

FY 2002 Commercial Thinnings (West) - Hayhurst Thinning T.S.

Decision Document

An Interdisciplinary (ID) Team of the Swiftwater Field Office, Roseburg District, Bureau of Land Management has analyzed the proposed **FY 2002 Commercial Thinnings (West)** project. This analysis and the "Finding of No Significant Impact" (FONSI) was documented in Environmental Assessment (EA) No. OR-104-02-02. The thirty day public review and comment period was completed on August 9th, 2002. One letter with comments was received as a result of public review.

This proposal is in conformance with the *"Final - Roseburg District Proposed Resource Management Plan / Environmental Impact Statement (PRMP/EIS) dated October 1994 and its associated Roseburg District Record of Decision and Resources Management Plan (RMP) dated June 2, 1995. The RMP was written to be consistent with 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 (FSEIS); dated Feb. 1994 and its associated Record of Decision for Amendments to Forest Service and Bureau of Land Management Planning Documents Within the Range of the Northern Spotted Owl (ROD) dated April 13, 1994; generally referred to as the "Northwest Forest Plan" (NFP).*

The EA analyzed the implementation of the "Proposed Action Alternative". The proposed action involves the commercial thinning and density management harvest of young growth timber in the Elk Creek Watershed located in Section 31, T21S R4W; Section 7, T22S R4W; and Section 3, T23S R6W; W.M.

The EA erroneously described the felling and girdling of two trees per acre within the Riparian Management Zone only. Actually this will occur throughout the entire Riparian Reserve. This requires the following changes to the EA:

- 1) Page 4, Features common to all alternatives, #5; should read "Riparian Reserve" vice "Riparian Management Zone".
- 2) Page 5, paragraph 3, the last sentence should read "A noncommercial aspect . . . would occur within the Riparian Reserves . . ." vice the distance figures given.
- 3) Page 17 under Key Issue indicates that trees would be felled and girdled within the Riparian Management Zone. This should read "Riparian Reserve".
- 4) Page 20, first paragraph, talks about "no-cut buffers". This description, though accurate enough for effects analysis (since the area will be uncut until after logging is complete), is not technically accurate since two trees per acre will be cut or girdled in this area. The proper term should have been "Riparian Management Zone".

Other changes should also be noted:

- 5) Page 6, last paragraph delete “falling trees into streams”.
- 6) Page 9, subheading 5 talks about “mature and old-growth” remnant trees. Later in the same paragraph numbers of “old growth remnant trees” were given. The same category (mature and old-growth) should have been carried forward, otherwise these trees could be assumed to be old-growth trees when they could be less than 200 years old.
- 7) Page 7 (top) talks about full suspension across streams in the Cat Tracks sale. There are also places where full suspension will be required on Hayhurst Thinning as well.

These changes do not alter the analysis or conclusions of the EA.

Decision

It is my decision to authorize the implementation of the Proposed Action Alternative and offer the **Hayhurst Thinning T.S.** for advertisement on January 28th as outlined in the EA (Section II, pg. 5). The project design features for this alternative are listed on pages 6-10 of the EA. These features have been developed into contract stipulations and will be implemented as part of the timber sale contract.

The following specifics should be noted as the result of sale layout:

- 1). Harvest activities will occur on 288 acres and harvest of approximately 5000 MBF of timber. The EA analyzed 356 acres. Sixty-eight (68) acres were dropped due to the discovery of an occupied marbled murrelet site as well as the removal of non-entry portions of the Riparian Reserve.
- 2). A total of 5455 ft. (1.03 mi.) of temporary road will be constructed. A total of 4.2 mi. of existing road will be renovated (i.e. brought back to its original design).
- 3). A stipulation was placed in the contract to fell and leave or girdle 194 trees within the Riparian Reserves in order to promote riparian values of snags for cavity nesters and an interim source of down woody debris. The Riparian Reserve contains 97 acres.
- 4). Approximately 225 acres (*Biological Assessment* [BA], November 20, 2002) have been changed from the Matrix Land Use Allocation to the Late-Successional Reserve (LSR) allocation (unmapped) due to the discovery of an occupied marbled murrelet site. This action is consistent with the NFP ROD (pg. 46) that requires the transfer of Land Use Allocations in a case such as this. The BA (pg. 8) did not consider these acres as suitable murrelet habitat due to a lack of nesting platforms and other habitat components. This area would be managed in a manner consistent with normal second-growth stands within the LSR (RMP, pg. 29) to create and maintain late-successional forest conditions as well as the recommendations of the *South Coast - Northern Klamath Late-Successional Reserve Assessment* (May 1998). The treatment of the LSR will help attain desired stand conditions.

Decision Rationale

The Proposed Action Alternative meets the objectives for lands in the Matrix, Riparian Reserve and Late-Successional Reserve Land Use Allocations and follows the management actions/directions set forth in the *Final - Roseburg District Proposed Resource Management Plan / Environmental Impact Statement* (PRMP/EIS) dated October 1994 and its associated *Roseburg District Record of Decision and Resources Management Plan* (RMP) dated June 2, 1995.

Section II of the EA describes three alternatives: a "No Action" alternative and two "Proposed Action" alternatives. The No Action alternative was not selected because the EA did not identify any impacts of the Proposed Action that would be beyond those identified in the EIS. The No Action alternative would not meet the objective of producing a sustainable supply of timber and other forest commodities. Alternative B was not selected because the EA did not show that any adverse impacts would incur from logging in the Riparian Reserve. Cultural clearances have been completed according to protocol. No consultation was required.

This project has been informally consulted with U.S. Fish and Wildlife Service. Their Letter of Concurrence (December 27, 2002) agreed with BLM's determination that the action "is not likely to adversely affect spotted owls and murrelets". Informal consultation with the National Marine Fisheries Service has been completed. Their Letter of Concurrence (July 15, 2002) concurred with BLM's determination that the action is not likely to adversely affect (NLAA) for the OC [Oregon Coast] coho salmon and steelhead trout."

This decision is based on the fact that the Proposed Action Alternative implements the Standards and Guidelines (S&Gs) as stated in the NFP and the Management Actions / Directions of the RMP. The project design features as stated in the EA would protect the Late-Successional and Riparian Reserves, minimize soil compaction, limit erosion, protect slope stability, wildlife, air, water quality, and fish habitat, as well as protect other identified resource values. This decision recognizes that impacts will occur to these resources, however, the impacts to resource values would not exceed those identified in the *Final - Roseburg District Proposed Resource Management Plan / Environmental Impact Statement* (PRMP/EIS). The Decision provides timber commodities with impacts to the environment at a level within the bounds of the RMP/EIS.

Comments were solicited from affected tribal governments, adjacent landowners and affected State and local government agencies. No comments were received from these sources. During the thirty day public review period, comments were received from one individual / organization. None of the comments provided new information, showed flawed analysis of our assumptions, or an error in data that would alter the conclusions of our analysis thereby requiring new analysis or reconsideration of the proposed action. Several comments warrant clarification:

- Trees will be cut within the RMZ, [Riparian Management Zone] but not yarded or sold. However, the EA did not keep in place a no-cut zone. Will cutting go right to the stream bed? How much dead wood will be actually created within the RMZ?

As stated in the EA (pg. 6), an RMZ will be maintained along all streams to protect riparian habitat and promote riparian values. The RMZ was designed after a review of current scientific literature (effects of various buffer widths) and on-site conditions (drainage, slope, soil stability)

to alleviate concerns of forest management impacts on the stream channel while also enabling limited management for riparian habitat purposes. The RMZ consists of the entire Riparian Reserve (under Alternative B) or a strip 40 ft. wide along non-fish bearing intermittent streams, 100 ft. along fish bearing streams and expanded whenever potentially unstable conditions were found so as to include the unstable areas (Alternative C). The only active management within this zone will consist of creating snags through selective girdling of standing trees and felling of selective trees to provide a source of interim woody debris. This management activity is consistent with the *South Coast – Northern Klamath Late-Successional Reserve Assessment* (LSRA) recommendations on developing coarse woody debris (CWD) within the Riparian Reserve appropriate for this age stand. There is approximately 2700 cubic feet of CWD found in these stands currently in decay class 3 and 4 logs. The LSRA recommends a range of CWD from 1,600 to 9,400 cubic feet per acre that should exist at stand age 80. Therefore to enhance current conditions, approximately two trees per acre will be treated through girdling or felling of selected trees. The stand exams for this project show an average of 275 stems per acre within the RMZ. Less than two trees per acre (0.7% of the RMZ) will be treated; therefore, cutting within the RMZ will have negligible effects on the stream channel. Although this EA did not specifically prescribe a no-cut zone, the RMZ will essentially function as such. The EA could not call it a no-cut buffer since a minimal number of trees will be cut and left as interim woody debris. Trees selected for cutting will take into consideration stream bank stability and stream shading. The increase in the amount of dead wood will be minimal and within the range of natural variability.

- We assume that in the description of Alternative C on page 4 of the EA, the “125 acres of density management harvest” includes the entire Riparian Reserve, including the RMZ. If not, how many acres of RMZ are there?

The EA figure of 125 acres includes both that portion of the Riparian Reserve that will be subject to density management harvest as well as the RMZ that is not subject to density management harvest (Alternative C). We agree that this lumping causes confusion. Approximately 65 acres of this total consists of the RMZ which is subject to treatment only.

- The outer 160 and 300 feet of the Riparian Reserve more dead wood would be left than the upland Matrix. Right? How much more? Who will do this work?

The outer portion of the Riparian Reserve beyond the RMZ will indeed be treated similarly to the RMZ, viz. felling or girdling two trees per acre leaving a small amount of additional dead wood. This work will either be accomplished under contract by the purchaser or if the purchaser elects to “buy out” of this treatment the money will fund a service contract to be administered by the BLM. No trees will be girdled or felled for interim down wood in the Matrix.

- The EA, page 6, last paragraph, describes activities in the Riparian Management Zone. Why then would logs be yarded “away from or parallel to the streams”? Why are you yarding trees cut in the RMZ at all?

This paragraph is within that portion of the EA which describes fulfillment of Aquatic Conservation Strategy objectives and the paragraph in particular describes how riparian habitat

will be protected and does not describe how activities are done in the RMZ. The paragraph states that riparian habitat will be protected by: (1) establishing the RMZ, (2) specifying directional falling for the logged portion of the Riparian Reserve to keep felled trees outside the adjacent stream areas, and (3) requiring the yarding of these same trees away from or at most parallel to the stream course, again to protect this area from excessive ground disturbance.

- The IDT Meeting notes says that botanical surveys will not be completed until September. The 3P EA requires all surveys to be completed prior to initiation of any falling activity.

The date for the completion of botanical surveys was a date speculated by the botanist eight months prior to any possible sale date. The actual surveys were completed in April, well in advance of the September date.

- Old-growth trees should not be cut. This includes incidental cutting of trees for yarding corridors, tail-hold trees, road construction, or road widening. The EA strongly hinted that old-growth WOULD be cut. The EA should have told us how many old-growth trees will have to be sacrificed.

The EA states that “Mature and old growth (RMP, pg. 112) remnant trees in the thinning units would be retained to the greatest extent possible . . .”. It should be noted that the RMP defines old-growth as trees over 200 years of age. These trees are a very minor component of the stand (EA pg. 9, para. 5). Trees that were retained were not actually aged but marked for retention based on physical appearance (Silvicultural Prescription, pg. 4). These larger trees, whether actual old-growth or not, will be retained to the greatest extent possible. It is practical to do so since they cause excessive damage to the residual stand when felled, however it is not a violation of the RMP to cut trees over 200 years. Old-growth trees are typically large although some suppressed old-growth trees can be less than eight inches. Similarly, young trees grown under favorable micro-climatic conditions can reach large diameters. The Hayhurst cruise data was reviewed to determine how many large trees will be removed. PNW Research Note (PNW-447, July 1986) *Interim Definitions for Old-Growth Douglas-fir and Mixed-conifer Forests in the Pacific Northwest and California* considers a large tree as greater than 32". Out of approximately 34,400 trees that will be cut on this sale, fifteen trees (0.04%) are over 32" (the largest being 34"). If these trees were actually aged they could be found to be less than 80 years old. The EA did not disclose the numbers of old-growth trees for two reasons: first the trees were not aged to get an actual determination of whether they are actually old-growth and secondly the EA is written before a final decision (this document) is rendered and final numbers are available. The EA did provide an estimate (pg. 9, para. 5) of potential numbers. Unfortunately the EA called these “old-growth” trees when they more technically should have been described as “mature or old-growth”. BLM feels that it has met the objective of “retaining to the greatest extent possible”. Remnants will continue to provide wildlife, genetic and other values into the next stand.

- Why is the BLM yarding trees on 20 acres of FGR slopes if there is any chance it would cause a debris avalanche into the stream?

The EA disclosed an increased risk of landslides in the FGR area by entering the Riparian Reserve. The EA further discloses that “Although the probability of debris avalanches would increase, it would still be in the low range (<10 percent) as under the no action alternative and

would be expected to be within the range of natural variation”. The EA also states “The most likely size of any debris avalanche would be small” and “The possibility of harvest-related debris avalanches impacting streams would be considered unlikely given the low probability of landslide occurrence and the protection afforded by the no-cut buffer.” In short the BLM believes that although the thinning could result in an increased risk it would be of such low probability, of small size and within the range of natural input of sediment as to not be of concern.

Compliance and Monitoring

Monitoring will be conducted as per the guidance given in the RMP (Appendix I).

Protest Procedures

Forest Management Regulation 43 CFR 5003.2 states that “[w]hen a decision is made to conduct an advertised timber sale, the notice of such sale shall constitute the decision document.” This notice will be placed in *The News Review* and constitute the decision document with authority to proceed with the proposed action. As outlined in Federal Regulations 43 CFR, 5003.3, "Protests of ... Advertised timber sales may be made within 15 days of the publication of a ... notice of sale in a newspaper of general circulation." Protests shall be filed with the authorized officer (Jay K. Carlson) and shall contain a written statement of reasons for protesting the decision. Protests received more than 15 days after the publication of the notice of sale are not timely filed and shall not be considered. Upon timely filing of a protest, the authorized officer shall reconsider the decision to be implemented in light of the statement of reasons for the protest and other pertinent information available to him/her. The authorized officer shall, at the conclusion of his review, serve his decision in writing to the protesting party. Upon denial of a protest ... the authorized officer may proceed with the implementation of the decision.

For further information, contact Jay K. Carlson, Field Manager, Swiftwater Field Office, Roseburg District, Bureau of Land Management, 777 NW Garden Valley Blvd; Roseburg, OR. 97470, 541 440-4931.

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Date