



# United States Department of the Interior

## BUREAU OF LAND MANAGEMENT

COOS BAY DISTRICT OFFICE

1300 AIRPORT LANE, NORTH BEND, OR 97459

Web Address: <http://www.blm.gov/or/districts/coosbay> E-mail: [BLM\\_OR\\_CB\\_Mail@blm.gov](mailto:BLM_OR_CB_Mail@blm.gov)

Telephone: (541) 756-0100 Toll Free: (888) 809-0839 Fax: (541) 751-4303

### **In Reply Refer To:**

1792/5400 (ORC030)

DOI-BLM-OR-C030-2010-0001-EA

Fairview NWFP Project

***October 17, 2011***

Dear Citizen:

As a result of comments received on the Fairview NWFP (Northwest Forest Plan) Project Environmental Assessment (DOI-BLM-OR-C030-2010-0001-EA), released on June 30, 2011, we have updated the EA to provide additional clarification within some sections.

The Fairview NWFP Project EA (October 17, 2011) and signed Finding of No Significant Impact (FONSI) have been posted to the district's website: <http://www.blm.gov/or/districts/coosbay/plans/index.php>. This project is designed to implement management objectives and direction of the 1995 Coos Bay District Resource Management Plan. The Environmental Assessment analyzes a No-Action Alternative and a Proposed-Action Alternative for conducting commercial thinning, alder conversion, and density management treatments.

The treatments are to be accomplished by multiple timber sale contracts sold in FY 2012 through FY 2016 (estimated). A Decision Document would be prepared for public comment prior to each timber sale.

The added language within the EA is intended to clarify project planning considerations, the need for roads, the effects of treatment within the Riparian Reserves, Large Woody Debris effects, and provide additional explanation on how the project is consistent with Aquatic Conservation Strategy objectives. These additions do not change the proposed action or effects, and only provide additional clarity to the analysis.

The following section has been added to chapter 1 on page 7 to describe other alternatives considered. These alternatives were considered by the IDT, but were determined to be unreasonable alternatives.

### ***“ALTERNATIVES CONSIDERED BUT ELIMINATED FROM DETAILED STUDY***

#### ***Regeneration Units***

*An alternative to incorporate regeneration harvest would have yielded approximately 1200 acres of final harvest treatment. This would have reduced the amount of projected new road construction by approximately 10 percent compared to the Proposed Action Alternative. The regeneration alternative was dropped from detailed consideration.*

### ***Additional Helicopter Units***

*An alternative to incorporate use of helicopter yarding in substitution of transportation development within approximately 9 percent of the proposed acres would have reduced the amount of new road construction by approximately 16 percent compared to the Proposed Action Alternative. The environmental effects of reduced road construction mileage would not have been appreciably different from the Proposed Action Alternative due to the ridgetop or upper slope location of roads, and the implementation of project design features to minimize potential impact. This alternative was dropped from detailed consideration because it would result in deficit timber sales that would not provide cost effective management on public lands (as specified by Purpose #5 on page 2)."*

**Road Management:** The description on page 14 has been expanded to clarify the need to update the District's transportation system. The following statement has been added to the first paragraph: *"Development would involve redesign of the old road network to eliminate roads from the transportation system that had paralleled various stream networks for access or roads designed for downhill yarding harvest systems. The redesign of the road network is intended to lessen environmental impacts by reducing proximity to streams, sedimentation potential and overall ground disturbance."*

### **PROJECT DESIGN FEATURES**

**Aquatic Resources:** The text for the first PDF for this section on page 19 has been amended to provide clarity on how riparian no harvest buffers would be determined for perennial streams. Text has been added to the third sentence as follows: *"Perennial streams and other fish-bearing streams would have no-harvest buffers that vary between 60 and 100 feet horizontally depending on the results of Light Detection and Ranging (LiDAR) shade analysis. LiDAR can be used to accurately delineate the trees and shrubs that are tall enough to provide primary shade or shade from 10 a.m. to 2 p.m., the period of greatest solar loading (Figure II-1). No-harvest buffers would be specified for each proposed harvest unit to capture the primary shade zones and portions of the secondary shade zones that provide shade during the morning and afternoon hours."* An illustration, Figure II-1, has also been added on page 20.

### **VEGETATION - EFFECTS**

The following text has been added to the No Action Alternative at the end of the second paragraph on page 34: *"With the finite site resources being divided among many trees, the individual trees will have slower growth rates, and therefore will be smaller than trees growing in the more open areas of a stand (Oliver and Larson 1990, pp. 211-217)."*

**Riparian Reserves:** The descriptions on pages 35 and 38 have been revised to clarify woody debris and snag effects. The following statement has been added to the third paragraph on page 35: *"The higher stocking levels would increase the availability of small snags and down wood, but would delay attainment of wildlife habitats associated with large diameter trees. These include large diameter snags, large diameter down wood, prey substrates provided by large surface areas of coarse deep-fissured bark, deep canopies, large limbs, and large platforms, cavities, and other structures found in damaged or injured large trees (Neitro et al. 1985; Weikel and Hayes 1997)."*

*Carey et al. (1999) observed that suppression mortality in conifers does not contribute materially to cavity habitat or canopy gap formation. Small snags usually do not have top rot or cavities and do not stand very long. They do contribute to the wood debris amounts on the forest floor for a relatively short time before decaying.”*

The following paragraph has been added to the effects of the Proposed Action Alternative within Riparian Reserves on page 38: *“Thinning would remove mainly trees that would have died in the coming 20 years, from competition mortality, had there been no thinning. The no-treatment buffer would assure attainment of small wood entering the stream for short-term recruitment needs. As the stand grows and competition or natural disturbance causes mortality, the trees that die would be larger in the treatment area. Although, the dead trees would be larger than those recruited from the unthinned area, few of those dead trees would be large enough to provide long-lasting, large structure until the stands are at least 80-years of age (USDI, BLM 2001).”*

**Species and Structural Diversity:** The following text has been added to the first paragraph for this section on page 37: *“There is also a mix of untreated areas adjacent to proposed stands that would contribute to landscape diversity. These stands would be retained in current condition indefinitely due to inaccessibility or current structural attributes. Approximately 650 acres have already been withdrawn from proposed treatment after project scoping.”*

#### **HYDROLOGY - EFFECTS**

**Large Woody Debris Delivery to Streams:** Paragraphs and illustrations for the entire section have been added on pages 45–50 to clarify and enhance the analysis of alternative effects upon woody debris processes near streams.

#### **CONSISTENCY WITH AQUATIC CONSERVATION STRATEGY OBJECTIVES**

**Watershed Analysis:** This entire section has been replaced on page 57 to better explain the analyses completed and the relevant concepts that have been incorporated into the project.

**Watershed Restoration: “Applying silvicultural treatments to restore large conifers in Riparian Reserves.”** The following text has been added to the first paragraph of this section on page 58: *“The Standards and Guidelines (USDA and USDI 1994b) elaborate on the riparian vegetation restoration component as follows: “Active silvicultural programs will be necessary to restore large conifers in Riparian Reserves. Appropriate practices may include planting unstable areas such as landslides along streams and flood terraces, thinning densely-stocked young stands to encourage development of large conifers, releasing young conifers from overtopping hardwoods, and reforesting shrub and hardwood-dominated stands with conifers.”*

#### **AQUATIC CONSERVATION STRATEGY OBJECTIVES**

**ACS #1:** The text within the first paragraph of “Site Scale Evaluation” on pages 59-60 has been amended to read as follows: *“Under the proposed action, several functions of the Riparian Reserves including stream bank stability, leaf and particulate organic matter input to the stream, shade, erosion control, and microclimate would be maintained at the site scale in the short-term and long-term, via the network of no-harvest buffer and upslope trees remaining after harvest.”*

**CARBON STORES AND CARBON FLUX**

**Short-term Impacts:** The following text has been added to the first paragraph on page 107:

*“The FVS model predicted the stands would transfer approximately 60 percent of tree carbon to wood product storage. Life cycle assessment (LCI) mill survey data shows that approximately 50–70 percent of the aboveground biomass in a sustainably managed forest is currently utilized in product processing mills to make solid wood products along with paper and biofuel co-products (Lippke, Oneil, Harrison, Skog, Gustavsson & Sathre 2011).”*

Questions regarding these changes and clarifications to the Fairview NWFP Project EA should be directed to John Goering at (541) 751-4271.

Sincerely,

*/s/ A. Dennis Turowski*

A. Dennis Turowski  
Umpqua Field Manager