

Happy Summit Density Management Harvest
EA# OR-104-97-11
Decision Document

An interdisciplinary (ID) team of the Swiftwater Resource Area, Roseburg District, Bureau of Land Management has analyzed the proposed Happy Summit Density Management Harvest project. This analysis and the "Finding of No Significant Impact" (FONSI) was documented in Environmental Assessment (EA) No. OR-104-97- 11. The thirty day public review and comment period was completed on April 16th, 1998. One letter with comments was received as a result of public review.

The proposed action involves the Density Management harvest of 386 acres of second growth forest in the Smith River Analytical Watershed located in Sections 25 and 35; T20S R6W; and Sections 1, 11 and 12; T21S R6W W.M. Approximately 6200 MBF of timber would be harvested.

The following objectives will be met by this proposal:

1. For the density management portion:
Protect and enhance conditions of late-successional forest ecosystems, which serve as habitat for late-successional forest species. (LSRA Oregon Coast Province - Southern Portion, pg. 1).
2. For riparian areas:
"Apply silvicultural practices ... to ... acquire desired vegetation characteristics needed to attain Aquatic Conservation Strategy objectives (RMP, pg. 25; S&G's, pg. C-32).
3. For the Key Watershed:
Reduce existing road mileage and pursue watershed restoration projects to conserve watershed conditions for at-risk anadromous salmonids and resident fish species.
4. Practice ecosystem management as outlined in the NFP and RMP (EA; pg. 2, para. D4).

Section II of the EA describes three alternatives: a "no action" and two action alternatives. Alternative #1 would have permitted temporary road construction, tractor logging and limited road decommissioning. Alternative #2 (the proposed action alternative) would not have any temporary road construction or tractor logging but would have full road decommissioning. The No Action alternative was not selected because the EA did not identify any impacts that were beyond those identified in the EIS and could not be mitigated through project design features. Alternative #2 was selected because it would have less impacts to water quality, a prime consideration in this Key Watershed, than would Alternative #1.

Decision

It is my decision to authorize the implementation of the Proposed Action Alternative as outlined above. Note: the EA on page 6, para. d states that we will decommission 21-6-14.1 segment A (portion). This should read segment D.

The sale date is planned for September 22, 1998 and the expected implementation of the project would begin in 1999. The contract duration will be 36 months. The project design features for this alternative are listed on pages 5 to 7 of the EA. These features have been developed into contract stipulations and will be implemented as part of the timber sale contract.

The EA (Section II) describes the Proposed Action. The following specifics are noted as the result of sale layout: A total of 5.4 mi. of existing road will be renovated (i.e. brought back to its original design) and 0.3 mi. of existing road will be improved (i.e. improved beyond its original condition). Full road decommissioning will be accomplished on 0.6 miles of permanent road. This decision includes the removal of a stream crossing culvert on Road # 20-6-35.0 segment B effectively blocking and decommissioning this road.

Decision Rationale

The Proposed Action Alternative meets the objectives for lands in the Matrix and Riparian Reserve Land Use Allocations and follows the principles set forth in the ROD for the Northwest Forest Plan (NFP), dated April 13, 1994 and the RMP, dated June 1995.

Cultural clearance with the State Historical Preservation Office was completed and resulted in a "No Effect" determination. Consultation with U.S. Fish and Wildlife Service for this project has been completed. The Biological Opinion is summarized as saying that the action is ". . . not likely to jeopardize the continued existence of the bald eagle, white-tailed deer, spotted owl or murrelet, or adversely modify designated critical habitat for spotted owls or murrelets."

Consultation under Section 7(a)(4) of the Endangered Species Act has not been completed with the National Marine Fisheries Service (NMFS) on the Umpqua River cutthroat trout, Oregon Coast steelhead trout and Oregon Coast coho salmon. The sale contract will not be awarded until a final Biological Opinion or letter of concurrence, which includes a non-jeopardy determination, has been received. The sale was designed to follow the guidance of the RMP and the NFP, and to incorporate mitigations identified in the consultations on previously listed salmonids, as appropriate. Therefore, it is our expectation that the Biological Opinion will not make a jeopardy determination nor prescribe any reasonable and prudent measures or terms and conditions that are not already part of the sale design and mitigation. Because the United States retains the right to reject any and all bids for any reason, the mere offering of the sale does not make any irreversible or irretrievable commitment of resources which have the effect of foreclosing the formulation or implementation of any reasonable and prudent alternative measures. If additional reasonable and prudent alternative measures or terms and conditions are prescribed which would require alteration in the terms of the sale contract, the agency retains the discretion (prior to contract award) to adjust the sale design accordingly and readvertise the sale if necessary.

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 RMP. The project design features as stated in the EA would protect the riparian areas, 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 the resources, however, the impacts to these resource values would not exceed those identified in the FSEIS. The Proposed Action Alternative provides timber commodities with impacts to the environment at a level within the bounds of the FSEIS.

BLM's adherence to the Standards and Guidelines of the ROD would generally allow project compliance with the ACS objectives. Site specific or project analysis has been done to verify this assumption. The timber sale contract will require an "Erosion Control Plan" prior to road renovation.

During the thirty day public review period comments were received from Umpqua Watersheds, Inc. (Francis Eatherington) which are addressed below. These comments were considered in the formulation of this decision.

! The number of trees BLM proposes to be left standing or on the ground is far short of the recommendations of the LSRA. BLM is cutting too many trees.

The Silvicultural Prescription contains a "Marking Guide" that describes how the unit would be marked:

"On all proposed units mark to retain between 100 and 120 ft² of basal area. The spacing between trees marked for retention is variable and dependant on diameter, size of crown, and proximity to features such as hardwoods, snags, and coarse woody debris."

The stand is marked on the basis of basal area and not trees per acre. A basal area mark allows for more variability within a stand and less uniformity that would result from a strict spacing at a certain number of trees per acre. A 13" tree has about one square foot of basal area. A 100 to 120 ft² basal retention as specified in the marking guide would result in 100 - 120 trees per acre if they were all 13" trees. This stand averages less than 13" therefore resulting in more than 120 trees per acre.

! Coarse Woody Debris retention is far lower than LSRA prescriptions. BLM must leave even more trees per acre now in order to meet the standing green tree levels of the future AND the snag and down woody debris needs of now and the future.

The EA (pg. 6, para. 3b) states that the existing CWD would be left which consists of blowdown and logs remaining from previous logging. The silvicultural prescription, as originally written, did not have enough detail regarding coarse woody debris. The original prescription stated that no attempt was made to quantify existing amounts of coarse woody debris and snags. A site specific survey was not done because data exists on the District that describes average levels of CWD found in young managed stands like the ones in the proposed project. As the result of this comment, the Silviculturalist, Fuels Specialist and Wildlife Biologist were directed to analyze this issue in more detail. This analysis showed that the current stands have on average 940 ft³ per acre in down logs (data from District CFI plots). This amount is mid

range when compared to the levels reported for young stands in Table 12 of the LSRA. The prescription also modeled a prediction for future development of CWD and snags. The expected mortality in trees in 70 years which will contribute towards future coarse wood is expected to result in 1500 - 4100 ft³ of CWD / acre.

! The “specific fire management plan” was not a part of the LSRA.

The “Fire Management Plan” is a part of the LSRA and is found in Appendix A. This plan was reviewed by the Fuel Management Specialist and considered in his report.

! BLM is going to be logging to within 20 feet of streams ... this logs on 96% of the reserves.

This project is located entirely within Late-Successional Reserves. This overrides the Riparian Reserve designation that exists in conjunction with the Matrix Land Use Allocation. The EA refers to this similar landscape feature as “riparian areas”. The main focus of this comment is the concern that the logging will impact the streams and fisheries. All of the streams were examined and site specific recommendations were made to protect the aquatic resource. This concern was addressed in the EA (pg. 5) which discusses a buffer up to 100 ft. that was maintained on Unit 11A. Additional concerns were noted in the ID Team process (IDT Meeting #3 Meeting Minutes) which discussed stream concerns for Unit 12A (slumpy) and Unit 35A (fish bearing). The streams were excluded from these units and are noted on the maps (Appendix C) as leave areas. Most of the remaining streams that will have a 20 ft. no-cut buffer will also have helicopter yarding that would be less ground disturbing. 96% of the riparian area will not be logged. A full treatment riparian area could have up to 90% being logged and as little as 0%. Many of these streams are not perennial (i.e. not flowing in the summer months) and will be logged during the dry season.

! BLM proposes to decommission portions of roads 20-6-36A and 21-6-14.1A. Viewing past roads BLM has chosen to decommission, we have no faith that these roads are currently a significant problem, or that their decommissioning will significantly improve environmental conditions in the watershed. No information is presented to show how this decommissioning will attain ACS objectives.

The roads proposed for decommissioning were selected through ID Team deliberations. There may be other roads in the watershed that would benefit from decommissioning to a greater degree than the roads that were selected, however, it would be impractical to do so. Candidate roads were selected from within the vicinity of the timber sale area. Decommissioning of roads outside the sale area would incur more expense and create potential contractual issues associated with accomplishing work not directly related to the timber sale contract.

The EA never stated that road decommissioning will “significantly” improve watershed conditions for this particular project or watershed. Decommissioning, however, is recognized by the NFP as an important component of watershed restoration (S&G’s, pg. B-31), especially within a Key Watershed. The BLM intends to pursue any opportunities that are identified as the result of ID Team process. A consistent policy of restoration will result in significant improvements over the long-term.

The EA (pg. 11) states "... decommissioning and obliterating roads would have a small positive net effect in restoring the hydrologic function to this watershed. After decommissioning and obliteration operations, the hydrologic function would show a small gain." Although ACS was not specifically mentioned at this point, this is clearly within ACS objective #4 of maintaining and restoring water quality.

! The Botany Report lists nine species required by the ROD to be surveyed, that have not been surveyed.

Botanical surveys have been performed. Provision is made in the sale contract to suspend operations and modify the sale if sensitive species are found subsequently.

! BLM is proposing a heavy thinning on unstable soils, without adequate protection. The ROD requires that unstable soils be reserved out of units, not thinned heavy.

A review of the ID process shows that soils inputs were considered throughout. The Soils Report (Appendix F) did not identify any specific slope stability concerns.

! The was no consideration of a full restoration alternative that would log less, or leave more trees on site.

A Decision Record for a full restoration project ("Smith River Risk Reduction and Restoration" project) was signed on June 4, 1998. This project will result in the full decommissioning of nearly six miles of road with no timber harvest. The Happy Summit did not consider a prescription with less cutting because the objective of accelerating late-successional characteristics would not be achieved.

Compliance and Monitoring

Monitoring will be conducted as per the guidance given in the ROD and the RMP.

Protest and Appeal 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 (John L. Hayes) 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/her review, serve his/her 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 John L. Hayes, Area Manager, Swiftwater Resource Area, Roseburg District, Bureau of Land Management, 777 NW Garden Valley Blvd; Roseburg, OR. 97470, 541 440-4931.

John L. Hayes, Area Manager
Swiftwater Resource Area

Date