

# Lower Cow Creek 2007 Commercial Thinning and Density Management Environmental Assessment

## Dragnet Commercial Thinning and Density Management Decision Record

Bureau of Land Management  
South River Field Office, Roseburg District Office  
EA # OR105-07-11

### **Decision:**

It is my decision to authorize the Dragnet Commercial Thinning and Density Management project, continuing implementation of Alternative Two described in the Lower Cow Creek 2007 Commercial Thinning and Density Management EA (pp. 3-10).

Commercial thinning and density management will be applied to 133 acres comprising six units. Units 1, 2 and 3 (76 acres) are within the Connectivity/Diversity Block land use allocation. Units 4 and 6 (38 acres) are in the General Forest Management Area and Unit 5 (19 acres) is in Late-Successional Reserve. The project will yield an estimated 1,322 thousand board feet of timber, of which 1,050 is creditable to the District's declared annual allowable sale quantity.

Units are located in Sections 7, 17 and 19, T. 31 S, R. 6 W., and Section 13, T. 31 S., R. 7 W., Willamette Meridian. Sale units are designated as follows:

Sale Unit	EA Unit Designation
Unit 1	31-6-17A
Unit 2	31-6-17B
Unit 3	31-6-17C
Unit 4	31-6-19A
Unit 5	31-7-13B
Unit 6	31-6-7A

Access to the units will be provided by the existing road network, construction of seven spur roads totaling 2,639 feet (~ 0.50 miles) in length, and renovation of 1,054 feet (~ 0.20 miles) of Road No. 31-6-17.8. Construction of the spur roads will require the cutting of an estimated two acres of right-of-way, located principally within unit boundaries.

Upon completion of commercial thinning and density management operations, the temporary unsurfaced spur roads and renovation portion of Road No. 31-6-17.8 will all be water-barred, seeded and mulched, and blocked to vehicular traffic.

Commercial thinning and density management will be accomplished exclusively with cable yarding equipment capable of maintaining a minimum of one-end suspension.

Implementation of this decision is subject to the following seasonal restrictions (EA, p.8-9):

- Felling and yarding of timber except for clearing rights-of-way is generally prohibited from April 15<sup>th</sup> to July 15<sup>th</sup> (barkslip period).
- Yarding and hauling of timber on unsurfaced roads is restricted to the period between May 15<sup>th</sup> and the onset of regular autumn rains, usually around mid-to-late October.

### **Additional Information:**

- The six units were evaluated for the presence of suitable habitat Oregon shoulderband snails (*Helminthoglypta hertleini*) and Chace sideband snails (*Monadenia chaceana*). Suitable habitat present in Units 3, 4 and 5 was surveyed according to an established protocol, but neither target species was located.
- No cultural resources were identified.
- Surveys did not detect any special status botanical species.

### **Rationale for the Decision:**

The Lower Cow Creek 2007 Commercial Thinning and Density Management EA analyzed two alternatives in detail, Alternative One, the alternative of No Action (EA, p. 3), and Alternative Two, The Proposed Action (EA, pp. 3-10).

Alternative Two will achieve the objectives of providing timber, improving stand quality and vigor, and accelerating the development of late-successional habitat on forest land within the Matrix and Late-Successional Reserve allocations (EA, p. 2), whereas Alternative One will not.

As described in the EA (p. 19), the commercial thinning and density management units consist solely of dispersal-only and unsuitable spotted owl habitat. Vertical and horizontal cover in the stands will be reduced by the removal of trees, but spotted owls are expected to continue to use the stands because post-treatment canopy closure will remain above 40 percent and average tree diameter will be 11 inches or greater, figures widely regarded as a threshold for dispersal function. The units are located outside of the 0.5 mile radius core area of any known owl site and treatment will not limit access to suitable habitat elsewhere in the home ranges.

Unit 5 is located in spotted owl Critical Habitat Unit OR-62. Analysis determined that habitat availability and connectivity would be maintained and that density management would not result in adverse modification of the Critical Habitat Unit.

### **Public Involvement & Response to Comment:**

The BLM received comments from seven organizations during development of the EA and during the public comment period on the EA (February 5<sup>th</sup> to March 6<sup>th</sup>, 2008). Comments did not provide new information or identify relevant issues the BLM should have considered in the analysis. Only comments relevant to the Dragnet Commercial Thinning and Density Management project (italicized) warranting clarification are addressed here.

*Comment: To promote structural and species diversity, the BLM needs to design silvicultural prescriptions that protects minor species, reintroduces minor species and by [sic] retains tree-clumps in the few places where they are found within the units. The EA says that in riparian reserves, the prescription “would be designed to enhance late seral forest structure by accelerating tree growth.” This is a limited definition of “forest structure”. Late seral forest structure includes more than just big trees.*

Response: The silvicultural prescription provides for stand diversity by retaining hardwoods greater than 10 inches diameter at breast height, retaining some broken or deformed trees, retaining minor conifer species, and planting a variety of trees in openings and heavily-thinned areas (EA, p.4-5). Clumps are frequently retained through the variable marking prescription, unless they present an operational concern. Many clumps are reserved from harvest already, based upon the size of the trees.

The BLM has implemented measures to maintain species diversity. Conifer species other than Douglas-fir constitute only 0.4 percent of the total sale volume and only 0.8 percent of the total number of trees designated for cutting. In marking of Units 1, 2, 3 and 5, all incense-cedar ten inches and larger, diameter breast height, were designated for retention

The BLM recognizes that many components are needed to achieve late-seral forest structure. Many of these components are addressed through the marking prescription. The BLM seeks to accelerate tree growth within Riparian Reserves to provide future sources of large wood for in-stream recruitment. The BLM utilized a variable marking prescription, and applied variable width “no-harvest” buffers along all streams in the Riparian Reserves.

*Comment: The EA failed to mention the Formosa Mine at the tip of same watershed as some of the units. The EA also failed to mention the community drinking water shed of Russell Creek, and how it would be protected from, or enhanced by, the logging activities.*

Response: The presence of the abandoned Formosa Mine site within the same watershed as some of the proposed units is not relevant to the environmental effects analysis of harvesting those units, as there are no shared effects between the Formosa Mine and the sale units.

The city of Riddle draws its water from Cow Creek, and has a small, unused water right on Russell Creek. Regardless, the EA explained that harvest would not adversely affect hydrologic functions or water quality (p.33-34, 36-38), because harvest activities are not expected to increase peak flows, increase sedimentation, or contribute to increased stream temperatures.

*Comment: The LSRA cautions: “New road construction, which further fragments late-successional habitat, is generally not compatible with LSR objectives.” The EA failed to consider if this is the case for any of the proposed new roads. The decision should disclose this.*

Response: Given the time, cost, and impact of new road construction, the BLM attempts to minimize such construction, especially within the Late-Successional Reserves. With the exception of a single surfaced landing spur in Unit 5 (31-7-13B), less than 250 feet in length, all new roads built to facilitate safe and economical operations on units in Late-Successional Reserves will be blocked and decommissioned, or fully decommissioned after use.

**Monitoring:**

Monitoring of the effects of the proposed action will be done in accordance with provisions contained in the ROD/RMP, Appendix I (p. 84, 190, 193, & 195-199), and will focus on the following resources: Riparian Reserves, Matrix, Late-Successional Reserves, Water and Soils; Wildlife Habitat; Fish Habitat; and Special Status Species Habitat.

**Protest Procedures:**

The decision described in this document is a forest management decision and is subject to protest by the public. In accordance with Forest Management Regulations at 43 CFR Subpart 5003 Administrative Remedies, protests of this decision may be filed with the authorized officer, Ralph L. Thomas, within 15 days of the publication of the notice of decision/timber sale advertisement on October 21, 2008, in *The News-Review*, Roseburg, Oregon.

43 CFR § 5003.3 subsection (b) states: "Protests shall be filed with the authorized officer and shall contain a written statement of reasons for protesting the decision." This precludes the acceptance of electronic mail (email) or facsimile (fax) protests. Only written and signed hard copies of protests that are delivered to the Roseburg District Office will be accepted. The protest must clearly and concisely state which portion or element of the decision is being protested and the reasons why the decision is believed to be in error.

43 CFR § 5003.3 subsection (c) states: "Protests received more than 15 days after the publication of the notice of decision or 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 project decision to be implemented in light of the statement of reasons for the protest and other pertinent information available. The authorized officer shall, at the conclusion of the review, serve the protest decision in writing to the party(ies). Upon denial of protest, the authorized officer may proceed with the implementation of the decision as permitted by regulations at 43 CFR § 5003.3 subsection (f).

If no protest is received by the close of business (4:30 P.M., PST) within 15 days after publication of the decision notice, this decision will be come final. If a timely protest is received, the project decision will be reconsidered in light of the statement of reasons for the protest and other pertinent information available, and the South River Field Office will issue a protest decision.

For further information, contact:

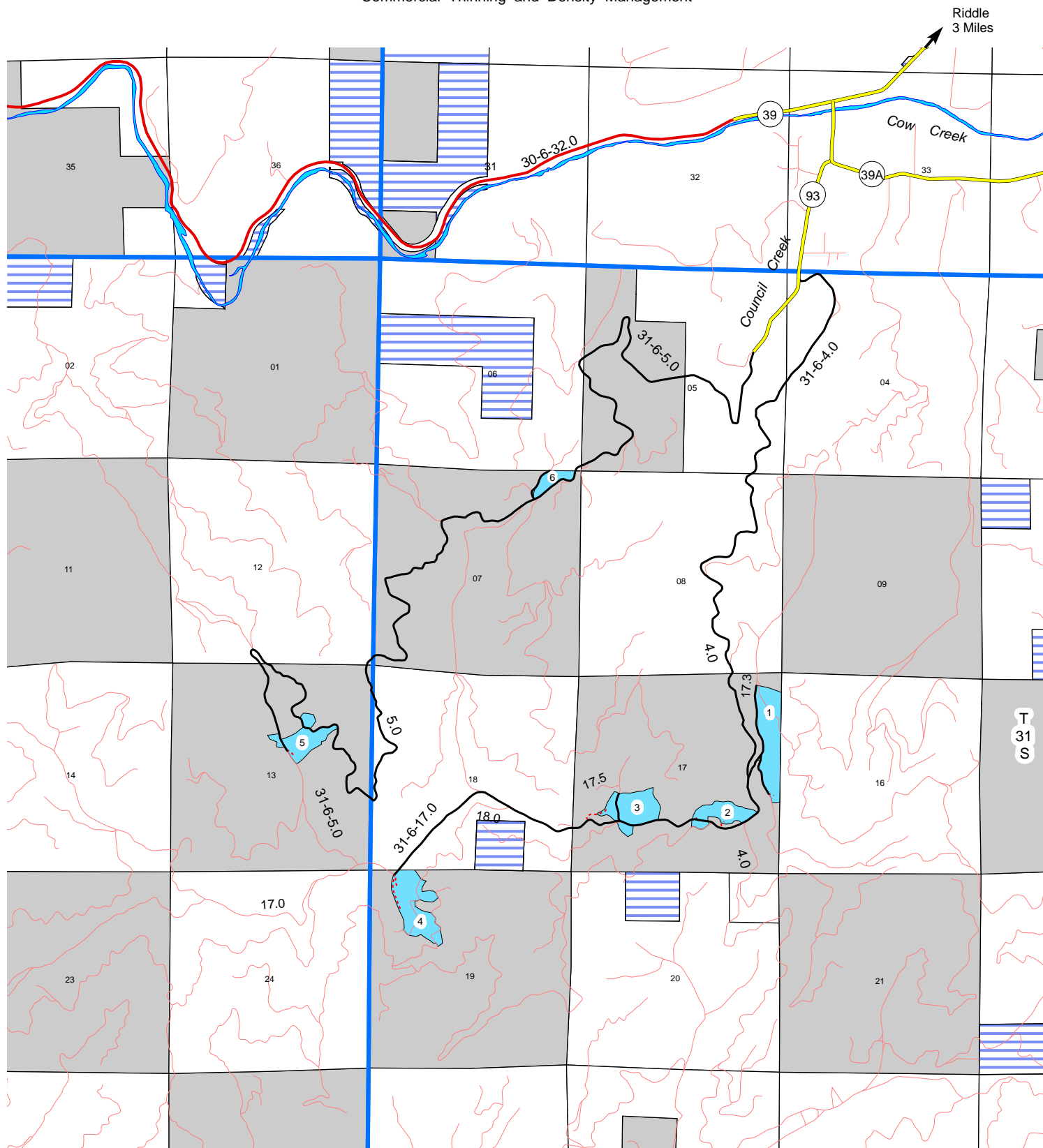


Ralph Thomas  
Field Manager  
South River Field Office  
(541) 464-3203

10/17/08  
Date

# DRAGNET

## Commercial Thinning and Density Management



Riddle  
3 Miles

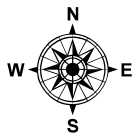
Cow Creek

Council  
Creek

T  
31  
S

R 7 W


R 6 W












T31S, R6,7W

Willamette Meridian, Douglas Co., OR

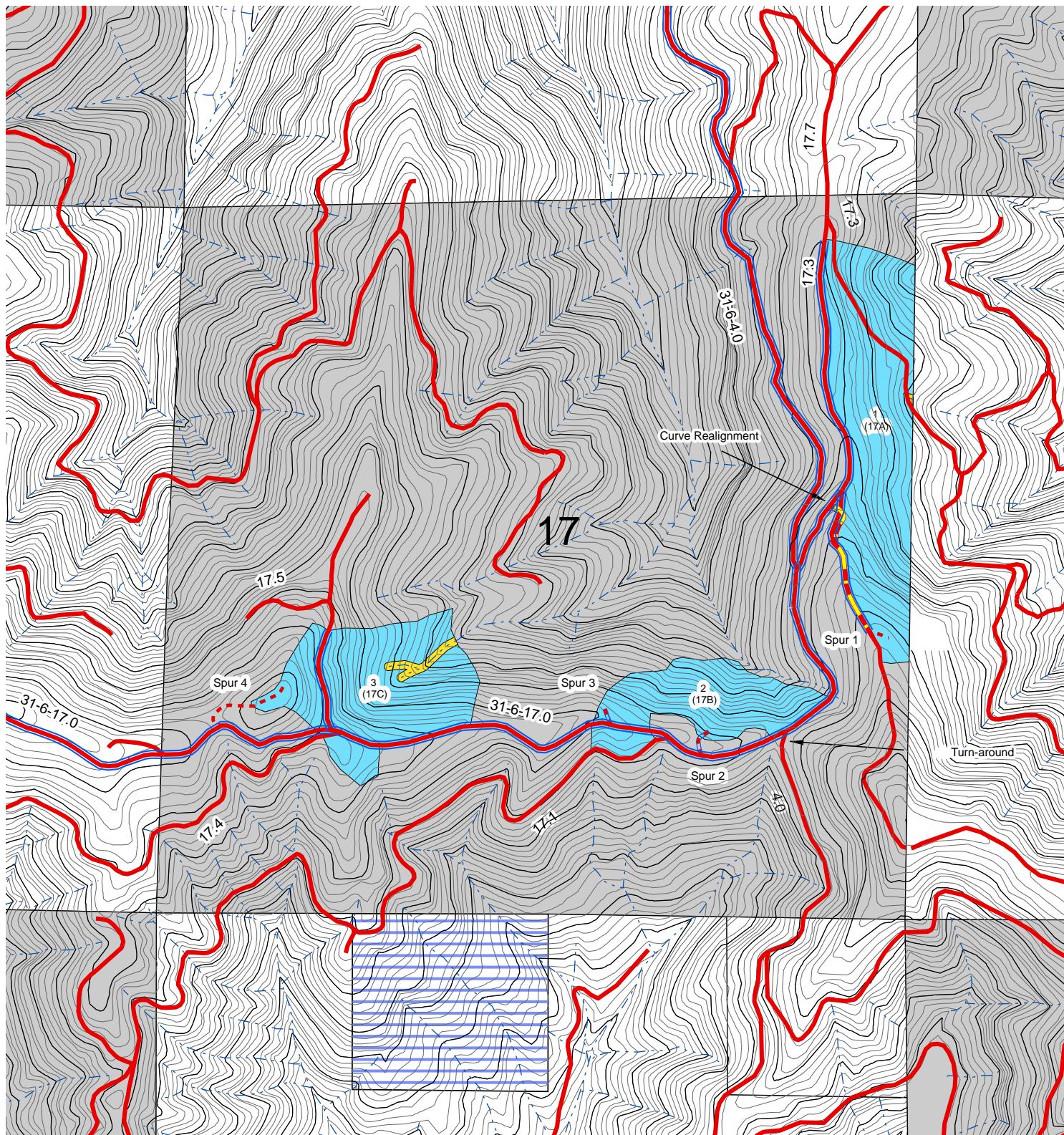
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-  County Road
-  Cow Creek Access Road
-  Haul/Access Route
-  Existing Road
-  New Spur Road
-  Thinning Area
-  BLM (PD) Land
-  BLM (O&C) Land
-  Non-BLM Land

# DRAGNET

## Commercial Thinning and Density Management



T31S, R6W

Willamette Meridian, Douglas Co., OR



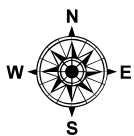
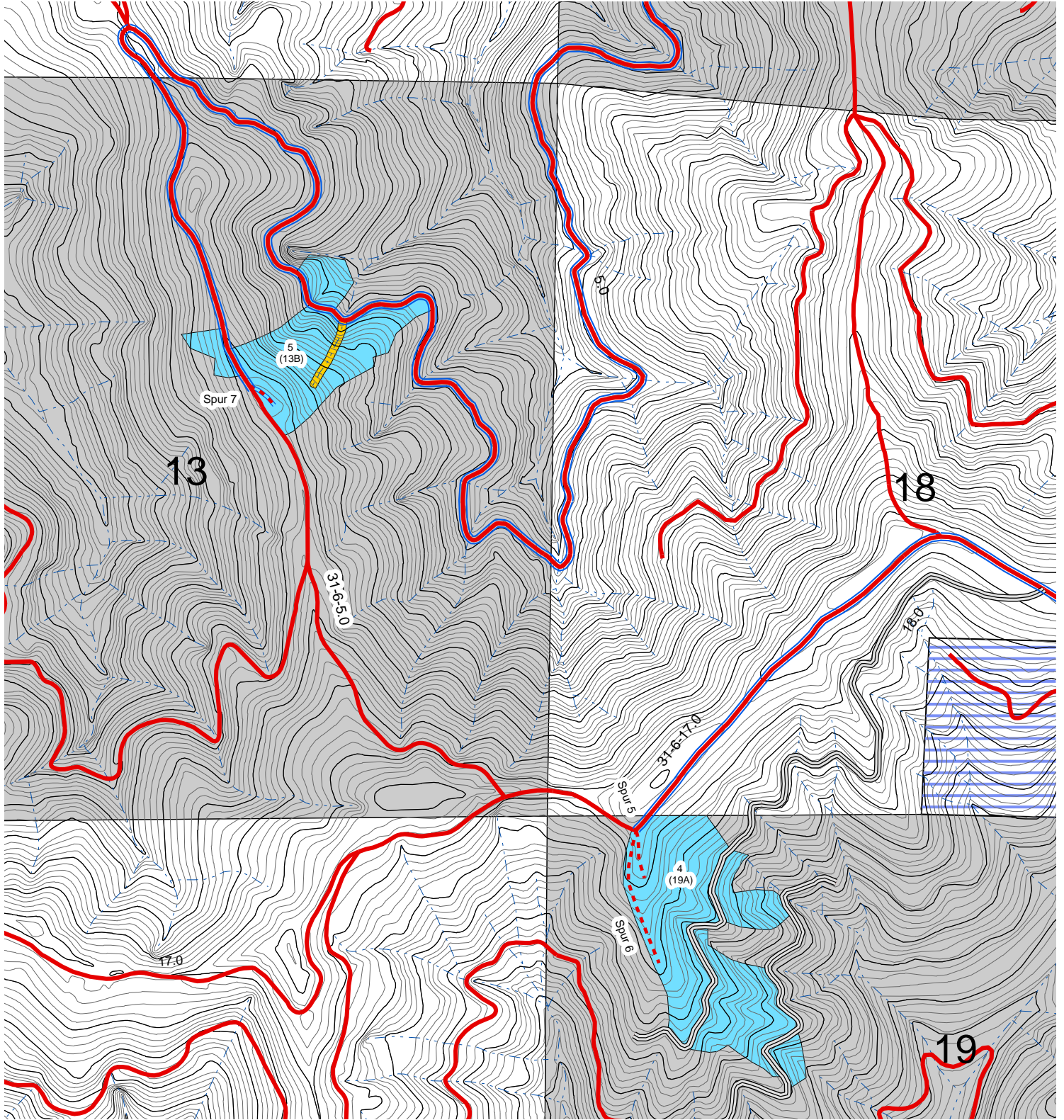
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- Existing Road
- Undrivable Road
- Haul/Access Route
- Renovate, Decommission
- Construct, Decommission
- Stream
- 20 ft. Contour
- 100 ft. Contour
- Thinning Area
- No Harvest Riparian Area
- BLM (PD) Land
- BLM (O&C) Land
- Non-BLM Land

# DRAGNET

## Commercial Thinning and Density Management



T31S, R6,7W

Willamette Meridian, Douglas Co., OR



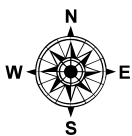
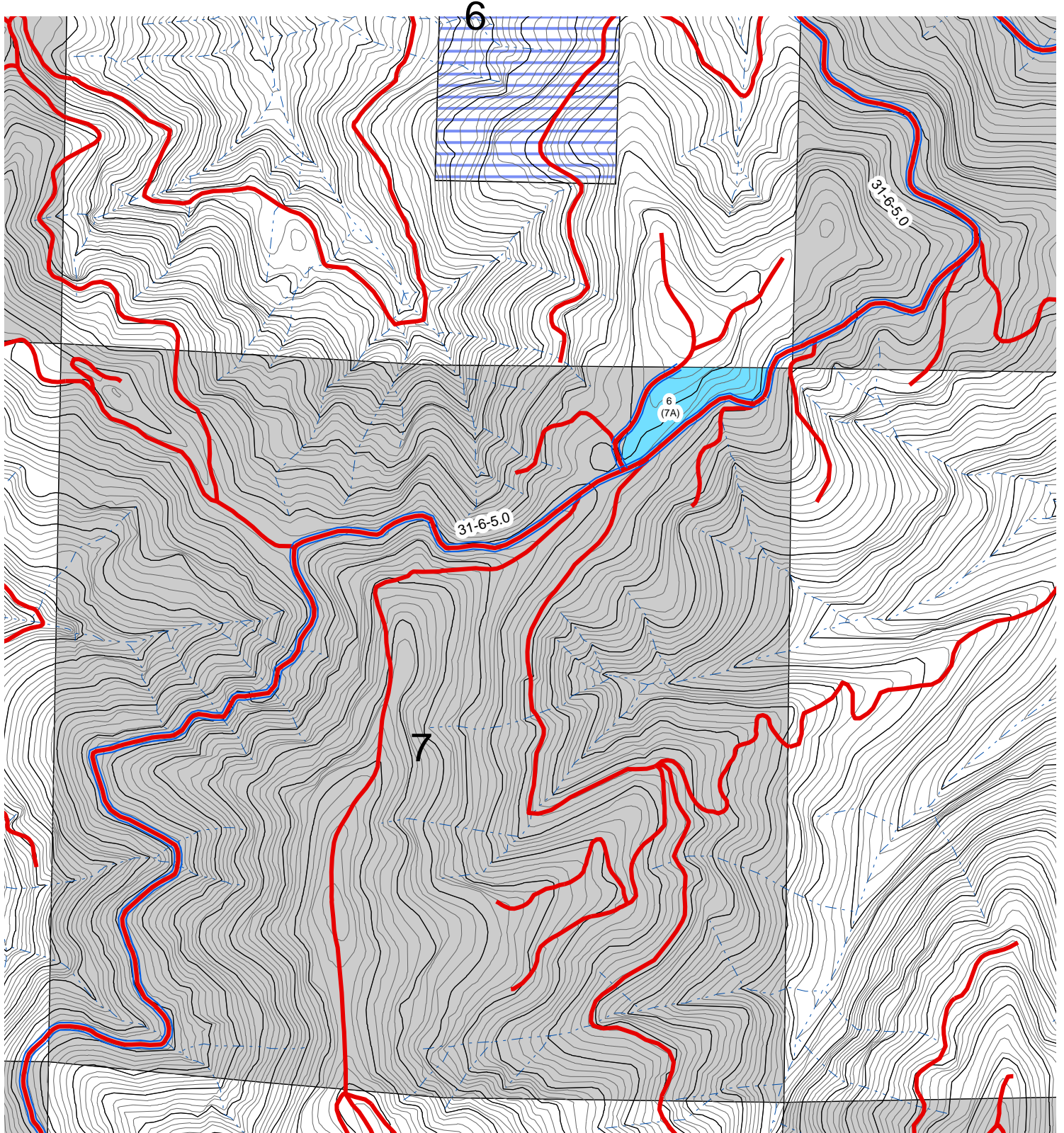
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- Existing Road
- Undrivable Road
- Construct, Rock
- Construct, Decommission
- Stream
- 20 ft. Contour
- 100 ft. Contour
- Thinning Area
- No Harvest Riparian Area
- BLM (PD) Land
- BLM (O&C) Land
- Non-BLM Land

# DRAGNET

## Commercial Thinning and Density Management



T31S, R6W

Willamette Meridian, Douglas Co., OR



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