

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

## **Halfway There Timber Sale**

### **Decision Document**

**November 10, 2015**

#### **SECTION 1 –THE DECISION**

##### **Decision**

The Half N Half Commercial Thinning and Density Management Environmental Assessment (EA) (NEPA#: DOI-BLM-OR-R040-2012-0011-EA), of which Halfway There is a part, proposed commercial thinning and density management of approximately 987 acres of young forest stands. It is my decision to authorize the Halfway There Timber Sale (Halfway There) as described under the Proposed Action Alternative in Chapter 2 (EA pgs. 6-21).

Halfway There will apply variable density thinning on approximately 275 acres located in the Upper Smith River Watershed in Section 33 of T. 20 S., R. 07 W. and Sections 3, 4 and 5 of T. 21 S., R. 07 W. Willamette Meridian (Figures 1-2). The silvicultural prescription will implement light, moderate and heavy thinning interspersed with untreated skip areas in second-growth forest stands that are 43-62 years old. The gap treatment is not included in the silvicultural prescription for Halfway There. Approximately four acres will be removed for the development of spur roads and rights-of-ways. Halfway There will provide approximately 7.017 million board feet (7.017 MMBF) of timber available for auction.

Updated information for this project is described below (q.v. pgs. 2-7). Approximately 155 acres of the 430 acres analyzed as Halfway There in the EA will not be treated at this time for the reasons described below under “Unit Configuration and Treatments”.

The Swiftwater Field Office initiated planning and design for this project to conform with the Roseburg District’s 1995 Record of Decision and Resource Management Plan (ROD/RMP). Halfway There includes lands within the General Forest Management Area (GFMA), Late Successional Reserve (LSR) and Riparian Reserve (RR) land use allocations.

The project design features that will be implemented as part of Halfway There are described on pages 11-21 of the EA under the Proposed Action Alternative. These project design features have been developed into contract stipulations and will be implemented as part of the timber sale contract.

## Updated Information

The updated information, described below, is not substantially different from the original proposal in the Action Alternative and does not alter the conclusions of the analysis.

### Plan Conformance

The thinning prescription for Halfway There was designed and trees were marked using management direction for Matrix, LSR and Riparian Reserve land use allocations under the 1995 ROD/RMP. The proposed prescriptions for Half N Half stands within LSRs 266 and 267 include gaps and heavy thinning to meet the objectives of accelerated late-successional conditions. Because these silvicultural treatments are outside the scope of recommendations included in the Assessments for LSRs 266 and 267, the Roseburg District requested review by the Interagency LSR Work Group. The Work Group determined that certain recommendations in the LSR Assessments, specifically small gap sizes and no heavy thinning, would not achieve the objectives of within-stand and landscape variability as supported by research completed subsequent to issuance of the Assessments. Based upon this review by the LSR Work Group, the Regional Ecosystem Office concurs with the Roseburg District's conclusion that the Half N Half silvicultural treatment to promote structural and vegetative diversity, including 5.3 acres (2 percent) of heavy thinning in Halfway There, is consistent with the Standards and Guidelines under the Northwest Forest Plan.

### Unit Configuration and Treatments

Of the 430 acres described in the EA (pg. 10) as the Halfway There project, thinning will occur on approximately 162 acres within GFMA, 15 acres within LSR and 98 acres within the Riparian Reserve land use allocations (Table 1; Figure 2). In addition, approximately 3 acres within GFMA, 0.1 acre within LSR and 0.5 acres within Riparian Reserve will be removed for the development of spur roads and right-of-ways on BLM lands (Table 1).

Halfway There will include approximately 40 acres of ground-based yarding and approximately 235 acres that will be cable-yarded (Figure 1). The EA displayed a combination of cable and ground-based yarding to harvest the 430 acres proposed for treatment. In addition, approximately four acres of timber will be removed through ground-based yarding for the development of spur roads and right-of-ways. Helicopter logging was considered as an alternative logging method but was determined to not be economically viable at this time (EA, pg. 21).

Approximately 155 acres of the 430 acres considered in the EA (pg. 10) will be excluded from this decision for the following reasons:

- Approximately 94 acres will be excluded from treatment at this time due to changes in timber harvest scheduling.
- Approximately 34 acres will be excluded from thinning because it is within no-harvest stream buffers (i.e. 35, 60 or 100 feet [EA, pg. 12] or within Riparian Reserves that will not be treated.
- Approximately 22 acres will be excluded from treatment because they are part of adjacent stands or are forest types where thinning is not appropriate at this time.
- Approximately five acres will be excluded from treatment to protect marbled murrelet platform trees and northern spotted owl suitable habitat within EA units.

**Table 1. Halfway There Units, Roads, and Land Use Allocations.**

Sale Unit No.	EA Unit	Township-Range-Section	Sale Unit Acres	Land Use Allocation (acres)			Roads/Right-of-Ways (acres)		
				GFMA	LSR	RR	GFMA	LSR	RR
1	5A	T21S-R07W-Sec. 5	14	13		1	0.5		
2	5C	T21S-R07W-Sec. 5	5	1		4	0.1		
3	5B	T21S-R07W-Sec. 5	5	4		1			
4	4A	T20S-R07W-Sec. 33 T21S-R07W-Sec. 4	58	25	15	18	0.6	0.1	
5	4A	T21S-R07W-Sec. 4	16	10		6			
6	3A & 3B	T21S-R07W-Sec. 3	168	107		61	0.8		
7	3C	T21S-R07W-Sec. 3	9	2		7	1.0		0.5
<b>Total</b>			<b>275</b>	<b>162</b>	<b>15</b>	<b>98</b>	<b>3.0</b>	<b>0.1</b>	<b>0.5</b>

**Roads and Spurs**

The spurs and roads in Halfway There have been re-numbered as shown in Table 2.

There will be approximately 5,477 feet (1.0 miles) of new spur road construction (Table 2; Figure 1) as part of Halfway There with approximately 680 feet within Riparian Reserves. The construction of Spur 10 to access Unit 7 will cross one intermittent stream. The EA (Table 4a, pg. 15) proposed approximately 1.51 miles of new construction in Halfway There, with 834 feet falling within Riparian Reserves. There will be less road construction than proposed in the EA because roads will not be constructed at this time to access units or portions of units that are not part of this decision. Spurs 10 and 11 (EA Spurs HTo and HTp) will be constructed to access Unit 7 (Figure 1). Approximately 170 feet of Spur 10 will be constructed through a stand with a birth date of 1780 however no large trees will be removed from this stand for road construction. Field review confirmed that construction of the spur will not preclude the remaining stand from continuing to function as suitable habitat.

To increase the economic viability of the timber sale, spurs will be rocked as described in Table 2 to allow for winter cable yarding opportunities. Approximately 81 percent of the Halfway There timber sale will be available for winter operations allowing harvest operations to take place outside of seasonal restrictions.

Approximately 6.3 miles of existing roads will be renovated for harvest operations (Table 2). The EA (Table 4a, pg. 15) proposed renovation of approximately 15.54 miles of existing roads in Halfway There. Proposed renovation will not occur at this time on roads that will not be needed for this timber sale.

Approximately 7,460 feet (1.4 miles) of roads will be decommissioned as part of Halfway There. The EA (Table 4a, pg. 15) proposed decommissioning of 2.09 miles of roads and spurs. Decommissioning will include installation of water bars, culvert removal, mulching with logging slash or straw, and blocking with a trench barrier, logging slash or gate (Table 2; EA, pg. 15). There will be less road decommissioning than proposed because road construction will not occur to access proposed units that are not part of this decision and therefore will not need to be decommissioned.

**Table 2. Halfway There Roads and Spurs**

Roads & Spurs		New Construction	Renovation	Surfacing		Decommissioning	
<i>(in Decision)</i>	<i>(in the EA)</i>	(feet)	(feet)	Existing	Proposed	(feet)	How Decommissioned
21-7-3.0	21-7-3.0		2,520	Rock			
21-7-3.10	Spur HT m	1,502		None	Rock		
21-7-3.4	21-7-3.4		1,490	Rock			
21-7-3.8	21-7-3.8		1,995	Rock			
21-7-3.9	21-7-3.9		985	Rock			
21-7-3.9	21-7-3.9		860	Native	Rock		
21-7-4.0	21-7-4.0		4,695	Rock			
21-7-4.1	21-7-4.1		12,095	Rock			
21-7-5.0	21-7-5.0		2,540	Rock			
21-7-5.3	21-7-5.3		2,020	Rock			
21-7-5.4	21-7-5.4		610	Rock			
Spur 1	Spur HT c	875	490	Native	Rock	1,365	Blade, water bar, block
Spur 2	Spur HT s	140		None	Rock	140	Blade, water bar, block
Spur 3	Spur HT d		2,070	Subsoiled	Rock	2,070	Blade, water bar, block
Spur 4	Spur HT e	415		None	Rock	415	Blade, water bar, block
Spur 5	Spur HT g	440		None	Rock	440	Blade, water bar, block
Spur 6	Spur HT h	130		None	Rock	130	Blade, water bar, block
Spur 7	Spur HT i	155		None	Rock	155	Blade, water bar, block
Spur 8	Spur HT j	150		None	Rock	150	Blade, water bar, block
Spur 9	Spur HT n	235		None	Rock	235	Blade, water bar, block
Spur 10	Spur HT o	1,065	300	None	Native	1,365	Blade, water bar, slash mulch, remove culvert, block
Spur 11	Spur HT p	370		None	Native	370	Blade, water bar, slash mulch, block
Spur 12	Spur HT r		625	Rock		625	Blade, water bar, block
<b>Totals</b>		5,477 (1.0 miles)	33,295 (6.3 miles)			7,460 (1.4 miles)	

## Northern Spotted Owl

Approximately 0.5 acres will be thinned with a light prescription within the 70-acre nest patch of the Smith Quarry (IDNO 4663O) northern spotted owl site which has not been occupied since 2006. Approximately 28 acres will be thinned with light and moderate prescriptions within the core areas of two northern spotted owl sites (Smith Quarry (IDNO 4663O) and Upper Johnson (IDNO 2041O)). Owls have not occupied these sites within the last 10 years. These core areas are not habitat-limited and canopy cover in the timber sale units will remain above 60 percent post-harvest thus the thinning will not affect the ability of these stands to function as dispersal habitat (EA pg. 41).

Consultation with the U.S. Fish and Wildlife Service has been re-initiated for the Halfway There timber sale due to the location of a new alternate nest site for the Hardenbrook Creek (IDNO 2056E) spotted owl site. The effects determination for the Halfway There timber sale remains *Not Likely to Adversely Effect* for the northern spotted owl because the proposed action is outside the nest patch and core area of the new site and the thinning treatment will maintain a sufficient amount and distribution of dispersal habitat within the home range.

## Pacific Fisher

The U.S. Fish and Wildlife Service proposed to list the Pacific fisher as a threatened species on October 7, 2014 (50 CFR 17; 79 FR 60419). The project is in the Coastal Oregon sub-region where fisher is likely extirpated (USFWS 2014, pg. 47)<sup>1</sup>. The Half N Half project, including Halfway There, is located approximately 70 miles north of the known occupied range of the fisher in Northern California/Southern Oregon and over 80 miles northwest of the Southern Oregon Cascades reintroduced population<sup>2</sup>. The area is not likely to be currently occupied by fishers (EA, Appendix A) and Halfway There is expected to have no effects to the species or its habitat, so further analysis will not be completed.

## Compliance and Monitoring

Compliance with this decision and the project design features described in the EA will be ensured by frequent on-the-ground inspections by the Contract Administrator. Monitoring will be conducted as directed in the Roseburg District's 1995 *Record of Decision and Resource Management Plan* (ROD/RMP) (pgs. 84-86) and as modified, refined, and clarified through plan maintenance as documented in the Roseburg District's *Annual Program Summary and Monitoring Reports*.

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<sup>1</sup> USDI-USFWS. 2014. Draft species report: fisher (*Pekania pennant*), west coast population. January 13, 2014. Pg. 47.

<sup>2</sup> USDI-FWS. 2014. Endangered and threatened wildlife and plants; threatened species status for west coast distinct population segment of fisher. Federal Register Vol. 79, No. 194. Pp. 60419-60443.

## SECTION 2 – THE DECISION RATIONALE

Chapter 2 of the EA describes a No Action Alternative and a Proposed Action Alternative. The No Action Alternative was not selected because it did not meet the stated purpose and need to produce forest products in support of the local economy; promote tree survival, growth and forest health; promote the development of late-successional stand characteristics in LSR; and promote vegetative and structural diversity in Riparian Reserves (EA pg.2).

The Proposed Action Alternative was selected because it meets the purpose and need of the Half N Half project (EA pg. 2), providing substantial timber volume in a cost-efficient manner while improving tree survival and growth in the residual stands, enhancing late-successional characteristics in LSR and structural and vegetative diversity in Riparian Reserves. Halfway There will provide approximately 7.017 million board feet of timber, of which 4.2 million board feet will be attributed to the Allowable Sale Quantity, that will be available for auction to local industry and thus provide revenue to support Federal and County governments. Approximately 81 percent of the Halfway There timber sale will be available for winter harvest operations outside of seasonal restrictions thus increasing the economic viability of the sale.

The thinning prescription for Halfway There was designed and trees were marked using management direction for Matrix, LSR and Riparian Reserve land use allocations under the 1995 ROD/RMP. The variable density thinning implemented in Halfway There will promote the development of diverse and structurally complex stands to enhance late-successional characteristics in LSR and Riparian Reserves. The thinning prescription implemented in Halfway There in GFMA will provide timber volume for the current market and improve tree growth and survival in the young stands for volume production in the future.

In the Upper Smith River Watershed, the total Riparian Reserve width for fish-bearing streams is 400 feet which is two site potential tree heights on both sides of the stream. The total Riparian Reserve width is 200 feet, one site potential tree height on both sides of the stream, for non-fish bearing streams and intermittent streams. The treatment prescription retains no-harvest buffers of 35 feet along intermittent streams, 60 feet along perennial streams, and 100 feet along fish-bearing stream channels. The outer portions of the Riparian Reserve will be thinned to variable densities to improve riparian vegetative and structural diversity, to produce stands that are more resilient to disturbance (EA pgs. 12, 65) and to meet restorative objectives of the Aquatic Conservation Strategy (EA pg. 66).

The Project Design Features described in the Half N Half EA (pgs. 9-21) will minimize soil compaction, limit erosion, and protect slope stability, wildlife habitat, fish habitat, air and water quality, as well as other identified resource values. The resource information contained in the EA and updated information presented in this document were reviewed and considered in selection of the action alternative and the decision to implement the Halfway There timber sale.

Based on the analysis of potential impacts contained in the Environmental Assessment, a Finding of No Significant Impact (FONSI) has been prepared for the Half N Half Commercial Thinning and Density Management project with a determination that the project, which includes Halfway There, would not have a significant impact on the human environment; therefore, an environmental impact statement will not be prepared.

## **Survey & Manage**

On December 17, 2009, the U.S. District Court for the Western District of Washington (District Court) issued an order in *Conservation Northwest et al. v. Bonnie et al.*, No. 08-1067-JCC (W.D. Wash.) (Coughenour, J.), granting Plaintiffs' motion for partial summary judgment and finding a variety of NEPA violations in the BLM and USFS 2007 Record of Decision eliminating the Survey and Manage mitigation measure. Judge Coughenour deferred issuing a remedy in his December 17, 2009 order until further proceedings, and did not enjoin the BLM from proceeding with projects. Plaintiffs and Defendants entered into settlement negotiations that resulted in the 2011 Survey and Manage Settlement Agreement, adopted by the District Court on July 6, 2011.

The Ninth Circuit Court of Appeals issued an opinion on April 25, 2013, that reversed the District Court's approval of the 2011 Survey and Manage Settlement Agreement. The case is now remanded back to the District Court for further proceedings. This means that the December 17, 2009, District Court order which found National Environmental Policy (NEPA) inadequacies in the 2007 analysis and records of decision removing Survey and Manage is still valid.

Previously, in 2006, the District Court (Judge Pechman) had invalidated the agencies' 2004 RODs eliminating Survey and Manage due to NEPA violations. Following the District Court's 2006 ruling, parties to the litigation had entered into a stipulation exempting certain categories of activities from the Survey and Manage standard (hereinafter "Pechman exemptions").

Judge Pechman's Order from October 11, 2006 directs: "Defendants shall not authorize, allow, or permit to continue any logging or other ground-disturbing activities on projects to which the 2004 ROD applied unless such activities are in compliance with the 2001 ROD (as the 2001ROD was amended or modified as of March 21, 2004), except that this order will not apply to:

- A. *Thinning projects in stands younger than 80 years old (emphasis added):*
- B. *Replacing culverts on roads that are in use and part of the road system, and removing culverts if the road is temporary or to be decommissioned;*
- C. *Riparian and stream improvement projects where the riparian work is riparian planting, obtaining material for placing in-stream, and road or trail decommissioning; and where the stream improvement work is the placement large wood, channel and floodplain reconstruction, or removal of channel diversions; and*
- D. *The portions of project involving hazardous fuel treatments where prescribed fire is applied. Any portion of a hazardous fuel treatment project involving commercial logging will remain subject to the survey and management requirements except for thinning of stands younger than 80 years old under subparagraph A. of this paragraph."*

The Halfway There project is in conformance with the 2001 ROD (as amended or modified as of March 21, 2004) and applies the Pechman exemptions.

1. The proposed thinning in the Half N Half project includes no regeneration harvest and includes thinning only in stands less than 80 years old, thus meeting exemption A of the Pechman exemptions (October 11, 2006 Order).
2. The location of Spur 10 (EA Spur HTo), that includes approximately 170 feet of road construction through a stand over 80 years old, has been surveyed applying the 2001 species list, thus this part of the Halfway There project is consistent with the 2001 *Record of Decision and Standards and Guidelines for Amendments to the Survey and Manage, Protection Buffer, and other Mitigation Measures Standards and Guidelines*, as incorporated into the Roseburg District Resource Management Plan. No Survey and Manage species were found.

The Halfway There project may still proceed even if the District Court sets aside or otherwise enjoins use of the 2007 Survey and Manage Record of Decision because the Pechman exemptions remain valid in such case. I have made the determination that Halfway There meets Exemption A of the Pechman Exemptions (October 11, 2006 Order) and the 2001 Record of Decision for Survey and Manage Species and therefore may proceed to be offered for sale.

## SECTION 3 – PUBLIC INVOLVEMENT

The BLM solicited comments from affected tribal governments, adjacent landowners, affected State and local government agencies, and the general public on the Half N Half Commercial Thinning and Density Management EA, which included the Halfway There project, during a 30-day public comment period from June 18, 2014 to July 18, 2014. Five sets of comments were received as a result of the public comment period.

Upon reviewing the comments, the following topics warrant clarification that is pertinent to the Halfway There project: 1) Heavy Thinning and Gaps; 2) Riparian Reserves; 3) Spotted Owls; 4) Marbled Murrelets; 5) Snags and Coarse Woody Debris; 6) Roads; 7) Carbon storage; and 8) Socio-economic Issues.

### 1. Heavy Thinning

Comments were received expressing concern that the heavy thinning prescription described in the EA was more like regeneration harvest and would remove too many resources such as snags and down wood from the stand.

*“Leaving 54 TPA is heavy thinning, not moderate thinning, and leaving 19 TPA is a regeneration harvest, not thinning at all. This EA proposes to thin too heavy and remove too many resources from the units, especially future snags.”*

*“Tables FV-4 and FV-5 do not disclose the effects of heavy thinning. They lump the effects of heavy thinning with two other prescriptions, which is misleading. These tables seem to imply that heavy thinning produces more very large trees (>30" dbh) but if the thinning treatment only leaves 19 tpa, then is unlikely to produce 41 very large trees.”*

Descriptions of the prescribed treatment in Halfway There are specified in the EA (pgs. 6-7) and the effects of those individual and combined treatments are described on pages 23-27. The heavy thinning treatment, defined as retaining an average of 19 trees per acre in the Half N Half project area, is a component of variable-density thinning (VDT), which was also defined in the EA (pg. 7) as *“a thinning method where at least two densities of trees are retained to promote stand heterogeneity. Provision of conditions conducive to the initiation and growth of tree regeneration is an objective of VDT to encourage understory development for the development of two-storied or multi-layered stands. In addition, VDT includes unharvested areas (e.g. no-harvest stream buffers and skips) and openings (e.g. gaps). An objective of VDT is to provide conditions conducive to the initiation and growth of tree regeneration thereby encouraging the development of two-storied or multi-layered stands through development of the understory.”*

The effect of variable-density thinning on young even-aged stands is the development of diversity and structural complexity (EA pg. 26). In contrast to VDT, a regeneration harvest in GFMA consists of only a single residual density of six to eight trees per acre (1995 ROD/RMP, pg. 150).

Tables FV-4 and FV-5 display predicted future conditions of live trees and snags for the stands treated with VDT. The heavy thinning prescription will not be implemented at the stand level. Heavy thinning will be implemented as a component of the VDT method applied at the stand level (Figure 2) thus the conditions shown in Tables FV-4 and FV-5 are for the entire stand not for each treatment area within each stand. The heavily thinned areas in VDT stands would produce the highest rates of tree diameter growth and would have an overstory canopy that would remain open long enough for the establishment, growth and long-term survival of understory vegetation (EA pg. 25). In combination with the other components of VDT, the 5.3 acres of heavy thinning that is included in Halfway There will add to the complexity of the post-treatment stand resulting in structural and vegetative diversity at the stand level.

BLM recognizes that suppression mortality is beneficial and will occur in skips and lightly thinned areas within the VDT stands. The four prescriptions included in Halfway There are intermixed in the treated stands so that the diverse effects of each prescription, such as the amount of suppression mortality that results in snags and down wood, will add variability across the post-treatment stand.

## 2. Riparian Reserves

Comments were received pertaining to Riparian Reserves including that: (a) some activities are not allowed (i.e. heavy thinning, gap creation) within Riparian Reserves since they would retard attainment of Aquatic Conservation Strategy (ACS) objectives; and (b) the 35 foot “no-harvest” buffer on intermittent streams is insufficient.

*“Heavy thinning and gaps in Riparian Reserves are not allowed because they do not enhance aquatic habitat – and that is the only reason allowed for extracting volume from reserves.”*

*“Intermittent streams will have a no-harvest buffer of only 35 feet. This is too small, and could include 0 trees. The BLM should widen this buffer, making sure at least one tree is left along the streams, and preferably more than one.”*

- a) Halfway There will meet ACS objectives at the site and watershed scale and in the short- and long-term. Based upon the restorative nature of the action, this project will not retard or prevent but will speed attainment of ACS objectives by creating structural and vegetative diversity. Therefore, this action is consistent with the ACS and its objectives at both the site and watershed scales (EA, pgs. 65-66 and Appendix C).

The heavy thinning prescription will only be implemented within Late-Successional Reserves in Unit 4 in Halfway There. Gaps are not included in the Halfway There timber sale units. Implementation of riparian thinning prescriptions including heavy thinning, in dense, overstocked, previously harvested stands will help restore adequate habitat to support riparian-dependent species at the site and watershed scales (EA, pg. 66, Appendix C). Thinning riparian areas will produce stands more resilient to disturbance from wind, flood, and fire. As tree growth rates and structural and species diversity increase, the thinned areas will develop late-seral characteristics in a shorter period of time than if left untreated (EA pgs. 24-27).

The time required for trees to attain large wood size (> 20 inches dbh) is expected to decrease. The cumulative increase in the availability of large wood to enter streams, coupled with increasing vegetative diversity in Riparian Reserves would contribute to the trend of gradually improving aquatic habitat in the Upper Smith River Watershed. When compared to the *No Action Alternative* that does not include riparian thinning, implementation would hasten the

attainment of healthy aquatic habitat capable of supporting the natural fish species mix and population variability typical of healthy coastal ecosystems (EA pg. 65).

- b) The no-harvest buffers (EA pg. 12) implemented in Halfway There are sufficient to protect streams. The EA (pg. 63) states that the no-harvest buffers of 35 feet on intermittent streams, 60 feet on perennial streams, and 100 feet on fish-bearing streams would provide root strength sufficient to maintain bank stability (USDI BLM 2008a), protect eroding banks, and prevent additional sediment from entering streams. Rashin *et al.* (2006) found that sediment delivery is unlikely when potential erosion features (e.g. skid trails and yarding corridors) are more than 33 feet (10 meters) from stream channels. As such, the no-harvest buffers reduce ground disturbance near streams and maintain an intact duff layer that would be effective at intercepting and filtering sediment from upslope sites and not concentrating in gullies or yarding/skidding trails (Rashin *et al.* 2006).

### 3. Northern Spotted Owls

*“This project thins .5 acres within the next patch for spotted owls, and 53 acres within a core area. This is unnecessary. There should have been an alternative that dropped these acres.”*

The thinning of 0.5 acres within a nest patch and 28 acres with two core areas for northern spotted owls will not affect the ability of these stands to function as dispersal habitat. The two owl sites (Smith Quarry (IDNO 4663O) and Upper Johnson (IDNO 2041O)) have not been occupied within the last 10 years. These core areas are not habitat-limited and canopy cover in the Halfway There timber sale units will remain above 60 percent post-harvest thus the implementation of the thinning will not affect the ability of these stands to function as dispersal habitat and will not cause a decline in productivity if these sites should become re-occupied by spotted owls (EA pg. 41).

### 4. Marbled Murrelets

Comments were received that stated that the protection of potential marbled murrelet nest trees was inadequate and that micro-site conditions would not be retained. Comments also asked for clarification of the protocol used for surveys.

*“The EA page 44 also tells us there is potential nesting murrelet trees [sic] in units that will be protected. “Trees immediately adjacent to platform trees that have interlocking canopies would be retained to maintain micro-site conditions and protect the platform tree.”*

*This protection is inadequate. Micro-site conditions are not retained by just a one tree-buffer. Micro-site conditions are susceptible to edge effects hundreds of feet away. A one-tree buffer to a suitable nest tree is inadequate protection for any potential murrelet. Murrelet nests are prone to predation due to edge impacts. Leaving one, or even two trees immediately adjacent does not solve this problem. The BLM should leave murrelets a larger no-treatment area around potential nest trees, or at least only light thinning adjacent to the potential nest site.”*

Also, *“The EA, page 20, tells us “three occupied sites [for marbled murrelets] were identified adjacent to nine of the units.” Heavy thinning and gaps adjacent to occupied sites could jeopardize those nests with predation.”*

*“On page 44 you reference occupancy surveys for marbled murrelets but do not explain what protocol was used.”*

The reference for the marbled murrelet survey protocol (EA pgs. 43-44) was inadvertently omitted. The statement should reference: Mack, *et al.* 2003 shown in References Cited in Chapter 4.

The retention of trees within a one site tree height buffer (200 feet, EA pg. 9) around platform trees is adequate to protect the micro-climate conditions for potential nest trees. This retention includes buddy trees, as defined in the EA (pg. 12), that have interlocking crowns with the platform tree providing canopy connectivity to protect micro-site conditions around the platform structure. This protection is based on the guidelines provided in the *Revised Policy for the Management of Marbled Murrelet Nesting Structure within Younger Stands*, otherwise referred to as the “*Residual Habitat Guidelines*”, developed by the U.S. Fish and Wildlife Service and the BLM.

In order to maintain microclimate conditions and avoid edge effects, a **light thinning** prescription will be implemented for those portions of units within 100 feet of adjacent suitable habitat as described in the EA (pg. 47). In addition, the thinning prescription will be implemented so that heavy thinning will not occur within one site tree distance (200 feet) of potential nest (ie. platform) trees or suitable habitat.

Because the Halfway There project implements these protections of marbled murrelet suitable and potential habitat, the *Biological Opinion on the Roseburg District Bureau of Land Management’s Fiscal Year 2014-2015 Program of Activities which may affect Spotted Owls, the Marbled Murrelet and Spotted Owl and Marbled Murrelet Critical Habitat* (FWS 01EOFW00-2013-F-0200) concluded that this action will not jeopardize the existence of the marbled murrelet or its Critical Habitat and will assist in the survival and recovery of the murrelet (EA, pg. 76).

##### 5. Snags and Coarse Woody Debris

Comments were received that the BLM did not provide adequate protection for existing snags and did not analyze the negative effects that thinning may have on future snag recruitment from the forest stands proposed for treatment.

*“EA page 11 states that ALL snags that pose a safety problem will be felled. No protection in the form of green-tree-retention buffering snags is offered as an alternative.”*

*“The EA failed to describe the negative impacts of capturing mortality and eliminating moset [sic] future snags. The EA also failed to describe the benefits of suppression mortality, such as smaller trees being used by wildlife or falling into streams. We are very concerned that heavy thinning “captures mortality”, delaying recruitment of snags and delaying development of critical components of old growth forests. This is especially critical in riparian reserves where recruitment of large wood is important.”*

As stated in the EA (pg. 11), conifer and hardwood snags in all land use allocations will be reserved from cutting unless they are a safety concern. This reservation with the exception for safety is the greatest protection available for existing snags that also complies with worker safety requirements established by the Occupational Safety and Health Administration.

Snags felled for safety reasons in the LSR or Riparian Reserve would be retained on site as coarse woody debris. Existing coarse woody debris in decay classes 3, 4, and 5 would be retained in GFMA lands, and all coarse woody debris would be retained in the LSR and Riparian Reserve (EA pg. 11).

The residual stands following harvest would provide a pool of candidate trees for future snag and coarse woody debris recruitment. Additional coarse woody debris and snags may be created incidentally through the harvest operations (e.g. damage leading to broken-out tops or individual tree mortality) or through weather damage (e.g. wind and snow break).

The EA did analyze the current snag condition with the predicted snag recruitment for stands 20 and 100 years after harvest as shown in Tables FV-2, FV-4 and FV-5. The EA describes that the No Action Alternative would produce more snags within 100 years through passive recruitment than the thinning alternative. The EA (pg. 27) also recognized that “thinning to reduce stand density involves a tradeoff between maintaining or improving individual tree growth rates and promoting understory growth that leads to multi-layered stand structure and reducing the accumulation of dead trees in the form of snags and down wood”.

However, after implementation of the thinning treatment, the snags that develop over the next 100 years are expected to be larger, with more resiliency and greater limb structure than those that would develop under the existing competitive stand conditions. The amount of snags will be within the range observed by Spies et al. (1988) in natural mature and old-growth Coast Range stands (EA, pg. 27).

## 6. Roads

Comments were received that inquired about the amount of road construction that would occur in older forests and spotted owl habitat.

*“Alternative 2 would build almost 3 miles of new roads. Some of this (.27 acres) would occur within forests over 230 years old (EA 32), and considered RA32 NSO habitat by the USFWS. Also impacted are the many acres of interior forests that would be fragmented, and cannot function as late-successional with a road through it.”*

Also, *“The BLM is required to do all Survey and Manage surveys in the forests over 80 years old to be clearcut for new roads. The EA failed to reveal the results of those surveys.”*

As stated in the Updated Information (q.v. pg. 3), Spurs 10 and 11 (EA Spurs HTo and HTp, respectively) will be constructed, and subsequently decommissioned, to access Unit 7. Approximately 170 feet of Spur 10 will be constructed through a stand with a birth date of 1780 however no large trees will be removed from this stand for road construction. Field review confirmed that construction of the spur will not preclude the remaining stand from continuing to function as suitable habitat.

The location of Spur 10 that occurs within a stand over 80 years old, has been surveyed applying the 2001 species list, to be consistent with the 2001 *Record of Decision and Standards and Guidelines for Amendments to the Survey and Manage, Protection Buffer, and other Mitigation Measures Standards and Guidelines*, as incorporated into the Roseburg District Resource Management Plan. No Survey and Manage species were found.

## 7. Carbon Storage

Comments were received regarding perceived discrepancies between the carbon storage analysis in the EA and a published study by Clark et al. (2011); whether or not underplanting in the treated stands would lead to additional carbon sequestration when compared to other thinning projects; and that analysis did not compare the No Action and Proposed Action Alternatives.

*“The Half N Half EA states that the carbon storage analysis was based on the Johnson Cleghorn EA, and not reanalyzed in this EA. Therefore, [sic] consider our Johnson Cleghorn carbon comments.”*

The carbon analysis presented in the Half N Half EA was not based solely on the Johnson Cleghorn EA. The EA says (pg. 75) that the BLM did not analyze carbon storage or emissions specifically for this project because there is sufficient information from analysis of four recent commercial thinning projects in the Swiftwater Field Office for the Decision Maker to make an informed decision between alternatives. Those four projects are Little River MMX EA, Elk Wings EA, Mud Den EA and Johnson Cleghorn EA. The Johnson Cleghorn comments that are similar in nature to those received for the Half N Half EA are addressed below.

*“The BLM has no basis to claim “Underplanting and ingrowth of natural regeneration” sequesters more carbon than the older trees would have sequestered if they had not been removed.”*

The Half N Half project does not include underplanting therefore no claim to the effects on carbon stores by underplanting or natural ingrowth is made in the analysis. The previously mentioned EA projects did not include underplanting so the carbon analyses for those thinning projects did not show additional sequestration of carbon through ingrowth, and are therefore representative of carbon analysis for Halfway There.

Comments stated that carbon should be analyzed at 100 years instead of 50 years to be consistent with studies of carbon modeling. Also, *“BLM uses an incorrect method that compares the carbon consequences “before and after” logging, instead of comparing the action and no-action alternatives at different times in the future”*

Carbon analyses for the four projects were based on a 50 year analysis period and presented information for the No Action and Proposed Action Alternatives. The Half N Half EA states on page 75:

“The analysis of each of these four projects shows that:

- The carbon emissions attributable to the projects, both individually and cumulatively, are of such small magnitude that it is unlikely to be detectable at any scale (global, continental or regional) and thus would not affect the results of any models now being used to predict climate change.
- Total carbon storage for the No Action Alternative of each project is higher than the total carbon storage for all Action Alternatives throughout the 50 year analysis period which is consistent with modeling by Clark et al. (2011, p. 50).”

The carbon analyses that are referenced in the EA do compare the effects before and after harvest. However, the No Action and Proposed Action Alternatives also compare the effects of harvest at 50 and 100 years into the future. The results of the analyses show a negligible impact on carbon emissions and storage at the regional, continental and global scales.

8. Socio-economic Issues

Comments were received that requested discussion of the socio-economic benefits of the Half N Half project that are used in making the final decisions for the proposed timber sales.

*“ . . . on page 5 [of the EA] there is a statement that the factors to be considered include “the degree to which the proposed project provides revenue to Federal and County governments from the sale of timber resources in support of local industry while managing the lands in a cost efficient manner. I suggest that in your final Decision document you provide discussion on this issue.”*

The Decision Rational (q.v. pg. 6) discusses the socio-economic benefits of the Halfway There timber sale in addition to the environmental and resource protections and benefits that were considered in development of the final decision.

The remaining comments did not raise substantive issues that would influence my Decision to implement Halfway There as described above (q.v. pgs. 2-7) and as part of the Half N Half Commercial Thinning and Density Management EA.

## SECTION 4 – 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 within 15 days of the first publication date of the notice of decision/timber sale advertisement in *The News-Review*, Roseburg, Oregon on November 17, 2015.

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.

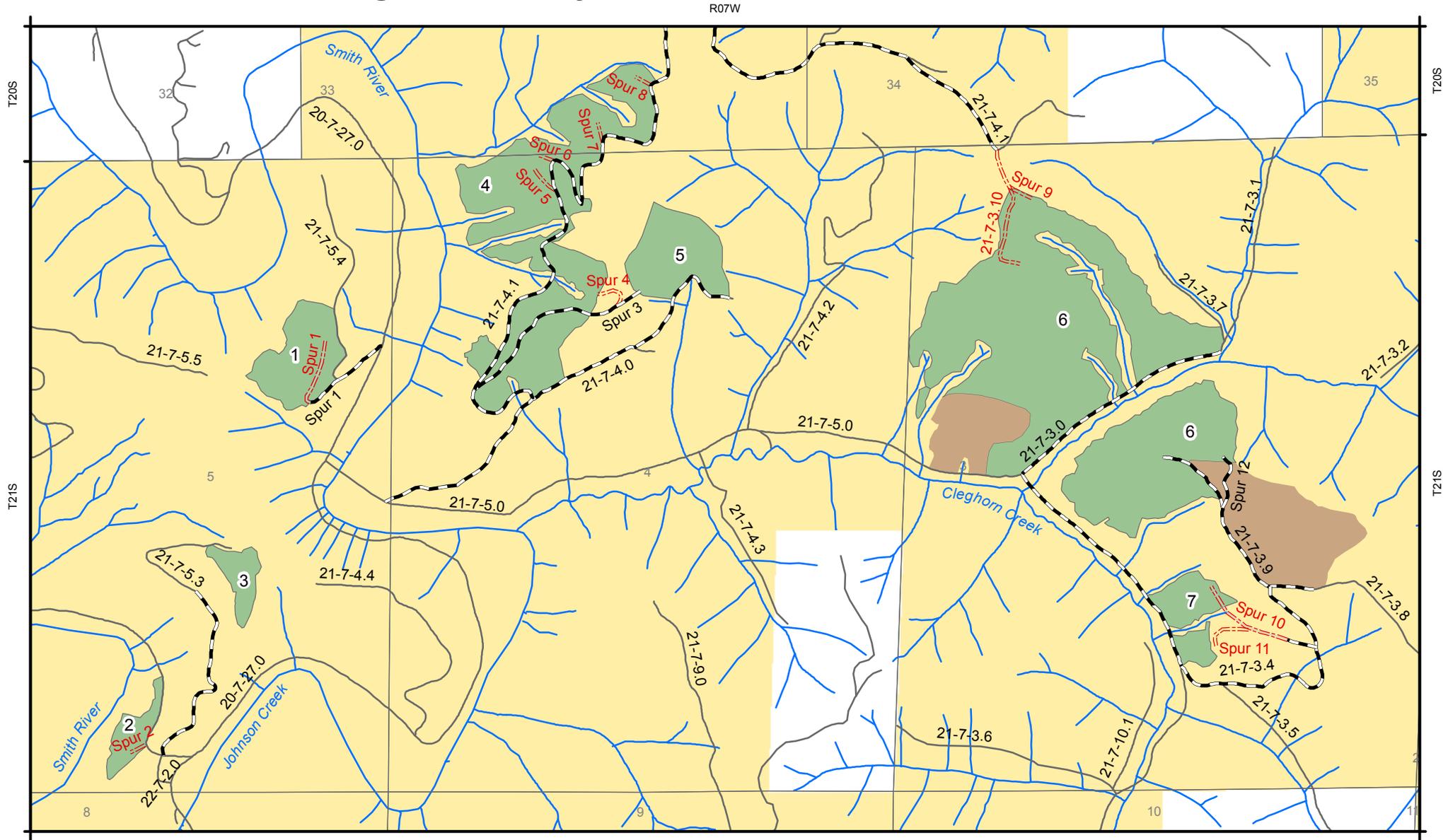
43 CFR § 5003.3 subsection (c) states: “Protests received more than 15 days after the publication of the notice of decision or the notice of sale are not timely filed and shall not be considered.” Upon timely filing of a protest, the authorized officer shall reconsider the project decision to be implemented in light of the statement of reasons for the protest and other pertinent information available to him. The authorized officer shall, at the conclusion of the review, serve the protest decision in writing to the protesting party(ies). Upon denial of a protest, the authorized officer may proceed with the implementation of the decision as permitted by regulations at 5003.3(f).

If no protest is received by the close of business (4:30 P.M.; Pacific Standard Time) within 15 days after first publication of the decision notice on November 17, 2015, this decision will become final. For further information, contact Max Yager, Field Manager, Swiftwater Field Office, Roseburg District, Bureau of Land Management, 777 NW Garden Valley Blvd; Roseburg, OR 97471; (541) 440-4930.

  
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Max Yager, Field Manager  
Swiftwater Field Office

Nov. 10<sup>th</sup>, 2015  
Date

# Figure 1. Halfway There Timber Sale Units and Roads

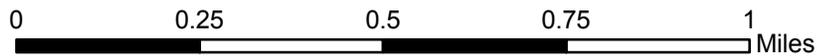


## Legend

### Halfway There Units

- Cable yarding
- Ground-based yarding
- BLM Administered Lands

- Road Construction
- Road Renovation
- Roads
- Streams



Date: 11/10/2015

No warranty is made by the Bureau of Land Management as to the accuracy, reliability or completeness of these data for individual or aggregate use with other data. Original data were compiled from various sources and may be updated without notification.



