

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

Green Thunder Regeneration and Commercial Thinning Harvest

Decision Document

An Interdisciplinary (ID) Team of the Swiftwater Field Office, Roseburg District, Bureau of Land Management has analyzed the proposed **Green Thunder Regeneration and Commercial Thinning Harvest** project. This analysis and the "Finding of No Significant Impact" (FONSI) are documented in Environmental Assessment (EA) No. OR-104-99-04. This project was previously analyzed and an EA made available for public review in July 1999. This project was delayed and subsequently reanalyzed and the EA revised and a decision signed on October 18, 2004. This decision was revoked on October 21, 2004 in order to consider a more rigorous review of cumulative effects in light of recent court rulings. This review resulted in another revision of the EA that was finalized on January 14, 2005. All previous Decision Documents and assessments are no longer valid.

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 regeneration harvest of mature and old-growth forest and the commercial thinning and density management harvest of second growth timber in the Little River and Middle North Umpqua Watersheds located in Sections 30, 31 and 33; T26S R2W, and Section 25, T26S R3W;W.M.

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

- 1). The original EA analyzed 12 acres within Critical Habitat Unit CHU-OR-27, an area designated as critical habitat for the Northern spotted owl. These acres have been dropped from the sale area in the current assessment therefore none of the sale will be in critical habitat for the spotted owl. The EA Appendix C map inadvertently included the previous map that shows harvest within the Critical Habitat Unit. The correct map is attached.
- 2). The EA (Appendix C) that was prepared in September 2, 2004 cited 95 acres would be harvested within the Connectivity / Diversity Block. This acreage was in error. This category actually breaks on the watershed boundary rather than the township line. The recent EA has corrected this error with the result that 40 acres actually falls within this category.
- 3). The EA prepared on September 2, 2004 cited four acres of FGR slopes within the project. The Soil Scientist has revised this figure in the present EA to five acres.
- 4). The EA (pg. 35) discloses Fish and Wildlife Service consultation of February 21, 2003 and NOAA-Fisheries consultation of July 21, 2004. These consultations have been updated to August Aug. 29, 2005 and October 28, 2004 respectively.

These above changes do not alter the analysis or conclusions of the EA because underlying analytical assumptions all remain the same.

Decision

It is my decision to authorize the implementation of the Proposed Action Alternative as outlined in the EA (Section II, pg. 5). The project design criteria for this alternative are listed on pages 6-13 of the EA. These features have been developed into contract stipulations and will be implemented as part of the timber sale contract. Subsoiling of decommissioned roads and skid trails will be accomplished by the BLM Operations Branch.

The following specifics should be noted as the result of project layout. The figures cited in the EA may vary from those cited below and are considered as preliminary estimates and not final figures. Although the EA figures were preliminary they are reasonable estimates and therefore do not limit the decision maker's ability to determine and evaluate the impacts of this action.

- 1). The EA analyzed potential harvest activities on 540 acres. This decision authorizes 134 acres of regeneration harvest on six units, 206 acres of commercial thinning or density management on one unit, and seven acres of road right-of-way clearcut for a total of 347 acres. This action will result in the harvest of approximately 6700 MBF (chargeable towards the Allowable Sale Quantity) and 200 MBF from the Riparian Reserve (not chargeable) for a total sale quantity of 6900 MBF of timber.
- 2). Approximately 7200 ft. (1.4 mi.) of unsurfaced temporary road and 750 ft. (0.1 mi.) of surfaced permanent road will be constructed. A total of 12.7 mi. of existing road will be improved (i.e. upgraded beyond its original design). Approximately 0.6 miles of existing road will be decommissioned.
- 3). Approximately 40 acres will be broadcast burned, 64 acres machine-piled and burned, and 31 acres will be hand-piled and burned on the regeneration units. Approximately 10,000 ft. of fire trail will be constructed around the perimeters of the units to be broadcast burned.
- 4). In the Adaptive Management Area regeneration harvest units (Units 1, 3, 5, 6, and 7) 881 retention (green) trees greater than 20" diameter at breast height (DBH) will be reserved from harvest. This equates to 9.3 green trees/acre. The RMP (pg. 34) requires retention of 6 to 8 green trees/acre. In the Connectivity / Diversity unit (Unit 2) 474 green retention trees were reserved. This equates to 12.2 green trees/acre. The RMP (pg. 34) requires retention of 12 to 18 green trees/acre in this size class. Retention trees are reserved in a scattered arrangement of individual trees as well as occasional clumps of two or more trees. The average retention tree diameter is 33" DBH. A total of 212 conifers greater than 8" but less than 20" DBH were also reserved to protect down logs and snags, although not required by the RMP, equating to an additional 1.6 trees per acre. Additionally, 91 hardwoods (six being 20" DBH and larger) were reserved equating to 0.6 trees per acre.
- 5). In the harvest areas, approximately 195 snags greater than 20" DBH and 20' in height are reserved. This equates to 1.5 snags/acre. The RMP (pg. 64) requires that sufficient snags be retained to meet 40% of the potential population level for cavity nesting birds. This equates to 1.2 snags/acre averaged over 40 acres (PRMP/EIS pg. 4-43). The existing snag retention levels within the units alone would therefore meet the current population needs of cavity nesters at a level of 50%, pre-harvest. A total of 63 snags greater than 8" but less than 20" DBH were also reserved although not required by the RMP. Although these snags may have some wildlife benefit they are not in the size class specified in the RMP. Overall a total of 258 snags greater than 8" were reserved equating to 1.9 snags per acre.

6). Approximately 7,845 linear feet of existing Class 1 and 2 down logs (coarse woody debris) were found in the units and will be reserved from harvest. This equates to 59 linear feet/acre. The RMP guideline (pg. 34) is for 120 linear feet/acre. An additional 1.0 green trees/acre was retained to meet this deficit. Additionally, 129 trees or snags (1.0 tree per acre) greater than 16" but less than 20" DBH were reserved that would also qualify for future recruitment of down logs in the size specified in the RMP.

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 PRMP/EIS.

Cultural clearance with the State Historical Preservation Office was completed and resulted in a "No Effect" determination.

Consultation with the U.S. Fish and Wildlife Service for this project has been completed. The Biological Opinion (Aug. 29, 2005) on page 101 concluded that "Adverse effects caused by the proposed action . . . are not considered significant [to spotted owls] because: (1) the Northwest Forest Plan conservation strategy considered such reductions, which the Service has concluded will not jeopardize the continued existence of spotted owl; (2) new information on the spotted owl (Courtney et al. 2004) affirmed the validity of the habitat-based spotted owl conservation strategy of the Northwest Forest Plan; and (3) the spotted owl population on the District is stable."

Conferencing with the National Oceanic and Atmospheric Administration – Fisheries for candidate Threatened and Endangered aquatic species concurred with BLM's determination that the project is ". . . NLAA [not likely to adversely affect] OC [Oregon Coast] coho salmon . . ." 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 would occur to some of these resources, however, the impacts to resource values would not exceed those identified in the PRMP/EIS. The Decision provides timber commodities with impacts to the environment at a level within those anticipated in the PRMP/EIS.

Comments were solicited from affected tribal governments, adjacent landowners and affected State and local government agencies. No comments were received from these sources. A thirty day public review and comment period was provided for the 2004 EA and completed on October 8th, 2004. During the thirty day public review period, comments were received from two organizations (Umpqua Watersheds, Inc. (UW) and Oregon Natural Resources Council (ONRC)) and two individuals.

An additional fifteen day public review period was provided for the revised 2005 EA. Additional comments were received from UW and ONRC as well as some 110 emails or cards and letters from individuals. These comments were reviewed to determine the adequacy of our analysis and whether new information had been provided that shows flawed analysis or assumptions that would require new analysis or reconsideration of the proposed action. ONRC provided many comments dealing with plan level decisions that are beyond the scope of this analysis. Several comments warrant clarification.

- The EA should have disclosed that the Green Thunder sale is a part of the August 2003 O&C Settlement agreement between BLM and the timber industry. We did not know the O&C Settlement agreement committed you to doing “regen harvest in the AMA” (UW; 10/6/04, pg. 1).
Response: When the Roseburg District of the BLM signed a Record of Decision in June 1995 an allowable harvest of 7.0 MCF (45 MMBF) was declared. During the life of this plan Roseburg District harvest has been far below that which was committed to in the ROD. As the result of this short fall, suit was brought by the American Forest Resource Council, et al v. Kathleen Clark, et al in the US District Court for the District of Columbia. The settlement agreement from this lawsuit mandated that the Westside Districts put up the full harvest level that was declared in their RODs. Further, the settlement agreement directed that BLM provide harvest within the Little River AMA as specified in the NFP (S&G’s, pg. D-8) which states that “Adaptive Management Areas are expected to produce timber as part of their program of activities consistent with their specific direction under these standards and guidelines”. The EA did not address this because NEPA is not designed to analyze court decisions that affect BLM policy but to analyze specific affects of given federal actions on the environment.
- Most of the Green Thunder sale is in the Adaptive Management Area . . . This requires BLM “to find creative solutions to community involvement with project planning” . . . BLM failed to do this (UW; 10/6/04, pg. 1).
Response: BLM’s primary vehicle for public outreach is the *Roseburg District BLM Planning Update* that is mailed out to nearly 150 addressees. Comments were solicited from these addressees. One of the addressees is the Little River Committee among others in the Glide area. BLM also published legal notices in the *News Review* to inform the public of the availability of this EA for public comment. There is no doubt many different ways that could be pursued to illicit public input. BLM is aware that the harvest of mature timber is controversial among some members of the public and that some local residents are opposed to it. Comments merely expressing opposition, although noted, are not helpful to the decisionmaker. Comments that are helpful are those that provide particular rationale by which we can review the assumptions and conclusions of the environmental assessment.

The NFP (S&G’s, pg. D-5) states “If the Adaptive Management Areas are to make timely contributions to the objectives of these standards and guidelines, and to the communities, it is absolutely critical that initiation of activities not be delayed by requirements for comprehensive plans or consensus documents beyond those required to meet existing legal requirements for activities.” One particular program that the BLM has used to involve the public in the Little River area has been an ongoing involvement of the Glide Middle School in doing water quality monitoring in the Little River Watershed since 1996. This was featured in a *News Review* article on January 28, 2005.

- ... the connectivity ... should [not] be considered as a single block ... BLM's response says Green thunder will harvest 39 acres [within Connectivity/Diversity Blocks] yet the EA indicates 95 acres ... (UW; 2/1/05, pg. 2). The consideration of all the connectivity as a single block was part of the response to comments in the Decision Document signed on October 18, 2004. This Decision has been rescinded and this consideration is no longer valid. The Connectivity/Diversity Block for this area has been reviewed and BLM concurs that this should not be considered as a single block. The EA Appendix C table cites that 40 acres would be subject to Connectivity harvest. The previous EA cited 95 acres. Apparently this comment was not based on the current EA.

- The NWFP says, "The overall objective for Adaptive Management Areas is to learn how to manage on an ecosystem basis ... This should have been included in the purpose and need ... The BLM is just doing another ordinary sale as if it is in the Matrix, not in the AMA (UW; 10/6/04, pg. 1). ... regeneration harvest do not further the objectives of the Little River AMA. (UW; 2/1/05, pg. 2).

Response: The whole NWFP itself was designed to manage the landscape on an ecosystem basis. The ROD (pg. 1) states that "The management direction consists of extensive standards and guidelines, ... that comprise a comprehensive ecosystem management strategy." The Need for Action in the EA stated the "need for a healthy forest ecosystem" and the objectives for the AMA as "Provision of well distributed late-successional habitat outside reserves; retention of key structural elements of late-successional forests ...; restoration and protection of riparian zones ...". These factors were part of the proposed action. Additionally, the original EA included a study by the Pacific Northwest Experimental Station of wildlife use of slash piles for cover. When the analysis of this project was resumed, the Experimental Station was contacted to set up this study as part of the project. Unfortunately, due to the very long time that has transpired in getting this project to implementation and uncertainty of BLM timber sales; the station was no longer interested in doing this study. As was stated previously, the NFP (S&G's, pg. D-8) states that "Adaptive Management Areas are expected to produce timber as part of their program ...". The Little River Adaptive Management Area has the specific emphasis of "intensive timber production" (pg. D-14); therefore regeneration harvest is consistent with the objectives of the Adaptive Management Area.

- The owl faces new threats to its long-term survival as it faces the West Nile Virus, competition from Barred Owls, and impacts from Sudden Oak Death Syndrome. The EA failed to address these threats. ... Therefore, no additional old growth should be harvested, even from Matrix lands, because when Matrix was designated, these newer threats and current status were unknown (UW; 10/6/04, pg. 4).

Response: The BLM, Forest Service, and US Fish and Wildlife Service have conducted a coordinated review of four recently completed reports containing new information on the northern spotted owl (NSO). The reviewed reports (hereinafter collectively referred to as "the reports") include the following:

- *Scientific Evaluation of the Status of the Northern Spotted Owl* (Sustainable Ecosystems Institute, Courtney et al. 2004);
- *Status and Trends in Demography of Northern Spotted Owls, 1985-2003* (Anthony et al. 2004);
- *Northern Spotted Owl Five Year Review: Summary and Evaluation* (USFWS, November 2004); and

Northwest Forest Plan – The First Ten Years (1994-2003): Status and trend of northern spotted owl populations and habitat, PNW Station Edit Draft (Lint, Technical Coordinator, 2005).

Based on *Evaluation of the Roseburg District Resource Management Plan Relative to Four Northern Spotted Owl Reports* (September 12, 2005) the Roseburg District Manager (Jay Carlson) found the following:

- (1) Effects on NSO populations identified in the four reports are within those anticipated in the PRMP/EIS, and that the RMP goals and objectives are still achievable in light of the information from the reports.
- (2) The latest information on the NSO does not warrant a change in RMP decisions pertinent to the NSO, and therefore does not warrant amendment or revision of the Roseburg District RMP.
- (3) The underlying analysis in the EIS remains adequate for purposes of tiering. NEPA analyses of NSO effects from proposed actions implementing the RMP.

- seasonal restrictions prohibiting logging for four months would be applied to Unit 31A if surveys indicate that a NSO is nesting within 65 yards. Yet six other units will have the restrictions imposed for seven months if surveys indicate a nesting NSO within a quarter mile. (UW; 2/1/05, pg. 3).

Response: Guidance from the Biological Opinion (August 29, 2005) directs that, timber harvest operations that do not modify or remove suitable habitat (such as in the commercial thinning/density management unit) will not occur within 65 yards of any unsurveyed suitable habitat, known nest site, or known activity center from March 1- June 30, unless current calendar year surveys indicate: 1) spotted owls not detected, 2) spotted owls present, but not attempting to nest, or 3) spotted owls present, but nesting attempt has failed. Waiver of the seasonal restriction is valid until March 1 of the following year.

For timber harvest operations that remove suitable habitat (such as in the regeneration harvest units), work activities such as tree felling, yarding, etc, will not occur within 0.25 miles of any unsurveyed suitable habitat, known nest site, or known activity center from March 1-September 30, unless protocol surveys indicate: 1) spotted owls not detected, 2) spotted owls present, but not attempting to nest, or 3) spotted owls present, but nesting attempt has failed. Waiver of the seasonal restriction is valid until March 1 of the following year. Therefore, based on the above guidance, seasonal restrictions to prohibit logging during the nesting season of the northern spotted owl would be applied to commercial thinning/density management Unit 31A (March 1st - June 30) if surveys indicate that a spotted owl is nesting within 65 yards and to regeneration harvest Units 25A, 25B, 25C, 33A, 33B, and 33C (March 1st - September 30th) if surveys indicate that a NSO is nesting within 0.25 mile.

- There is an active Red-tailed Hawk nest site in Unit 33A that will be destroyed by the proposed harvest . . . The mitigation efforts are inadequate to protect these important raptors (UW; 10/6/04, pg. 7).

Response: Seasonal restrictions would be applied within 0.25 mile of the red-tailed hawk nest site from March 1 st through July 15th. In addition, a five acre nest core would be established around the nest site in suitable habitat to protect this raptor nest as required by the RMP (pg. 39) and specified by Oregon State Office IM OR-99-036). The five acre nest core includes one acre dropped from the harvest unit and four acres from the adjacent Riparian Reserve. This adjacent Riparian Reserve is approximately eight acres in size, which combined with the one acre removed from the harvest unit effectively provides for nine acres for the red-tailed hawk nest area. It is expected that the seasonal restrictions along with the nest core area will mitigate disturbance effects from the proposed action. The nest site itself will not be destroyed since it is within the nest core area.
- The EA says that existing hard and soft snags at least 20” in diameter and 15 feet in height will be retained where possible. We saw snags smaller than 20” that are full of cavities, and we hope as many of these as possible will be retained (UW; 10/6/04, pg. 7).

Response: The EA specified this size in order to be consistent with the PRMP/EIS (Appendices 226) which states: “Wildlife trees (snags) will be greater than 20” dbh and at least 15 feet tall; . . .”. The EA (pg. 11) recognized that the smaller snags also provides an interim value to wildlife until the larger snags come on line by stating: “An interim source of snags would be provided by reserving snags that do not meet the size described.” These smaller trees were marked for retention and will be reserved in the timber sale contract. As stated previously, 63 snags less than 20 in. are reserved.
- The proposed . . . project would remove or modify . . . interior Late Successional Old Growth habitat. This deviates from the recommendations of the Little River Watershed Analysis recommendations (UW; 10/6/04, pg. 7). The BLM did not identify loss of Interior Habitat as a concern, but should have . . . (UW; 2/1/05, pg. 6).

Response: BLM did identify this as a concern and addressed it in Appendix D, Public Concern #1. The wildlife biologist for the project reviewed the watershed analysis recommendation and concluded that “The interior habitat blocks which would be affected by the proposed project do not meet the criteria used to select treatment areas in the 1995 Little River watershed analysis.”
- The BLM failed to consider the cumulative effects of repeated herbicide applications for roadside and plantation brush control on this watershed (UW; 10/6/04, pg. 8).

Response: There are no records of herbicide applications for brush control on BLM plantations in this watershed. About 1/8 acre of roadsides was treated with herbicide for Scotch broom control in 1999 in Section 30 and six acres in 2004. Eleven acres of roadside in Section 31 were treated in 2003. There is no record of Section 25 being treated with herbicides. Herbicides are applied following the label directions at a maximum rate of 3-lbs of active ingredient per acre. 2-4-D may remain active for one to six weeks in the soil and at its highest application rate may persistent in the soil for up to 30 days. The Vegetation Treatment FEIS on BLM Lands in 13 Western States (1991) addresses some of the environmental consequences and cumulative impacts. Herbicide application for noxious weeds is not included as part of the proposed action.

- Four acres in Unit 33A and one acre in 25A are fragile due to slope gradient and contain sites considered potentially unstable . . . The Northwest Forest Plan requires unstable soils to be included in Riparian Reserves. The BLM failed to do this. Grouping of retention trees . . . as a measure to protect slope stability is inadequate (UW, 10/6/04; pg. 9).

Response: Under the Timber Production Capability Classification (TPCC) system (BLM Handbook 5251-1) these slopes would be classified as FGR (Sites of steep to very steep slopes that have a high potential for debris type landslides but are considered suitable for timber production [BLM Handbook 5251-1, pg. 7]). An FGR classification does not mean that the area must be withdrawn from harvest but rather that proper mitigation must be applied to lessen the potential for landslides. The mitigation applied in this case (EA, pg. 10) consisted of grouping of required green retention trees in certain critical areas and avoiding broadcast burning on steep slopes (Units 25A and 33A), placing roads in stable locations, and dry season logging (Units 33A and 33B). The BLM acknowledges that grouping of retention trees to protect slopes that are unstable and that could impact ACS objectives would be inadequate. In this case such areas would be withdrawn. However, in Unit 25A and 33A the areas are not unstable but only potentially unstable. Any landslide that could result would be at most 0.2 acres and would not impact streams. On slides of such small size, retaining extra trees would serve to further stabilize the area and could prevent failure.

The Northwest Forest Plan does not require all unstable and potentially unstable lands to be included in the Riparian Reserves. The RMP (pg. 24) and NFP (pg. C-31) states that only “The extent of unstable and potentially unstable areas (including earthflows)” is to be included in the Riparian Reserve. The Issue Resolution Team (a team of specialists at the Regional Ecosystem Office charged with resolving issues of interpretation of the NFP) has issued an opinion based on the discussion in the FSEIS on page B-96 that states that “... Riparian Reserve widths are not intended to include all geomorphic landforms related to slumps and earthflows; rather, the intent is to include those areas with a **significant** probability of failure and which are likely to directly affect the rate of achieving the ACS objectives ...” (emphasis added).

The soil scientist did not find any unstable areas within the project. The five acres of FGR in Units 25A and 33A were analyzed to contain sites with a moderate potential of failure but would unlikely produce landslides that could reach streams (page 27, para. 2). The EA further concluded that fish-bearing streams would not be affected.

- This project was proposed once before and was withdrawn to comply with survey and manage requirements. What were the results of the surveys? If the BLM did surveys and has data it should be disclosed in the EA, not hidden from the public (ONRC, 10/6/04; pg. 2).

Response: The Survey and Manage requirements were removed as the result of the March 2004 *Record of Decision To Remove or Modify the Survey and Manage Mitigation Measure Standards and Guidelines*. Most of the former Survey and Manage species have been assigned status under the various Special Status categories. This was reflected in the Analysis File (Appendix F) Table 3 (wildlife) and Table 5 (plants). Additionally the botanical survey results of 6/99 and the results of resurvey of 3/8/04 lists the Survey and Manage species and is part of the Analysis File. Former terrestrial Survey and Manage species locations are also found on BLM data base.

Compliance and Monitoring

Compliance with this decision will be ensured by frequent on the ground inspections by the Authorized Officer's Representative.

Newly created skid trails as well as old skid trails used under this entry will be evaluated for the need for amelioration by the Soil Scientist after completion of ground-based operations in accordance with RMP plan maintenance criteria (*Roseburg District Annual Program Summary and Monitoring Report Fiscal Year 2001*, pg. 70). Amelioration will include subsoiling after completion of operations or documentation in a plan that defers subsoiling until final harvest.

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 L. 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 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.

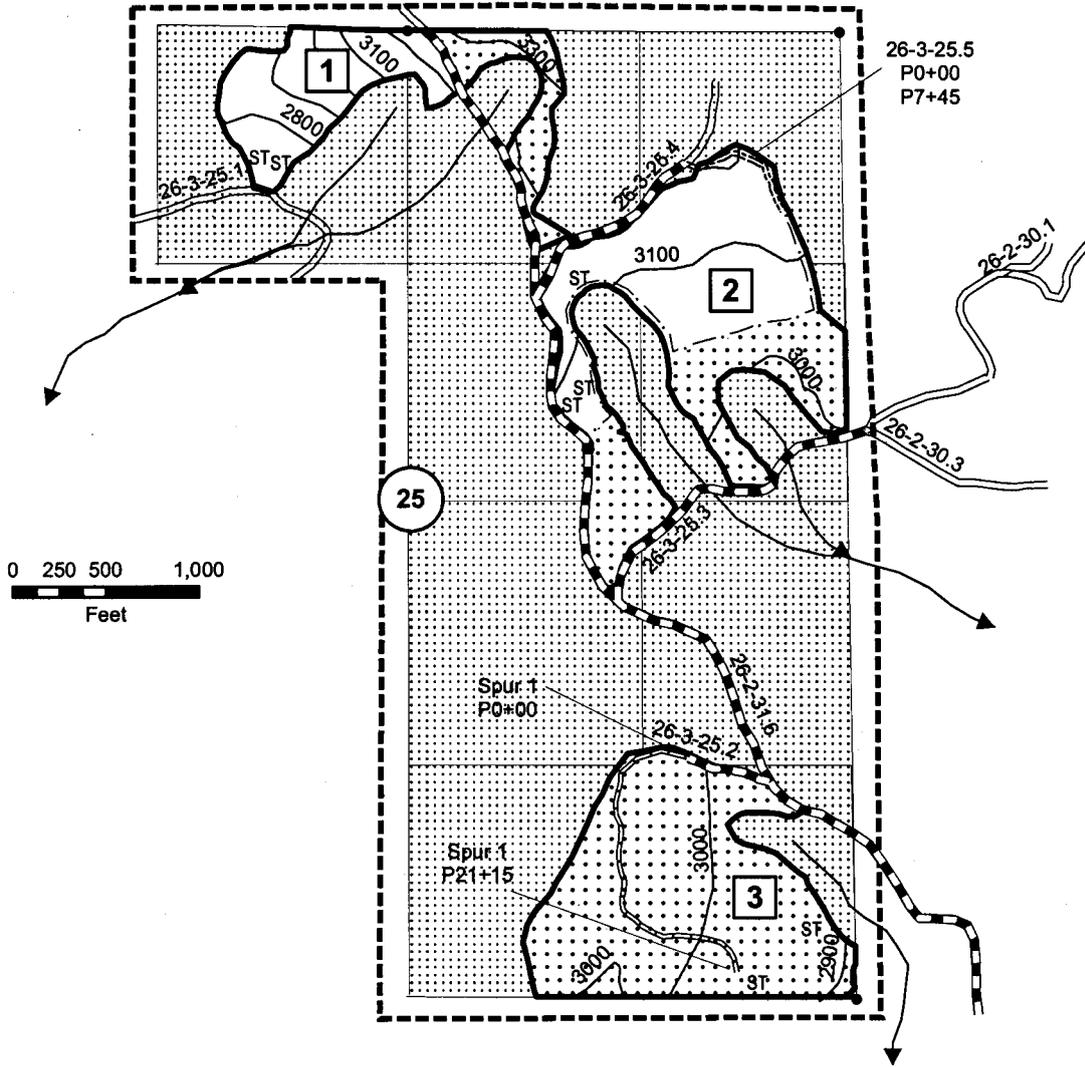
For further information, contact Marci Todd, Field Manager, Swiftwater Field Office, Roseburg District, Bureau of Land Management, 777 NW Garden Valley Blvd; Roseburg, OR. 97470, 541 440-4931.



Marci L. Todd, Field Manager
Swiftwater Field Office

12/15/05
Date

District	Township	Range	Section	Meridian
Roseburg	26S	3W	25	Willamette

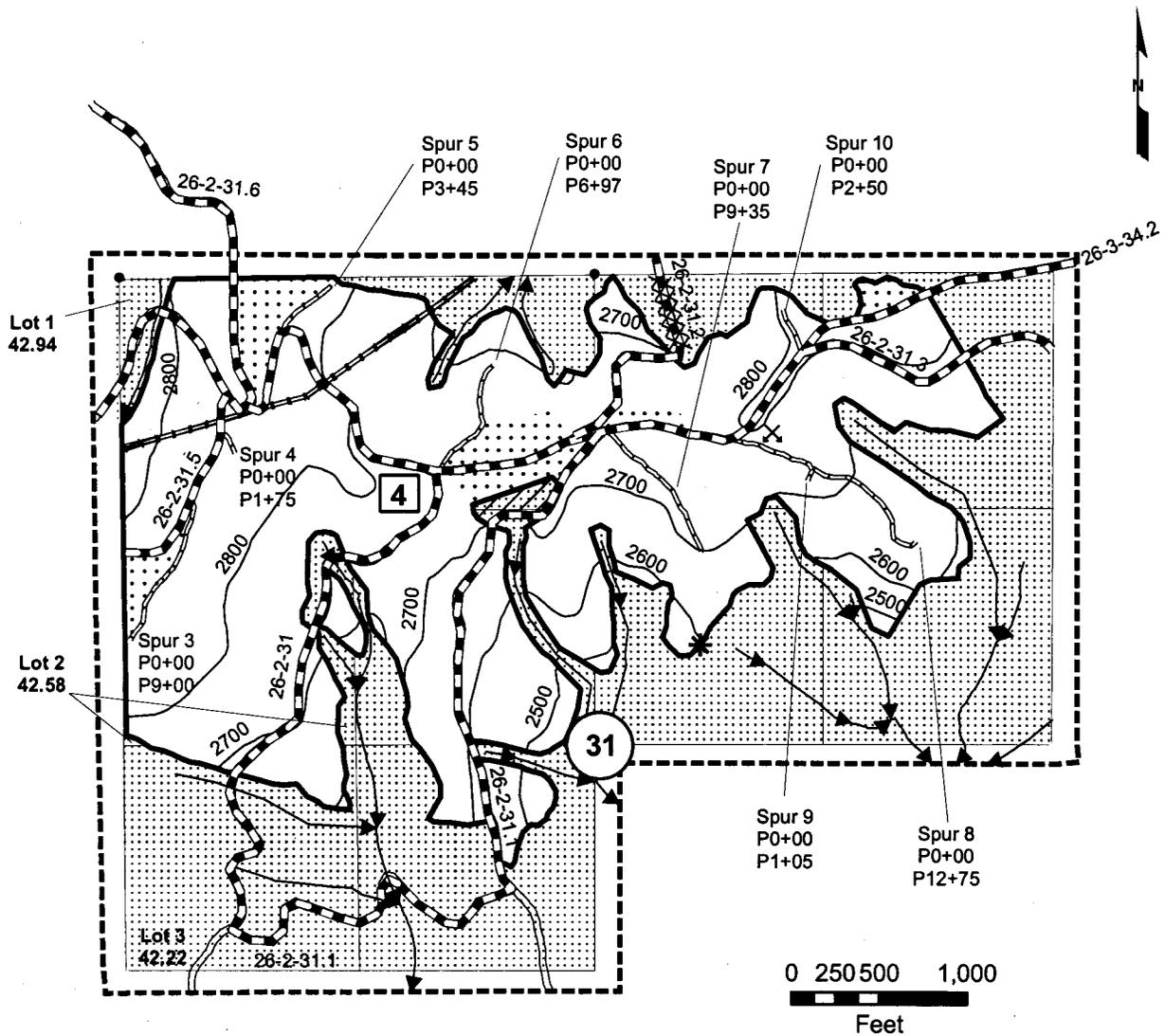


LEGEND

Scale: 1Inch = 1000 Feet

- | | |
|---|--|
|  Harvest Area - Cable Yarding |  Existing Road to be Improved |
|  Harvest Area - Ground-Based Yarding |  Road to be Constructed |
|  Reserve Area |  Existing Road |
|  Boundary of Cutting Area |  Temporary Spur to be Constructed |
|  Stream |  Fire Trail to be Constructed |
|  100 Ft. Contour Lines |  Found Corners |
|  Boundary of Contract Area |  Approximate Seed Tree Location |

District	Township	Range	Section	Meridian
Roseburg	26S	2W	31	Willamette

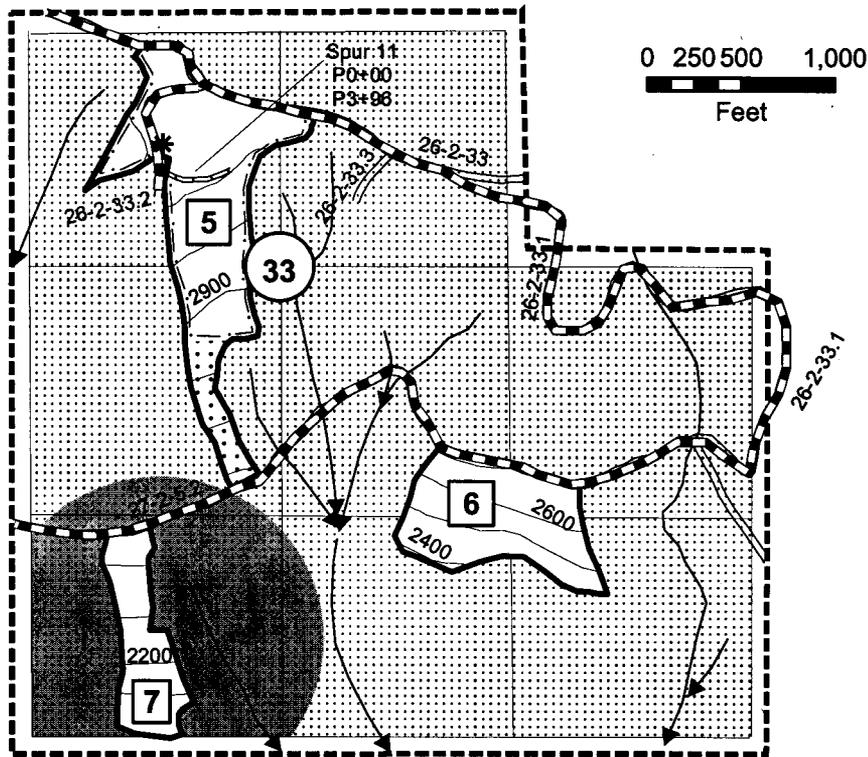


LEGEND

Scale: 1 Inch = 1000 Feet

- | | | | |
|---|-------------------------------------|---|---|
|  | Harvest Area - Cable Yarding |  | Existing Road |
|  | Harvest Area - Ground-Based Yarding |  | Existing Road To Be Improved |
|  | Reserve Area |  | Temporary Spur To Be Constructed |
|  | Archeological Site |  | Power Line Right-of-Way |
|  | Boundary of Timber Harvest Units |  | Trees Marked for Harvest in the Reserve |
|  | 100 Foot Contour Lines |  | Stream |
|  | Boundary of Contract Area |  | Found Corners |
|  | Archeological Monument |  | Rock Stockpile |

District	Township	Range	Section	Meridian
Roseburg	26S	2W	33	Willamette



LEGEND

Scale: 1Inch = 1000 Feet

- | | |
|---|---|
| <ul style="list-style-type: none"> Harvest Area - Cable Yarding Harvest Area - Ground-Based Yarding Reserve Area Red-Tailed Hawk Seasonal Restriction Area Boundary of Cutting Area Boundary of Contract Area | <ul style="list-style-type: none"> Existing Road to be Improved Existing Road Temporary Spur to be Constructed Stream 100 Ft. Contour Lines Fire Trail to be Constructed Archeological Monument |
|---|---|