



United States Department of the Interior

BUREAU OF LAND MANAGEMENT

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1792/5400 (ORC040)
DOI-BLM-ORWA-C040-2013-0003-EA
Six Twigs Environmental Assessment

July 14, 2016

Dear Citizen:

The BLM has completed the Six Twigs Environmental Assessment (DOI-BLM-ORWA-C040-2013-0003-EA) and prepared a Finding of No Significant Impact (FONSI). The EA contains analysis of the potential impacts of conducting regeneration treatments. The proposed project is designed to implement management objectives and direction of the 1995 Coos Bay District Resource Management Plan.

These documents are located on our BLM website at <http://1.usa.gov/23rZUnT>. The majority of the project would be implemented through multiple timber sales expected to be sold in fiscal years 2017 and 2018. A Decision Rationale document would be posted prior to any sale of timber.

Due to external and internal comments received during public review of the EA and unsigned FONSI (April 15, 2016 through May 20, 2016), the BLM made some minor edits, clarifications on timber productivity in Chapter 3, and expanded the section of the EA which discusses public input.

These updates do not constitute substantive changes or result in different outputs or alternatives; no additional or different analysis was conducted based on comments received during public review.

For further information, contact Racheal Jones at 1300 Airport Lane, North Bend OR, 97459 or (541) 756-0100, or by e-mail at blm_or_cb_mail@blm.gov, ATTN: Racheal Jones

Sincerely,

/s/ Kathy Westenskow

Kathy Westenskow

Myrtlewood Field Manager

**FINDING OF NO SIGNIFICANT IMPACT
for the
Six Twigs Environmental Assessment
DOI-BLM-ORWA-C040-2013-0003-EA**

I. Introduction

The Bureau of Land Management (BLM) has prepared an Environmental Assessment (EA), which contains analysis of the effects of implementing regeneration harvest on 217 acres of forested stands designated as the Matrix land use allocation. The EA contains two alternatives: a No Action Alternative and a Proposed Action Alternative. The No Action Alternative provides a useful baseline for comparison of environmental effects and demonstrates the consequences of not conducting regeneration harvest. The analysis of the Proposed Action Alternative (or proposed project) describes the effects of implementing the proposed action, including how it would meet the Purpose and Need of the EA, which includes (but is not limited to) conducting harvest and silvicultural activities within the Matrix, protecting federally listed species, and providing early-successional habitat. The Six Twigs Interdisciplinary Team (ID Team) established the need for the proposed regeneration treatments after reviewing the differences between existing and desired stand conditions. The EA is attached and is incorporated by reference in this Finding of No Significant Impact (FONSI).

The proposed treatments are located in the following Township, Range, and Sections: T. 31 S., R. 14 W., Secs., 7, 14, 15, 18, 22, 23, 28, 29, 30, 32, Willamette Meridian.

The ID Team developed site-specific analysis for the EA under the management direction of the 1995 Coos Bay District Record of Decision and Resource Management Plan (1995 ROD/RMP). This EA is tiered to the 1994 Coos Bay District Proposed Resource Management Plan/Final Environmental Impact Statement and the proposed action is in conformance with the 1995 Coos Bay District ROD/RMP as supplemented and amended by:

- Management of Port-Orford-cedar in Southwest Oregon Final Supplemental Environmental Impact Statement and its ROD (2004).
- Record of Decision and Standards and Guidelines for Amendments to the Survey and Manage, Protection Buffer, and other Mitigation Measures Standards and Guidelines (2001).

The 1995 Coos Bay District ROD/RMP was designed to be consistent with the 1994 Final Supplemental Environmental Impact Statement (FSEIS) on Management of Habitat for Late Successional and Old Growth Forest Related Species Within the Range of the Northern Spotted Owl (Northwest Forest Plan) and its Record of Decision/Standards and Guidelines, also known as the Northwest Forest Plan. As stated in the ROD for the Northwest Forest Plan, the Aquatic Conservation Strategy (ACS) was developed to restore and maintain the ecological health of watersheds and aquatic ecosystems on public lands within the range of Pacific Ocean anadromy. The Six Twigs EA concluded the proposed project is consistent with the ACS objectives (EA pp. 71–78).

II. Finding of No Significant Impact

The EA effects analysis indicates that there would not be a significant impact on the quality of the human environment from the implementation of either alternative. This finding and conclusion is based on my

consideration of the Council of Environmental Quality's (CEQ) criteria for significance (40 CFR 1508.27), both with regard to context and intensity of the impacts described in the EA.

Context

The BLM adopted its Coos Bay District Resource Management Plan in 1995, incorporating the 1994 Northwest Forest Plan and its EIS. The BLM has thus prepared two EISs that consider the significant and potentially significant effects of conducting regeneration harvest in the Coos Bay District within stands of similar age to the stands within the proposed project. The Coos Bay District RMP projected that in the third decade (fiscal years 15–24), the District would harvest 7,900 acres of timber using regeneration harvest techniques to meet the ASQ (USDI 1995, p. E-9). At the close of fiscal year 2015 the District harvested 84 acres (or 1 percent) of the projected acres (USDI 2015a). The District fell well below the acres projected to be regenerated in the second decade, only harvesting 385 acres (or 4.8 percent) of the 7,900 acres projected (USDI 2014a). Implementing regeneration treatments analyzed in this EA would contribute 217 acres (or 2.7 percent) to the third decade projection (7,900 acres).

Given the very large discrepancy between the acreage of regeneration harvest assumed within the RMP and what the Coos Bay District has actually offered for sale, it is abundantly clear that the incremental effect of the harvest proposed in the Six Twigs EA is well within the effects of the total regeneration harvest projected within the Coos Bay EIS. Even though the incremental harvest within the proposed project falls within the RMP EIS's effects analysis, the BLM analyzed the specific effects of the proposed action to determine if there is unique site-specific information, new information, or changed circumstances that would invalidate the analyses and conclusions from the NWFP EIS or RMP EIS. No significant effects beyond those analyzed in the Coos Bay EIS would occur as a result of implementing the proposed project; this conclusion is supported with the reasons detailed below in our evaluation of the NEPA regulatory significance factors.

In the case of site-specific actions, significance usually depends on the effects in the locale rather than in the world as a whole. This project is a site-specific action that by itself does not have international, national, region-wide, or statewide importance. The discussion of the significance criteria that follows applies to the intended action and is within the context of local importance in the area associated with the Six Twigs proposed project. The actions described in the proposed action would be limited in scope and geographic application (40 CFR 1508.27(a)). The location of the action is described in the EA (p. 1) and displayed on maps (EA, Chapter 7). The physical and biological effects are limited. The affected environment sections of Chapter 3 in the EA describe the locations and current conditions of the various resources. The resource effects sections in Chapter 3 reveal that most of the direct and indirect environmental effects are confined to the project area with some effects extending beyond the project area.

The proposed action would occur in the General Forest Management Area (GFMA) of the Matrix land use allocations (LUA) as designated by the 1995 Coos Bay District RMP. The RMP anticipated that the following forest management activities would occur in this LUA:

- Provide a sustainable supply of timber and other forest commodities to provide jobs and contribute to community stability (RMP, p. 22);
- Protect, manage, and conserve federally listed and proposed species and their habitats to achieve their recovery in compliance with the Endangered Species Act, approved recovery plans, and the Bureau Special Status Program (p. 32); and
- Provide early-successional habitat (RMP, p. 22).

Intensity

Intensity refers to the severity of impact (40 CFR 1508.27 (b)). The following ten sections refer to the specific conditions/concerns addressed under 40 CFR 1508.27 and document my consideration of the intensity (severity) of the effects as addressed in the Six Twigs EA.

1. *Impacts that may be both beneficial and adverse* (40 CFR 1508.27 (b)(1))

I considered both beneficial and adverse impacts associated with the proposed action as presented in Chapter 3 of the EA. Any impacts, both beneficial and adverse, are not significant as they are consistent with the range and scope of those effects of timber management analyzed in the 1994 Final Coos Bay District RMP/EIS to which the EA is tiered. Furthermore, any potentially adverse impacts would be diminished or eliminated by implementation of project design features (EA pp. 14–20). The Six Twigs EA identified impacts, both beneficial and adverse, for eight resources in detail. These beneficial and adverse impacts are described in the EA under forest productivity (pp. 23–28), wildlife (pp. 28–41), botany (pp. 41–44), fisheries (pp. 44–51), water resources (pp. 51–63), soil resources (pp. 63–65), fuel loadings (pp. 65–67), and climate change (pp. 67–71).

Overall impacts of the proposed action would have a beneficial impact in either the short and/or long-term for resources in the project area. These benefits include improvement of forest stand health through reforestation of root rot resistant tree species, the production of sustained yield timber, and the retention and recruitment of wildlife habitat for identified species in leave areas. However, I recognize that some beneficial actions can have adverse effects to different resources, species, and habitat availability. Some resources and/or species would experience adverse impacts that were identified to be short-term in nature or were not identified as significant adverse impacts because impacts were minimized either through timing, design, or protection measures. Impacts to resources were minimized by designing the project to be consistent with RMP standards and guidelines and including design features to mitigate impacts as part of the proposed action. Previous projects, with similar activities using these or similar design features, have been found to be effective in avoiding or minimizing adverse effects.

2. *Public Health and Safety* (40 CFR 1508.27(b)(2))

No aspect of the proposed action would have an effect on public health and safety. The public would not be allowed to enter hazardous work areas because the Six Twigs proposed project is located behind locked gates with no public access (EA p. 79). Smoke management from pile burning would adhere to the Oregon Smoke Management Plan (OAR 629-43-043) (EA p. 67, 78). The drinking water source for the Langlois Water District is Floras Creek. Some of the proposed harvest units are located within the headwaters of the Floras Creek and North Fork Floras subwatersheds and are, therefore, part of the Drinking Water Protection Area (DWPA) for Langlois (EA p. 81). Due to the full Riparian Reserve buffers and project design features, there would be no potential for an increase in sediment delivery to streams that could affect the DWPA (EA p. 63), and there are no pesticides, herbicides, or fertilizers used as part of the proposed project that could potentially contaminate the DWPA (EA p. XX).

3. *Unique characteristics of the geographic area* (40 CFR 1508.27(b)(3))

There are no known unique characteristics of the geographic area. Specifically there are no known prime or unique farmlands, wetlands, floodplains, Wild and Scenic Rivers, Areas of Critical Environmental Concern, or wilderness values within the project area (EA p. 80).

4. *Degree to which effects are likely to be highly controversial* (40 CFR 1508.27(b)(4))

The effects on the quality of the human environment are not likely to be highly controversial. CEQ guidelines relating to controversy refer not to the amount of public opposition or support for a project, but to a substantial dispute as to the size, nature, or effect of the action. The proposed project is not unique or unusual. The effects of both the proposed project and the No Action Alternative are well known and not controversial. The BLM has experience implementing actions similar to both the proposed project and the

No Action Alternative in similar areas. Personal dislike of the BLM implementing management direction of the Coos Bay District RMP does not constitute scientific controversy.

Furthermore, the proposed project and No Action Alternative fall well within the management actions/direction of the Coos Bay District RMP. The Coos Bay District RMP projected that in the third decade (fiscal years 15–24), the District would harvest 7,900 acres of timber using regeneration harvest techniques to meet the ASQ (USDI 1995, p. E-9). At the close of fiscal year 2015 the District harvested 84 acres (or 1 percent) of the projected acres (USDI 2015a). The District fell well below the acres projected to be regenerated in the second decade, only harvesting 385 acres (or 4.8 percent) of the 7,900 acres projected (USDI 2014a). Implementing regeneration treatments analyzed in this EA would contribute 217 acres (or 2.7 percent) to the third decade projection (7,900 acres).

5. *Degree to which effects are highly uncertain or involve unique or unknown risks (40 CFR 1508.27(b)(5))*

The possible effects of the proposed activities on the quality of the human environment are not highly uncertain and do not involve unique or unknown risk not previously considered and analyzed in the 1994 FEIS, to which this decision is tiered. Timber harvest is a common practice on lands managed by the BLM in western Oregon and the risks are well known and understood. None of the public comments received indicated unique or unknown risks to the human environment.

Climate change and greenhouse gas emissions have been identified as an emerging resource concern by the Secretary of the Interior (Secretarial Order No. 3226; January 16, 2009), the OR/WA BLM State Director (IM-OR-2010-012, January 13, 2010), and by the general public through comments on recent project analyses. It is currently beyond the scope of existing science to identify a specific source of CO² emissions and designate it as the cause of specific climate impacts at an exact location. As an aid to decision-making, the EA analysis estimates carbon flux to the analysis area associated with the proposed action. Although the proposed action would be predicted to result in a flux of approximately 19 thousand metric tons of carbon as a part of the proposed action (over 50 years), the difference in carbon storage in 50 years between alternatives would be too small to lead to a detectable change in global carbon storage, and existing climate models do not have sufficient precision to reflect the effects on climate from such a small fractional change in global carbon storage (EA p. 73). For this reason the effects to carbon flux from the proposed action are not highly uncertain and do not present unique or unknown risks.

6. *Consideration of whether the action may establish a precedent for future actions with significant impacts (40 CFR 1508.27(b)(6))*

The proposed project does not establish a precedent for future actions or represent a decision in principle about future actions with potentially significant effects. The timber management program on BLM-managed lands in western Oregon is a well-established program, thus implementation of the proposed project would not establish a new precedent. The proposed action is consistent with actions appropriate for the Matrix land use allocation, as designated by the Coos Bay District RMP.

7. *Consideration of whether the action is related to other actions with cumulatively significant impacts (40 CFR 1508.27(b)(7))*

The ID Team evaluated the proposed project area in the context of past, present, and reasonably foreseeable actions (p. 22). No cumulatively significant impacts are identified in the EA. These include impacts discussed in the EA under forest productivity (pp. 23–28), wildlife (pp. 28–41), botany (pp. 41–44), fisheries (pp. 44–51), water resources (pp. 51–63), soil resources (pp. 63–65), fuel loadings (pp. 65–67), and climate change (pp. 67–71).

8. *Scientific, cultural, or historical resources, including those listed in or eligible for listing in the National Register of Historic Places (40 CFR 1508.27(b)(8))*

The proposed activities would not affect districts, sites, highways, structures or objects listed in or potentially eligible for listing in the National Register of Historic Places. If archaeological resources are discovered prior to or during harvest activities, all activities in the vicinity would cease immediately and the Authorized Office and a BLM cultural resource specialist would be notified. Work would proceed only after authorization from the BLM (EA p. 79).

9. *Threatened or endangered species and their critical habitat (40 CFR 1508.27(b)(9))*

The Myrtlewood Field Office initiated consultation with the U.S. Fish and Wildlife Service for evaluation of effects to the northern spotted owl and the marbled murrelet. On February 1, 2016 (Tails No. 01EOFW00-2016-F-0068) the BLM received a Biological Opinion that concludes the Six Twigs proposed project “is not likely to jeopardize the spotted owl or the murrelet because the proposed project has been planned consistent with the Northwest Forest Plan.” Additionally, the EA contains an analysis of effects to the northern spotted owl and the marbled murrelet (EA pp. 30–39). The proposed action would not remove or modify NRF (nesting, roosting, and foraging) habitat for the northern spotted owl. There are seasonal restrictions in the area where the detection of a single male occurred and spot-check surveys would continue in timber sale areas adjacent to NRF habitat (EA p. 35). The project would not remove or modify any occupied murrelet sites or any trees with available murrelet nesting structure. The project includes a 300-foot, no-harvest buffer around all occupied murrelet sites to protect occupied stands from hard edge effects (EA p. 38). For these reasons, the BLM does not anticipate disruption of northern spotted owls or of marbled murrelets from implementation of the proposed project.

The sediment generated from the proposed harvest and road activities would not result in negative effects to the federally listed coho or coho critical habitat (CCH). Implementation of project design features and Best Management Practices, and the proximity of species and habitats in relation to harvest and road activities would minimize if not eliminate sediment input (EA p. 51). The Myrtlewood Field Office has determined that the proposed activities would have “no effect” to federally threatened Oregon Cost coho salmon and its associated Critical Habitat; thus consultation with the National Marine Fisheries Service is not required. The proposed action would also not result in adverse effects to Essential Fish Habitat as designated by the Magnuson-Stevens Fishery Conservation and Management Act (16 U.S.C. 1855 as amended).

There are no threatened or endangered botany species within the project area.

10. *Any effects that threaten a violation of Federal, State, or local laws or requirements imposed for the protection of the environment (40 CFR 1508.27(b)(10))*

The proposed project was designed to conform to Federal, State, and local laws imposed for the protection of the environment (EA p. 3).

This project complies with the Coastal Zone Management Act, as there would be no adverse effects to Coastal Zone resources from implementing this project because water quality would not be impacted (pp. 51–63).

Analysis has also concluded that implementation of the proposed actions would not change the likelihood of and need for listing of any Special Status Species under the ESA as identified in BLM Manual 6840 and BLM OR/WA 6840 policy.

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 Six Twigs proposed project is consistent with the Coos Bay District 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.

Pursuant to Executive Order 13212, the BLM must consider the effects of this decision on the President's National Energy Policy. As there would be no impact to the exploration, development or transportation of undeveloped energy sources from the proposed action, a Statement of Adverse Energy Impacts is not required.

Conclusion

Based on the information contained in the EA (DOI-BLM-ORWA-C040-2013-0003-EA), and all other information available to me, I have determined that the proposed action would not have a significant impact on the human environment within the meaning of section 102(2)(c) of the National Environmental Policy Act of 1969, and that an Environmental Impact Statement is not required. I have determined that the effects of the proposed activities would be within those analyzed in the 1995 Record of Decision/Resource Management Plan for the Coos Bay District.

/s/ Kathy Westenskow

7/8/2016

Kathy Westenskow
Myrtlewood Field Manager

Date