversity for a total of three acres, all in section 13(EA p. 35). I have decided to implement these five low density canopy gaps in section 13 because the BLM interdisciplinary team (ID Team) considered them to be very important to meet ACS objectives for habitat diversity in this location (EA pp. 36, 51, 56, 57, 58, 109, 114, 139).

These topics are also addressed in the following EA sections: *FONASI* (Stand Characteristics and Wildlife) pp. vi and vii; *1.2* (Purpose and Need) pp. 2-4; *1.3* (Conformance with Land Use Plan, Statutes, Regulations, and other Plans) pp. 4-8; *2.3* (Alternatives 1) - pp. 12-15, 27-28; *2.7* (No Action Alternative) p. 34; *2.8* (Alternatives Considered) pp. 34-35; *2.9* (Changes Made in Response to Comments) pp. 35-38; *3.2* (General Assumptions, Methodology and Setting) - pp. 42-46; *3.3.1* (Vegetation) – pp. 46-61; *3.3.5* (Wildlife) – pp. 100-119.

#### **10.9 ESA Listed Species-Northern spotted Owl (EA Issue 4)**

I received comments suggesting that the entire area must be or should be managed for spotted owl habitat and that the proposed Gordon Creek Thinning I timber sale will be detrimental to spotted owls. A comment also suggested that additional land be set aside to provide adequate habitat for spotted owls and barred owls to coexist.

The project area contains no critical habitat. It currently serves as dispersal habitat and will continue to do so after the project is implemented. Additionally, the area will continue to provide habitat for spotted owl forage species such as red tree voles in GFMA and Riparian Reserve LUAs, the project will provide for a dead wood component by retaining existing large snags and legacy features, no old growth stands or habitat exist within the Gordon Creek Thinning I project area. Surveys have not substantiated spotted owl occupancy in the area. The project is in full compliance with required protections for the spotted owl in the Gordon Creek Thinning I project area.

***Scale for Northern Spotted Owl Cumulative Effects:*** The scale for cumulative effects for the northern spotted owl is the provincial home range of known spotted owl sites, which is 1.2 miles for the Cascades of Western Oregon (BA, p. 3; LOC, p. 11) and the location of the project in relationship to adjacent known spotted owl sites and Late Successional Reserves (LSRs). The scale was chosen because the Northwest Forest Plan (NWFP) goal for conservation and recovery for the spotted owl is to maintain suitable owl habitat within LSRs and known owl sites, and maintain dispersal habitat between LSRs and known owl sites.

Cumulative effects to spotted owls and their habitat were analyzed thoroughly at multiple scales in the BA, including the current Environmental Baseline (BA pp.11-20), and Cumulative Habitat Effects Summary (BA pp. 38). I reviewed the cumulative effects analysis for the northern spotted owl in the EA and concluded that the scale utilized for the cumulative effects analysis in the EA is the appropriate scale.

Four recent reports on Northern spotted owls were considered in the revised Gordon Creek Thinning EA. Competition from barred owls was one threat that was identified as a conservation concern in one of the four reports (Courtney *et al.* 2004). Having reviewed the most recent information concerning the effects of barred owl competition on spotted owls, the impacts they are having is unclear at this point. Furthermore, I found no information nor did the commenter provide me with information indicating that deferring the proposed project or changing the project area's land use allocation (see responses 10.1 and 10.8) will have any measurable effect at reducing the potential threat that barred owls may have on spotted owls. The commenter presented no evidence that the Gordon Creek Thinning I timber sale would in any way change the potential for these two owl species to coexist.

This topic is fully addressed in the following sections of the EA: *FONASI* (Stand Characteristics, Special Status Species and Wildlife) pp. vi-vii; **1.2** (Purpose and Need) pp. 2-3; **1.3** (Conformance) pp. 4-8; **1.4.2.4** (Issue 4, Special Status Species) p. 9; **2.3.4** (Design Features – Special Status Species) pp. 28-29; **3.3.5** (Wildlife) – pp. 100-119. See also Biological Assessment (BA) p. 8, *Letter of Concurrence Regarding the Effects of Habitat Modification Activities within the Willamette Province, FY2009-2010* (LOC) (reference # 13420-2008-I-0140) p.14, both of which are incorporated by reference.

#### **10.10 Special Status Species (excluding ESA threatened/ endangered species) (EA Issue 4)**

Concerns were raised that the proposed project would have an adverse effect on Special Status Species in particular bats and Larch Mountain salamander and the Columbia dusksnail. The EA fully discussed measures to protect special status species (SSS) and were specifically addressed as Issue 4. I have reviewed the concerns and project design and have concluded that the project will not have adverse impacts to SSS. Concerning the Larch Mountain salamander, the project contains no suitable habitat. For bat species the project is retaining what little habitat exists in the form of large snags and old growth trees.

This topic is fully addressed in the following sections of the EA: *FONASI* (Stand Characteristics, Special Status Species and Wildlife) pp. vi-vii; **1.2** (Purpose and Need) pp. 2-3; **1.3** (Conformance) pp. 4-8; **1.4.2.3** (Issue 3, Riparian and ACS) p. 9; **1.4.2.4** (Issue 4, Special Status Species) p. 9; **2.3.1** (Proposed Treatments) pp. 12-15; **2.3.4** (Design Features – Special Status Species) pp. 27-29; **3.3.1** (Vegetation, large remnant trees) p. 49; **3.3.3** (Aquatic Habitat) pp. 83-86, 88, **3.3.5** (Wildlife) – pp. 100-119.

#### **10.11 Windthrow**

I received comments suggesting that BLM should conduct additional analysis on the extent of windthrow (blowdown) that occurred in the project area during the winter of 2008/2009 and commenters express concern that significant windthrow could occur adjacent to new and existing openings created by road construction and timber harvesting on private land. BLM has reviewed the extent of the windthrow during the 2008/2009 winter and found that the damage was similar to what BLM has observed in the past. BLM did observe additional storm damage from ice and heavy snow. The BLM does not expect a significant or unusually high amount of additional windthrow following thinning because the BLM has observed windthrow patterns in both thinned and unthinned forest stands in the vicinity of the Gordon Creek Thinning I project for many years and has observed no significant differences in levels of windthrow between thinned and unthinned stands (EA pp. 53-54, 58, 60-61). Additionally, research cited in the EA such as Roberts (2007) supports this observation.

This topic is fully addressed in the following sections of the EA: **1.4.2.1**(Issue 1) p. 9; **2.3.1** (Proposed Treatments) pp. 12-15; **2.9** (Changes) pp. 35-37; **3.3.1** (Stand Characteristics) pp. 48, 53-54, 58, 60-61; **3.3.3** (Aquatic Habitat) p. 92; **3.3.6** (Fire) pp.120-122, 125.

#### **10.12 Economic Viability of timber sale (EA Issue 5)**

Concerns were raised that too many restrictions on the project would have an adverse effect on the economic viability of the timber sale. Other comments suggested that the project be delayed due to the current poor timber market conditions.

Economic viability was identified in the Purpose and Need and as Issue 5 in the EA (EA pp. 10). The EA analyzed costs for three action alternatives, summarized in EA Table 6 (EA pp. 33). Economic considerations are included in the decision factors for the project and timber value at harvest is a consideration in the management direction for the GFMA LUA (RMP pp. 20, 46) (EA pp. 2, 3, 4). BLM is directed to provide timber on an even flow sustained yield basis. BLM is not guided by market conditions. Historically, timber prices are cyclical. Timber sale contracts are typically for a three year period. The length of the contract period provides purchasers flexibility to make business decisions to address cyclical market conditions.

I have reviewed the project design and current market conditions and have concluded that the Gordon Creek Thinning I timber sale is an economically viable project. The BLM modified the original proposed action to enable extension of the logging operating season in response to public comment. The BLM determined that these changes are necessary to improve the economic efficiency of the planned thinning (RMP, D-1), thereby improving the timber value at harvest (RMP p. 46, D-1) and increasing the probability that the proposed timber sale can be successfully offered to the marketplace (EA pp. 2-4, 38). I have determined that extending the operating season will not result in impacts to resources that are not adequately analyzed in the EA (EA pp. 72, 96).

This topic is fully addressed in the following sections of the EA: **1.4.2.5** (Issue 5) p. 10; **2.3.2** (Logging Systems) pp. 15-16; **2.3.3** (Fuel treatments) pp.18-19; **2.3.4** (Project Design Features) pp. 20-31; **2.9** (Changes in response to comments) pp 37-38; **3.3.4** (Soils and logging methods) pp.93-100.

### **10.13 Invasive Non-Native Plants (EA Issue 6)**

Commenters expressed some concern that road building would encourage the spread of invasive/non-native plants, and were interested in the BLM's plan to control the introduction and spread of invasive non-native plants. One commenter suggested that not logging the area would prevent the establishment of invasive species. Not thinning the proposed units does not meet the purpose and need as stated in EA section 1.2 (EA pp. 1-4). Non-native invasive plants are most often found in road prisms as the likely result of vehicle traffic. The EA includes an expanded discussion of invasive/non-native plants, and project design features to prevent the introduction and spread of non-native invasive species (EA pp. 28, 55). This topic is fully addressed in the following sections of the EA: **FONASI** p. vi; **1.4.2.6** (Issue 6) p. 10; **2.3.4** (Design Features) pp. 27-28; **3.3.1** (Vegetation) pp. 51-52, 55, 61.

### **10.14 Carbon Storage/Climate Change**

Commenter stated that “[c]arbon storage was eliminated as an issue based on inaccurate summary statements.” The commenter expressed the opinion that the BLM should do an EIS on carbon storage because the EA is not based on sound science. The commenter stated that BLM should manage for conservation of carbon and the logic track presented suggests, though does not plainly state, that the BLM should not harvest any timber because “[a]ll net [carbon] emissions are adverse and must be addressed and controlled.”

Public comments on the 2007 EA identified carbon storage as an issue of concern. The ID Team reviewed all issues raised during public comment and categorized those relevant to the EA and those not relevant. BLM carried relevant issues forward for further analysis.

The ID Team identified carbon storage as a non relevant issue and eliminated it from further analysis in the EA because it is an EIS/RMP level issue, and analysis of carbon storage is beyond the scope of a project level EA.

The 1994 and 2008 RMP EIS documents addressed carbon storage (1994 EIS pp. 4-7-4-8; 2008 EIS pp. 220-224, 537-543, Appendices pp. 27-30). The BLM designed and analyzed the Gordon Creek Thinning I under the 1994 RMP EIS, and I am now issuing the Gordon Creek Thinning I as a transition project with a decision after signing and adoption of the 2008 RMP EIS and ROD. The impacts of this timber sale as a part of the entire planned vegetation management program are within the assumption of the level of activities analyzed in the 1994 FEIS. The 2008 Final EIS, the latest BLM analysis on this topic, concludes that all potential operations on BLM land in western Oregon combined would have such a small potential change in global carbon storage that there are no climate models with sufficient precision to reflect those changes (2008 EIS p. 543). The 2008 Final EIS concluded that the proposed RMP and all alternatives, including the No Action Alternative (1995 RMP), would increase carbon storage from current levels. None of the alternatives would result in carbon storage of more than one percent of the current carbon stored in forests and harvested wood in the United States. Commenters provided no information that would result in a different conclusion regarding the effects of this thinning sale on carbon storage.

While it is not speculative that some change in climate conditions will occur in the future, it is not possible to reasonable foresee the specific nature or magnitude of the changes. I have considered the information presented by the commenter, the reference material recommended by the commenter, additional references linked by the commenter's online materials<sup>4</sup>, and references used and summarized by BLM planners during periodic and ongoing monitoring of carbon storage research. I did not find anything in these resources that concluded that this project would have a significant adverse impact on carbon sequestration or carbon storage and that delaying the Gordon Creek Thinning I timber sale to prepare an EIS is unnecessary. The project area would retain a forest environment after the completion of the project. It appears the main point of the comment ties back to topic 10.1 regarding whether the commenter agrees with the actions that take place under the established land use allocations. See response to 10.1.

### **10.15 Access to Stands during Comment Period**

Some commenters expressed concern about being able to access the area during 2<sup>nd</sup> EA comment period that took place in spring when roads were blocked by snow and down trees. BLM initiated the project by mailing a scoping letter in September 2006. The comment period on the original EA was in September – November 2007, when the area is free from snow. Although access to the area is extremely limited due to a series of gates that are controlled by private landowners, the public has been granted entry permission from private landowners when requested. Although it did not take place during a comment period, on June 4, 2007 the BLM hosted one field trip to view areas that were identified as high concern areas by the public. Therefore, I have concluded that the public has had sufficient opportunity to view the project proposal.

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<sup>4</sup> (e.g. *Forests, Carbon and Climate Change* (2006 Oregon Forest Resources Institute) and *The Straight Facts On Forests Carbon And Global Warming* (Oregon Wild Website))

## **10.16 Spotted Owl Recovery Plan/WOPR**

A comment was raised suggesting that the Gordon Creek projects be deferred because the Obama administration has withdrawn support for the Spotted Owl Recovery Plan on which the Western Oregon Plan Revision (WOPR) was based. The Gordon Creek Thinning EA was planned in accordance with the 1995 RMP and not the WOPR. The Gordon Creek Thinning I timber sale is a "transition" sale as defined in the 2008 ROD/RMP for the Salem District (*DR section 5.0*). Impacts this project would have on the northern spotted are fully addressed in the EA (EA pp. 13-15, 27-31, 101-119, 135--144, 146). Also, see response 10.9. I find no sufficient reason to defer the sale.

## **10.17 Range of Alternatives**

Commenters feel that there is an inadequate range of alternatives analyzed in the EA and acknowledge that the EA analyzed three Action Alternatives and the No Action Alternative. Some comment letters recommended an alternative that drops thinning and road construction/reconstruction in section 13 southeast of the powerline. Other comments related to alternatives include: increase "no harvest buffers" to minimum 220 feet; manage for decadence/old growth; use of variable density thinning; manage for water quality; and manage for carbon storage.

After reviewing the EA, I have determined that the range of alternatives analyzed is adequate for the following reasons. The purpose and need for the project defines the project and limits the range of action alternatives to those which fulfill the purpose and need for action (EA pp.2-4). The EA analyzed three action alternatives based on differing lengths of road to be constructed, improved, renovated and used and the logging systems required to implement the project with those road parameters (EA pp. 12-33). The ID Team also considered four additional action alternatives which were not analyzed in detail (EA pp 34-35). The EA also analyzed the No Action Alternative.

The changes made in response to comments received on the original Gordon Creek Thinning EA (EA pp. 35-38) are also alternative actions that were analyzed. To drop the proposed actions in section 13 would be implementation of the No Action Alternative (EA p. 32) in this specific area. The other specific comments are responded to in 10.1, BLM Land Use Allocations. Additionally, each resource analyzed in EA section 3.0, pp. 39-141 includes analysis of all three Action Alternatives and the No Action Alternative.