

Decision Record
South Scappoose Creek Project
Environmental Assessment # DOI-BLM-OR-S060-2011-0007-EA

I. INTRODUCTION

The Bureau of Land Management (BLM) conducted an environmental analysis documented in the *South Scappoose Creek Project Environmental Assessment* (EA # DOI-BLM-OR-S060-2011-0007-EA) and the associated project file. The proposed project was to commercially thin approximately 1,540 acres of 46- to 70-year-old, relatively dense, single-storied, even-aged, Douglas-fir-dominated stands and to regeneration harvest approximately 100 acres of 52- to 73-year-old stands comprised of hardwood-dominated stands, mixed hardwood/conifer stands, and dense single-story Douglas-fir stands. Additional connected actions include associated road construction, renovation, maintenance and decommissioning/stabilization, treatment of fuels, installation of one gate to control illegal garbage dumping, and the creation of Course Woody Debris – both snags and downed trees. The EA and Finding of No Significant Impact (FONSI) were made available for public review in September 2011. The FONSI was then signed on November 21, 2011.

II. DECISION

I have decided to implement the South Scappoose Creek Project as described in Alternative 2, the Proposed Action (EA pp.12-29). This decision is based on site-specific analysis in the South Scappoose Creek Project Environmental Assessment (EA # DOI-BLM-OR-S060-2011-0007-EA), the supporting project record, management recommendations contained in the *Scappoose Creek Watershed Analysis* (December 1996), as well as the management direction contained in the *Salem District Record of Decision/Resource Management Plan* (ROD/RMP) (May 1995), which were incorporated by reference into the EA. Hereafter, Alternative 2 is referred to as the “selected alternative”.

The project is expected to be implemented through four commercial timber sales, as follows:

Timber Sale Name	Estimated Total Acres	Anticipated Year of Sale (Fiscal Year)
Rabinsky's Cube	485	2013
#4	306	2014
Dutch Treat	453	2015
Lucky 13	391	2016

In addition to the four timber sales above, the project includes road construction, renovation, maintenance and decommissioning/stabilization, treatment of fuels, installation of one gate to control illegal garbage dumping, and coarse woody debris (CWD) creation. A portion of the CWD management strategy within the thinning treatment units will be implemented under the timber sale contracts; additional snags or down wood may be added following 2 to 4 years of post-harvest monitoring.

Modifications:

The identification of a previously unmapped stream within T3N, R3W section 1 (SWSW) has resulted in a minor modification of treatment unit 16, which in the EA was proposed for regeneration harvest. A Riparian Reserve width of one site-potential tree height (240 feet) totaling approximately 3.5 acres in size was configured along the length of both sides of this perennial, non-fish bearing stream. Under this modification the stream will be protected with a no-harvest 60 foot buffer, and the stand within the remaining 180 feet of the Riparian Reserve is very similar to the adjacent stand proposed for thinning and will therefore be treated with a similar silvicultural thinning prescription to that of unit 2.

Decision Summary:

Timber Harvest: Including the modification described above, the selected alternative is to commercially thin approximately 1544 acres and to regeneration harvest approximately 96 acres (see EA Figures 3 – 10 located in *EA section 8.1*).

The project includes the application of a thinning prescription to approximately 1544 acres of 46- to 70-year-old, relatively dense, single-storied, even-aged, Douglas-fir-dominated stands (see EA Table 2). Treatments include thinning the Douglas-fir stand component, generally retaining conifers other than Douglas-fir. Treatments will be designed to retain legacy trees, trees with structural deformities, existing down wood and snags, and a component of trees in the suppressed and intermediate crown classes.

The Matrix Land Use Allocation (LUA) is divided into two subcategories - General Forest Management Area (GFMA) and Connectivity/Diversity Blocks (CON); the South Scappoose Creek Project is located within both of these subcategories of the Matrix LUA. Specifically, within the CON and GFMA LUAs the project will proportionally thin the units to various densities. Proportional thinning involves thinning across all tree size classes and will be a different management approach from the more common “thinning from below” strategy. This will result in a degree of variation in trees per acre and canopy layers. Proportionally thinning these stands will capture some of the suppressed trees while still leaving some for future competition mortality. The intermediate, co-dominant and dominant trees will also be thinned. This will result in these stands having approximately the same diameter distribution as they do now and at the same time accelerate growth throughout the stand. The co-dominant and intermediate trees would be expected to be released and continue putting on volume for a future regeneration harvest. Some of the suppressed trees would be expected to release and start growing vigorously while others would be expected to fall out of the stand over time and therefore provide continued snag and down wood recruitment. Relatively open areas and landings in the thinning units will be evaluated for planting with shade-tolerant conifers.

Within the Riparian Reserve LUA the project includes thinning from below to varying basal area retentions. Thinning from below will result in the largest trees within the stand being retained. The retained trees would be expected to develop under accelerated growth rates and become larger trees faster. Over time, some of the large trees will die or be blown down and thus contribute to snags and down wood habitat, and/or stream structure. In the thinning from below prescription, the hardwoods will be thinned through but will be favored for retention to promote a multi-layered canopy and habitat diversity. In addition to hardwoods and the largest trees in the stands, retained trees will also include

all western redcedars and trees with characteristics desirable to wildlife.

The project also includes a total of approximately 96 acres of regeneration harvest in the GFMA and CON LUAs. Regeneration harvest areas are forested with 52- to 73-year-old stands comprised of hardwood-dominated stands, mixed hardwood/conifer stands, and dense single-story Douglas-fir stands. The regeneration harvests will be retaining approximately 14 to 30 trees per acre (in GFMA and CON, respectively). The leave trees will be a mix of the species present in the stand but will favor some of the largest trees in the stand, western redcedar and trees with characteristics desirable to wildlife with the expectation that a portion of the retained trees will be windthrown to provide down wood habitat. Existing down wood and snags will be retained as coarse woody debris. The treatment areas will be replanted with a mixture of native species.

The additional descriptions of timber harvest operation contained within EA Section 2.4.1 (EA pp. 12-15) and the design features for timber harvest described in EA Section 2.4.2 (EA pp. 21-29) are incorporated into the selected alternative.

Road Work: To facilitate implementation of the selected alternative, approximately 5.53 miles of new road construction will occur. Of this, approximately 1.37 miles will be rock-surface and 4.16 miles will be natural-surface (no rock will be added). Approximately 4.79 miles of this new road construction will be on lands within the Matrix LUA and 0.87 miles will be within the Riparian Reserve LUA. All new road construction within the Riparian Reserves will be temporary. New natural-surface roads and landings will be decommissioned and new rock-surface roads will be stabilized following timber harvest and site preparation activities.

Approximately 7.18 miles of existing roads will be renovated as necessary. This will include brushing, clearing and grubbing, blading, drainage structure improvement or replacement, and rocking where needed. Of the roads to be renovated, 4.42 miles are natural-surface and 2.76 miles are rocked. Of the roads to be renovated, all the natural-surface roads will be decommissioned following timber harvest and site preparation activities. Approximately 0.31 miles of renovated rocked road will be stabilized as well.

Approximately 22.30 miles of roads will have maintenance performed prior to log hauling or rock hauling from private source in T3N, R3W section 2. All the roads to be maintained are gravel-surfaced. Maintenance will consist of cutting vegetation from the roadbed, ditches and adjacent to the road; blading and shaping the roadbed and ditches; repairing small slides and slumps; maintaining, repairing, adding cross drainage; replacing undersized stream-crossing culverts; replacing damaged cross drain culverts; and adding rock to replace depleted rock surfaces.

All new, natural-surface road construction, and approximately 4.42 miles of renovated existing natural-surface roads will be decommissioned. Decommissioning will consist of removing stream-crossing culverts, decompacting, water barring, seeding or planting with native species, and restricting OHV use.

All new road construction being analyzed as rocked roads will be stabilized. Stabilization of rocked roads will consist of removing stream-crossing culverts, water barring, and restricting OHV use. Restricting OHV use may include the strategic placement of boulders, logs, root wads, or other types of earthen barriers. If roads that are analyzed as being rocked are used as natural-surfaced instead,

these roads will be decommissioned instead of stabilized following timber harvest and site preparation activities.

Additional descriptions of the road work contained within EA Section 2.4.1 (EA pp. 14-19) and design features for road work described in EA Section 2.4.2 (EA p. 24) are incorporated into the selected alternative.

Fuels Treatments: Fuel treatment strategies will be implemented on portions of the project areas to reduce both the intensity and severity of potential wildfires in the long term (after fuels reduction has occurred) and for site preparation in regeneration harvest units, thinning harvest units, or in gaps created within thinning harvest units. Post-harvest fuels hazard surveys will be conducted and site-specific treatments will be recommended. A variety of fuels prescriptions may be implemented including slashing brush, lopping slash and brush, lopping and scattering of slash, pullback of slash from property lines and roadsides, hand or machine piling and burning, swamper burning, landing piling and burning, or selling the material as firewood. These treatments may occur along roads or property lines, on landings, within regeneration and commercial thinning harvest units, or other areas within the harvest units such as heavily thinned “gap” areas where the fuel load is determined to be hazardous, and/or where underplanting of trees is recommended.

Gate Installation: A gate will be installed on existing BLM spur road 3N-2-29.3 located in section 29 to aid in the control of the current illegal dumping occurring at the end of this road.

CWD Management: A portion of the CWD management strategy within the thinning treatment units will be implemented during the timber sales; this portion includes some of the reserve trees incidentally felled or topped for operational purposes (intermediate support and/or lift trees, yarding corridor construction) being retained on site rather than sold to the purchasers. Retention of these trees will work toward achieving the desired CWD objectives within the thinning units and will include up to approximately one topped tree and one felled tree per acre within sections 7, 9, 11, 19 and 29 and up to approximately two topped trees and two felled trees per acre within sections 1 and 13. All reserve trees within the regeneration harvest units that are felled or topped for operational purposes will be retained for CWD.

The harvest units will be monitored for 2 to 4 years following harvest to evaluate the amount of additional blow down and mortality post-harvest to determine if additional treatments are needed to meet habitat objectives. If it is determined necessary to augment the CWD retained during the timber sales and post-harvest blow-down/mortality, additional felling of green trees or snag creation may be implemented, depending on the availability of funding. These treatments will focus on Douglas-firs, generally 20 to 30 inches dbh in order to meet adequate levels of CWD on those acres determined to be deficient. This portion of the CWD management strategy will be implemented separately from the timber sales.

III. COMPLIANCE WITH DIRECTION

The Salem District initiated planning and design for this project to conform and be consistent with the Salem District’s 1995 Record of Decision and Resource Management Plan (1995 ROD/RMP). Following the March 31, 2011 decision by the United States District Court for the District of Columbia in Douglas Timber Operators et al. v. Salazar, which vacated and remanded the administrative

withdrawal of the Salem District's 2008 Record of Decision and Resource Management Plan (2008 ROD/RMP), we evaluated this project for consistency with both the 1995 ROD/RMP and the 2008 ROD/RMP. Based upon this review, the selected alternative contains some design features not mentioned specifically in the 2008 ROD/RMP. The 2008 ROD/RMP did not preclude use of these design features, and the use of these design features is clearly consistent with the goals and objectives in the 2008 ROD/RMP. Accordingly, this project is consistent with the Salem District's 1995 ROD/RMP and the 2008 ROD/RMP.

Survey and Manage Species Review:

The South Scappoose Creek Project is consistent with court orders relating to the Survey and Manage mitigation measure of the Northwest Forest Plan, as incorporated into the Salem District Resource Management Plan.

On December 17, 2009, the U.S. District Court for the Western District of Washington issued an order in *Conservation Northwest, et al. v. Sherman, et al.*, No. 08-1067-JCC (W.D. Wash.), granting Plaintiffs' motion for partial summary judgment and finding NEPA violations in the *Final Supplemental to the 2004 Supplemental Environmental Impact Statement to Remove or Modify the Survey and Manage Mitigation Measure Standards and Guidelines* (USDA and USDI, June 2007). In response, parties entered into settlement negotiations in April 2010, and the Court filed approval of the resulting Settlement Agreement on July 6, 2011. Projects that are within the range of the northern spotted owl are subject to the survey and management standards and guidelines in the 2001 ROD, as modified by the 2011 Settlement Agreement.

The South Scappoose Creek Project is consistent with the Salem District Resource Management Plan/Forest Land and Resource Management Plan as amended by 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* (2001 ROD), as modified by the 2011 Settlement Agreement.

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 2001 ROD 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;
- 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."

Per the 2011 Settlement Agreement, the 2006 Pechman Exemptions remain in force:

“The provisions stipulated to by the parties and ordered by the court in Northwest Ecosystem Alliance v. Rey, No. 04-844-MJP (W.D. Wash. Oct. 10, 2006), shall remain in force. None of the following terms or conditions in this Settlement Agreement modifies in any way the October 2006 provisions stipulated to by the parties and ordered by the court in Northwest Ecosystem Alliance v. Rey, No. 04-844-MJP (W.D. Wash. Oct. 10, 2006).”

The commercial thinning portion of the South Scappoose Creek Project meets Exemption A because it entails no regeneration harvest and entails thinning only in stands less than 80 years old. The regeneration harvest portion of the South Scappoose Creek Project does not meet a Pechman Exemption and therefore has been surveyed to protocol for the appropriate species. Survey protocols on these acres were completed November 16, 2011.

Northern Spotted Owl (NSO) Status Review:

The following information was considered in the analysis of the selected alternative: a/ *Scientific Evaluation of the Status of the Northern Spotted Owl* (Sustainable Ecosystems Institute, Courtney et al. 2004); b/*Status and Trends in Demography of Northern Spotted Owls, 1985-2003* (Anthony et al. 2004); c/ *Northern Spotted Owl Five Year Review: Summary and Evaluation* (USFWS, November 2004); and d/*Northwest Forest Plan – The First Ten Years (1994-2003): Status and trend of northern spotted owl populations and habitat, PNW Station Edit Draft* (Lint, Technical Coordinator, 2005). In summary, although the agencies anticipated a decline of NSO (Northern Spotted Owl) populations under land and resource management plans during the past decade, the reports identified greater than expected NSO population declines in Washington and northern portions of Oregon, and more stationary populations in southern Oregon and northern California.

The reports did not find a direct correlation between habitat conditions and changes in NSO populations, and they were inconclusive as to the cause of the declines. Lag effects from prior harvest of suitable habitat, competition with Barred Owls, and habitat loss due to wildfire were identified as current threats; West Nile Virus and Sudden Oak Death were identified as potential new threats. Complex interactions are likely among the various factors. This information has not been found to be in conflict with the NWFP or the RMP (*Evaluation of the Salem District Resource Management Plan Relative to Four Northern Spotted Owl Reports, September 6, 2005*).

IV. ALTERNATIVES CONSIDERED

Alternatives Considered but Not Analyzed in Detail:

None

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, pages 12-29.

V. DECISION RATIONALE

Considering public comment, the content of the EA and supporting project record, the management recommendations contained in the Scappoose Creek Watershed Analysis, and the management direction contained in the ROD/RMP, I have decided to implement the selected alternative as described above. The following is my rationale for this decision.

1. The selected alternative:
 - Meets the purpose and need of the project (EA section 1.2).
 - Complies with the *Salem District Record of Decision and Resource Management Plan*, May 1995 (RMP) and related documents which direct and provide the legal framework for management of BLM lands within the Salem District (EA section 1.3, pp. 6-9).
 - Is fully compliant with *The Record of Decision and Standards and Guidelines for Amendments to the Survey and Manage, Protection Buffer, and other Mitigation Measures Standards and Guidelines* (January 2001).
 - Considers new information on the northern spotted owl (DR p.4).
 - Will not have significant impact on the affected elements of the environment beyond those already anticipated and addressed in the RMP/EIS.
 - Has been adequately analyzed.
2. The No Action alternative was not selected because it does not meet the Purpose and Need directly, or delays the achievement of the Purpose and Need (EA section 1.2).

VI. PUBLIC INVOLVEMENT/CONSULTATION/COORDINATION

Scoping:

External scoping (seeking input from people outside of the BLM) was conducted by means of a scoping letter for the South Scappoose Creek Project sent out to a total of 21 county, state and federal government agencies, organizations, associations, and interested parties on the Tillamook Resource Area mailing list on February 17, 2011. This scoping letter was also posted to the BLM's Salem District website. A Notice for Public Comment was published in *The South County Spotlight* newspaper of Scappoose Oregon on February 23, 2011. Finally, a description of the proposal was included in the Salem District, Bureau of Land Management Project Updates for the spring and summer of 2011 which were mailed to more than 1000 individuals, organizations and agencies.

As a result of this scoping effort, nine letters providing comments were received. In addition to the letters, three phone calls were received by individuals requesting additional information or wishing to provide comment. A summary of the public comments received and BLM responses are contained in Appendix 1 of the EA. The scoping comment letters are available for review at the Tillamook Resource Area Office, 4610 Third Street, Tillamook, Oregon.

Comment Period and Comments:

Based on the original scoping responses, a notification of availability of the South Scappoose Creek Project EA was mailed to nine agencies, individuals and organizations on September 14, 2011.

Additionally, a legal notice was placed in *The South County Spotlight* newspaper soliciting public input on the action on September 21, 2011 and the EA was posted to the BLM's Salem District website. On October 13, 2011, Tillamook Resource Area staff members provided a field tour of the South Scappoose Creek Project Area as requested by the Scappoose Bay Watershed Council. The tour was attended by approximately 22 interested persons.

A total of three written comment letters or e-mails were received during the 30 day comment period for the EA. A summary of these comments and BLM responses can be found in Appendix A of this Decision Record.

Consultation/Coordination:

Wildlife Consultation

The spotted owl will be affected by this project through the modification and removal of dispersal habitat in a region of northwest Oregon which currently contains an insufficient quantity of habitat to facilitate owl dispersal. While the modification of approximately 1544 acres of dispersal habitat will occur through commercial thinning, these acres will be in a condition to continue to function in the same capacity after treatment as before. Approximately 96 acres of dispersal habitat will be treated with regeneration harvest treatments and removed from a condition to function as spotted owl dispersal habitat.

There are a few unsurveyed large trees with potentially suitable murrelet nesting platforms near a few of the treatment units. These trees would be protected and managed in accordance with Option 3 as described by the Level 2 Team for the North Coast Planning Province. Activities including road construction and timber felling and yarding could occur within 300 feet of these few trees (the disruption distance for murrelets) during the murrelet breeding season resulting in a very minor potential for disturbance.

Due to the impacts to spotted owl habitat and the minor potential for disturbance to murrelets, consultation with the U.S. Fish and Wildlife Service is warranted and will be completed either programmatically within the appropriate year's batched Biological Assessment or through a project-specific consultation as appropriate.

As a part of the ESA streamlined consultation process, on October 25, 2011 a presentation addressing the impacts of the South Scappoose Creek project was given to the interagency North Coast Planning Province Level I Team (terrestrial sub-group) in Salem Oregon.

Fisheries Consultation

It is anticipated that consultation with the National Marine Fisheries Service on the potential effects of the South Scappoose Creek project upon Lower Columbia River coho salmon and Lower Columbia River chinook will not be completed or required based on the fact that the project has been determined to be of no effect upon these species.

Consultation for Magnuson-Stevens Fisheries Conservation and Management Act Essential Fish Habitat for the South Scappoose Creek project is also not required based on the lack of identified impacts to fish habitat.

VII. CONCLUSION

Review of Finding of No Significant Impact

I have determined that change to the Finding of No Significant Impact covering the South Scappoose Creek Project is not necessary because I've considered and concur with information in the EA and FONSI and this Decision Record. No new information was provided that lead me to believe the analysis, data or conclusions are in error or that the selected action needs to be altered. The selected action will not have effects beyond those already anticipated and addressed in the RMP EIS.

Supplemental or additional information to the analysis in the RMP EIS in the form of a new environmental impact statement is not needed for the reasons described in the South Scappoose Creek Project Finding of No Significant Impact.

Administrative Review Opportunities

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 5003, protests of this decision may be made within 15 days of the publication of a notice of decision in a newspaper of general circulation. This notice of decision will be published in *The South County Spotlight* newspaper of Scappoose Oregon on or before **November 23, 2011**. To protest this decision a person must submit a written protest to Tillamook Field Manager, 4610 Third Street, Tillamook, Oregon 97141 by the close of business (4:30 p.m.) on **December 8, 2011**. The protest must clearly and concisely state the reasons why the decision is believed to be in error.

Any objection to the South Scappoose Creek Project or my decision to go forward with it must be filed at this time in accordance with the protest process outlined above.

At the time of advertisement for the timber sale (Notice of Sale), what constitutes a protestable decision is limited to 1) whether there has been new BLM direction requiring a change from that in the South Scappoose Creek Project EA and/or 2) changes between the timber sale design as described in the South Scappoose Creek Project EA and that in the final timber sale contracts.

As interpreted by BLM, the regulations do not authorize the acceptance of protests in any form other than a signed, written hard copy that is delivered to the physical address of the BLM Tillamook Resource Area Office. If no protest is received by the close of business (4:30 pm) on **December 8, 2011**, this decision will become final. If a timely protest is received, the project decision will be reconsidered in light of the statement of reasons for the protest and other pertinent information available, and the Tillamook Resource Area will issue a protest decision.

Approved by: /s/ Stephen M. Small
Stephen M. Small
Tillamook Resource Area Field Manager

 11/23/11
Date

APPENDIX A:

RESPONSE TO PUBLIC COMMENTS RECEIVED ON THE SOUTH SCAPPOOSE CREEK PROJECT ENVIRONMENTAL ASSESSMENT AND FONSI (EA# DOI-BLM-OR-S060-2011-0007-EA)

On September 14, 2011, a notice stating that the South Scappoose Creek Project EA was available for public comment was sent to 9 individuals, organizations and agencies (Project Record Documents 34 and 37). A legal notice was placed in *The South County Spotlight* newspaper soliciting public input on the action on September 21, 2011. The EA was posted to the BLM's Salem District website. On October 13, 2011, Tillamook Resource Area staff members provided a field tour of the South Scappoose Creek Project Area as requested by the Scappoose Bay Watershed Council; the tour was attended by approximately 22 interested persons.

A total of three written comment letters or e-mails were received during the 30-day comment period for the EA (Project Record Documents 38–40). A summary of these comments and BLM responses can be found below.

Project Record Document 38 – Doug Heiken – Oregon Wild

Introductory General Comment: *“To supplement our scoping comments below, please consider the following comments on the EA”*

BLM Response: Oregon Wild scoping comments were addressed in EA Appendix 1

Comment 1: *“It is very important to recognize the landscape context of this project. These are isolated BLM parcels within a large area of mostly industrial timberlands which lack large or old trees, lack stream protection, lack snags, lack structural diversity and complexity, and lack large stores of carbon. As such, the BLM lands must carry some extra weight in terms of protecting water quality, storing carbon, providing high quality habitat types that are not well-represented on industrial forestlands (e.g. snags, down wood, large old trees, vegetation diversity, stream buffers, dense multi-layered canopy). The NEPA analysis should carefully disclose the impacts on these key resources.”*

BLM Response: The BLM fully recognizes the landscape context of this project as is evident in several sections of the EA, most notably section 3.1 (Vegetation and Forest Stand Characteristics) and section 3.5 (Threatened or Endangered Wildlife Species, Habitat and/or Critical Habitat).

Comment 2: *“Healthy vigorous forests” are over-represented on non-federal lands, but such forests do not provide habitat for all species, many of which depend on snags, decadence, and dead trees. Thinning “captures mortality” and results in a long-term reduction in recruitment of snags and dead wood. See Heiken, D. 2010. Dead Wood Response to Thinning: Some Examples from Modeling Work. <http://www.slideshare.net/dougoh/effects-of-logging-on-dead-wood-habitat>. These effects need to be mitigated by leaving significant unthinned areas both within treated stands and across the landscape. Riparian reserves and areas inaccessible from existing roads are good places to leave untreated for*

mitigation purposes. The actual scale and extent of untreated areas should be determined quantitatively based on meeting short- and long-term goals for snags and dead wood and carbon storage. This is not reflected in the EA. Since BLM lands must provide a disproportionate amount of snag habitat in this industrial landscape, leaving 48% of this area untreated may not be enough, given the relative scarcity of BLM lands in the area and the intensity of management in the surrounding landscape. Also, recruiting snags from retention areas requires long-term retention of dense forest conditions (i.e. no logging for a long time). it is unclear if BLM can legitimately count the 48% untreated areas as mitigation (e.g., EA p 37) because BLM is not making any decision to leave those areas dense and unlogged in the future.”

BLM Response:

The fact that 48% of the Forest Operations Inventory (FOI) units acreage considered for harvest will be left untreated during this entry and will remain in an unthinned condition where mortality will continue at current rates is not considered by the BLM to be mitigation. These facts are stated in the affected environment and environmental effects sections in acknowledgment of the logic you expressed in comment #1 above, *“It is very important to recognize the landscape context of this project”*. Rather than being expressed as mitigation, it is recognizing those natural processes that would be expected to continue to occur on a portion of the lands in the surrounding landscape.

Recognizing the context of the surrounding landscape, we have incorporated several design features within the project to help offset some of the impacts expected to result from thinning upon CWD habitat features (EA section 2.4.2).

Comment 3: *“Regen harvest is already an overused forest practice on non-federal lands, so it should be avoided on federal lands. The stands being proposed for regen logging should be allowed to develop and progress via natural processes of competition, and natural mortality from competition and wind. These are diverse forests and will continue to remain ecologically diverse.”*

BLM Response: As discussed in EA section 2.4.1, all of the stands selected for regeneration harvest have reached culmination of mean annual increment (CMAI). The definition of CMAI is: *the age in the growth cycle of a tree or stand at which the mean annual increment for volume is at a maximum* (Helms 1998). The regeneration harvest of these stands is consistent with the NWFP and Salem District ROD/RMP. As stated within EA section 2.1, regeneration harvest within these stands is also consistent with *Scappoose Creek Watershed Analysis*. As stated in two locations in EA section 3.1.3 pg. 42: *“The regeneration harvest unit would introduce a new age class containing numerous legacy trees comprised of mature green trees, snags, and down wood to further diversify the stands in the connectivity block. Stands selected for regeneration harvest would be planted with Douglas-fir and a mix of other conifer species. The leave trees would continue to grow into future large snags while the young stand underneath would continue growing to provide fiber in the future.”* Additionally, as discussed in EA section 3.1.1, the BLM is proposing to regen 100 acres or 3.2% of the total 3,166 acres of land under BLM ownership in the South Scappoose Creek watershed. EA section 2.4.1 describes BLM regeneration in comparison to private regeneration harvests as follows: *“Although the BLM refers to these treatments as regeneration harvests, they are not the traditional regeneration harvests that are commonly implemented by most private landowners. The proposed regeneration harvests would be retaining 14 to 30 trees per acre (in GFMA and CON, respectively) as opposed to traditional regeneration harvests, commonly used by private landowners that generally retain up to 2*

trees per acre. The leave trees would be a mix of the species present in the stand but would favor some of the largest trees in the stand, western redcedar and trees with characteristics desirable to wildlife with the expectation that a portion of the retained trees would be windthrown to provide down wood habitat. Existing down wood and snags would be retained as coarse woody debris. The treatment areas would be replanted with a mixture of native species.”

Comment 4: *"Proportional thinning" should be combined with a diameter cap to retain all the largest trees."*

BLM Response: By definition, post-treatment the retained trees within the Matrix LUA which are thinned proportionally will include trees of all size classes represented in approximate proportion to that of the stand pre-treatment. That is to say, if pre-treatment, 10% of the stand is comprised of trees considered to be large, dominant trees, the post-treatment thinned stand will contain approximately 10% large, dominant trees.

Comment 5: *"The rationale for logging in riparian reserves is unsupported by the evidence and inconsistent with the ACS. Logging will clearly cause adverse effects on recruitment of dead wood necessary for both terrestrial and aquatic habitat objectives for riparian reserves. Vegetation diversity will develop over time through natural mortality processes and does not require logging. The EA misconstrues the NWFP standards & guidelines related to logging in riparian reserves. The EA fails to mention: (a) the general rule that logging is prohibited; (b) the caveat that thinning is allowed only if "needed" to meet ACS objectives; (c) the requirement not to "retard" attainment of ACS objectives; and (d) the fact that silvicultural intervention contemplated in the NWFP could be non-commercial which would mitigate for the logging-related reduction of wood recruitment."*

BLM Response: BLM disagrees that thinning within the riparian reserves in the South Scappoose Project is inconsistent with the ACS objectives. The Northwest Forest Plan (p. B-31), states *"Active silvicultural practices will be necessary to restore large conifers in Riparian Reserves."* It also states (p. C-32) that timber harvest is appropriate in riparian reserves where silvicultural practices are applied to control stocking and acquire desired vegetation characteristics to attain ACS objectives. Moreover, the Salem ROD/RMP (p. D-6) states *"merchantable logs may be removed ... "where such action would not be detrimental to the purposes for which the Riparian Reserves were established"*.

The project was designed to increase large conifers and future large coarse woody debris, large snag habitat and in-stream large wood, long-term structural and spatial diversity, and other elements of late-successional forest habitat, and to improve diversity of species composition (EA p. 5). Without thinning (see No Action Alternative, p. 37), stands would become increasingly dense and uniform, crown development would decrease, diameter growth rate would decline, and competition-related mortality would increase. This would result in smaller coarse wood additions coming mainly from the smaller-diameter trees and very little development of second canopy layers, composed mostly of shade-tolerant conifers.

As stated in the response to Oregon Wild comment 2, The South Scappoose Creek Project thinnings represent about 52% of the stands originally considered for treatment. Within the riparian stands selected for thinning, treatment will provide the long-term benefit of increased tree sizes and stand vigor in the 25-year time frame analyzed (EA p. 40 and Tables 9 and 12). Within those stands originally considered for treatment but not carried forward into the South Scappoose Creek Project,

vegetation diversity will develop through natural processes.

Comment 6: *“The analysis of ACS Objective 8 on page 118 does not address the loss of function wood caused by logging.”*

BLM Response: It is correct, the brief ACS write-up on page 118 addressing ACS Objective 8 could have been more complete and/or clear. The analysis did however note the use of 60- or 100-foot no-harvest buffers on streams, and the retention of a canopy closure of 50% or greater within the adjacent riparian area thinnings. To address your comment concerning the loss of function wood caused by logging, the brief ACS write-up should have clearly linked these project design features to the results of the studies referenced on page 61 of the EA which stated the following – *“In the Pacific Northwest, the majority of woody debris recruitment occurs within 59 to 65 feet of the stream edge (McDade et al 1990, Van Sickle and Gregory 1990, Meleason et al 2002). The use of 60- or 100-foot no-harvest buffers precludes most of the potential loss of this wood.”*

We will be more careful in the future, Thank you.

Comment 7: *“The analysis of thinning effects on riparian reserves (EA pp 42-43) does not reflect the loss of function wood that is removed off-site via commercial logging, nor does it accurately reflect the long-term loss of recruitment of snags and dead wood to support terrestrial and aquatic habitat relative to the no action alternative or non-commercial thinning).”*

BLM Response:

BLM disagrees that the effects of thinning on loss of functional wood in the Riparian Reserves and snag and coarse wood recruitment are not adequately analyzed in the EA.

On EA page 43 it is stated that one of the expected effects of the thinning within the Riparian Reserves is *“a decreased mortality of the smaller-sized trees over the next 25 years following treatment compared to the untreated stands.”* One can only conclude from this that decreased mortality would result in a decreased recruitment of snags and dead wood.

Furthermore, on EA page 61 the following is stated:

“Approximately 29% of the proposed project area (approximately 479 acres) would occur within riparian reserves. These riparian reserve treatments would occur outside no-harvest buffers that would be implemented on all stream channels. Harvesting trees within the riparian reserve and outside the no harvest buffers would directly remove a potential source of small wood to stream channels. In the Pacific Northwest, the majority of woody debris recruitment occurs within 59 to 65 feet of the stream edge (McDade et al 1990, Van Sickle and Gregory 1990, Meleason et al 2002). The use of 60- or 100-foot no harvest buffers precludes most of the potential loss of this wood.

The Curtis relative density following treatment in the riparian reserve first site potential tree height (240 feet) would be maintained at 30 or higher. When used in combination with no-harvest buffers a Curtis relative density of greater than or equal to 30 following timber harvest has been accepted by NMFS [in recent Endangered Species Act consultations for listed fish] as having no measurable effect [insignificant to the species or habitat] to large woody debris recruitment. Although the thinning of riparian reserves removes some potential small diameter wood available for future stream

recruitment, small diameter wood does not last as long and is more readily moved from the system than large diameter wood. Thinning would be expected to accelerate the growth rate of the trees that remain in the riparian reserves and increase the quality and volume of large woody debris naturally recruited to the stream channel. The benefit of this growth would be very minor as the majority of perennial streams within the project area lack the power to move wood.”

In addition to the no harvest buffers described above, the larger analysis area analyzed in the EA needs to be considered. The Riparian Reserve treated represents only a portion of the Riparian Reserves in the analysis area, all of these untreated stands will continue on their current growth pattern and would be anticipated to contribute wood in response to natural processes.

Also see BLM responses to Oregon Wild comments 5, 6 and 8.

Comment 8: *“EA (p 61) says “Thinning would be expected to accelerate the growth rate of the trees that remain in the riparian reserves and increase the quality and volume of large woody debris naturally recruited to the stream channel” This is simply unsupported by the evidence. Logging removes many trees that would grow and provide large wood but for the fact that they were commercially removed as part of this project. The increase growth on a few stems does not compensate for the loss of volume and number of pieces of functional wood. The EA also says “small diameter wood does not last as long and is more readily moved from the system than large diameter wood” This fails to recognize the important fact that the “large wood” is a function of stream size and gradient. Small wood can provide valuable hydrologic and biological functions, especially in small streams like those in this project area. In short, the EA seems to get a few facts wrong: (a) there is no bonus volume form thinning, (b) small wood can provide biological function in small streams as well as upland habitats that are also supposed to be protected by riparian reserves. See Heiken, D. 2010. Dead Wood Response to Thinning: Some Examples from Modeling Work. <http://www.slideshare.net/dougoh/effects-of-logging-on-dead-wood-habitat> Based on the true facts, BLM should be doing more to mitigate for adverse effects of logging in riparian reserves, instead of taking credit for the illusory benefits of thinning in riparian reserves.”*

BLM Response:

As discussed in BLM responses to Oregon Wild comments 6 and 7, there is very little potential loss of wood of any size to streams when no-harvest buffers are employed in the design of these thinnings. Treatments proposed in Riparian Reserves are designed to improve or maintain aquatic conditions, including those functions provided by wood recruited to the stream channel. As described, the impact to large wood and small wood recruitment has been effectively eliminated by implementing no-harvest buffers. In the short-term, little change is expected in the recruitment of all sizes of LWD to streams in the project area because the majority of the wood recruitment is expected to come from the no-harvest buffers and nearby untreated Riparian Reserves where natural processes will continue to provide wood in a range of sizes. In the long-term, smaller sized wood will continue to be recruited from stands adjacent to the streams, and trees within the untreated buffers will continue to grow and provide a source for larger sized pieces of wood. The light to moderate thinning in riparian reserves outside of the buffers is designed to promote habitat for a variety of riparian-dependent species, as well as for aquatic species. While thinning will remove some of the density-dependent suppression mortality it will also accelerate the development of larger diameter trees over the following 20-30 years, which will then be available for recruitment to nearby streams when disturbance events occur. The

accelerated recruitment of large wood, which is more stable and long lasting than small wood pieces (Spence et al., 1996; Harmon et al., 1986; McHenry et al., 1998; Rosenfeld and Huato, 2003), has been identified as a critical need for aquatic ecosystems in the Northwest (FEMAT, 1993).

Comment 9: “BLM should take extra steps to protect the rare North Coast DPS of the red tree vole which the FWS recently concluded is warranted for listing under the Endangered Species Act.”

BLM Response: Per BLM policy, the fact that the USFWS determined the status of North Coast DPS of the red tree vole as being warranted but precluded for listing under the Endangered Species Act results in their being managed as a Bureau Sensitive Species. Within the Tillamook Resource Area, even prior to this USFWS determination, the red tree vole was already considered a Bureau Sensitive Species. This, together with the Survey and Manage Standards and Guidelines does not change our current processes for the conservation of this species.

Comment 10: “Both the regen harvest and the road rights-of-way need to meet survey and manage requirements. The 2001 ROD recommends, and NEPA requires, that survey information be made available in the NEPA document so the public can be informed by it and comment upon it.”

BLM Response: All regeneration harvest units and associated road construction locations were surveyed for appropriate survey and manage species. Road rights-of-way associated with Peckman Exempt thinning units are considered to be a part of the thinning project and therefore also S&M exempt.

While not required, protocol surveys for mollusks, including S&M mollusks were conducted on approximately 500 acres of the thinning treatment area to help inform the conclusions of the analysis for special status mollusk species.

Intuitive controlled botanical surveys were conducted throughout the entire South Scappoose Creek project area. As a matter of process, all listed ESA, S&M and Bureau Sensitive plant species encountered are documented as known sites and protected according to policy and/or management recommendations for that species. Where S&M protocol surveys were not required incidental encounters of S&M plant species are still documented and managed, many of these species overlap onto the BLM Special Status Species list. No ESA, S&M or Bureau sensitive plant species were located within the South Scappoose Creek Project Area. General information concerning these surveys is located in the EA and more specific information is available at the Tillamook RA field office.

We generally attempt to have all required pre-project surveys completed and their results included in the NEPA document. Given our planning schedule, the only way to complete the required S&M mollusk surveys in the regeneration harvest units would have been to complete two spring surveys; this option would technically meet the survey protocol although completing one survey in the spring and one in the fall is preferred. Rather than complete two spring surveys, potentially compromising the survey results, the determination was made to complete one fall survey after the EA was completed but prior to decision – not an ideal situation but still meeting the requirements of the 2001 Survey and Manage ROD. Mollusk surveys were completed on November 16 2011 with no S&M or Bureau Sensitive mollusk species being encountered.

The 2001 Survey and Manage ROD (p. 24) says that *where practicable* survey information should be

in the NEPA document; it requires surveys are completed *prior to the decision*. We are aware of no NEPA requirement that survey information be made available in the NEPA document.

Comment 11: *“BLM cannot claim that every acre of every unit lacks multi-storied structure thus negating the need for RTV surveys. Stands are just not that uniform. They survey protocol must be applied at the sub-stand scale used by the species, not the stand scale used by foresters.”*

BLM Response: All the stands planned for thinning range in age from 46 to 73 years and therefore are exempt from the requirement for S&M surveys via the Peckman Exemption (EA section 1.3.1 and Decision Record section III).

Ranging in age from 52 to 73 years, the stands planned for regeneration harvest lack multi-storied structures and contain no legacy trees – predominate trees in the overstory remaining from previous stand. With the species composition of the regeneration harvest units being made up of up to 89% hardwoods, many of these stands are hardwood-dominated stands or mixed hardwood/conifer.

Even applied at the sub-stand scale, the habitat conditions present within the treatment units do not meet the criteria contained within the protocol for determining the need for pre-disturbance red tree vole surveys.

Comment 12: *“EA Page 78 says that adverse effects to spotted owl habitat related to canopy cover would be mitigated relatively quickly as the canopies regrow, but the EA does not say how long it would take for snags and dead wood to recover after thinning. In fact it would likely take a very long time to develop optimal dead wood structural components after thinning. See example form the Curran-Junetta Project below, showing that thinning causes a 6 decade delay in attainment of snag objectives.”*

BLM Response: Page 80 of the EA states: *“The most adverse and long-lasting effect of the thinning upon spotted owls and their habitat would probably be halting or greatly reducing the natural snag recruitment processes for up to 20 or 30 years, by removing those trees that might otherwise have died from the effects of tree-to-tree competition (i.e. suppression mortality).”* Additionally, EA Table 11 displays the estimated parameters for suppression mortality within the thinning units 25 years after implementing the South Scappoose Creek Project and No Action Alternatives as projected by ORGANON. The numbers in Table 11 only reflect CWD resulting from suppression mortality and do not reflect CWD treatments or other expected CWD inputs such as logging slash.

Comment 13: *“The EA (p 80) says “In the long term (20+ years) the 479 acres of thinning treatments areas located within the Riparian Reserve LUA would be expected to begin to develop into spotted owl suitable habitat sooner than under the No Action Alternative.” This is unsupported by the evidence showing that commercial logging causes a long-term reduction in recruitment of snags and dead wood which are essential and defining elements of suitable spotted owl habitat.”*

BLM Response: BLM recognizes that there are many different components to spotted owl habitat and as described within the EA, the impacts of the project upon these individual habitat components are not all positive or all negative. For this reason, the analysis contained on EA page 79 states: *“The thinning proposal would result in some habitat features developing sooner than would be expected without treatment.”* We are aware that thinning causes a reduction in the recruitment of snags and dead wood

as stated on EA page 80: *“The most adverse and long-lasting effect of the thinning upon spotted owls and their habitat would probably be halting or greatly reducing the natural snag recruitment processes for up to 20 or 30 years, by removing those trees that might otherwise have died from the effects of tree-to-tree competition (i.e. suppression mortality).”*

The sentence you reference was emphasizing that consistent with the ROD/RMP and NWFP, thinning units within the GFMA LUA will be evaluated for regeneration harvest in approximately 15 to 20 years and likely harvested prior to or soon after developing into suitable owl habitat. Under our current management plans, this would not be the case for land within the Riparian Reserve LUA. Not being subject to regeneration harvest, stands within the Riparian Reserves will be retained long enough to realize the benefits of the treatment upon the development of suitable habitat. Recognizing the context of the surrounding landscape, project-wide design features such as the retention of existing western redcedar and big-leaf maples, and a strategy for the management of CWD as well as Riparian Reserve-specific design features such as the retention of a component of red alder and thinning from below, favor the development and maintenance of suitable owl habitat within the Riparian Reserves.

Comment 14: *“BLM needs to give greater care in managing for spotted owl prey species, especially flying squirrels, which are important in both suitable NRF habitat and in dispersal habitat where foraging opportunities increase survival value. Recent evidence that thinning suppresses flying squirrel populations for “several decades” is reason for concern. Speculation about long-term benefits must be weighed against several decades of habitat degradation. In this landscape where BLM needs to provide a disproportionate share of habitat for owl prey, can the owl really tolerate a several decade delay in speculative benefits?”*

BLM Response: The analysis of the impacts of the project upon the northern spotted owl considered the impacts of the project upon flying squirrels (EA p. 78-79).

Comment 15: *“The carbon analysis should provide a graphic display of effects such as that shown below. Thinning always results in a net transfer of carbon from the forest to the atmosphere. Forest regrowth never catches up to the unlogged alternative. BLM must account for the time-value of carbon, that is, the climate effects of the extra carbon in the atmosphere during the “catch-up” the time period.”*

BLM Response: The incremental increase in carbon emissions as greenhouse gasses that could be attributable to the South Scappoose Creek Project is 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 (EA p. 110).

Project Record Document 39 – Lona Pierce

Comment 16: *“The thinning in this proposed project is generally acceptable, except leaving patches of denser stands would help shade some areas more heavily. In a section thinned 10 years ago (as seen on the tour), much native understory has regenerated: vine maple, elders, alders, red huckleberry, etc. These shrubs and small trees are so thick that any lower-growing plants associated with coniferous forests will be unable to grow: mosses, sedges, mushrooms, wildflowers, many liverworts and ferns.*

With blowdown and other losses of standing trees, the forest floor in the thinned zones will be quite open for a long time. Areas thick with salal and/or Oregon grape likewise are poor in wildflowers (lily family, orchids, many others) and other plants that need some filtered sun but not as much as will occur in the proposed thinning project. Leaving varying denser patches (only thin a handful of trees to allow scattered sunbeams to enter) from five to 30 acres will help demonstrate what size is optimum to generate a healthy forest floor of lower-growing plants. Such areas are important for pollinators and amphibians associated with this filtered-sunlight ecosystem, and offer alternative forest projects for people.”

BLM Response:

Hotspots for nonvascular plants (i.e. lichens, mosses, and liverworts) can be found in shrub dominated habitats. Many mosses and liverworts encountered during surveys are found in dark shaded areas of the forest floor, riparian zones or seeps that generally have a higher component of understory shrub habitat that contribute to higher humidity. Having a variety of shrubs benefits lichen diversity, given the varying pH levels different shrubs provide as a growing substrate. Closed conifer timber canopies tend to harbor lower levels of diversity for non-vascular species. Deciduous shrubs and hardwoods benefit the forest floor by contributing leaf drop and building humus layers which contribute available nutrients.

Areas that are dominated with salal and/or Oregon grape still contribute to pollinators. Typically Oregon grape is considered a dry site indicator which may not be conducive to supporting populations of common lilies or orchids. Salal tends to dominate based on its allelopathic properties yet it still offers opportunities for pollinators and forage and can be a substrate for rare crust lichens.

With that said, all plants play certain roles in our local forests, some on an individual basis and some in associations. A change in forest conditions and vegetation can be beneficial or adverse; it just depends upon how it is perceived.

Comment 17: *“No cedars should be cut, including in the riparian zone with its basal-area measuring system. The vast majority of thinned trees should be the youngest. Forest trees more than 60 years old in Columbia County are becoming very rare. We should allow the few left on BLM lands to survive. Hemlocks and grand firs should be planted in thinned stands where only D. fir is growing. I believe this is mostly already planned for, and I wholeheartedly agree.”*

BLM Response: Within the thinning units, all western redcedar will be reserved. Within the regeneration harvest units, a portion of the trees reserved as wildlife trees or trees to provide down woody debris will also be cedars. Post-harvest, the relatively open areas and landings in the thinning units will be evaluated for planting with shade-tolerant conifers.

Comment 18: *“Alders and big-leaf maples should be allowed to grow to maturity in at least the riparian zones. They offer substantial food and shelter to wildlife, the leaves are important to the stream ecosystem, and historically they have always been part of the coniferous forest. Likewise -- other important but noncommercial plants of the riparian zone should be encouraged: corydalis, delphiniums, devil's club and other forest plants of damp canyons and creeksides.”*

BLM Response: Recognizing their importance to the riparian and stream ecosystems, where present,

an alder component will be maintained within all thinning areas located within the Riparian Reserve LUA – approximately 479 acres. Additionally, all bigleaf maples will be reserved in all thinning units where they currently exist. The current red alder component will however be removed entirely from those portions of the thinning areas located within the uplands - stands within the Matrix LUA.

Vegetation in riparian habitats is continuously changing based on constant disturbance. Plants are dispersed more readily where there is an available source of reproductive material. Plants such as corydalis, delphiniums, devils club and other forest plants develop populations as conditions meet certain requirements for that species (soil type, water table, competition, etc.). Because we are buffering wetlands and riparian areas these plants should have the ability to naturally develop populations or maintain current populations where site conditions meet their specific requirements.

Comment 19: *“Columbia County is arguably the most logged county in Oregon -- with BLM sections as the primary acreage where maturing forests still exist. The total BLM acreage here is approximately 6,000 acres, with most of that acreage managed for logging. The stated goal on the tour was to wind up with about 15 percent total as mature diverse forestland. This is an excellent target for the county as a whole, but it will mean only 1 percent or less of the entire county will be managed as such -- very low overall. I urge a greater proportion of the sections be managed for old growth characteristics. The BLM sections in the vicinity of Gunner's Lake are proposed to be managed as connectivity sections -- with a rotation of about 150 years. This is relatively high compared to the 30-40 year cycle of industrial tree farms, but will never allow the forest to reach its prime, with the majority of trees 300-700 year-old with hemlock, grand fir, cedar, and yew as important components of the Douglas fir canopy.”*

BLM Response: The 15% Standard and Guideline you mention represents the *minimum* amount of late-seral forest (per the NWFP and Salem District ROD/RMP) which must be maintained on federal land in any given watershed. In the long-term, under the NWFP and current ROD/RMP, it is expected that essentially all of the lands within the Riparian Reserve LUA, LSR (Late-Successional Reserves) LUA and at least a portion of the Matrix/Connectivity Block LUA which, as you state are managed on a 150-year rotation, will be in a late-seral habitat condition. These portions of the BLM ownership add up to more than 50% of BLM’s ownership within the watershed.

Comment 20: *“Management of these sections [containing and/or managed for late-seral habitat] should be primarily to control invasive species, or add a diversity of native species that have been lost due to past forest practices in the county. Fewer roads being maintained in these areas will mean fewer invasive species and diseases being spread by vehicles, as well. Maintenance of logging roads (spraying/weed whacking) is extirpating many once-common wildflowers that used to flourish in the filtered sunny areas along the forest's edge. Minimizing road building of any kind, even temporary roads, is important to limit weeds, diseases, and sedimentation, as well as for not disrupting cool solid blocks of forest -- which are now among the rarest ecosystem in the county.”*

BLM Response: Design features to reduce or mitigate non-native /invasive plant species plant introductions are included within EA section 2.4.2.

Project Record Document 40 – Janelle St. Pierre, Coordinator, Scappoose Bay Watershed Council

Comment 21: *“We are particularly interested in seeing the riparian reserve areas enhanced through selective thinning and then left to grow into a mature canopy over time. We also hope that identified areas in the watershed will continue to be managed as late-successional reserves. BLM lands are the only large scale timber areas that are being managed on a longer rotation. BLM lands are a critical resource since there are very few areas left that have any older stands of timber. We understand the need to have marketable federal timber resources in Columbia County and feel that the BLM prescriptions are a good balance between protecting the natural resources and providing local income.”*

BLM Response: See BLM Response to Lona Pierce comment 19 above.

Comment 22: *“The large pond in the NW corner of Section 7, Unit 3 needs to be clearly marked and protected. We would like BLM to consider minimizing road construction near this pond. We have established that we have populations of red-legged frogs and western painted turtles in the watershed, but do not know the full extent of habitat use. We are interested in protecting all ponds that may provide habitat. This also means protecting the forested areas in close proximity to the ponds that provide upland habitat for amphibians and nesting areas for turtles. Road construction between the ponds and the upland habitat is of particular concern. Turtles and amphibians were not addressed in the EA, so we feel that this needs further consideration.”*

BLM Response: The pond you reference is considered to be fish-bearing, and although “historically enhanced” it is probably of a natural origin; as such, the Riparian Reserve on this pond is the width of two site-potential tree heights – in this area, 480 feet (Salem ROD/RMP p. 12). Within this Riparian Reserve, the pond and the values you speak of will be protected on its southern side by a no-harvest buffer at least 100 feet wide; no timber harvest will occur on the northern side of the pond.

The South Scappoose Creek Project includes the temporary renovation of existing Road 3N-2-7 located south of this pond. This road is located outside of the pond’s no-harvest buffer but within the Riparian Reserve. After use, this natural surfaced road will be decommissioned including design features to help discourage the current high levels of OHV use and resulting damage experienced by this area.

EA Table 21 (page 86) includes a complete list of the wildlife species considered in the analysis of South Scappoose Creek project. The fact that they are included on the BLM State Director’s Special Status Species list from February 2008, both the Northwestern Pond Turtle and the Painted Turtle were considered. However, in general only those species which are identified as being impacted by the project in the brief impact synopsis on this table are carried forward into the analysis contained within the main body of the document. An analysis of the Northwestern Pond Turtle and the Painted Turtle was not carried forward into the body of the EA based on the fact that no habitat for these species is located within the project areas. The impact synopsis could have also included the fact that the expected range for both of these species is located further down in the river systems than the Scappoose Creek project area. Cope’s giant salamander, the only amphibian currently on our Special Status Special list, was not carried forward into the main body of the document based on the fact that

considering the project design features, no impacts to their stream habitats are anticipated.

Comment 23: *“We appreciate that BLM will reduce the overall amount of roads by approximately three miles as a result of implementing the proposed actions. While the prescriptions seems adequate for maintaining the roads, we hope that road decommissioning will be supervised carefully to ensure that OHV use is restricted on closed roads.”*

BLM Response: The decommissioning or stabilization of temporary roads is described within EA section 2.4.1 with specific design features outlined in EA page 24 of section 2.4.2.