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IN REPLY REFER TO:
5400 (014)

DECISION RECORD #2
FOR
SOUTH GERBER FOREST HEALTH TREATMENTS EA #OR-014-04-06
PROJECT: East Fork Juniper Utilization and Pine Thinning

INTRODUCTION

During the summer of 2006, the Klamath Falls Resource Area (KFRA) cut and piled western juniper in the East Fork Fuels Treatment Unit (approximately 715 acres) under the Fuels IDIQ contract. The document that analyzed the cutting and piling treatment in compliance with the National Environmental Policy Act (NEPA) was DNA 02-03.

The demand for a variety of juniper products both locally in the Klamath Falls area as well as in the surrounding communities has been increasing. In 1999 and 2000 the KFRA begin selling juniper sawlogs to the local REACH mill that manufactures the juniper in a variety of products. Prior to this, the primary use for western juniper was firewood. Since 2004, the demand and use for western juniper has expanded to include:

- Biomass for energy in co-generation plants
- Clean chips for hardboard production
- Particle board filler material
- Untreated post & pole material.

The Klamath Falls Resource Area awarded the Gerber Stew Stewardship Contract in 2004 in part to provide a continual supply of western juniper to develop and sustain local markets to utilize the biomass that was primarily being burned. To date, the KFRA continues to burn 80+% of the western juniper that it cuts. A secondary objective of the Stewardship Contract has been to assist rural communities with developing sustainable employment opportunities utilizing new products and biomass while implementing treatments to restore forest and rangeland health. The East Fork Juniper Utilization and Pine Thinning treatment would be implemented using the existing stewardship contract and meet the objectives stated above.

On April 25, 2007, an interdisciplinary core group including Dana Eckard (range), Steve Hayner (wildlife), and Mike Bechdolt (forestry) reviewed the East Fork juniper cutting and piling unit to assess the potential for utilizing the western juniper. They observed the following:

1. About 60-80 acres of the East Fork unit on the east side overlapped into a commercial ponderosa pine stand that is scheduled to be included in the Adobe West Timber Sale proposed for design in 2009. Only the western juniper in the ponderosa pine stands was cut and piled. None of the commercial pine stand was thinned during the fuel treatment. Many of the western juniper piles are located within and adjacent to the commercial timber and presently cannot be burned without the risk of damaging the immediately adjacent residual pine trees (See attached photos).
2. The majority of the East Fork western juniper cutting and piling unit is located primarily on juniper woodlands and rangelands and outside commercial forest stands (See Maps).

PROPOSED ACTION

On June 7th, 2007, a core group including Larry Brooks (Assistant Field Manager), Dana Eckard (Range), Steve Hayner (Wildlife), Don Hoffheins (NEPA/Planner), and Mike Bechdolt (Forestry) met to discuss the options of yarding the juniper and thinning of ponderosa pine concurrently within the project area. Based upon the discussion, field review and review of the existing NEPA documentation, the proposed action is as follows:

1. Within the ponderosa pine stands, the existing juniper that is presently cut and piled will be yarded with one-end suspended by a standard grapple, rubber-tired skidder to a loading point. This amounts to about 60-80 acres.
2. Concurrently with yarding the juniper in the ponderosa pine stands, the ponderosa pine stand would be thinned to 60-100 basal area. Approximately 60-78 acres will be thinned and approximately 100 MBF of timber will be removed.
3. In the areas outside of the ponderosa pine stands but within the fuel treatment boundaries of the East Fork unit, existing cut juniper will be skidded only with mechanized yarding equipment that fully suspends and transports the material to a main designated skid trail approximately three hundred (300') feet apart. Once the material is transported to a main designated skid trail, the material will then be one-end suspended to a loading point for processing. Approximately 320 acres will be yarded using this method .i
4. Upon completion of yarding and removal of pine log and juniper bole material from the landings, the residual slash and debris remaining on the landings (loading points) will be piled and burned or biomassed.
5. Disturbed areas, primarily landings and skid trails on the juniper woodlands, will be seeded with native grasses and/or planted and tubed with native shrub species.

EXISTING NEPA ANALYSIS

1. The impacts including timber harvesting and western juniper cutting and utilization in and adjacent to the forested stands were analyzed under the South Gerber Forest Health Treatment EA#OR-014-04-06. This assessment analyzed multiple proposed actions across watersheds with implementation proposed over a five to ten year period. It was anticipated that separate Decision Records would be prepared at the time specific projects were proposed. This Decision Record applies only to those areas shown on the attached map and within the boundaries of the East Fork Fuel Treatment Area.
2. The proposed treatment is based on: (a) current resource conditions in the project area, (b) the results of monitoring previous and similar treatments to date, and (c) meeting the

objectives and direction of the KFRA Resource Management Plan (RMP). The proposals presented and evaluated in the South Gerber EA reflect what the interdisciplinary team determined to be the best balance and integration of resource conditions, resource potentials, competing management objectives, expressed interests of the various publics, and the concerns of surrounding communities.

DECISION

It is my decision to implement the actions proposed above which were analyzed as part of Alternative 1, the Preferred Alternative, in the South Gerber EA. As part of this action, Best Management Practices (BMPs) in Appendix D of the KFRA ROD/RMP and the Project Design Features (PDF) in Appendix B of the EA will be applied. The approved action will result in:

- Harvest (cut and yard) and remove (haul) approximately 100 MBF of ponderosa pine from 60-80 acres of existing ponderosa pine stands.
- A density management thinning prescription resulting in a residual basal area range from 60 to 100 square feet per acre.
- Yarding and removing western juniper that has been already cut within both the ponderosa pine stands and juniper woodlands (380 – 400 acres).
- Within the ponderosa pine stands, standard grapple skidding will be allowed (60-80 acres)
- In the juniper woodlands areas (approximately 320 acres), all juniper will be fully suspended with mechanized yarding equipment to the main designated skid trails approximately three hundred (300') feet apart. One-end suspension using mechanized yarding equipment on the designated main skid trails will be allowed.
- Disturbed areas will be seeded and/or planted and tubed with native vegetation.

Roads:

- Existing roads will be used. No new roads or temporary roads would be constructed.
- All blocked roads that are opened to facilitate logging will be blocked again upon completion of harvest and yarding activities.

Riparian Reserves:

- Antelope Reservoir and Alkali Spring will receive buffers that extend to the edge of the high water mark and/or the extent of the riparian vegetation, whichever is greater. This buffer will be determined by the Klamath Falls Resource Area hydrologist.
- The perennial and intermittent streams containing, or connecting to, fish populations will be buffered and protected as described in the PDFs (Appendix B) of the South Gerber EA and the BMPs in Appendix D of the KFRA ROD/RMP. Specifically, operational boundaries will be delineated to establish no-mechanical-equipment-entry zones along stream channels to protect thermal regimes adjacent to streams and maintain stream bank stability.

Wildlife Management:

- Implement the PDFs described in Appendix B of the South Gerber EA and the BMPs applying to timber harvesting in the KFRA ROD/RMP, Appendix D, for all actions conducted in the East Fork proposed treatment area.
- Special Status, Threatened and Endangered Species – The management actions/directions as described on pages 38 & 39 of the RMP will be applied.

Fuel treatments:

- Upon completion of yarding and removal of the pine and juniper boles, the residual landing slash will be either biomassed or burned on site.

ACS Consistency

The nine objectives of the ACS provide for maintenance and restoration of the ecological health of watersheds, as outlined in the KFRA RMP (page F-6). ACS objectives applicable to this DR include: maintaining and restoring the physical integrity of the aquatic system (Objective 3); maintaining and restoring water quality (Objective 4); and maintaining and restoring species composition and structural diversity of plant communities in riparian areas (Objective 8), (page F-6). All other ACS objectives would be met since there would not be any impact from this project towards attainment of those objectives.

Antelope Reservoir, Alkali Spring, streams, and riparian areas would be buffered and established as "no-mechanical-equipment-entry zones" within the project area. Riparian Reserve buffers, Best Management Practices (BMPs), and Project Design Features (PDFs), as described in the proposed action, are expected to maintain and restore the physical integrity of water resources, including the shorelines and banks of Antelope Reservoir and Alkali spring and the associated riparian area. Plant communities would be maintained and restored because invasive juniper in riparian reserves would be removed (hand cut under the Fuels IDIQ contract) and no mechanical equipment would be permitted in riparian areas, minimizing any potential impacts to water quality. Use of partial suspension techniques for yarding in juniper woodlands will reduce soil and vegetation disturbance in upland areas, thus minimizing the risk of fine sediment and nutrient transport to aquatic systems. Therefore, the proposed action is consistent with the attainment of the ACS Objectives through implementation of no-entry buffers, BMPs, and project specific PDFs.

Monitoring

Monitoring will consist of contract administration and an interdisciplinary core group review to determine if:

- Cultural sites were protected
- Riparian reserves were adequately buffered
- Adequate suspension of the material was achieved.
- Residual basal area was achieved
- Response from the seeding

The KFRA prepares an Annual Program Summary (APS) and Monitoring Report on a yearly basis. The Annual Program Summary documents the results of annual timber sale monitoring as well as on-going monitoring of other resources and treatments.

Mitigation

All PDFs described in Appendix B of the South Gerber EA and all BMPs in Appendix D of the KFRA ROD/RMP that pertain to timber harvesting will be implemented. No additional mitigation was deemed necessary and thus none was described in the EA or in this decision record.

Resources Not Present
The following resources are not present within the proposed East Fork Fuel Treatment Area: prime and unique farmlands, mining claims, paleontological resources, hazardous materials, roadless areas, wilderness areas, and wilderness study areas.

Environmental Consequences
Implementation of the proposed action is consistent with the effects analyzed in the South Gerber EA and the RMP/EIS. The PDFs from the South Gerber EA and the BMPs from the KFRA ROD/RMP will minimize the effects to the affected resources and result in no impacts greater than those described in the EA and the KFRA ROD/RMP.

RATIONALE FOR SELECTION OF ALTERNATIVE 1

The decision to implement this proposal, Alternative 1, meets the purpose and need identified in the EA and furthers the intent established in the Klamath Falls Resource Area RMP to harvest timber, cut and utilize juniper, and protect other resource values.

Alternative 2, the No Action Alternative, is rejected because it does not meet the resource management objectives for the Matrix identified in the Klamath Falls RMP and the Northwest Forest Plan. Beneficial economic opportunities from utilizing the ponderosa pine and juniper would be foregone. In addition, subsequent attempts to burn the material in place would result in increased mortality to the existing pine stand from the burning.

CONSULTATION AND COORDINATION

BLM biologists have made a "No Effect" determination for all threatened and endangered species for this project. Therefore, no consultation was necessary.

PUBLIC INVOLVEMENT

The KFRA requested public comments on the South Gerber EA on two different occasions. The first was an initial scoping letter dated February 5, 2004 that outlined the proposed treatments for the analysis area. Three comment letters were received. Upon completion of the EA, the public was again notified on January 13, 2005 and allowed to comment during a formal thirty (30) day public comment period. Again, three comment letters were received. The following provides responses to the main issue topics raised in the comments:

Roads
Comment: *No new road construction, particularly in roadless areas.*
Response: In compliance with the Federal Land Policy and Management Act of 1976, the BLM inventories roadless areas 5,000 acres or more in size. There are no roadless areas on BLM land within the project area. Current average road density within the proposed contract areas is estimated at between one and two miles per square mile. Therefore, there will be no road construction in any roadless areas.

Comment: *Limit or don't construct temporary roads.*

Response: No new permanent or temporary road construction is proposed in the East Fork Juniper Utilization and Pine Thinning treatments.

Comment: *Avoid damage to roads during inclement weather.*
Response: Project activities and road use are seasonally limited to the dry season when soil moisture at a six inch depth are less than 20 percent (typically June 1 to October 15) thereby reducing potential effects.

Comment: *Adverse impacts from roads to streams, soils, wildlife, hydrology, vegetation (noxious weeds), tree growth, and increased spreading of diseases should be addressed.*
Response: The EA discusses road-related environmental effects to the above resources on pages 11, 12 and 19, therefore, this topic is sufficiently addressed.

Riparian Reserves
Comment: *Proposed action is contrary to the requirements of Aquatic Conservation Strategy (ACS).*
Response: The project is not contrary to the requirements of ACS because for all ACS objectives applicable to this DR, these objective would either be met or attainment of these objective would not be prevented. This is described in the ASC Consistency section of this document.

Vegetation
Comment: *Do not cut trees over 12" DBH.*
Response: The KFRA ROD/RMP (page E-3) specifies that "…trees in all size classes are eligible for thinning in order to reduce stocking to site capacity." The KFRA monitors stand structure and forest conditions on an annual basis (see 2004 Annual Program Summary and Monitoring Report pages 88-92). The bulk of the trees to be removed under the proposed action are between 8" and 16" Diameter Breast Height (DBH). While retaining all trees over 12" DBH may be desirable by some of the public, there is no basis for an arbitrary tree diameter limit for this project. As verified by monitoring past projects (2004 Annual Program Summary and Monitoring Report) stand diversity is expected to be retained, therefore, no diameter limit is necessary.

Comment: *Retain all large snags.*
Response: As described in the EA (Appendix B, page 3), a minimum of 1.4 snags per acre would be retained to meet the 60% optimum cavity nesting habitat in the area. In addition, because this is a density management harvest where approximately 1/4 to 1/3 of the trees are removed, there is expected to be sufficient recruitment trees available to meet future snag and down woody debris requirements thereby negating the need to retain all large snags.

Comments: *Patch cut size violates the RMP. Patch cuts are the same as clear cuts. Retention of diversity in the stand including mistletoe trees is necessary.*
Response: No Patch Cuts are proposed under the proposed action for East Fork Juniper Utilization and Pine Thinning treatment unit.

Comment: *Thinning should be done at variable densities and carefully.*

Response: The Density Management Prescription and thinning will result in a residual basal area of 60 to 100 square feet per acre.

NEPA

Comment: *Inadequate site-specific analysis of direct, indirect, and cumulative impacts.*
Response: The South Gerber EA tiers to the KFRA RMP/EIS. The assessment addressed direct, indirect, and cumulative effects of each action associated with the proposed timber sale and fuel treatments. The cumulative effects discussion in the EA address past, present and reasonably foreseeable future actions on BLM land, and on adjacent Forest Service and private lands. Therefore, the effects are fully and adequately analyzed.

Comment: *An EIS instead of an EA should be written.*
Response: The analysis is sufficient to support the conclusion that effects of actions proposed in the EA will not exceed those analyzed in KFRA RMP/EIS and the determination in the FONSI that the effects of this proposed action are not significant, so an EIS is not required.

Comment: *Inadequate description of mitigation measures.*
Response: The list of Best Management Practices and Project Design Features provided in Appendix B of the EA is sufficient to protect resources and minimize potential environmental effects, so no additional mitigation measures were developed.

Comment: *Inadequate range of alternatives considered.*
Response: Four alternatives were considered in the original EA and two were analyzed in detail. The rationale for dropping two alternatives from further analysis is on page 6 of the EA. Despite there being only two alternatives analyzed and documented in detail, the range of alternatives considered was adequate.

Wildlife

Comment: *Inadequate analysis of impacts on wildlife.*
Response: The KFRA RMP/EIS, to which the South Gerber EA is tiered, considers at length the effects of timber management and other activities on wildlife. The EA (pages 23-29) describes the current situation and anticipated effects to wildlife specific to the project area. One of the benefits as discussed in the EA of reduced canopy closure is more sunlight on the forest floor resulting in an increase in forbs, grasses, and shrubs with a corresponding benefit to wildlife species. Therefore the analysis of specific wildlife species is adequate.

Grazing

Comments: *Consider impacts on forest health from livestock grazing/Cumulative effects not addressed. Livestock grazing must be eliminated.*
Response: Rangeland Health Standards Assessments completed for all allotments in the project area as part of the Gerber-Willow Valley Watershed Analysis (July, 2003) show that current levels of livestock grazing are appropriate to meet all five standards for Rangeland Health, which would also apply to "forest health Current levels of grazing have no measurable effect on timber resources, especially coniferous species. The KFRA ROD/RMP recognizes and provides for livestock grazing as a legitimate use of the public lands (page 62 and Appendix H).

Fire and Fuels
Comment: *Thinning and fuels reduction should focus on smaller trees and ladder fuels, particularly trees less than 12."*
Response: Thinning and fuels reduction efforts for this project do focus on ladder fuels and trees less than 12" DBH. The prescription also allows for thinning of trees over 12" DBH.

Comment: *Don't focus on reducing canopy fuels.*
Response: Canopy levels will be reduced from the proposed thinning but this is not the focus of the project.

Comment: *Ensure long-term recruitment of future old-growth.*
Response: The treatments are expected to maintain future old-growth recruitment (see vegetation discussion above) and estimated canopy closure of 40 percent or more in stands that are currently densely stocked. Therefore the long-term recruitment of future old-growth is expected.

Comment: *Harvesting will actually increase wildfire severity and risks.*
Response: Fuel treatments are designed to remove accumulated fuels including piles of western juniper scattered amongst the pine stands as well as in the woodlands. The overall effect of the proposed action is expected to modify the present fuel condition class to closer resemble historic conditions thereby benefiting multiple resources. As a result of all actions proposed including harvesting, the wildfire severity and risk is not expected to increase. In addition, utilization of the piles will result in less smoke emissions.

Juniper Management
Comment: *There is limited scientific evidence supporting western juniper encroachment of historic rangelands.*
Response: There are a variety of objectives for juniper management but the emphasis in this project area is fuels reduction, rangeland health, and forest health. Appendix H of the RMP discusses the type of vegetative improvements proposed in the different allotments. Page H-69 states that vegetative control would consist of cutting or burning juniper to improve resiliency of native grasses, forbs, and shrubs. Page 56 of the RMP discusses the cutting and yarding of up to 1,000 acres per year of juniper woodlands to improve forest and range land ecosystem and watershed conditions. Research is increasingly validating the benefits of treating invasive western juniper; (***Western Juniper Its Impact and Management In Oregon Rangeland***, Oregon State University Extension Service, February 1993, Bedell, Eddleman, Deboodt, Jacks.; ***Range Field Day 1999 Progress Report Juniper Woodlands: History, Ecology, and Managemen*t**, Agricultural Experiment Station, Oregon State University, Special Report 1002, June 1999; ***Western Juniper in Eastern Oregon***, Gedney, Azuma, Bolsinger, McKay, United States Department of Agriculture, Forest Service, Pacific Northwest Research Station, General Technical Report -464, November 1999). The effects of invasive western juniper are discussed in the Gerber Watershed Analysis and the literature cited above. The effects of the proposed

actions to treat some of the invasive juniper are analyzed in the South Gerber EA and are within those analyzed the KFRA RMP. Therefore, the decision is to utilize the juniper as proposed.

Salvage Harvesting
Comment: *The cumulative effects of salvage harvesting were not considered.*
Response: No salvage harvest is being proposed.

CONCLUSION

A. Consideration of Public Comments
I have reviewed the public comments summarized above and have discussed them with an interdisciplinary team of specialists on my staff. The EA and this DR contain the requisite site specific information to implement the proposed action. The comments received do not provide any substantially new information or new analysis. Nor do they identify substantial new data gaps that would indicate additional analysis is needed. Finally, the comments do not identify any significant new data which would alter the effects described in the EA. I am confident that the South Gerber EA plus the supplemental information presented above, including responses to public comments contained in this DR, in addition to the more comprehensive analysis done in the Klamath Falls Resource Area RMP to which the EA is tiered, represents a thorough analysis of potential effects associated with the East Fork juniper utilization and pine thinning.

B. Plan Consistency
Based on the information in the South Gerber EA and in the record, I conclude that this action is consistent with the Klamath Falls Resource Area Resource Management Plan. The action will help to move this portion of the landscape towards the desired future condition considered in development of the RMP. The actions will comply with the Endangered Species Act, the Native American Religious Freedom Act, cultural resource management laws and regulations, and Executive Order 12898 (Environmental Justice). This decision will not have any adverse effects to energy development, production, supply and/or distribution (per Executive Order 13212).

C. Finding of No Significant Impact
No significant impacts were identified. No impacts beyond those anticipated in the KFRA RMP/EIS would occur. Refer to the accompanying Finding of No Significant Impact.

D. Summary
In consideration of public comments, the consistency with the RMP and the finding that there would not be any significant impacts, this decision allows for activities related to the East Fork juniper utilization and pine thinning.

/s/ *Donald J. Holmstrom* 6/27/07

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Donald J. Holmstrom, Manager Date
Klamath Falls Resource Area
Lakeview District, Bureau of Land Management

East Fork Pine and Juniper Utilization Treatment
T.41S., R.14.5E., Section 1,2,3,10, &11 WM.