

UNITED STATES  
DEPARTMENT OF THE INTERIOR  
BUREAU OF LAND MANAGEMENT  
NORTHWEST OREGON DISTRICT OFFICE

**PRELIMINARY FINDING OF NO SIGNIFICANT IMPACT**

DOI-BLM-ORWA-N050-2017-0006-EA

Thurston Hills Non-Motorized Trails and Forest Management Environmental Assessment

The Bureau of Land Management (BLM) has prepared an Environmental Assessment (EA) (DOI-BLM-ORWA-N050-2017-0006-EA) which analyzed the effects of two separate actions presented for analysis by the Upper Willamette Field Office, Northwest Oregon District Bureau of Land Management (BLM): 1) a new non-motorized trail system for hiking and mountain biking; and 2) a timber harvest, named the Pedal Power Timber Sale. The BLM analyzed a No-Action Alternative and five action alternatives. On the basis of the information contained in the EA (April 23, 2018) and all other information available to me, it is my determination that the implementation of the selected actions encompassed by Alternative 3, including trail development and timber harvest actions, would not have a significant effect on the quality of the human environment, considering the context and intensity of impacts (40 CFR 1508.27). Therefore, an environmental impact statement (EIS) is not necessary and will not be prepared.

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

**Brief Project Description**

The Upper Willamette Field Office, Northwest Oregon District (formerly Eugene District), Bureau of Land Management (BLM) is selecting to implement a trail development action and a regeneration harvest action evaluated in the Thurston Hills Non-Motorized Trails and Forest Management EA. The project is located in the Cedar Creek subwatershed in Springfield, Oregon, in Township 18 South, Range 2 West, Section 1 and Township 17 South, Range 1 West, Section 31.

The trail development action (in Alternative 3) would develop approximately 8.5 miles of non-motorized hiking and mountain biking trails within the BLM's Willamalane Non-Motorized Trails Extensive Recreation Management Area (ERMA), which was designated by BLM's 2016 Northwestern and Coastal Oregon Record of Decision and Resource Management Plan (RMP). The trail layout would have two potential connections to the adjacent hiking and mountain biking trail system being developed by the Willamalane Park and Recreation Department (WPRD) in the WPRD's Thurston Hills Natural Area. All trails would be open to hiking and mountain biking. However, to complement the WPRD trail system, the proposed BLM trails would be designed for primary use by mountain bikers, with secondary uses by hikers (including trail runners, joggers, and pedestrians). Trail layout, design, and construction of the trails would be guided by the International Mountain Bicycling Association (IMBA) trail design guidelines and

BLM's *Guidelines to a Quality Trail Experience; Mountain Bike Trail Guidelines* (USDI BLM, 2017).

The timber harvest action (in Alternative 3) would implement a regeneration harvest on approximately 155 acres in the Harvest Land Base (HLB) utilizing the management direction of the 2016 RMP for timber harvest in the Harvest Land Base (HLB) Moderate Intensity Timber Area (MITA). The entire harvest unit size is approximately 165 acres, consisting of approximately 155 acres of harvest and 10 acres of aggregate (grouped) green tree retention. The BLM would incorporate harvest practices pursuant to the RMP management direction for regeneration harvest within MITA, and harvest would be accomplished by two harvest methods including ground-based and cable (skyline) yarding. Associated actions would include road work and post-harvest slash disposal, site preparation, and reforestation. Road work would include approximately 0.4 mile of road construction, 4 miles of road renovation, new cross-drains, and up to five (5) culverts (four replacements and one new) for stream crossings.

## **Public Involvement**

The BLM offered a 30-day public comment period during scoping which began March 17, 2017, and ended April 30, 2017. During the scoping period, the BLM held a public meeting in cooperation with the WPRD on April 13, 2017 and solicited comments from the public. The BLM also sent coordination letters to the Confederated Tribes of Siletz, the Confederated Tribes of Grand Ronde, and the Confederated Tribes of Warm Springs, inviting them to consult. The BLM did not receive a response from any of the Tribes.

The BLM engaged a public involvement specialist (contractor) to conduct more in-depth interviews with stakeholders identified during scoping as having a vested interest in the project. These interviews were conducted in September 2017. After developing a preliminary range of alternatives and issues in response to public comments, the BLM held a public open house on November 7, 2017, to solicit input on these alternatives and on the list of issues the BLM proposed to consider in the EA.

The BLM posted the EA and Preliminary Finding of No Significant Impact (FONSI) on April 23, 2018, for a 15-day public comment period ending May 8, 2018.

## **Context**

The selected actions are site-specific actions that by themselves do not have international, national, region-wide, or statewide importance. The actions described would be limited in scope and geographic application (40 CFR 1508.27(a)). The EA described the project location (Section 1.0), the purpose and need (Section 1.2), and the affected environment (Chapter 3). The direct, indirect, and cumulative effects of the selected actions for the issues analyzed were detailed in Chapter 3. The physical and biological effects were found to be limited in scope and scale. The direct and indirect environmental effects would be confined to the project area. These analyses were reviewed in consideration of the CEQ's guidance on cumulative effects analysis, and the results were disclosed in the EA.

## Conformity

The BLM signed a Record of Decision (ROD) approving the Northwestern and Coastal Oregon Record of Decision and Resource Management Plan (2016 ROD/RMP) on August 5, 2016. The Upper Willamette Field Office designed this project to conform to the 2016 ROD/RMP, which is the authorizing RMP for this project.

## Intensity

I have considered the potential intensity of the impacts that would result from the selected action relative to each of the 10 areas required for consideration by the CEQ, as detailed below (40 C.F.R. § 1508.27(b)):

### 1. Impacts that may be both beneficial and adverse.

I considered both beneficial and adverse impacts associated with the selected action as presented in the Row River Trail Improvements EA. The EA analyzed environmental effects from the project and presented six (6) issues not in detail in Section 1.6 and four (4) issues in detail in Section 3.

The EA concluded the following relative to potentially affected environmental resources and conditions:

**Fire Hazard:** There would be no potential for significant effects from the proposed actions on fire hazard beyond those disclosed in the Proposed Resource Management Plan/Final Environmental Impact Statement for Western Oregon (PRMP/FEIS or FEIS). Trail development would not affect fire hazard because it would not change the structural stage, fuel model, or fuel loadings in the project area. Potential effects on fire hazard from timber harvest and reforestation activities are within the scope and scale of effects analyzed in the FEIS. Cumulatively, BLM's effects on fire hazard patterns within the Thurston Hills vicinity are diminished because fire hazard accrues from all landscape areas and this project would affect less than 1/10 of one percent of the landscape. EA p.10

**Fire Risk:** The BLM analyzed the potential fire risk associated with residual activity fuels resulting from timber management activities in detail in the PRMP/FEIS, to which the EA tiers. For the Thurston Hills project, the BLM assessed the wildfire hazard potential (WFP) associated with timber harvest in the project area and found that the resultant activity fuels risk category would remain low under the selected action. EA p. 11. The BLM also evaluated wildfire risk relative to trail development and use. The selected action would increase the number of visitors in the project area; however, due to the change in how the public would use the land (from unmonitored diffuse activities to monitored developed recreation), the BLM anticipates no change or a decrease in fire risk in the project area. These effects on fire risk would therefore be neutral or positive. EA pp.11-12

**Invasive Plants:** The BLM evaluated potential changes in invasive plants for the timber harvest action. The BLM would expect invasive plants to increase after harvest, with the increased levels persisting up to about 30 years, at which point planted conifers and other shade-tolerant native vegetation would outcompete (cause reductions in) invasive species. Due to the current prevalence of weeds in the project area, BLM reforestation efforts after harvest would include proactive cutting back of invasive shrubs to promote growth of the

planted seedlings. These extra efforts, in addition to the BLM's implementation of project design features (PDFs) and other monitoring and control actions described in the EA, would dampen the increase of invasive species, with rates of infestation remaining high after timber harvest, similar to existing conditions. EA pp. 12-13

**Trespassing, Litter, Vagrancy, Privacy, Traffic, and Traffic Noise for Residences:** The BLM evaluated the effects of the selected trail development action on neighboring residences relative to trespassing, litter, vagrancy, privacy, traffic, and traffic noise. The evaluations in the EA concluded that undesirable and criminal activities would not increase and may actually decrease in the project area as a result of trail development. Relative to privacy, three residences located where the trail corridor could not be rerouted farther away, would be potentially affected by noise or visual effects from trail users, with effects including audible noise such as the whirring of bicycle wheels, voices, and visual sightings of recreational users. Two of these residences are currently exposed to occasional noise and visual sightings of trail users on user-created trails. The third residence is set back from the trail and has screening vegetation on their property but the timber harvest action would remove trees near their property which could increase their exposure to the trail. The BLM, would incorporate aggregate green tree retention along the trail near this residence to provide a forested corridor for the trail to the extent possible. During and after trail construction, the BLM would implement a suite of management measures to enhance security through design, education, and enforcement. Relative to traffic, the BLM trail development would not result in vehicular traffic on 79<sup>th</sup> Street because BLM is not proposing trail heads, parking facilities, or other amenities accessible from 79<sup>th</sup> Street or any other local roads. Based on these considerations, the BLM does not anticipate the potential for significant impacts to neighboring residences. EA pp. 13-15

**Mature and Late-successional Forest Characteristics and Effects on Spotted Owl:** The BLM previously analyzed effects on the amounts of late-successional forest structural stages and down woody material and the effects on spotted owl recovery in the PRMP/FEIS, to which this EA tiers. The Thurston Hills project would be consistent with these effects because the proposed regeneration harvest follows RMP management direction, with features detailed in the EA Section 2.3.2. The affected stands would develop through the Early Successional, Stand Establishment, Young High Density, and Mature Multi-layered Canopy structural stages, as anticipated by the PRMP/FEIS (Volume 1, p. 318), before the BLM once again conducts harvest. There are no known spotted owl sites in the Thurston Hills project area. EA pp. 16-17

**Sediment Entering Streams:** The BLM previously analyzed effects of sediment yield from road construction in the PRMP/FEIS, to which this EA tiers. For the Thurston Hills project, the BLM hydrologist conducted a quantitative analysis that included road construction, timber hauling, and trail building on sediment yields. The BLM concluded that the estimated increases in sediment yield from the Thurston Hills project would not be detectable relative to background sediment load. Neither road building and use, nor trail building and use, nor the combination of road/trail building and use would result in detectable changes in water quality. EA pp.17-19

**Recreational Experiences:** The selected trail development action (Alternative 3) would occur after timber harvest and was therefore designed to account for the conditions that would be present after regeneration harvest. The action would develop approximately 8.3

miles of new designated non-motorized, single-track trails within the ERMA. The trail network would offer a broad range of trail experiences (play, escape, challenge and efficiency) and provide for intermediate and advanced opportunities, with a variety of technical trail features including jumps, berms, grade reversals, and rollers on 12 distinct segments of trail. Trail width would be narrow (24-36 inches) across all trail segments, providing for a challenging and fun experience. When connected to and combined with the adjacent WPRD 12-mile system, the approximately 20 miles of the combined trail system would provide a much-needed recreational opportunity in the Eugene/Springfield area. EA pp. 35-37 and p. 39

**Cost and Revenues:** Cost outlays would be required for the trail development action and net revenues would result from the timber harvest action. There are no links between the funding and revenues of the two proposed actions; they are funded and administered through different programs.

Costs for the proposed trail development action are estimated at approximately \$369,900, corresponding to a cost of approximately \$44,566 per mile. EA p. 43. These costs reflect the costs of elevating the trail tread or amending the trail with crushed rock within riparian areas to provide stable trails in wet conditions, as well as costs for converting haul roads (Spurs A and D) into trails, manipulating soils in the exposed regeneration harvest area to enhance trail tread, and creating man-made Technical Trail Features (rollers, jumps, and rock gardens) for the challenge segments.

Net revenues from the proposed timber harvest action would be approximately \$2.2 million, which accounts for the cost of road work. Net revenue is not the same as the proceeds sent to O&C Counties, which would be a portion of the net revenue, nor does it reflect the secondary benefits associated with employment during harvest, local spending, and the ultimate sale of timber products for the end user. However, it is an accurate and consistent way to estimate the relative “value” of timber produced from the project. EA pp. 42-43

**Timber Volume as Allowable Sale Quantity (ASQ):** The selected timber harvest action would contribute approximately 6 mmbf, representing approximately 12 percent of the Eugene SYU annual total ASQ target of 53 mmbf per year. Timber sales planned within the Eugene SYU for the years 2018-2023, including the Pedal Power sale, once implemented, would contribute to the ASQ volume. EA pp. 45

**Forest Stand Age Class Distribution:** The selected timber harvest action would increase the 0-10 year age class by 155 acres and it would decrease the 70-year age class by 155 acres at the scale of both the Upper Willamette Field Office and the Eugene SYU. The Pedal Power harvest combined with other regeneration harvests in the Upper Willamette Field Office and the Eugene SYU would result in a trend of increased HLB acres in the 0-10 year age class. Over time, acres in the 0-10 year age class would move into the 20-40 year age class, and successively into the 40-60 age class, for a more even distribution of ages across the age classes, as anticipated by the RMP. EA pp. 47-48

**2. The degree to which the proposed action affects public health and safety.**

The selected trail development action would be neutral or beneficial for public health and safety, providing outdoor recreational opportunities associated with health benefits. Public safety associated with the trail development action was assessed through the issue of “trespassing, litter, vagrancy, privacy, traffic, and traffic noise”, and the BLM anticipates neutral or positive effects. EA pp. 13-15. The selected timber harvest action would be implemented following all OSHA safety regulations, such as: temporary road closures would be implemented on Road No. 18-2-1 (extension of 79<sup>th</sup> Street) during timber loading and road work to keep people at a safe distance from active operations (EA p. 26); and snags would not be created within falling distance of power lines, structures, roads, or trails that will remain open after harvest activities (EA p. 24).

**3. Unique characteristics of the geographic area such as proximity of historic or cultural resources, park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas.**

There are no unique characteristics of importance in the Thurston Hills project area. The BLM conducted a cultural resource inventory of the project area in July, 2017 and no cultural resources were identified.

**4. The degree to which the effects on the quality of the human environment are 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 effects of activities planned under the selected actions are similar to many other trail development and timber harvest projects of a similar size and type implemented by the BLM. No unique or appreciable scientific controversy has been identified regarding the effects of the project.

**5. The degree to which the possible effects on the human environment are highly uncertain or involve unique or unknown risks.**

The selected actions would not impose highly uncertain impacts or involve unique or unknown risks to the human environment. The effects of activities planned under the selected action are similar to many other trail development and timber harvest projects of a similar size and type implemented by the BLM. The risks are well known and understood.

**6. The degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration.**

This project neither establishes a precedent nor represents a decision in principle about future actions. The selected trail development action is consistent with the BLM management direction for recreational facilities, would not cause significant environmental effects, and would not establish a precedent for future recreation actions with significant effects. The selected timber harvest action is consistent with the BLM management direction for forest management, would not cause significant environmental effects, and would not establish a precedent for future actions with significant effects.

**7. Whether the action is related to other actions with individually insignificant but cumulatively significant impacts.**

The BLM evaluated the project in context of past, present, and reasonably foreseeable actions and determined that there is not a potential for significant cumulative effects. The BLM identified that the selected actions would have local and regional positive cumulative effects relative to recreational opportunities, timber volumes (in ASQ), and forest age class distribution. These effects would be consistent with the local and regional settings considered in the analyses.

The selected trail action would provide a new recreational opportunity in the Eugene/Springfield area as anticipated by the RMP, and in combination with the WPRD trail system, would provide a well-constructed and sustainable local recreational facility into the future. EA pp. 35-36.

The selected timber harvest action would provide for approximately 6 million board feet of ASQ, which would be combined with other timber sales in the Eugene Sustained Yield Unit (SYU) to provide enough timber volume to meet the annual ASQ targets for the Eugene SYU (53 mmbf per year). EA p. 45. The timber harvest action would redistribute approximately 155 acres into the 0-10 year forest age class, and, combined with future harvests, would cause a more even distribution of ages across the age classes, as anticipated by the RMP as a means to provide sustained yield harvest levels. EA p.48

**8. The degree to which the action may adversely affect districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historic resources.**

The selected action would not affect any cultural resources listed in or deemed eligible or potentially eligible for listing in the National Register of Historic Places. The BLM conducted surveys in 2017 and no cultural resources were identified in the project area. EA p. 9

**9. The degree to which the action may adversely affect an endangered or threatened species or its habitat that has been determined to be critical under the Endangered Species Act of 1973 (ESA).**

No endangered or threatened species or critical habitat as determined per the ESA occur in the project area and therefore no such species or habitat would be affected by the selected action.

**10. Whether the action threatens a violation of Federal, State, or local law or requirements imposed for the protection of the environment.**

The selected action does not violate or threaten to violate any Federal, State, or local laws imposed for the protection of the environment.

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 selected action, a Statement of Adverse Energy Impacts is not required.

## Conclusion

Based on the information contained in the EA (DOI-BLM-ORWA-N050-2017-0006-EA) and all other information available to me, I have determined that the selected actions 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 in conformance with the management direction of the 2016 Record of Decision/Resource Management Plan for the Northwest Oregon District.

Signature of the Responsible Official:

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Brian Bickford  
Upper Willamette Field Manager  
Northwest Oregon District Office

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Date