

**U.S. Department of Interior
Bureau of Land Management
Roseburg District, Oregon**

Bonanza Commercial Thinning Harvest

Decision Document

An Interdisciplinary (ID) Team of the Swiftwater Field Office, Roseburg District, Bureau of Land Management has analyzed the proposed **Bonanza Commercial Thinning Harvest** project. This analysis and the "Finding of No Significant Impact" (FONSI) were documented in Environmental Assessment (EA) No. OR-104-04-07. The thirty day public review and comment period was completed on December 23rd 2004. 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 EA analyzes the implementation of the "Proposed Action Alternative". The proposed action involves the commercial thinning and density management harvest of second growth timber in the Calapooya Watershed located in Sections 16, and 17; T24S R3W, W.M.

The following changes to or clarifications of the EA should be noted:

- 1). Page 7, paragraph 2a(6) should read "subsoiling of spur #1, 2, 3, 7, and possibly 5" rather than "subsoiling of spur #1, 2, 3, and 5" as stated.
- 2). Page 17, paragraph 5 should read "modification of 207 acres of Northern spotted owl dispersal habitat" instead of 218 acres that was cited. The EA figure was not reduced by 11 acres for the Townsend's Big-eared bat site that was dropped from the project.
- 3). Appendix C lists Unit 1 as having 181 acres and Unit 2 as 26 acres. Final acres are 176 and 22 acres respectively.
- 4). A Townsend big-eared bat was found in an old mine adit in Unit 16A after the EA was finalized. The management recommendation was to reserve 15 acres around this feature (see Appendix C map).
- 5). Page 4 of Appendix D states "stands that are 30 to 40 years of age". This should read "50 to 55 years".

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

Decision

It is my decision to authorize the implementation of the Proposed Action Alternative as outlined in the EA (Section II, pg. 4).

The project design criteria for this alternative are listed on pages 5-10 of the EA. These features have been developed into contract stipulations and will be implemented as part of the timber sale contract. Several of these design criteria will be accomplished through District resources and personnel. This includes:

- 1). Prior to wet season haul on surfaced roads, the stream crossings along the haul route will be evaluated by Field Office personnel for the need for sediment reducing measures such as placement of straw bales in ditch lines to prevent sediment from entering streams. If needed, these structures will be put in place by the purchaser prior to haul.
- 2). The Roseburg District Road Maintenance work group will subsoil Spurs No. 1, 2, 3, and 7. The Swiftwater Field Office Soil Scientist will evaluate Spur No. 5 for subsoiling which may be included with the others.
- 3). The Swiftwater Field Office Soil Scientist will evaluate the skid trails used for ground-based logging as well as other areas of compaction after completion of operations for the need for subsoiling in accordance with RMP criteria (BMP III B3; RMP, pg. 139). If subsoiling is determined to be necessary it will be accomplished by the Roseburg District Road Maintenance work group.

The following specifics should be noted as the result of project layout. The figures cited below may vary from the equivalent figures cited in the EA. Those cited in the EA are considered as preliminary estimates and not final figures. The fact that the EA figures were preliminary estimates has not limited the decision maker's ability to determine and evaluate the impacts of this action.

- 1). The EA analyzed potential harvest activities on approximately 250 acres. This decision authorizes the harvest of 194 acres of commercial thinning and density management on two units, and four acres of road right-of-way clearcut for a total of 198 acres. This action will result in the harvest of approximately 2130 MBF of timber from the Matrix land use allocation (chargeable for Allowable Sale Quantity) and 560 MBF from the Riparian Reserve (not chargeable) for a total sale quantity of 2690 MBF.
- 2). A total of 3145 ft. (0.6 mi.) of temporary road will be constructed. A total of 3.7 mi. of existing road will be renovated (i.e. brought back to its original design).
- 3). The average tree to be harvested is 12 inches DBH.
- 4). The harvest area will include approximately 168 acres of cable logging, 26 acres of ground-based logging and four acres of road right-of-way logging.

Decision Rationale

The Proposed Action Alternative meets the objectives for lands in the Matrix and Riparian 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 two alternatives: a "No Action" alternative and a "Proposed Action" alternative. The No Action alternative was not selected because it would not meet the objective of producing a sustainable supply of timber and other forest commodities (RMP pg. 33 and 60) and because the EA did not identify any impacts of the Proposed Action that would be beyond those identified in the EIS.

Consultation as required under Section 106 of the National Historic Preservation Act with the State Historical Preservation Office (SHPO) was completed on October 25, 2000 with a "No Effect" determination.

The actions anticipated under this analysis are covered under the *Formal consultation and written concurrence on FY 2003-2008 management activities (Ref.# 1-15-03-F-160)* (February 21, 2003, Table 1a) with the US Fish & Wildlife Service which concluded (pg. 29) that the project would “. . . not likely to jeopardize the continued existence of the spotted owl, murrelet and bald eagle, and are not likely to adversely modify spotted owl or murrelet critical habitat . . .” (EA, pg. 27). *The Five-Year Status Review for the Northern Spotted Owl* (USFWS, 2004) was released in November 2004. The final determination of the review was to keep the status of the northern spotted owl as ‘threatened’.

Since the OC coho salmon is no longer a species listed under the Endangered Species Act (ESA) consultation and a Biological Opinion are not required. The coho has been proposed for listing as “threatened” by NOAA-fisheries therefore conferencing was requested. BLM has determined that the proposed project would result in a Not Likely to Adversely Affect (NLAA) for the coho. In addition, the proposed activities were analyzed for, and determined to not adversely affect Essential Fisheries Habitat (EFH).

This decision is based on the fact that the Proposed Action Alternative implements the Standards and Guidelines (S&G’s) as stated in the NFP and the Management Actions / Directions of the RMP. The project design criteria as stated in the EA would protect the 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 could occur to some of 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 those anticipated in 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 organization (Umpqua Watersheds, Inc.). These comments were reviewed to determine the adequacy of our analysis and whether new information had been provided that shows flawed analysis or assumptions on our part that would require new analysis or reconsideration of the proposed action. Several comments warrant clarification.

- “We urge you to consider more recent information contained in the September 2004 final report of the Sustainable Ecosystems Institute (SEI), *Status and Trends of the Northern Spotted Owl*.”

Response: The EA was finalized in mid-October 2004. At that time this report was only in draft form and was undergoing peer review. The BLM biologists for this project were aware of the draft report. This new information was considered in *The Five-Year Status review for the Northern Spotted Owl* (USFWS 2004) which was released in November 2004. The final determination of the review was to keep the status of the northern spotted owl as ‘threatened’. The following items effectively summarize the findings [Quotes from pages 55-56, in: USFWS. 2004. Northern Spotted Owl Five-Year Review: Summary and Evaluation. Portland, OR. pp. 73]:

(1) “The rate of habitat loss on Federal lands has been substantially reduced, and projection models have been used to estimate a potential ingrowth of about 600,000 acres of late-successional habitat some of which will have the structural characteristics to support spotted owls.”

(2) “Demographic data collected over 15 years document declining populations across the species range with the most pronounced declines in British Columbia, Washington, and northern Oregon. However, populations are still relatively numerous over most of the species historic range, suggesting the threat of extinction is not imminent, and the subspecies is not “endangered” even in the northern part of the range where the demographic results are least promising.”

(3) “The nature, magnitude, and extent of barred owl effects on northern spotted owls remain uncertain. Consequently, there was general agreement amongst managers that barred owl effects across the range must be weighted carefully, given uncertainty about how the species interact and potential time-lags in detecting effects. Likewise, the new threats of West Nile virus and Sudden Oak Death were perceived as both potentially severe and imminent, but substantial uncertainty about their effects mediated against placing too much weight on these factors.”

“In summary, for every risk factor that has declined since listing (e.g., the current rate of habitat loss due to timber harvest, the threat of predation), another factor was identified that counterbalanced risks (e.g., habitat removal due to uncharacteristic wildfires, West Nile virus, barred owls). The net change in loss of habitat is positive, and although spotted owl populations continue to decline, that response was expected.”

Based on the findings in the status review and in discussion with the U.S. Fish and Wildlife Service BLM does not believe that this constitutes significant new information in regards to reinitiating consultation. Although the EA did not specifically address this new information the affects the EA (pg. 16) concludes that “Thinned stands would continue to function as [owl] dispersal habitat, but in a slightly degraded condition”.

- “Because this project is expected to temporarily degrade 218 acres of dispersal habitat for 10 to 15 years, perhaps a higher thinning limit should be considered, thus retaining more canopy closure”.

Response: The wildlife biologist would consider any level of thinning as temporary degradation of dispersal habitat so a higher level of retention would still have the same overall effect since trees are cut, gap openings are created, and limbs destroyed through falling activities. Since this area is part of the General Forest Management Area it could be potentially subject to final regeneration harvest after age 80 (in 30 years or more). The Riparian Reserve will continue to mature and provide habitat in the future.

- “The BLM should have considered the impacts of removing timber versus doing a restoration-only thin in the riparian areas”.

Response: This EA did not consider a restoration-only alternative, however this alternative has been considered by ID Teams in past projects (specifically Green Thunder). A restoration-only alternative was not considered viable because the RMP directs harvest in the Riparian Reserve in order to meet ACS objectives (RMP, pg. 25), cutting and leaving trees would result in a large unmitigated fuel hazard, and PDC’s (partial suspension, waterbarring yarding corridors were gouging occurs; RMP, pg. 130) would mitigate concerns regarding soil disturbance and water quality.

- “We are very concerned about the 900 feet of road construction in the RR. . . . The EA should have considered an alternative that helicopter logged instead of building 900 feet in riparian reserves. . . . We would prefer that construction of Spur 3 be dropped.”

Response: The EA (pg. 20) analyzed the temporary construction within the Riparian Reserve. Due to the hydrologic features described (“The affected stream is not typical of normal stream features. This intermittent stream channel is 1000 feet long with no surface connection to downstream waters.”). The EA concluded “No adverse impact from the spur road construction would occur because sediment transport would not occur since all sediment would be filtered out when the stream goes subsurface”. This issue was also addressed in the Appendix D (Issue Identification Summary) by stating that “Construction of temporary spurs within the Riparian Reserve would provide an opportunity for restoration in this area. About 1600 ft of old spur roads within the Riparian Reserve would be treated by subsoiling to ameliorate the compacted surface of these features. The temporary stream crossing fill material and any drainage structures would be removed and the channel reshaped when this project is complete. This would restore surface flow through this stream crossing which is currently interrupting surface flow and remove a potential source of erosion.” The Swiftwater Field Office believes that the impacts due to temporary spur construction in the Riparian Reserve would be offset by the restorative action that is planned.

- Item 6 on page 7 of the EA states that all new construction will be decommissioned when logging is completed . . .” and lists Spur roads 1, 2, 3 and 5 . . . however, page 18 reads “. . . Spurs #4 and #6 and possibly Spur #5 would not be subsoiled [also the IDT notes] indicated that “All spurs will be blocked and waterbarred except for spurs in the riparian.” Please explain why those roads will not be blocked.”

Response: The EA, by stating “Decommissioning all new construction”, does not imply subsoiling all new construction but rather the ones listed. The EA should have listed “spur number 1, 2, 3, 7, and possibly 5” to be subsoiled rather than stating that “Spur 1, 2, 3, and 5” would be subsoiled. The list on page 18 is therefore correct. The ID Minutes meant to convey that spurs in the Riparian Reserve would not just be blocked and waterbarred but also subsoiled.

- “Why does the BLM not offer to protect important snags with retention trees to eliminate logger safety issues? RR’s should have the full component of snags to supply 100% of the needs of cavity nesters. The largest trees that need to be thinned in the Riparian Reserves should be killed for snag habitat, instead of sold . . .”

Response: It has been normal practice for tree markers to reserve mark trees near snags to provide some minimal level of protection. In many cases there are no trees nearby that could be marked (e.g., the snag is in a gap opening). Buffers could be marked around each snag but this would make the unit impractical to log. The BLM has had success in retaining as many of these trees as possible in recent logged sales. There is no requirement to provide 100% of the needs of cavity nesters in the Riparian Reserve. Additionally units are marked to “thin from below” which means that the smallest trees are removed and the larger trees retained. Therefore the largest trees are not being sold. The silvicultural prescription will result in larger trees being provided for future snag recruitment and large down wood in the riparian areas.

- “Scattered throughout these 11 acres are potentially unstable sites . . . These areas should be eliminated from commercial logging.”

Response: The EA is designed to assess potential environmental impacts. An important impact on forested hillsides is potential for landslides. These conditions are difficult but not impossible to assess. The EA (pg. 13) states that 11 acres of the project is classified as FGR (fragile soils due to slope gradient). Under the Timber Production Capability Classification (TPCC), timber on FGR slopes can be harvested when proper mitigation is applied. The Swiftwater Soil Scientist did a field exam of this area and found that there were areas of potential instability scattered within the eleven acres. One acre was determined to meet the criteria for reservation and was removed from the project (EA, pg. 9; para. 2d). The Soil Scientist concluded that the remaining slopes in question had a low risk of failure (less than 10 percent) under the action alternative and also concluded that the likely size of any landslide that might initiate would be small (less than 0.1 acre). Mitigation would be applied to help keep the risk low – dry season logging with at least one-end suspension and the hand waterbarring of skyline yarding trails that could channel water. BLM believes that compliance with the TPCC requirement has been met.

Another consideration for the Soil Scientist is to determine whether the slope in question meets the requirement for slope stability protection under the Aquatic Conservation Strategy objectives as discussed in the FSEIS. The intent of the FSEIS is to include in the Riparian Reserve those areas with a **significant** probability of failure and which are likely to **directly** affect the rate of achieving the ACS objectives (B-24). This requirement was to set the Riparian Reserve boundary and not to necessarily exclude Density Management harvest from the Riparian Reserve where slopes are potentially unstable. In the case of Bonanza, about three quarters of the FGR slopes (Unit 17A) are outside of Riparian Reserve boundaries and isolated from streams by gentle slopes. There is no risk here of generating landslides that could impact streams. Therefore, reservation is not required and thinning can not be excluded for ACS reasons.

On the remaining three acres of FGR slopes (Unit 16A), the probability of landslides resulting from thinning would be low. Therefore sediment delivery to streams would be unlikely. The distribution of landslides in time and space and their delivery of materials to streams would not be appreciably altered from that under natural regimes.

- “The prescription specifies, “All . . . large diameter hardwoods would be retained.” However, . . . the Tree Marking Guide . . . reads “Retain . . . some large diameter hardwoods”. The EA should explain if all of the large ones will be retained or only some . . .”

Response: Unfortunately the prescription was written too general. It was the intent to mark all large remnant and hardwood trees however this is not always possible. Sometimes these trees occur within road rights-of-ways, logging corridors, etc. and cannot be retained. The prescription should have read “most” rather than “all”.

Compliance and Monitoring

Monitoring will be conducted as per the direction 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 (Marci Todd) and shall contain a written statement of reasons for protesting the decision and specifically state which portion or element of the decision is being protested and cite applicable Code of Federal Regulations (CFR) pertinent to the point(s) of protest. Protests received more than 15 days after the publication of the notice of sale are not timely filed and shall not be considered. The regulations do not authorize the acceptance of protests in any form other than a written hard copy that is delivered to the physical address of the advertising BLM office. 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 her. The authorized officer shall, at the conclusion of his review, serve her decision in writing to the protesting party. Upon denial of a protest ... the authorized officer may proceed with the implementation of the decision.

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Date