

## FINAL DECISION DOCUMENTATION and DECISION RATIONALE

### **Lulay Camp**

Environmental Assessment Number OR080-2003-17

USDI - Bureau of Land Management  
Oregon State Office, Salem District, Cascades Resource Area

Township 10 South, Range 1 East, Sections 19, 29 and 33;  
Township 10 South, Range 2 East, Section 19,  
Willamette Meridian  
Linn County, Oregon

### **Introduction**

The Bureau of Land Management (BLM) has conducted an environmental analysis (Environmental Assessment Number OR080-2003-17) for two projects. Project 1 is a proposed timber sale to commercially thin 190 acres of 40-60 year old stands, partial cut 41 acres of a previously thinned 70 year old stand, and regeneration harvest 7 acres of a windthrown stand that was salvage logged in the Matrix land use allocation; and to thin 22 acres of Connectivity Block and 36 acres of Riparian Reserve land use allocations with a variable density management thinning. Project 2 is a Riparian Management proposal to create habitat features such as CWD, snags, wolf trees and small canopy gaps within portions of the Riparian Reserve allocation by falling or base girdling trees, without removing any of the wood from these areas. These stands are located within the Crabtree Creek and Thomas Creek Watersheds. A Finding of No Significant Impact (FONSI) was signed on June 11, 2003 and the EA and FONSI were then made available for public review.

This decision authorizes the implementation of only those activities directly related to and included within the timber sale (Project 1). A separate decision will be issued concerning the Riparian Management proposal (Project 2).

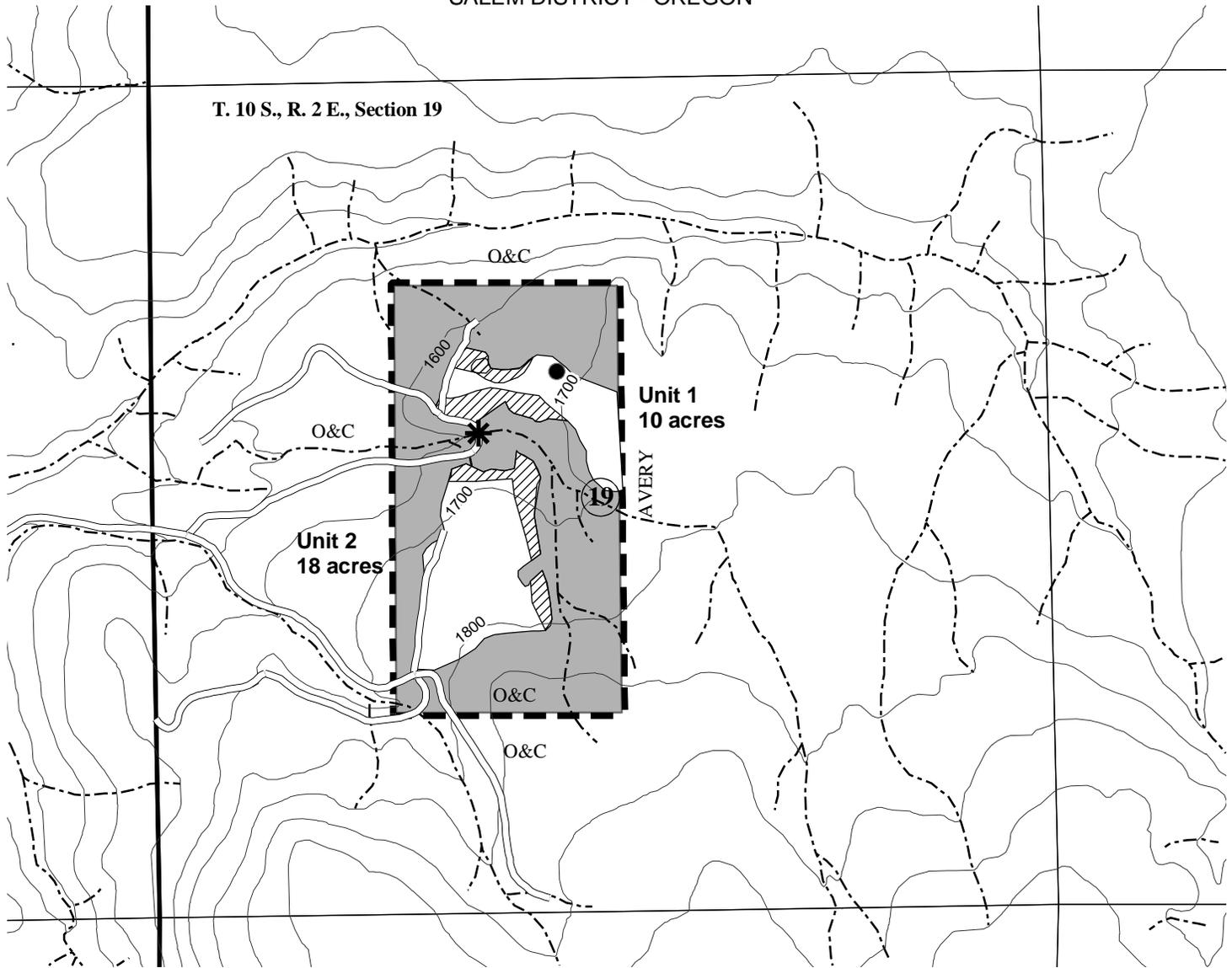
### **Decision**

I have decided to implement the timber harvest and associated silvicultural treatments (Project 1) described in Alternative 2 (EA pp. 4-6) with modifications described below, hereafter referred to as the "selected action". The selected action is shown on the Lulay Camp Timber Sale Exhibit A attached to this Decision Rationale. My decision is based on site-specific analysis in the Environmental Assessment (EA # OR080-03-17), the supporting project record, management recommendations contained in the *Crabtree Watershed Analysis* and the *Thomas Creek Watershed Analysis*; as well as the management direction contained in the *Salem District Resource Management Plan (RMP)* dated May 1995.

**TIMBER SALE CONTRACT MAP - Contract No. OR080-TS04-502**

TRACT 2004-502  
Sheet 1 of 4

T. 10 S., R. 1 E., Sections 19, 29 & 33 and T. 10 S., R. 2 E., Section 19, W.M.  
SALEM DISTRICT - OREGON



Boundaries of Unit Area - Regeneration Harvest and Right-of-Way Area are painted orange and posted.  
Boundaries of Unit Area - Partial Cut, Green Tree Retention Area, Reserve Area and Special Yarding Area are posted only.

Unit Area - Partial Cut	289 acres
Unit Area - Regeneration Harvest	7 acres
Right-of-Way Area	3 acres
<u>Reserve Area</u>	<u>741 acres</u>
<b>Total Contract Area</b>	<b>1040 acres</b>

**Legend**

- Unit Area - Partial Cut
- Unit Area - Regeneration Harvest
- Special Yarding Area
- Green Tree Retention Area
- Reserve Area
- Boundary - Unit Area
- Boundary - Contract Area
- Existing Road - Useable
- Existing Road - To be decommissioned
- Existing Road - To be renovated
- Right of Way Area
- Stream
- Culvert to be Removed
- Gate

N  
  
Scale: 1" = 1000 ft.  
Contour Interval: 100 ft.

## A. Modifications

### 1. Unit Numbering and Unit Acres

Use the following table to cross reference EA unit numbers and acres with contract unit numbers and acres.

Contract Unit No.	1	2	3	4	5	6	7	8	9	10	R/W P	R/W P-1	R/W P-2
EA Unit No.	2-19A	2-19B	19D	19C	19A	29A	29B	33A	33B	33C	19D	33A	33C
Contract Acres	10	18	37	16	7	42	81	31	29	25	1	1	1
											Incl. in actual unit acres, assigned acres for contract administration only		
EA Acres	12	18	57	17	12	42	102	34	33	24	n/a	n/a	n/a
Change (Neg.)	(2)	0	(20)	(1)	(5)	0	(21)	(3)	(4)	1	n/a	n/a	n/a

### 2. Acres by Type of harvest and LUA

Based on final measurements using GPS with differential correction analysis, the following corrections to estimated acres are made:

Type of Harvest	EA Units	Contract Units	EA Estimated Acres	Final Acres	Net Change, Acres (Neg.)
Regeneration, Matrix	19A	5	12	7	(5)
Partial Cut, Matrix	29A	6	42	41	(1)
Commercial Thinning, Matrix	19 C,D; 29 B; 33 A,B,C	3,4,7,8,9,10	243	190	(53)
Density Management, Connectivity	2-19 A&B	1, 2	23	22	(1)
Riparian Reserve Density Management	19C,D; 29 B; 33 B,C; 2-19A,B	3,4,6,7,8,9,10	31	36	5
Right-of-Way			n/a associated with 3400 ft. of new temp. road.	3 Nominal ac. associated with 3015 ft. of new temp. road.	n/a
<b>TOTAL</b>			<b>351</b>	<b>296</b>	<b>(55)</b>

### 3. Timber volume

No timber volume estimates were included in the EA. Final timber volume estimates of 7094 CCF (4426 MBF) for the sale have been determined through a field timber cruise.

#### Timber Volume by Unit and Land Use Allocation

Unit	GFMA		Connectivity		Riparian Reserve		Total	
	MBF	CCF	MBF	CCF	MBF	CCF	MBF	CCF
1			93	174	40	74	133	248
2			285	514	58	105	343	619
3	503	915			44	80	547	995
4	157	285			124	224	281	509
5	184	297					184	297
6	542	874			17	27	559	901
7	890	1608			121	219	1011	1827
8	481	891					481	891
9	433	786			33	59	466	845
10	282	520			110	202	392	722
R/W-P	11	19					11	19
R/W-P1	15	26					15	26
R/W-P2	3	5					3	5
<b>TOTAL</b>	<b>3501</b>	<b>6226</b>	<b>378</b>	<b>688</b>	<b>547</b>	<b>990</b>	<b>4426</b>	<b>7904</b>

### 4. Road Construction, Renovation, Decommissioning, and Maintenance

Length of new construction determined by traverse with staff compass and tape. Length of existing roads are taken from District road records.

#### Road work.

Action	EA Length	Contract Length	Difference (Neg)
New Construction - Natural Surface	3400 Ft.	3015 Ft.	(385) Ft.
Renovation - Shape and re-compact existing surface, re-align tight curves.	4000 Ft.	3432 Ft.	(568) Ft.
Renovation - brushing, blading, culvert replacement	N/A – “Road Maintenance” in EA, no length, covered in Transportation System NEPA	8.38 miles	N/A
Road Decommissioning	1200 Ft.	1425 Ft.	225 Ft.
Culvert and Fill Removal	One	One	0

## **B. Changes to the Environmental Consequences**

The environmental impacts are within those described in the original EA and are less than or the same as those anticipated for the proposed action in that assessment for the following reasons:

- Retained trees densities are the same to slightly more than described in the EA (varied with the individual people marking), but within the range where the overall effects are not anticipated to be measurably different from those described in the EA.
- Over the sale area, basal area, number of retained trees per acre, and canopy closure meet the requirements for spotted owl dispersal habitat.
- There are 55 fewer acres in the selected action than in the proposed action.
- There are 5 more acres of Riparian Reserve Density Management in the selected action than in the proposed action.
- There are 385 feet less new construction, natural surface truck road than estimated in the proposed action.
- There are 568 feet less road renovation (shaping, compacting and curve alignment on existing road beds) than estimated in the proposed action.
- There are 225 feet more road decommissioning than estimated in the proposed action.

The above modifications do not change the scope of the project analyzed in EA number OR-080-03-17, nor do these modifications affect the adequacy of the analysis contained in the EA.

## **C. Summary of the Decision**

### **1. Harvest**

- Nine units totaling 289 acres are to be harvested with some variety of partial cut system – Selective Cut, Commercial Thinning, or Density Management. One unit totaling 7 acres would be regeneration harvested. Total harvest area is 296 acres.
- Within the partial cut units, and included in those acres, are three rights-of-way, administratively designated as one acre each for a total of three acres shown as clearcut for right-of-way. Actual clearing acres are somewhat less.
- Of the 283 total acres: 238 acres (80%) are GFMA, 22 acres (7%) are Connectivity, and 36 acres (12%) are Riparian Reserve. (Total 99% due to cumulative rounding error.)
- 4426 MBF total harvest volume. Of this:
  - 3501 MBF (79%) is from GFMA
  - 378 MBF (9%) is from Connectivity
    - Total 3879 MBF (88%) is from Matrix
  - 547 MBF (12%) is from Riparian Reserves.

### **2. Yarding**

- All ground based yarding with tracked or wheeled tractors would take place on slopes not steeper than 35 percent.
- Multiple pass tractor roads would use existing skid roads, where possible. Multiple pass tractor roads and landings are considered to be compacted ground.

- Compacted area used by the purchaser would be limited to 10 percent of the unit area on Matrix ground. Combined compacted and disturbed area would be limited to five percent of the unit area in Riparian Reserves.
- A single pass of a tractor on top of a slash and/or brush mat is not considered to be compacting. Disturbance from this operation would depend on the equipment and operating techniques used.
- Cable yarding is not anticipated, but may be allowed if it is designed to meet our objectives.
- Rather than specifying logging techniques, the contract requires that the purchaser submit a plan for BLM review and approval to achieve BLM resource objectives. Some limits to the operation are specified.

### 3. Road Access

- 3015 feet of road construction would take place, all temporary, natural surface road.
- Road renovation would consist of: shaping and recompacting the existing surface on 0.65 miles of existing, unused or ripped roads; and brushing, blading and culvert replacement on 8.38 miles of aggregate (e.g. gravel) road and maintaining roads to the standards described in the transportation management objectives and Best Management Practices in the RMP.

### 4. Fuels Treatment

- There are two fuels treatments planned for the selected action: 1) All landing piles and miscellaneous piles remaining after other operations are complete would be covered and burned to reduce potential wildfire damage. 2) Slash and debris on the seven acre unit 5 would be machine piled, covered and burned to reduce potential wildfire damage and to prepare the site for reforestation.

### 5. Blocking skid roads:

- After operations, main skid roads would be blocked in order to minimize additional soil disturbance and damage to other forest resources from off road vehicle (ORV) use. There are no gates to limit ORV access from Neal Creek road system to the project area.

### 6. Design Features and Mitigation Measures:

- All design features and mitigation measures described in the EA (pp. 7-13) are incorporated into the timber sale contract.

### 7. Compliance with Direction:

- The selected action is consistent with applicable land use plans, policies, and programs. Programmatic documents covering this proposal are *the Record of Decision for Amendments to the Survey and Manage, Protection Buffer, and Other Mitigation Measures Standards and Guidelines (ROD, January 2001)*; *Salem District Resource Management Plan (May 1995)*; *Record of Decision (ROD) for Amendments to Forest Service and Bureau of Land Management Planning Documents Within the Range of the Northern Spotted Owl (April 1994)*; and *the Western Oregon Program-Management of Competing Vegetation Record of Decision (August 1992)*. All of these documents may be reviewed at the Cascades Resource Area office.

## Alternatives Considered

**Alternatives Dropped From Detailed Analysis:** The proposed action changed during the environmental analysis. The following units were dropped from this project due to resource conflicts.

- Section 29, Unit 6: Defer harvest for 10-20 years until CMAI and evaluate for regen harvest under management plans in place at that time. The IDT chose to recommend implementing the FOTEST management direction in this stand. Management choice of the “No Action” alternative for this proposal would have essentially implemented this alternative.
- Section 19: The stand under consideration was similar to Unit 6. A windstorm and subsequent salvage harvest made the most heavily stocked portion of this stand unsuitable for either deferred harvest or thinning. The remaining portion of the stand is already too lightly stocked for a partial cut at this time, so that deferral to re-evaluation in 10-20 years was the consensus of the IDT.
- Sections 5 and 29: Heavily stocked thirty year old stands were considered for commercial thinning. Dropped due to presence of red tree vole nests.
- No New Road Construction: The proposed road construction is within the analysis and intent of the RMP and facilitates logging in an economically and environmentally sound way. The IDT concluded that the anticipated impacts of natural surface road construction and the multi-pass skid trails that would be required without the new road would be essentially the same, so there was no compelling reason to fully analyze the less efficient alternative of “no new roads.”

### Alternatives Considered in Detail:

The EA analyzed the effects of the proposed action and the no action alternatives. Complete descriptions of the "action" and "no action" alternatives are contained in the EA, on pages 4-7 (description of the alternatives) and 7-13 (design features and mitigation measures).

## Reasons for the Decision

Considering public comment, the content of the EA and supporting project record, the management recommendations contained in the *Crabtree Creek Watershed Analysis* and the *Thomas Creek Watershed Analysis*, and the management direction contained in the RMP and *Survey and Manage* ROD, I have decided to implement the selected action as described above. My rationale for this decision follows:

The selected action addresses the identified purpose and need for action in that it would:

- Contribute to BLM timber management objectives by providing timber and other forest products, while protecting water quality and other resource values (RMP p. 1); and
- Develop stand characteristics to maintain future forest management options and to maintain terrestrial habitats to support a diversity of forest species on Matrix lands (RMP p. 1).
- Develop stand characteristics to restore and maintain aquatic ecosystem functions in support of ACS Objectives on Riparian Reserve lands (RMP p. 2).

In addition, the selected action:

- Offers an economically viable sale, and
- Improves the existing transportation system.

The “no action” alternative was not selected because it does not meet the purpose and need described above and because the following consequences were considered to be less desirable than those of the selected action.

Timber management: The “no action” alternative would not provide for intermediate harvest of wood products, would result in lower quality logs in the long run (even though the anticipated total fiber production would be higher), would limit or eliminate the opportunity for future intermediate harvest due to low crown ratios, and would forego the opportunity to restore the windthrown stand to timber production at this time.

Habitat and stand diversity: The “no action” alternative would result in slower development of stand complexity and large diameter trees associated with late successional characteristics and potential CWD in the treatment areas (except unit 5).

Water quality: Removal of the failing culvert in T. 10 S., R. 2 E., section 19 may be delayed due to lack of service contract funding until it fails and has negative impacts on Neal Creek.

The IDT did not consider other differences between the selected action and the “no action” alternative to be significant.

## **Public Involvement/ Consultation/Coordination**

**Scoping:** In compliance with NEPA, the project first appeared in the April 2002 edition of the quarterly *Salem District Project Update*, and in editions since then, which were mailed to over 1,070 addresses. A scoping letter dated February 27, 2003 was sent to 113 potentially affected and/or interested individuals, groups, and agencies.

**Comment Period and Comments:** The EA was made available on the Internet and notices mailed on June 11, 2003 to the same list of agencies, individuals and organizations as was the Scoping letter described above. A legal notice was placed in local newspapers soliciting public input on the action from June 11 to July 11, 2003. One letter was received during the public comment period. This letter included several positive comments about the project and the environmental analysis, as well as negative comments and recommendations for change. Our response to substantive comments can be found in Appendix A of this Decision Rationale.

**Consultation/Coordination:** The Lulay Camp proposal was submitted for Formal Consultation with U.S. Fish and Wildlife Service (USFWS) on September 3, 2002. Consultation with the USFWS resulted in a May Affect, Not Likely to Adversely Affect Determination for northern spotted owl. The selected action will follow all applicable terms and conditions from the Biological Opinion dated February 27, 2003 [BO# 1-7-03-0008].

The Lulay Camp project was sent for formal consultation with the U.S. Department of Commerce, National Marine Fisheries Service (NOAA Fish), NOAA reference number 2003/00758. A letter of concurrence with the determination of “may affect, not likely to adversely affect” to listed fish was issued on July 02, 2003.

## Conclusion

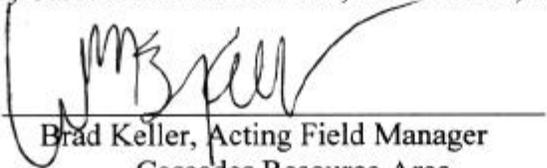
I have determined that change to the Finding of No Significant Impact (June 2003) for the Lulay Camp Timber Sale is not necessary for these reasons: The Lulay Camp EA, along with additional information contained in this document, fully covers the project. There are no significant new circumstances or facts relevant to environmental concerns and bearing on the modification to the proposed action or its impacts, which were not addressed in the EA.

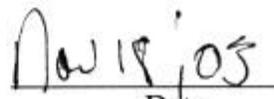
The action is within the scope of the alternatives identified in the original EA, and the environmental impacts are within those described in the original EA and are less than or the same as those anticipated for the proposed action in that assessment.

**Protests:** In accordance with Forest Management Regulations at 43 CFR 5003.2, the decision for this timber sale will not become effective or be open to formal protest until the Notice of Sale is published "in a newspaper of general circulation in the area where the lands affected by the decision are located". Protests of this sale must be filed within 15 days of the first publication of the notice. For this project, the Notice of Sale will be published in the *Albany Democrat Herald* on or around November 21, 2003. The planned sale date is December 17, 2003.

**Contact Person:** For additional information, contact Keith Walton (503) 375-5676 or Bob Hershey (503) 315-5931, Cascades Resource Area, Salem BLM, 1717 Fabry SE, Salem, Oregon 97306.

Approved by:

  
Brad Keller, Acting Field Manager  
Cascades Resource Area

  
Date

## **Appendix A: Response to Comments**

### **Response to Comments from ONRC on the Lulay Camp Timber Sale EA**

**ONRC comment letter dated June 30, 2003, Received July 01, 2003**

**Prepared by Keith Walton, Forester, with input from other resource specialists.**

**November 12, 2003**

ONRC comments are quoted or summarized in *bold italics*. BLM responses are in normal font. Grouping of quotes and summaries of comments were done by Keith Walton, with the full intent to accurately reflect the original comment without distorting the intent, essence or context.

*“In general, we support thinning in young managed stands.”* (p. 1, ¶1) *“The variable density thin in the connectivity block and riparian reserves looks very promising and exciting.”* (p. 1, ¶2) *“Commercial thinning of 243 acres of 40-60 year old trees in GFMA designation is exactly the type of project what [sic] ONRC would like to see prioritized for the Cascade Resource Area.”* (p. 1, ¶3) *“It appears that BLM has worked for retention of largest trees and some deformed trees for structure, particularly in the density management units. ONRC has no concerns with the partial cut prescriptions for the 42 acres of 60-70 year old stands that have previously been commercially thinned.”* (p. 1, ¶4) *“ONRC is pleased to see that the BLM plans on decommissioning 1200’ of unnecessary roads...and pulling the culvert after completing operations in 19A.”* (p. 2, ¶ 1) *“Your plans to do non-commercial riparian reserve treatments...appear to be well planned and appropriate for dense, uniform riparian reserves...”* (p. 2, ¶ 2)

#### **BLM Response:**

The BLM appreciates ONRC’s support for its implementation of these elements of the RMP.

*ONRC encourages lower density areas with small openings in the Connectivity Block density management units than planned* (p. 1, ¶ 2).

#### **BLM Response:**

The low density areas were marked to reflect a residual stand of approximately 70 leave trees per acre from a stand that averaged about 170 trees per acre prior to marking. In a fifty year old stand that is heavily comprised of western hemlock, it is probably wise to not go lower than 70 leave trees per acre for stand stability reasons. In addition, an effort was made to maintain at least 40% crown closure over the entire treated stand to maintain owl dispersal habitat.

The proposed treatment is not intended to be the only entry into this stand. To maintain and enhance overall stand structural development, a second thinning may be deemed desirable by stand age 65 to 70. By that time, the stand should be well suited for another treatment that would bring residual overstory stocking levels down further. At the time of a second thinning, overstory tree sizes will be much larger than today’s 16 inch average DBH and snag creation would also be a part of the future thinning. Today’s residual overstory will provide the resources for any future operations.

To summarize, the 70 leave tree per acre figure of the more heavily thinned portions of this stand was derived from both an immediate stand stability concern, and the idea that future overstory manipulations are intended in order to maintain good overall structural development.

*The BLM should consider variable density thinning with some areas to 50-60 TPA in GFMA rather than the proposed uniform thin from below* (p. 1, ¶3).

**BLM Response:**

*The Salem District Record of Decision and Resource Management Plan* provides the guidance for our land management objectives. On GFMA designated lands, it directs us to produce stands that provide for maximum average annual growth over the lifetime of a timber stand. The commercial thinnings prescribed here are designed to capture an intermediate harvest of volume that may very likely be lost to suppression mortality if left unthinned. They will also promote accelerated growth of the residual trees resulting in bigger and more valuable trees at final harvest with more viable options for green tree retention. Variable density thinning is best suited for other LUAs such as LSR or Riparian Reserve where land management goals are more stand structure oriented.

*“There appears to be a mistake in the EA where the BLM neglected to include reasoning for why the roads have been abandoned, what condition they are in now (page 6). The portions of roads to be reconstructed are not shown on the maps... (p. 2, ¶ 3)”*

**BLM Response:**

This statement of an error in the text of the EA is essentially correct. I (the author of the EA) failed to supply the additional information as noted by the editor. The following information should have been included in the EA and should provide the information needed by ONRC.

“The road to the north edge of unit 33A and the western spur going north into unit 33C were ripped and blocked under a previous operation. Some non-woody plants have taken root in the road beds. The eastern spur going north into 33C was not maintained so that brush has overgrown the roadbed from the sides, some debris has fallen onto the road surface, and some alder and non-woody plants have taken root in the roadbed. The subgrade is intact on all of these roads and the surface course of rock is in place but would need to be bladed and shaped to make a useable running surface. Minor re-alignment of the eastern road into 33C is needed to correct a curve that is too sharp for log trucks in use today.”

The roads have not been “abandoned” and deleted from the transportation infrastructure. The road into unit 33A and the western road into unit 33C were closed during the period between operations requiring their use. They were closed with the full intent to open them back up when needed. The eastern road into 33C was simply not maintained during the time when it was not needed for operations.

The road segments to be renovated were not given a separate symbol (my error), but they are shown on the map as roads and are the only roads accessing the interior of units 33A&C. The road (to be renovated) into 33A is the road ONRC discusses in Paragraph 4 of page 2.

***“During this project, about a mile and a half of road currently either not constructed or reclaimed by the forest will be opened and constructed. This project would reconstruct... (p. 2, ¶ 3)” “...the BLM is also considering reconstructing even more road that the forest has reclaimed. (p. 2, ¶ 4)”***

**BLM Response:**

The term “reconstruct” is incorrect and is not used in the EA. To “reconstruct” is to rebuild a road that no longer exists. Since the subgrade is in place and no culverts are affected, “renovation” (returning a road to its original design standard) is correct and appropriate. The phrase “reclaimed by the forest” lacks enough specificity to be substantive. The integrity of the basic structure of these roads has not been compromised by natural processes that could be described as “reclaiming by the forest”. It could be argued that the process has begun, but is far from restoring the roadbeds to a functioning part of the ecosystem.

***“While we agree that long skid trails following the same route as these proposed roads both cause soil compaction, we disagree that their impacts would be “essentially the same.” Roads require grading a surface, easing the spread of noxious weeds and altering sheet flow and capillary action of water more than an ungraded surface. Skidding equipment is run over slash and is designed to minimize soil disturbance, while road constructing equipment is designed to maximize it. (p. 2, ¶ 4)”***

**BLM Response:**

“Essentially the same” is a professional opinion based on many years of observation and exposure to numerous articles and papers on different aspects of logging operations and soils. The balance of different factors (seedbed for weeds, sheet flow, capillary action, soil disturbance, etc.) may differ somewhat between the options of high-use, multi-pass skid roads and dirt truck roads. However, on the whole, the site specific impacts of these two options on this gentle ground were judged by the IDT to be essentially the same.

Specifically addressing the points raised in ONRC’s comments:

Disturbed soil provides seedbed for weed seeds, regardless of the method of disturbance. The area disturbed and the preventive measures taken to prevent establishment of weeds are more of a determining factor than the method of disturbance. The area affected and the preventive measures taken would be virtually identical for the two options.

Sheet flow on this relatively flat ground, would not be expected to be a significant factor under either option. Capillary action would be more affected by compaction than by the surface characteristics such as grading. The erosion control measures described would mitigate these effects equally under both options.

Running skidding equipment over slash apparently helps reduce soil disturbance when there are relatively few passes being made over the same skid road. “Relatively few” depends on the exact type of equipment, the amount of slash, and subtle differences in operating style. With the high number of passes expected to be made on skid roads in these locations, especially with conventional skidding

equipment dragging the trailing end of the logs, the slash and soil would be displaced from the skid road to form berms along each side of the skid road. The soil in these berms would need to be moved back into the traveled portion of the skid roads to mitigate potential channeling and puddling in the skid road. The IDT considers this to be “essentially the same” soil disturbance as a graded dirt truck road with the design features described in the EA.

***“Roads are more easily used by OHV’s. If a heavily used OHV trail is already in the area, it is possible that new road construction/reconstruction will be discovered by OHV users even after stabilization efforts described in the EA. (p. 2, ¶ 4)”***

**BLM Response:**

OHV use has not been “heavy” on any of the trails or roads in the vicinity, except the route through 19D. The neighbors use it as a one mile shortcut route to neighboring properties to avoid a route of over ten miles by public roads. The careful nature of their use does not have the same effects as high-speed recreational use. Access to this OHV trail is through private (residential) land and a privately controlled gate on the access road, so recreational use is uncommon.

The “varying degrees of use” on other roads and trails are all lighter than the use of the trail in 19D. Most of the use on these trails is horses. Tire tracks are relatively uncommon on most trails in the area, except for one short hill climb in unit 6 (29A). The nature of the terrain, private gates controlling access to the area, and the general character of the routes available (apparently boring) appear to make the area relatively unattractive to OHV users. Dead-end spur roads do not appear to attract any more OHV use than skid roads.

The roads to be renovated could all be used in their current condition by small OHVs, but such use is minimal. The BLM does not expect any significant change to current use patterns as a result of the proposed action.

***“We suggest that you drop the plans to reconstruct 4000’ of roads, dropping units 33A and 33C. This would eliminate the need to construct a new roads [sic] spur into 33A and drop only 58 acres from the project area. Would it be possible yard [sic] some of these units over the existing, passable road system? (p. 2, ¶5)”***

**BLM Response:**

See the above response on the use of the term “reconstruct”.

Dropping units 33A and 33C would result in not fulfilling the Timber Management component of the Purpose and Need for Action in these stands, and not being able to manage them according to the goals in the RMP during this planning cycle.

Yarding units 33A and C to existing, passable roads would require skid roads in the same locations as the truck roads to be constructed or renovated. See the discussion above. Yarding 33C to existing,

passable roads would place the landings in the Riparian Reserve where the nature of landing activity would be expected to cause more disturbance and sediment generation than the proposed action.

These two units comprise approximately 24 percent of the 243 acres of planned commercial thinning (29 percent of the 190 acres in the final project) that ONRC described as “*exactly the type of project what [sic] ONRC would like to see prioritized for the Cascade Resource Area.*” (p. 1, ¶3)

*“We also have some concerns about the proposed regeneration of 12 acres in the stand impacted by windthrow. In the past, we have seen projects result in a cycle of windthrow, where the effects of blowdown continue over time as more and more of the forest is savaged following windthrow, resulting in greater wind exposure to the remaining trees. The potential risks of windthrow in the forest adjacent to this unit was not described.”* (p. 2, ¶6)

#### **BLM Response:**

As was described in more detail in the silvicultural report (in the project development file which was made available for review during the EA comment period), this wind damage was caused by an atypical “tornado-like” cell which not only uprooted trees, but also snapped many trees off, twisted and cracked others without breaking them off (leaving them in a severely weakened condition), and partially tore the root systems on other trees. This cell affected only a small area in this vicinity, and was part of a highly unusual storm system in 2002 that spawned a series of these cells in a relatively narrow band from Eugene, through the Sweet Home, Lebanon, and Lacombe areas, and finally dissipated in the vicinity of the Lulay Camp project. The unusual nature of this storm was widely reported in the news media at the time.

The “cycle of windthrow” ONRC describes was common with the “clearcut” style of regeneration harvest done under previous decadal management plans on BLM lands, and still commonly practiced on private industrial timber lands. It has been more common on high elevation sites where a long edge of a uniform stand was exposed to the wind by large harvest areas. There are many long edges created by private clearcuts adjacent to, and in the vicinity of, this unit, yet this type of edge-effect windthrow has not been observed in this vicinity under typical wind conditions. The EA states that a threat of additional wind damage would be expected *within* the stand “due to the weakened root systems combined with sparse stocking” if no action was taken. (EA p. 25, section IV.A.3.a) ¶1)

In summary: the windthrow and weakened status of standing trees in this stand was caused by a highly unusual wind pattern, not the typical winds experienced in the area; the potential for additional wind damage is based on the weakened condition of trees planned for removal, not the exposed edge of healthy forest; and the scenario described by ONRC has been observed to **not** be a problem in this area.

The actual size of this stand is seven (7) acres, approximately 60 percent of the estimated acreage analyzed in the EA.

**Appendix B: Comment Letter from ONRC**

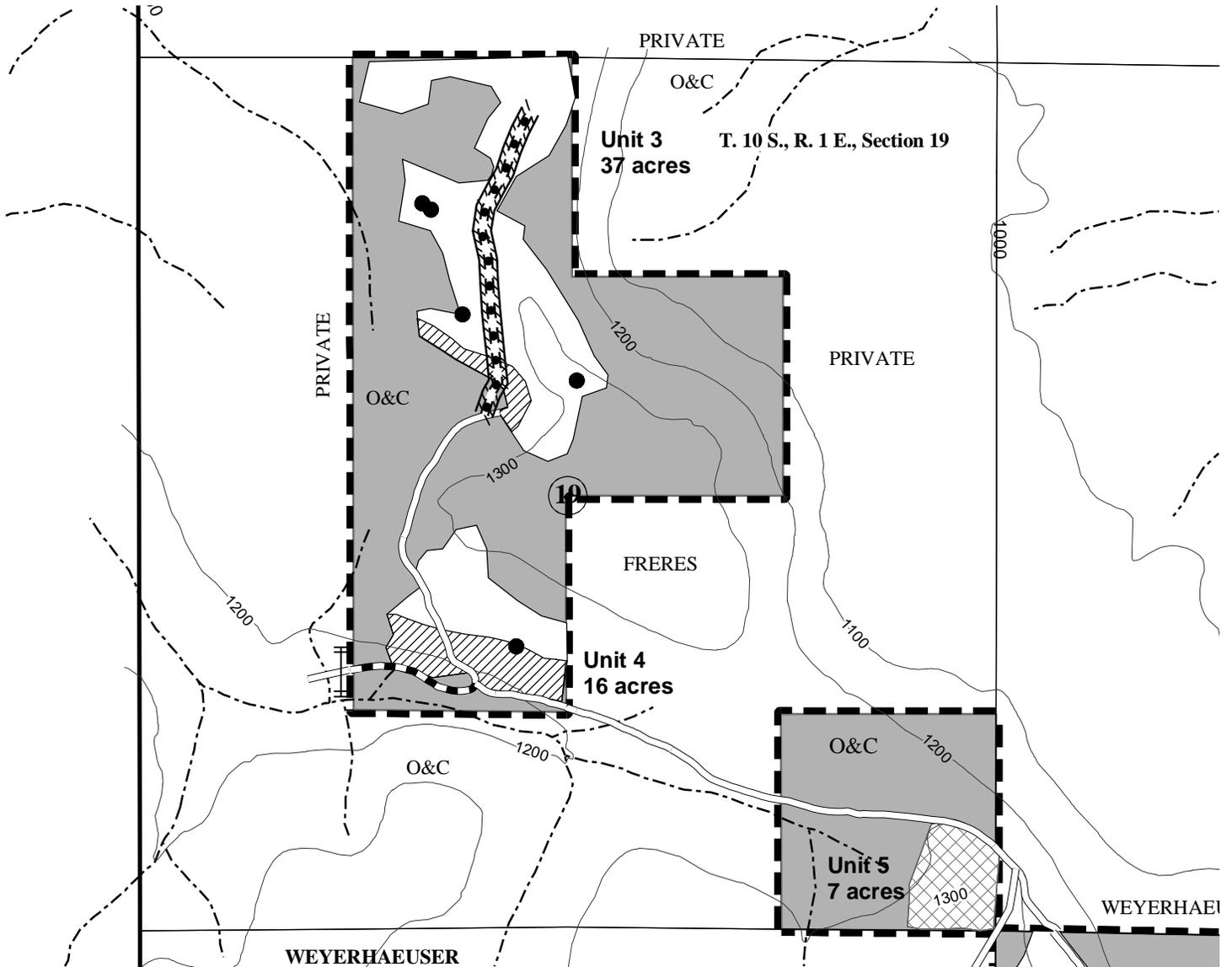
**See Attachment, 3 pages**

**Appendix C: Lulay Camp Timber Sale Exhibit A**

**See Attachment, 4 pages.**

**TIMBER SALE CONTRACT MAP - Contract No. OR080-TS04-502**

T. 10 S., R. 1 E., Sections 19, 29 & 33 and T. 10 S., R. 2 E., Section 19, W.M.  
SALEM DISTRICT - OREGON



Unit Area - Partial Cut	289 acres
Unit Area - Regeneration Harvest	7 acres
Right-of-Way Area	3 acres
<u>Reserve Area</u>	<u>741 acres</u>
<b>Total Contract Area</b>	<b>1040 acres</b>

Boundaries of Unit Area - Regeneration Harvest and Right-of-Way Area are painted orange and posted.  
Boundaries of Unit Area - Partial Cut, Green Tree Retention Area, Reserve Area and Special Yarding Area are posted only.

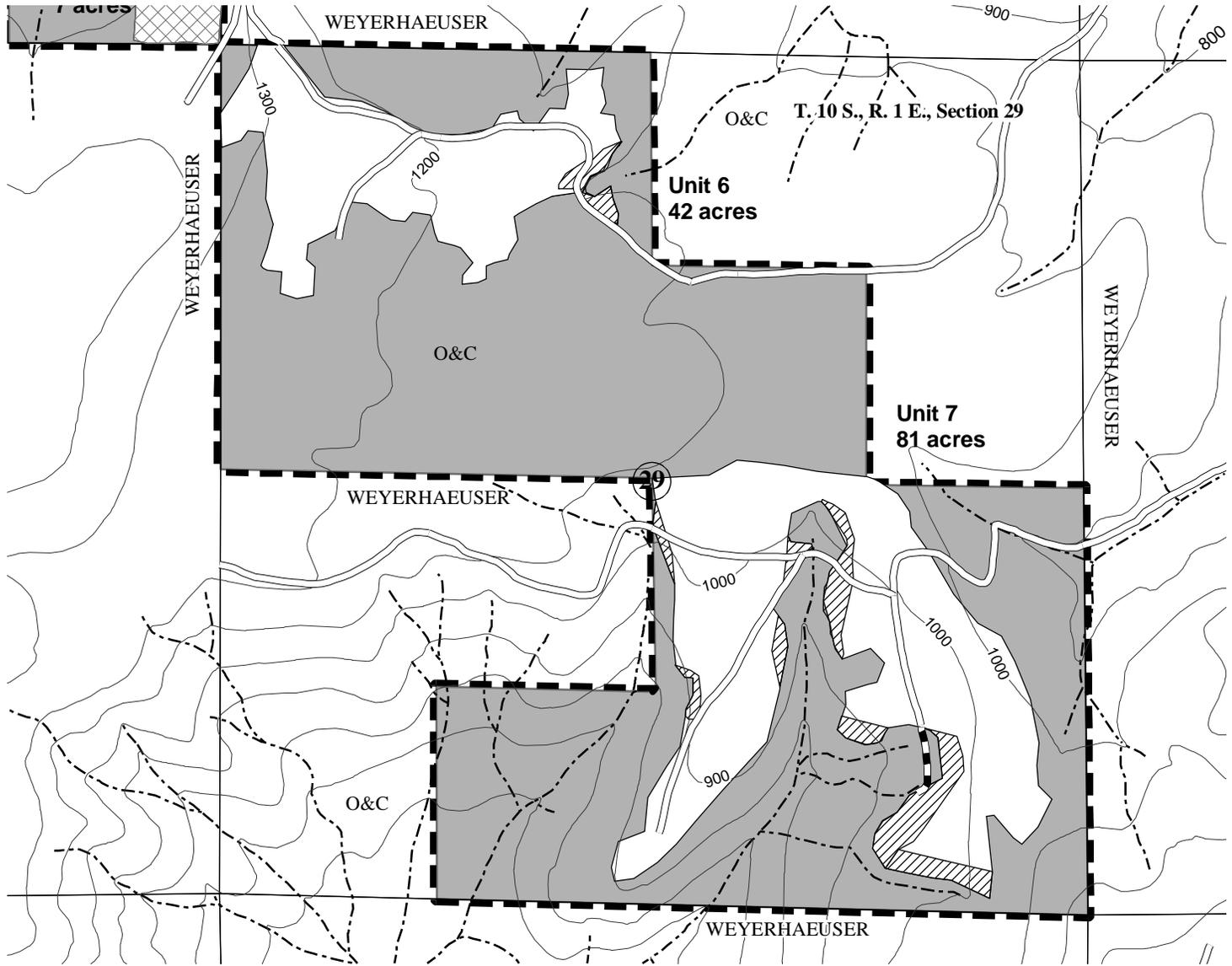
**Legend**

- |                                  |                                      |
|----------------------------------|--------------------------------------|
| Unit Area - Partial Cut          | Existing Road - Useable              |
| Unit Area - Regeneration Harvest | Existing Road - To be decommissioned |
| Special Yarding Area             | Existing Road - To be renovated      |
| Green Tree Retention Area        | Right of Way Area                    |
| Reserve Area                     | Stream                               |
| Boundary - Unit Area             | Culvert to be Removed                |
| Boundary - Contract Area         | Gate                                 |

N  
Scale: 1" = 1000 ft.  
Contour Interval: 100 ft.

**TIMBER SALE CONTRACT MAP - Contract No. OR080-TS04-502**

T. 10 S., R. 1 E., Sections 19, 29 & 33 and T. 10 S., R. 2 E., Section 19, W.M.  
SALEM DISTRICT - OREGON



Unit Area - Partial Cut	289 acres
Unit Area - Regeneration Harvest	7 acres
Right-of-Way Area	3 acres
Reserve Area	741 acres
<b>Total Contract Area</b>	<b>1040 acres</b>

Boundaries of Unit Area - Regeneration Harvest and Right-of-Way Area are painted orange and posted.  
Boundaries of Unit Area - Partial Cut, Green Tree Retention Area, Reserve Area and Special Yarding Area are posted only.

**Legend**

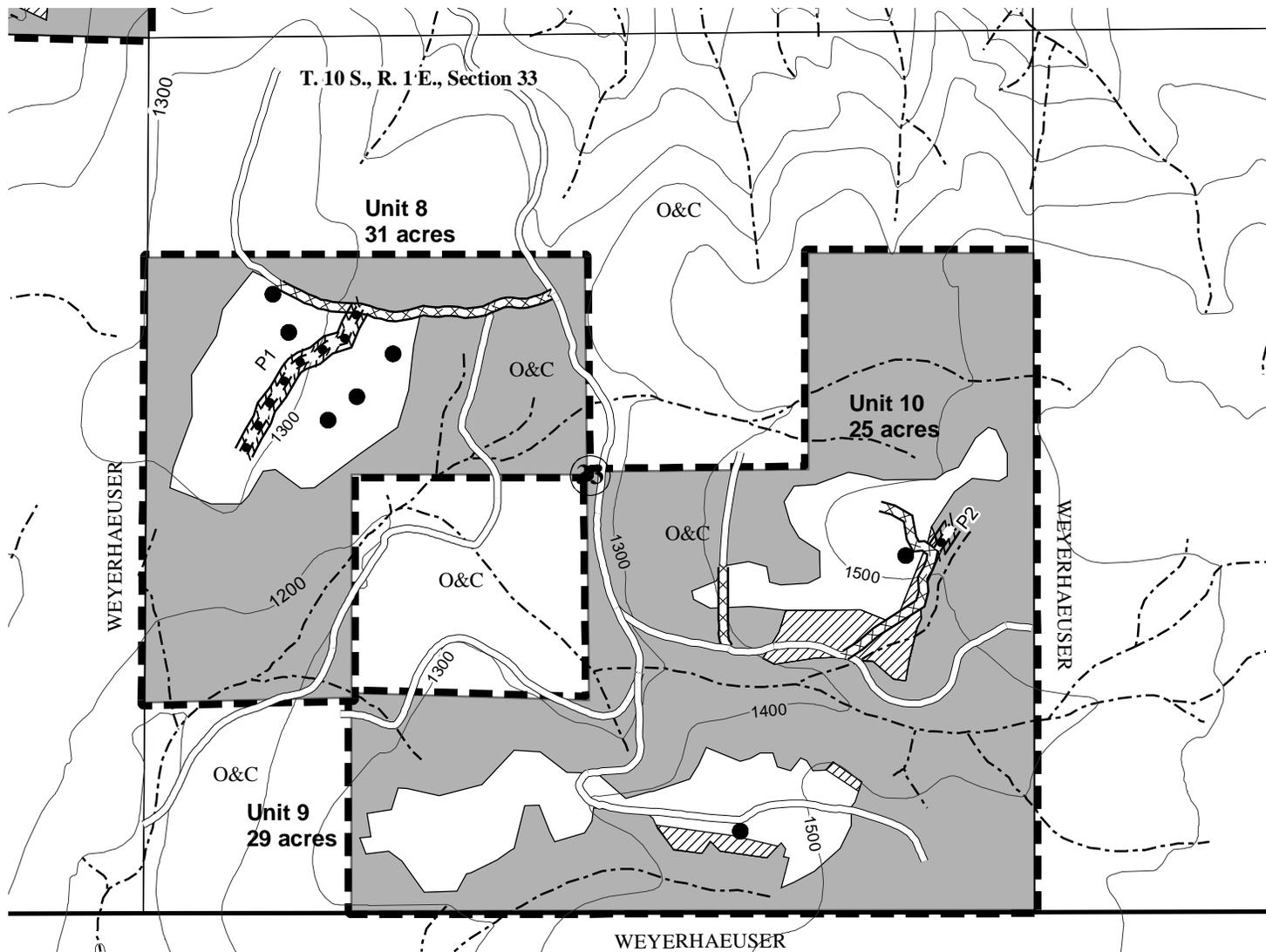
- |                                  |                                      |
|----------------------------------|--------------------------------------|
| Unit Area - Partial Cut          | Existing Road - Useable              |
| Unit Area - Regeneration Harvest | Existing Road - To be decommissioned |
| Special Yarding Area             | Existing Road - To be renovated      |
| Green Tree Retention Area        | Right of Way Area                    |
| Reserve Area                     | Stream                               |
| Boundary - Unit Area             | Culvert to be Removed                |
| Boundary - Contract Area         | Gate                                 |



Scale: 1" = 1000 ft.  
Contour Interval: 100 ft.

**TIMBER SALE CONTRACT MAP - Contract No. OR080-TS04-502**

T. 10 S., R. 1 E., Sections 19, 29 & 33 and T. 10 S., R. 2 E., Section 19, W.M.  
SALEM DISTRICT - OREGON



Boundaries of Unit Area - Regeneration Harvest and Right-of-Way Area are painted orange and posted.  
Boundaries of Unit Area - Partial Cut, Green Tree Retention Area, Reserve Area and Special Yarding Area are posted only.

Unit Area - Partial Cut	289 acres
Unit Area - Regeneration Harvest	7 acres
Right-of-Way Area	3 acres
<b>Reserve Area</b>	<b>741 acres</b>
<b>Total Contract Area</b>	<b>1040 acres</b>

- Legend**
- Unit Area - Partial Cut
  - Unit Area - Regeneration Harvest
  - Special Yarding Area
  - Green Tree Retention Area
  - Reserve Area
  - Boundary - Unit Area
  - Boundary - Contract Area
  - Existing Road - Useable
  - Existing Road - To be decommissioned
  - Existing Road - To be renovated
  - Right of Way Area
  - Stream
  - Culvert to be Removed
  - Gate



Scale: 1" = 1000 ft.  
Contour Interval: 100 ft.