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

COPELAND DIVIDE COMMERCIAL THINNING TIMBER SALE

Decision Document

An Interdisciplinary (ID) Team of the Swiftwater Field Office, Roseburg District, Bureau of Land Management has analyzed the proposed **Copeland Divide Commercial Thinning** project. This analysis and the "Finding of No Significant Impact" (FONSI) were documented in Environmental Assessment (EA) No. OR-104-02-11. The thirty day public review and comment period was completed on September 25th, 2003. One letter with comments was received as a result of public review.

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 commercial thinning and density management harvest of second growth timber in the Calapooya and Lower North Umpqua Watersheds located in Sections 19, 29, & 32, T.25S., R.3W.; W.M.

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

1. Page 4 and Appendix C lists the acreage for Copeland Divide as 440 and 435 acres respectively. The final figure is 436 acres.

2. Page 6 describes the Riparian Reserve in terms of ". . . stems per acre after thinning . . .". This description should have been more specific and read ". . . **dominant and co-dominant** [emphasis added] trees per acre after thinning . . .". There are many stems on a typical acre of second-growth forest with stems from one or two inches up to mature diameters of residual trees from the previous stand. The EA as written could lead to the conclusion that the Riparian Reserve would be cut more heavily than was the intention.

3. The output from the Organon stand model was reviewed by the Silviculturalist who felt that the 45 - 70 dominant and co-dominant trees per acre figure will more accurately depict the result of thinning within the Riparian Reserve than the 30 - 60 stems which was depicted in the EA. These changes do not alter the analysis or conclusions of the EA.

<u>Decision</u>

It is my decision to authorize the implementation of the Proposed Action Alternative as outlined in the EA (Section II, pgs. 4-5). The EA (pg. 6) stated that ". . . 12 trees per acre would be girdled or felled and two trees per acre of this number would be topped." This requirement was reviewed and it was determined that the topping of trees was too expensive and the value to wildlife was not significantly greater than a girdled tree. Girdling is much easier and less expensive to implement. This decision therefore will not include the topping of trees.

The project design criteria for this alternative are listed on pages 6-11 of the EA. These features have been developed into contract stipulations and will be implemented as part of the timber sale contract.

The following specifics should be noted as the result of project layout:

1). Harvest activities will occur on 436 acres and harvest approximately 8880 CCF (4570 MBF) of timber.

2). A total of 4995 ft. (0.9 mi.) of road will be constructed. This will consist of 0.48 miles of permanent road and 0.46 miles of temporary road. A total of 6.5 mi. of existing road will be renovated (i.e. brought back it its original design).

3). A total of 320 ft. of existing road will be decommissioned.

This decision also includes the following actions to be accomplished by the Swiftwater field Office:

1). Prior to any wet season haul on surfaced roads, the stream crossings along the haul route will be evaluated for the need for turbidity reducing measures (ex., placement of weed free straw bales and/or silt fences). If needed, these structures will be put in place prior to haul.

2). The need for amelioration of soil compaction resulting from ground-based operations will be evaluated by the Soil Scientist after completion operations in accordance with RMP criteria. If needed, skid trails will be subsoiled after use.

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 the EA did not identify any impacts of the Proposed Action that would be beyond those identified in the EIS and would not meet the objective of producing a sustainable supply of timber and other forest commodities.

Cultural clearances have been completed according to protocol. No consultation was required.

Consultation with the U.S. Fish and Wildlife Service for this project has been completed. The Biological Opinion (February 21, 2003) concluded that the action is " . . . not likely to jeopardize the continued existence of the spotted owl, murrelet, or bald eagle, and are not likely to adversely modify spotted owl or murrelet critical habitat”

Consultation with the National Oceanic and Atmospheric Administration (NOAA- fisheries) has been completed. Their Letter of Concurrence (July 11, 2003) concurred with BLM’s "not likely to adversely affect” determination for the OC coho salmon.

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 could occur to some of these resources, however, the impacts to resource values would not exceed those identified in the *Final - Roseburg District Proposed Resource Management Plan / Environmental Impact Statement* (PRMP/EIS). The Decision provides timber commodities with impacts to the environment at a level within those anticipated in the RMP/EIS.

Comments were solicited from affected tribal governments, adjacent landowners and affected State and local government agencies. No comments were received from these sources. During the thirty day public review period, comments were received from one organization. None of the comments provided new information, showed flawed analysis or assumptions, or revealed an error in data that would alter the conclusions of the analysis thereby requiring new analysis or reconsideration of the proposed action. Several comments warrant clarification:

● The Riparian Reserves will be thinned down to 60 to 30 trees per acre. This is a very heavy thinning . . . we are not told the age or average DBH of the stand . . .

The Silvicultural Prescription (pg. 7) says "Mark to retain on average 70 square feet of basal area per acre in large dominant and co-dominant trees including hardwoods". Basal area is the cross sectional area of trees at DBH, including the bark, stated in square feet on a per acre basis. A 14 inch tree has approximately one square feet of basal area. Theoretically if all the trees were the same size then there would be 70 fourteen inch trees per acre. The EA (pg. 6) cites that the Riparian Reserve would have ". . . 30-60 stems per acre after thinning and RMZ treatment except in areas of potential instability (pg. 9) where heavier retention would be prescribed." Thinnings are marked by basal area and not numbers of trees per acre; however the EA gave a range of trees per acre because it is easier for the reader to visualize than basal area. This Decision (pg. 1) has already addressed the inadequacy of describing the stand in terms of stems per acre when only dominant and co-dominant trees were intended to be included in this description. The lower limit of 45 trees per acre would result in a theoretical stand of trees with a diameter of nearly 17 inches.

● 14 acres of road right-of-ways will be clearcut, including 150 feet of new roads in Riparian Reserves (pg 7). This is excessive. More helicopter logging should have been proposed . . .

Helicopter logging is very expensive in part due to the heavy consumption of fuel and is an option used as last resort only if the area cannot be accessed in any other way or if there are over riding environmental concerns that would best be resolved through helicopter logging. The EA analysis did not identify any concerns that would be resolved through helicopter logging. Access will be provided by roads that will be predominantly temporary roads that will be constructed on stable low-impacting locations.

● . . . only snags over 20" diameter will be protected (page 9). Why? . . . please move the diameter limit for snags to be protected down to 16" . . . There is no reason why a 16" snag in a Riparian Reserve shouldn't be protected as much as a 20" snag.

The EA cites 20 inches as the diameter of snags that would be retained. This is in keeping with the EIS (Appendix 226) which says "Wildlife trees (snags) will be greater than 20" DBH and at least 15 feet tall . . .". These trees are afforded special protection because that is the minimum size snag that has functional value to cavity users. However, trees smaller than this can be marked. The marking guide in the Silvicultural Prescription (pg. 7) states "All existing old growth trees, snags, and down logs are reserved. Down logs do not need to be painted. Mark snags with an 'S' with orange paint". This is carried forward into the timber sale contract into Section 40 (Timber Reserved from Cutting) which states "All snags in the Harvest Areas . . .". The contract in effect reserves all snags regardless of size; however, some of those in the smaller size class may not be able to survive logging. If these snags are cut or knocked over they will still provide an important function as down woody debris.

Compliance and Monitoring

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 (Jay K. Carlson) 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) protest. 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 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 Jay K. Carlson, Field Manager, Swiftwater Field Office, Roseburg District, Bureau of Land Management, 777 NW Garden Valley Blvd; Roseburg, OR. 97470, 541 440-4931.

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Jay K. Carlson, Field Manager Date
Swiftwater Field Office