



# United States Department of the Interior



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IN REPLY REFER TO:  
5400 (014)

**DECISION RECORD #1  
FOR  
SOUTH GERBER FOREST HEALTH TREATMENTS EA #OR-014-04-06  
PROJECT: Adobe East Timber Sale**

## **INTRODUCTION**

The effects of the Adobe East Timber Sale are analyzed in the South Gerber Environmental Assessment (EA), (EA# OR014-04-06). This assessment analyzed multiple proposed actions across watersheds with implementation proposed over a five to ten year period. It was anticipated that separate Decision Records would be prepared at the time specific projects were proposed. This Decision Record applies only to the Adobe East Timber Sale (See Map 1) including associated activities. The timber sale is scheduled to be sold August 24, 2005. I will be making further decisions in the future based on the other proposed actions outlined in the South Gerber EA.

The Klamath Falls Resource Area (KFRA) interdisciplinary team designed the Adobe East Timber Sale based on: (a) current resource conditions in the project area, (b) the results of monitoring the previous decade of timber harvest activities, and (c) meeting the objectives and direction of the KFRA Resource Management Plan (RMP). The proposals presented and evaluated in the South Gerber EA reflect what the interdisciplinary team determined to be the best balance and integration of resource conditions, resource potentials, competing management objectives, expressed interests of the various publics, and the concerns of surrounding communities.

## **DECISION**

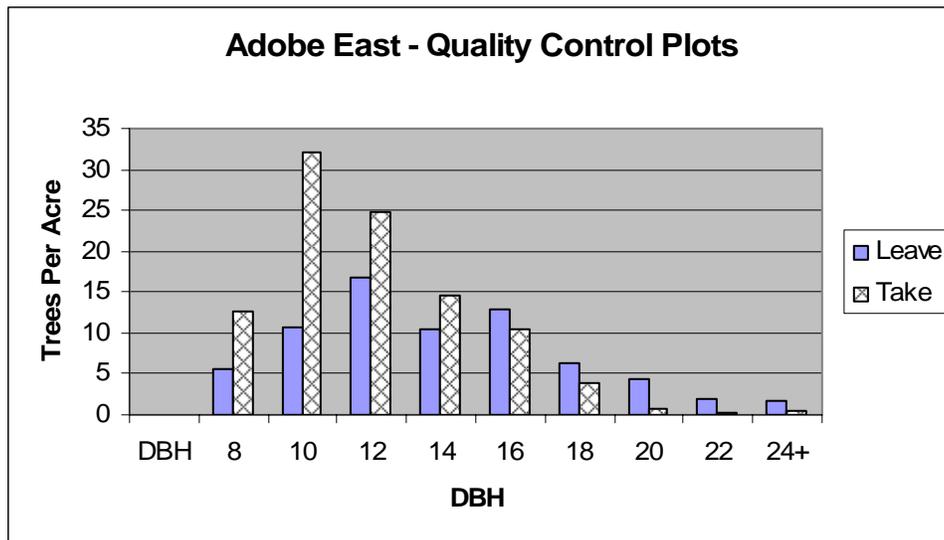
It is my decision to implement Alternative 1, the Preferred Alternative, proposed in the South Gerber EA. As part of this action Best Management Practices (BMPs) in Appendix D of the KFRA ROD/RMP and the Project Design Features in Appendix B of the EA will be applied. The approved action will result in the implementation of the Adobe East Timber Sale within the analysis area, specifically:

### Timber Harvesting:

- Timber harvesting in the very southeast portion of the KFRA in Townships 40 and 41 South, Range 15 East (see attached map).

- Approximately 1,400 acres of BLM commercial forest land and juniper woodland will be thinned using a Density Management prescription. No patch cuts or regeneration harvests are planned as part of the Adobe East Timber Sale. The Klamath Falls Resource Area density management prescriptions are designed to improve the forest health and reduce hazardous fuels and associated risks of higher severity wildfires. They are also designed to reserve an array of trees sizes and forest structure and maintain and enhance the existing ecological functions of the stand including wildlife habitat. Based on results of some quality control plots taken within the proposed Adobe East Timber Sale area, Figure 1 shows the expected distribution by diameter class of trees designated for cutting (take trees) and retention (leave trees).
- Approximately 2.7 million board feet (MMBF) of commercial timber will be harvested.
- Within the unit boundaries, all junipers over ten (10) feet tall, except those meeting the older juniper definition, will be cut concurrently with the commercial timber harvesting operations.
- All harvesting will be done with ground based equipment; rubber tired grapple skidders, track mounted skidders, and mechanical harvesters with twenty (20) foot radial booms.
- Harvesting activities will occur within the matrix and riparian reserve land use allocations (see KFRA FEIS pages 2-12 to 2-26 for definition of matrix and riparian reserves lands).

Figure 1 – Adobe East Timber Sale – Quality Control Plots Showing Comparison of Take versus Leave Trees Per Acre by Diameter Class.



Roads:

- Access to the sale areas will be on existing road systems. Approximately forty-one (41) stations (4,100 feet) of temporary dirt spurs will be built. Upon completion of harvesting, the proposed new spur road along with existing blocked roads will be re-blocked.
- Approximately 16.76 miles of road will be renovated which includes grading, cleaning ditches and culverts, and resurfacing roads with 4,040 cubic yards of rock.
- All blocked roads that are opened to facilitate logging will be blocked again upon completion of harvest.

#### Riparian Reserves:

- Approximately 10 acres of BLM land within the riparian reserves will be thinned using a Density Management prescription. These acres are included in the total density management treatment acres listed above.
- The perennial and intermittent streams containing, or connecting to, fish populations will be buffered and protected as described in the PDFs (Appendix B) of the South Gerber EA and the BMPs in Appendix D of the KFRA ROD/RMP. Specifically, operational boundaries will be delineated to establish no-mechanical-equipment-entry zones along stream channels to protect thermal regimes adjacent to streams and maintain stream bank stability.
- The objectives of the Aquatic Conservation Strategy (ACS) will it be met with implementation of the PDFs and BMPs.

#### Wildlife Management:

- Osprey: As stated on page 34 of the Klamath Falls RMP “restrict some management activity within ¼ mile of known sites between May1 and August 1”. In Unit 4 this seasonal restriction will be implemented.
- Implement the PDFs described in Appendix B of the South Gerber EA and the BMPs applying to timber harvesting in the KFRA ROD/RMP, Appendix D, for all actions conducted in the Adobe East Timber Sale Area.
- Northern Goshawk: Two years of surveys were completed for northern goshawks in the Adobe East Timber Sale area. No northern goshawks were detected. If a site is located in the future, a buffer and seasonal restriction will be implemented (page 38 KFRA RMP).
- Special Status, Threatened and Endangered Species – The management actions/directions as described on pages 38 & 39 of the RMP will be applied.

#### Fuel treatments:

- Upon completion of harvesting, most of the harvested area would be underburned within three to four years to reduce fuel loads and re-introduce fire as part of the natural ecological process in the area.

#### Monitoring

The KFRA ROD/RMP (Appendix K) requires that at least twenty percent of the timber sales, silviculture projects, or other ground disturbing activities be monitored annually. The KFRA has issued an Annual Program Summary (APS) and Monitoring Report on a yearly basis since the signing of the Resource Management Plan in 1995. The Annual Program Summary documents the results of annual timber sale monitoring as well as on-going monitoring of other resources. The 2004 Annual Program Summary and Monitoring Report, Table 19-5 on page 37 lists all the sales that have been sold and those that have been monitored to date. Monitoring related to timber harvesting has included determining soil effects, stand attribute changes (basal area, trees per acre, species composition, structure), numbers and spacing of skid trails, coarse woody debris and snag requirement compliance, establishment and adherence to riparian reserve buffers, threatened and endangered species buffers, cultural resources buffers, and seasonal use restrictions. The Adobe East Timber Sale will have some or all of these attributes monitored.

#### Mitigation

All PDFs described in Appendix B of the South Gerber EA and all BMPs in Appendix D of the KFRA ROD/RMP that pertain to timber harvesting and to the resources listed in the Site Specific

Information section above will be implemented. No additional mitigation was deemed necessary and thus none was described in the EA or in this decision record.

### **Resources Not Present**

The following resources are not present within the proposed Adobe East Timber Sale Area: prime and unique farmlands, mining claims, paleontological resources, hazardous materials, roadless areas, wilderness areas, and wilderness study areas.

### **Environmental Consequences**

Implementation of the proposed action is consistent with the effects analyzed in the South Gerber EA and the RMP/EIS. The PDFs from the South Gerber EA and the BMPs from the KFRA ROD/RMP will minimize the effects to the affected resources and result in no impacts greater than those described in the EA and the KFRA ROD/RMP.

### **RATIONALE FOR SELECTION OF ALTERNATIVE 1**

The decision to implement this proposal, Alternative 1, meets the purpose and need identified in the EA and furthers the intent established in the Klamath Falls Resource Area RMP to harvest timber and protect other resource values.

Alternative 2, the No Action Alternative, is rejected because it does not meet the resource management objectives for the Matrix identified in the Klamath Falls RMP and the Northwest Forest Plan. Beneficial economic opportunities from timber harvesting would be foregone and no thinning or fuels reduction benefits would be realized.

### **CONSULTATION AND COORDINATION**

BLM biologists have made a "No Effect" determination for all threatened and endangered species for the Adobe East Timber Sale. Therefore, no consultation was necessary.

### **PUBLIC INVOLVEMENT**

The KFRA requested public comments on the South Gerber EA on two different occasions. The first was an initial scoping letter dated February 5, 2004 that outlined the proposed treatments for the analysis area. Three comment letters were received. Upon completion of the EA, the public was again notified on January 13, 2005 and allowed to comment during a formal thirty (30) day public comment period. Again, three comment letters were received. The following provides responses to the main issue topics raised in the comments:

#### **Roads**

Comment: *No new road construction, particularly in roadless areas.*

Response: No new permanent road construction is proposed. In compliance with the Federal Land Policy and Management Act of 1976, the BLM inventories roadless areas 5,000 acres or more in size. There are no roadless areas on BLM land within the project area. Current average road density within the proposed contract areas is estimated at between one and two miles per square mile. Therefore, there will be no road construction in any roadless areas.

Comment: *Limit or don't construct temporary roads.*

Response: Construction of approximately 4,100 feet of temporary spur roads is limited to the minimum necessary to accomplish the proposed treatments. One spur will facilitate the closure and continued reclamation of an existing road immediately adjacent to a streambed. These new

temporary spur roads, along with existing blocked roads, will be closed upon completion of activities. Therefore, a beneficial effect is expected over the long term by not using the older road near the streambed.

Comment: *Avoid damage to roads during inclement weather.*

Response: Project activities and road use are seasonally limited to the dry season when soil moisture at a six inch depth are less than 20 percent (typically June 1 to October 15) thereby reducing potential effects.

Comment: *Adverse impacts from roads to streams, soils, wildlife, hydrology, vegetation (noxious weeds), tree growth, and increased spreading of diseases should be addressed.*

Response: The EA discusses road-related environmental effects to the above resources on pages 11, 12 and 19, therefore, this topic is sufficiently addressed.

### **Riparian Reserves**

Comment: *Proposed action is contrary to the requirements of Aquatic Conservation Strategy (ACS).*

Response: The objectives of the ACS include maintaining and restoring the species composition and structural diversity of plant communities in riparian areas (RMP page 7). Riparian Reserve buffers, Best Management Practices, and Project Design Features, as described in the proposed action, are expected to maintain and restore the plant communities in the area thereby reducing effects and meeting ACS objectives. Aquatic species and habitat are limited in the project area. Potential increases in water yield and spring flow are not expected to contribute to an increase in aquatic habitat. However, the quality of existing habitat would be enhanced as a result of implementing the proposed action. Water quality would not be reduced because implementation of BMPs and PDFs will provide buffers. The cumulative effects of restoration treatments designed to improve, protect, and restore the function of riparian ecosystems in the project area and in the adjacent watershed would have similar results on aquatic habitat, consistent with the ACS.

### **Vegetation**

Comment: *Do not cut trees over 12" DBH.*

Response: The KFRA ROD/RMP (page E-3) specifies that "...trees in all size classes are eligible for thinning in order to reduce stocking to site capacity." The KFRA monitors stand structure and forest conditions on an annual basis (see 2004 Annual Program Summary and Monitoring Report pages 88-92). The bulk of the trees to be removed are in the 10" and 12" size classes (Figure 1 above). While retaining all trees over 12" DBH may be desirable by some of the public, there is no basis for an arbitrary tree diameter limit for this project. As verified by monitoring past projects (2004 Annual Program Summary and Monitoring Report) stand diversity is expected to be retained, therefore, no diameter limit is necessary.

Comment: *Retain all large snags.*

Response: As described in the EA (Appendix B, page 3), a minimum of 1.4 snags per acre would be retained to meet the 60% optimum cavity nesting habitat in the area. In addition, because this is a density management harvest where approximately 1/4 to 1/3 of the trees are removed, there is expected to be sufficient recruitment trees available to meet future snag and down woody debris requirements thereby negating the need to retain all large snags.

Comments: *Patch cut size violates the RMP. Patch cuts are the same as clear cuts. Retention of diversity in the stand including mistletoe trees is necessary.*

Response: KFRA RMP Plan Maintenance in 1999 changed the maximum patch cut size to five acres (page 70 of the 2004 Annual Program Summary and Monitoring Report). As opposed to clear cuts, patch cuts retain a minimum of five to ten large green trees per acre in addition to any snags present. Thinning is done at variable densities, including leaving thermal clumps to provide habitat diversity (pages 23-24 of the EA). Patch cuts are not the same as clearcuts and therefore, do not violate the RMP.

Comment: *Thinning should be done at variable densities and carefully.*

Response: Figure 1 (above) shows that trees in diameter classes ranging from eight to 24 inches will remain which will result in variable density stands. The 2004 Annual Program Summary and Monitoring Report (page 90) shows a summary of the post treatment stand attributes of a timber sale that includes canopy closure, basal area, trees per acre, tree sizes, fuel loading, coarse woody debris data, and snag data. The summary shows a range of individual plot stand data indicating that the residual stand contains a considerable amount of variation thereby validating that variable density thinning is being implemented.

## **NEPA**

Comment: *Inadequate site-specific analysis of direct, indirect, and cumulative impacts.*

Response: The South Gerber EA tiers to the KFRA RMP/EIS. The assessment addressed direct, indirect, and cumulative effects of each action associated with the proposed timber sale and fuel treatments. The cumulative effects discussion in the EA address past, present and reasonably foreseeable future actions on BLM land, and on adjacent Forest Service and private lands. Therefore, the effects are fully and adequately analyzed.

Comment: *An EIS instead of an EA should be written.*

Response: The analysis is sufficient to support the conclusion that effects of actions proposed in the EA will not exceed those analyzed in KFRA RMP/EIS and the determination that effects are not significant so an EIS is not required.

Comment: *Inadequate description of mitigation measures.*

Response: The list of Best Management Practices and Project Design Features provided in Appendix B of the EA were sufficient to protect resources and minimize potential environmental effects, so no additional mitigation measures were developed.

Comment: *Inadequate range of alternatives considered.*

Response: Four alternatives were considered and two were analyzed. The rationale for dropping two alternatives from further analysis is on page 6 of the EA. Despite there being only two alternatives analyzed and documented in detail, the range of alternatives considered was adequate.

## **Wildlife**

Comment: *Inadequate analysis of impacts on wildlife.*

Response: The KFRA RMP/EIS, to which the South Gerber EA is tiered, considers at length the effects of timber management on wildlife. The EA (pages 23-29) describes the current situation and anticipated effects to wildlife specific to the project area. One of the benefits as discussed in the EA of reduced canopy closure is more sunlight on the forest floor resulting in an increase in

forbs, grasses, and shrubs with a corresponding benefit to wildlife species. Therefore the analysis of specific wildlife species is adequate.

### **Grazing**

Comments: *Consider impacts on forest health from livestock grazing/Cumulative effects not addressed. Livestock grazing must be eliminated.*

Response: Rangeland Health Standards Assessments completed for all allotments in the project area as part of the Gerber-Willow Valley Watershed Analysis (July, 2003) show that current levels of livestock grazing are appropriate to meet all five standards for Rangeland Health, which would also apply to “forest health”. The cumulative effects of grazing on timber resources and management were not specifically addressed in the EA because grazing is not an issue of concern for this area. Current levels of grazing have no measurable effect on timber resources, especially coniferous species. The KFRA ROD/RMP recognizes and provides for livestock grazing as a legitimate use of the public lands (page 62 and Appendix H).

### **Fire and Fuels**

Comments: *Thinning and fuels reduction should focus on smaller trees and ladder fuels, particularly trees less than 12.”*

Response: Thinning and fuels reduction efforts for this project do focus on ladder fuels and trees less than 12” in diameter (Figure 1 above).

Comments: *Don’t focus on reducing canopy fuels.*

Response: Canopy levels will be reduced from the proposed thinning but this is not the focus of the project.

Comments: *Ensure long-term recruitment of future old-growth.*

Response: The treatments are expected to maintain future old-growth recruitment (see vegetation discussion above) and estimated canopy closure of 40 percent or more in stands that are currently densely stocked. Therefore the long-term recruitment of future old-growth is expected.

Comments: *Harvesting will actually increase wildfire severity and risks.*

Response: Fuel treatments include underburning to remove accumulated fuels including slash generated by timber harvest. The overall effect of the proposed action is expected to modify the present fuel condition class to closer resemble historic conditions thereby benefiting multiple resources. As a result of all actions proposed including harvesting, the wildfire severity and risk is not increased.

### **Juniper Management**

Comment: *There is limited scientific evidence supporting western juniper encroachment of historic rangelands.*

Response: There are a variety of objectives for juniper management but the emphasis in this project area is fuels reduction, rangeland health, and forest health. Appendix H of the RMP discusses the type of vegetative improvements proposed in the different allotments. Page H-69 states that vegetative control would consist of cutting or burning juniper to improve resiliency of native grasses, forbs, and shrubs. Page 56 of the RMP discusses the cutting and yarding of up to 1,000 acres per year of juniper woodlands to improve forest and range land ecosystem and watershed conditions. Research is increasingly validating the benefits of treating invasive

western juniper; (*Western Juniper Its Impact and Management In Oregon Rangeland*, Oregon State University Extension Service, February 1993, Bedell, Eddleman, Deboodt, Jacks.; *Range Field Day 1999 Progress Report Juniper Woodlands: History, Ecology, and Management*, Agricultural Experiment Station, Oregon State University, Special Report 1002, June 1999; *Western Juniper in Eastern Oregon*, Gedney, Azuma, Bolsinger, McKay, United States Department of Agriculture, Forest Service, Pacific Northwest Research Station, General Technical Report -464, November 1999). The effects of invasive western juniper are discussed in the Gerber Watershed Analysis and the literature cited above. The effects of the proposed actions to treat some of the invasive juniper within the Adobe East Timber Sale area are analyzed in the South Gerber EA and are within those analyzed the KFRA RMP. Therefore, the decision is to treat the juniper as proposed.

### **Salvage Harvesting**

Comment: *The cumulative effects of salvage harvesting were not considered.*

Response: There is potential for salvage harvesting to occur unrelated to this sale. Except for salvage of larger areas burned by wildfire or killed by insects or disease, the typical salvage harvest is of individual or small groups of trees. The Roaming Salvage II EA includes discussions of direct, indirect and cumulative effects of these types of actions. Effects on other resources are minimized through implementation of BMPs and PDFs.

## **CONCLUSION**

### **A. Consideration of Public Comments**

I have reviewed the public comments summarized above and have discussed them with the interdisciplinary team of specialists on my staff. The EA and this DR contain the requisite site specific information to implement the proposed action. The comments received do not provide any substantially new information or new analysis. Nor do they identify substantial new data gaps that would indicate additional analysis is needed. Finally, the comments do not identify any significant new data which would alter the effects described in the EA. I am confident that the South Gerber EA plus the supplemental information, including responses to public comments contained in this DR, in addition to the more comprehensive analysis done in the Klamath Falls Resource Area RMP to which the EA is tiered, represents a thorough analysis of potential effects associated with the Adobe East Timber Sale and fuels treatments.

### **B. Plan Consistency**

Based on the information in the South Gerber EA and in the record, I conclude that this action is consistent with the Klamath Falls Resource Area Resource Management Plan. The action will help to move this portion of the landscape towards the desired future condition considered in development of the RMP. The actions will comply with the Endangered Species Act, the Native American Religious Freedom Act, cultural resource management laws and regulations, and Executive Order 12898 (Environmental Justice). This decision will not have any adverse effects to energy development, production, supply and/or distribution (per Executive Order 13212).

### **C. Finding of No Significant Impact**

No significant impacts were identified. No impacts beyond those anticipated in the KFRA RMP/EIS would occur. Refer to the accompanying Finding of No Significant Impact.

D. Summary

In consideration of public comments, the consistency with the RMP and the finding that there would not be any significant impacts, this decision allows for activities related to the Adobe East Timber Sale.

As outlined in 43 CFR § 5003 Administrative Remedies at § 5003.3 (a) and (b), protests may be made within 15 days of the publication date of a notice of sale. Publication of such notice in *The Klamath Falls Herald and News*, Klamath Falls, Oregon constitutes the decision date from which such protests may be filed. Protests shall be filed with the authorized officer and contain a written statement of reasons for protesting the decision.

43 CFR 5003.3 subsection (b) states: "Protests shall be filed with the authorized officer and shall contain a written statement of reasons for protesting the decision." This precludes the acceptance of electronic mail or facsimile protests. Only written and signed hard copies of protests that are delivered to the Klamath Falls Resource Area office will be accepted.



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Jon Raby, Manager  
Klamath Falls Resource Area  
Lakeview District, Bureau of Land Management

7/22/05

Date

Sale Name: Adobe Bill East  
Willamette Meridian:  
T40S R15E Secs.31, 32  
T41S R15E Secs.5,6,7,8,17,18,19,20,21

Timber Sale Contract Map  
Contract No. OR014-TS5-2  
Exhibit A  
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