

**Decision and Rationale  
for the Environmental Assessment for the  
Soukow Timber Sale**

**Soukow EA #OR110-01-38**

**Decision**

The Soukow timber sale was proposed, and the environmental effects of the proposed action and the No Action alternative were analyzed in an Environmental Assessment (EA) for the Soukow Project Area, dated July 30, 2001. In addition, an Addendum to the EA (dated August 3, 2001) was prepared to include several road treatments which were identified subsequent to the preparation of the EA. This decision will apply to the actions proposed in the EA as supplemented by the Addendum. The effects described in the Addendum do not alter and are within the scope of those already described in the EA.

Two comments were received from the public, including several substantial comments on this proposal and the environmental effects. I reviewed the comments in detail with staff specialists and considered them carefully. Those deliberations were incorporated into this decision.

My decision is to implement Alternative 4, the Preferred Alternative, for the Soukow timber sale as described in the Environmental Assessment, as modified by the Addendum dated August 3, 2001. This alternative includes the Project Design Features described as common to all alternatives, as well as those specific to Alternative 4 (EA p. 36). More detailed information on the timber harvest and subsequent treatments can be found in the silvicultural prescription in the Medford District files.

The decision to implement this proposal meets the purpose and need identified in the EA and furthers the intent established in the Northwest Forest Plan and RMP to manage the Matrix lands with commercial forest products as a major objective. The decision will provide approximately 2 million board feet of timber by conducting timber harvest on about 317 acres. The timber harvest will include regeneration harvest and commercial thinning, in accordance with management direction and standards and guidelines in the RMP.

In addition, road renovation, improvement and decommissioning will take place in support of the timber harvest and to maintain a safe transportation system, while reducing sedimentation from existing roads into streams. No new permanent roads will be constructed. Approximately 0.7 miles of temporary spur roads will be constructed and then ripped and seeded when management activities are concluded.

The proposed action is located in Douglas County, in:

- T 32S, R 7W, sec. 19, 20, 29, 30, 31, 33 ,
- T 32S, R 8W, sec. 25,
- T 32S, R 7W, sec. 3, 9.

## **Specific Decision Points and Rationale**

One public comment claimed that the BLM has not fully analyzed the effects on spotted owl Critical Habitat and that an Environmental Impact Statement (EIS) is necessary. The EA did address this issue (EA p. 59) and the issue was also the subject of formal consultation with the US Fish and Wildlife Service (USFWS) under the Endangered Species Act. The USFWS has concluded that the proposed harvest will not result in adverse modification to Critical Habitat and that the action will not violate the Endangered Species Act. Nothing in the comments indicate that the effects on spotted owls resulting from this project are beyond those described in the Final EIS for the Medford District Resource Management Plan to which the EA is tiered.

Some comments also disagreed with many of the management practices and protection measures concerning late-successional associates, especially Survey and Manage species. Many of those concerns have been dealt with in the Northwest Forest Plan in the *Final Supplemental Environmental Impact Statement on Management of Habitat for Late-Successional and Old-Growth Related Species Within the Range of the Northern Spotted Owl* and the *Final Supplemental Environmental Impact Statement for Survey and Manage, Protection Buffers and other Mitigating Measures in the Northwest Forest Plan*. The Soukow EA tiers to the analyses in these documents. The fact that some people disagree with those analyses or the decisions based on those documents is beyond the scope of the EA. I have reviewed the specific protection measures and analysis done for these species in light of the objections raised in the comment letters and can find no basis for modifying the proposed alternative. Many of the comments are simply stating a disagreement with commercial harvest in late-successional habitat. Others allege faulty or incomplete analysis, but do not offer any data or evidence that would indicate that the EA is inadequate. I am confident that the EA represents a thorough analysis of the site-specific impacts to affected habitats and species, in light of the more comprehensive analysis done in the two EIS documents to which the EA is tiered. I am also confident that the BLM fully complies with the Standards and Guidelines established in the Records of Decision for these EISs and with the survey methods and protocols which are currently required.

One comment stated that the survey methodology for various species should be specifically described in the EA. I disagree with that contention, since the methods have been described and those descriptions are available to the public. It is clear that the National Environmental Policy Act (NEPA) calls for concise and focused descriptions of the proposals and their effects; not all background information is required to be part of the NEPA document. The methods used and the details of the findings are available in the Medford District office. Including that level of background detail would result in extremely unwieldy and unnecessarily large documents and would not lead to better decision making or understanding by the public.

Another comment claimed that the EA did not address the effects of commercial harvest of three proposed units in a connectivity/diversity block. The RMP makes it very clear that the connectivity/diversity blocks are not reserves, but are a portion of the Matrix land use allocation which is available for intensive timber management, including timber harvest, including regeneration harvest (RMP p. 48, p. 74, 75). In this case, the effects on the connectivity block habitat is minimal because these units are proposed for commercial thinning, not regeneration harvest. Commercial thinning in a connectivity/diversity block would not adversely affect the late-successional habitat conditions substantially, so it was not a major focus of the EA analysis. Table 6 did disclose that the wildlife biologist on my staff estimated that the thinning prescription for these units would maintain suitable late-successional habitat (EA p. 53). Indeed, other harvest units had been considered by the ID team within this connectivity/diversity block but were dropped from the Preferred Alternative, in part because of the concerns raised in the Watershed Analysis which were cited in the public comment.

Fire management was also a topic raised in public comments. I agree with the commenter's assertion that it would be preferable, from a fire ecology stand point, to conduct prescribed burning in the summer when fires tend to occur naturally. But the extreme risks of loss of natural resource values, damage to private property and personal injury make that scenario impossible to implement, given the site-specific conditions of fuels, land ownership patterns and terrain in the project area. Forest plants often have their perennating buds at the ground surface, or in the lower layers of the duff. Fires that occurred when the duff was dry have been observed to burn all the way to the ground surface, killing the plants, while fires that occurred while the lower layers of duff were moist only burned off surface fuels, allowing plants to resprout later in the spring. Spring burning is a treatment designed to balance the need to accomplish disparate objectives in complex situations with the least adverse environmental effects. The environmental effects of spring burning were discussed in the Medford District RMP/EIS. Best Management Practices for burning are described in the RMP and will be implemented as standard procedures during this project. More site specific analysis was not considered necessary in this EA because it was not identified as a Key Issue during the scoping process, as called for in NEPA.

The concern about the commercial thinning and clearing around pines in Riparian Reserves in one comment letter is moot, since I am implementing Alternative 4, which does not include the treatments within Riparian Reserves which were described as part of Alternative 5 in the EA (EA p. 37-38).

Site-specific soils conditions were considered during the development of this project, contrary to another comment I received. Detailed soil types and conditions in individual stands have been mapped in the Timber Productivity and Capability Classification (TPCC) system, which was used as base information in assessing this project. In addition, each proposed harvest unit and road location was inspected on the ground for more detailed problem areas. These areas were avoided when designing timber harvest units and road locations. Again, impacts to soils of management practices were analyzed in the RMP/EIS and there is no need to re-analyze these impacts unless there would be additional or substantial site-specific impacts not already covered.

This is not the case and there is nothing in the comments submitted which leads me to believe otherwise. This comment letter went on to make a series of claims of general soils impacts from various management practices. These factors were considered by the ID Team during the development and assessment of the project and there is nothing other than general claims in the comment letter to convince me that these effects have not been considered in the RMP/EIS or have been mitigated by the adoption of the Project Design Features described in the EA.

One comment letter went to considerable lengths to contend that the analysis in the EA of effects on water quality and hydrologic functions is inadequate and flawed. I reviewed the discussion in the EA (EA pp. 40-43; pp. 44-46, pp. 61-62) and reviewed the public comments with our fisheries biologist and hydrologist. It should also be noted that a detailed formal consultation with the National Marine Fisheries Service (NMFS) was conducted since the Oregon Coast Coho salmon was considered a federally listed species under the Endangered Species Act when the EA was developed. The biological assessment included a detailed examination of water quality and stream issues, based on the information in the EA. Based on the information in the EA and in the Biological Assessment, the NMFS concurred with BLM's assessment that this timber sale is not likely to adversely affect coho salmon. A careful reading of the water issues raised in the public comment letters reveals general allegations and assertions, but nothing specific to indicate why they feel the BLM's analysis is flawed or inadequate. It is clear that the commenters do not agree with commercial timber harvest conducted within the Standards and Guidelines of the Northwest Forest Plan and RMP. But there is no new information presented, no scientific literature cited, no specific concern raised that has not already been adequately considered by the Northwest Forest Plan, the RMP/EIS or the Soukow timber sale EA. I feel that the BLM scientists have done a commendable job in analyzing these effects already and the ID team has gone to great lengths to mitigate potential impacts to the point that it is clear to me that this project complies with all necessary requirements. Merely raising questions about these issues does not convince me that the analysis was flawed. And again, the concern about impacts from the pine clearing within Riparian Reserves is off the mark, since that was only included in Alternative 5 and will not be implemented. Finally, the commenters completely neglect to consider the positive effects which will result from the road work done as part of this timber sale.

It is untrue that there is no reliable sediment monitoring data for the Dad's Creek sixth-field watershed. The Glendale Resource Area has monitored aquatic macroinvertebrates in Dad's Creek and Skull Creek since 1994. Other stations will be added as funding permits. Stations are monitored at approximately five-year intervals. Reports are available at the Medford District.

The statements mentioned in one comment regarding the times of hydrologic recovery are not really as inconsistent as they may appear. In general, hydrologic recovery is considered 70-80 percent complete within 15-20 years following regeneration harvest and is essentially complete within 30 years following harvest, with the attainment of closed canopy conditions.

One specific concern was raised about the possible impacts to domestic water supply in Riddle. This possibility is so remote that I consider it well outside the scope of this analysis. It is clear that if impacts to fish and water quality in the immediate vicinity are minimal, the claim that there would be any impacts to any domestic water supply over 20 miles distant is highly unlikely.

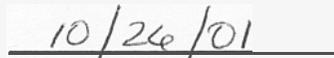
Both comment letters mention general assertions that the benefits of thinning young stands may be questionable. I reviewed this with BLM silviculturists and believe they are aware of and using the most recent scientific findings available. If the commenters wish me to consider new scientific findings which we may have overlooked, I would be happy to. But again, merely mentioning "new science" is not adequate to convince me that the recommendations and assessments of the silviculturists on my staff are in error.

In summary, I find that the action will be consistent with the Medford District Resource Management Plan and the Northwest Forest Plan, including the Aquatic Conservation Strategy. This project is also consistent with the Endangered Species Act, the Native American Religious Freedom Act and cultural resource management laws and regulations.

In accordance with the BLM Forest Management Regulations (43 CFR 5003.2(1)), the decision for this timber sale will not become effective, or be open to formal protest, until the first Notice of Sale appears in a newspaper of general circulation in the area where the lands affected by the decision are located.



Lynda L. Boody  
Field Manager, Glendale Resource Area,  
Medford District, Bureau of Land Management



Date

FINDING OF NO SIGNIFICANT IMPACT (FONSI)

for the  
Soukow Timber Sale  
OR-1 10-01-38

The proposed action for the Soukow timber sale is described in the environmental assessment (EA) and it can be obtained at the Medford District Office.

The proposed action is located in:

T 32S, R 7W, sec. 19,20,29,30,31,33 ,  
T 32S, R 8W, sec. 25,  
T 32S, R 7W, sec. 3,9.

The public notice of availability of this FONSI is provided through the Medford District BLM central registration recording system and newspapers in the area of the proposed action.

There are no wetlands, wild and scenic rivers, known hazardous waste areas, areas of religious concern, prime nor unique farmlands within the project area. The project area does not qualify for wilderness designation. No significant adverse impact is anticipated to fisheries, lands and minerals. No cultural sites are in the project area. The effects on Threatened and Endangered Species and special status species are described in the EA. Formal consultation requirements will be met as called for under the Endangered Species Act.

The estimation of impacts was based on research, professional judgment and experience of the interdisciplinary team. This method of estimating effects to the environment reduces the uncertainties to a level which does not involve highly unknown or unique risks.

FONSI DETERMINATION

I have reviewed the environmental assessment including the explanation and resolution of any potentially significant environmental impacts not previously identified. And I have reviewed the comments received from the public concerning this proposal. I have determined the action described above will not have any significant impacts on the human environment beyond those already fully described in the Final Medford District Proposed Resource Management Plan and Environmental Impact Statement and that a supplemental EIS is not required.



Lynda L. Boody  
Glendale Resource Area Manager  
Medford District, BLM



Date