

## DECISION DOCUMENTATION and DECISION RATIONALE

### **Gold Goose Thinning**

Environmental Assessment (EA) Number OR080-04-05

USDI - Bureau of Land Management  
Oregon State Office, Salem District, Marys Peak Resource Area

Township 6 South, Range 7 West, Section 34; Township 7 South, Range 7 West, Sections 3 and 4;  
Willamette Meridian  
Polk County, Oregon

### **Introduction**

The Bureau of Land Management (BLM) has conducted an environmental analysis for the Gold Goose thinning project, which is documented in the Gold Goose/Neuman Road environmental assessment (EA) (EA # OR080-04-05) and the associated project file. This project (Gold Goose Thinning) is a proposal to conduct commercial thinning on 171 acres leaving variable tree densities within the stand. A Finding of No Significant Impact (FONSI) was signed on February 23, 2005 and the EA and FONSI were then made available for public review.

### **Decision**

My decision is based on site-specific analysis in the Gold Goose/Neuman Road EA , the supporting project record, management recommendations contained in the *Rowell Creek\Mill Creek\Rickreall Creek\Luckiamute River Watershed Analysis* (1998) as well as the management direction contained in the *Salem District Resource Management Plan* (RMP) dated May 1995 and associated management direction (EA section 1.3).

I have decided to implement the Alternative 2 of Gold Goose Thinning Project described below, hereafter referred to as the “selected action”. The selected action is shown on the Alternative 2 Gold Goose EA map attached to this Decision Rationale.

### **Summary of the Decision**

#### **1. Stand Treatment of Thinning**

- Density Management will occur on approximately 171 acres. Nineteen acres of the harvest units are in Adaptive Management Area land use allocation, 78 acres in Late Successional Reserve land use allocation and 74 acres in Riparian Reserve land use allocation. Eight patching openings are located throughout the thinning area in section 3.
- Aerial yarding will occur on approximately 149 acres and ground based yarding will occur on approximately 22 acres (EA section 2.2.3).

## **2. Road Access**

- Approximately 2 miles of road renovation will occur prior to the timber sale.

## **3. Fuels Treatment**

- Debris accumulation on landings and roads which are a result of yarding units 3A and 34A will be machine piled, covered, and burned.

## **4. Coarse Woody Debris (CWD) Creation**

- Post-harvest assessment of the size and condition of snags and down log accumulations from harvest activities, windthrow, and beetle kill within 5 years post-harvest date will be completed by the wildlife biologist and/or silviculturist. A summary of the CWD conditions with recommended new inputs will be analyzed for additional creation of CWD. Trees at stand average or larger DBH would be targeted for CWD selection.

## **5. Design Features and Mitigation Measures**

- All design features and mitigation measures described in the EA (pp. 13-16) will be incorporated into the timber sale contract.

## **Compliance with Direction**

The selected action has been designed to conform to the following documents, which direct and provide the legal framework for management of BLM lands within the Salem District: **1/ Salem District Record of Decision and Resource Management Plan**, May 1995 (RMP): The RMP has been reviewed and it has been determined that the selected action conforms to the land use plan terms and conditions (e.g. complies with management goals, objectives, direction, standards and guidelines) as required by 43 CFR 1610.5 (BLM Handbook H1790-1). Implementing the RMP is the reason for doing this project (RMP p.1-3); **2/ Record of Decision for Amendments to Forest Service and Bureau of Land Management Planning Documents within the Range of the Northern Spotted Owl and Standards and Guidelines for Management of Habitat for Late-Successional and Old-Growth Forest Related Species within the Range of the Northern Spotted Owl**, April 1994 (the Northwest Forest Plan, or NWFP); **3/ Record of Decision to Remove or Modify the Survey and Manage Mitigation Measure Standards and Guidelines in Forest Service and Bureau of Land Management Planning Documents within the Range of the Northern Spotted Owl**, March 2004 (SSSP); All of these documents may be reviewed at the Marys Peak Resource Area office.

## **Alternatives Considered**

Pursuant to Section 102 (2) (E) of NEPA (National Environmental Policy Act of 1969, as amended), Federal agencies shall “Study, develop, and describe appropriate alternatives to recommended courses of action in any proposal which involves unresolved conflicts concerning alternative uses of available resources.” The following unresolved conflicts concerning

alternative uses of available resources (section 102(2) (E) of NEPA) were identified: there is a need to reduce tree densities and maximize late successional characteristics over the watershed; there is also a need to minimize road densities wherever possible in the watershed.

An alternative proposing more thinning, no new road construction and shorter haul routes would meet the purpose and need of the project and address these conflicts. Therefore, the EA analyzed the effects of the No Action Alternative (No action), Alternative 1, and Alternative 2.

## **Reason for the Decision**

Considering the content of the EA and supporting project record, the management direction contained in the RMP and Survey and Manage ROD, and public comment, I have decided to implement the selected action as described above. My rationale for this decision follows:

The selected action, addresses the identified purpose and need for action in that it would:

- Increase structural diversity in relatively uniform dense conifer stands in both the Adaptive Management Area and Late Successional Reserve.
- Growth of trees would be accelerated to restore large conifers to Riparian Reserves
- Habitat (e.g. coarse woody debris, snag habitat, in-stream large wood) for populations of native riparian-dependent plants, invertebrates, and vertebrate species can be enhanced or restored
- Contribute toward District timber management goals and local economic diversity in the Adaptive Management Area.
- Manage the roads in the area to meet transportation needs and Aquatic Conservation Strategy (ACS) objectives.
- Increase the structural diversity of forest stands in portions of the Riparian Reserve to meet ACS habitat objectives.
- Reduce tree densities within stands in the project area in order to increase tree diameter growth.
- Increase late successional forest characteristics within the Late Successional Reserve and Riparian Reserves, including terrestrial down wood and snags and the development of multilayered stands.
- A timber sale that could be successfully offered to purchasers, to meet timber harvest target objectives (contributing to a stable timber supply) for this year in the Adaptive Management Area. Additional needs to accomplish this would include:
  - Logging systems appropriate to the topography and to the silviculture prescription.
  - Access to the stands appropriate to logging the stand efficiently.
  - Roads which are hydrologically stable.

**Alternative 1** was not selected for the following reasons:

- The treatment of early to mid-seral stands in Riparian Reserves would occur on fewer acres.
- Late-successional forest conditions, which serve as habitat for late-successional forest species, would be developed, accelerated, and enhanced on fewer acres.
- Structural diversity in relatively uniform dense conifer stands in the Late Successional Reserve would occur on fewer acres.

- Road densities would increase with the construction of 4,500 feet of new road.

**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 2.1). For example:

- The No Action alternative was not selected as it would not achieve the management opportunities that were identified within the *Rowell Creek\Mill Creek\Rickreall Creek\Luckiamute River Watershed Analysis* (Purpose and Need, EA p. 10).
- Over time, trees would thin themselves, but remaining trees would be of smaller diameter and have smaller crowns. Smaller diameter trees would not function on the ground and in streams as long or as well as larger diameter trees.
- The stand would have less vertical structure and poor height to diameter ratio (overcrowded trees tend to develop a condition of small diameter relative to height which makes them prone to wind throw) than the managed stand due to the past crowded stand conditions. The residual trees with reduced crowns size would not be as vigorous as the managed stand.

## **Public Involvement/Consultation/Coordination**

**Scoping:** In compliance with National Environmental Policy Act (NEPA), a scoping letter dated February 4, 2004 was sent to 55 potentially affected and/or interested individuals, groups, and agencies. One response was received during the scoping period.

**Comment Period and Comments:** The EA was made available on the Internet and notices were mailed on March 9, 2005 to approximately 41 agencies, individuals and organizations. A printed copy of the EA was mailed to 2 organizations on March 9, 2005. A legal notice was placed in local newspaper soliciting public input on the action from March 9, 2005 to April 11, 2005.

One letter was received from an organization during the EA comment period. The BLM response to substantive comments can be found in Appendix A of this Decision Rationale.

**Consultation/Coordination:** The Gold Goose project was determined to have "no effect" on spotted owls or marbled murrelets. However, spotted owl critical may be affected by this action. To address concerns for federally listed wildlife species, formal consultation with U.S. Fish and Wildlife Service was initiated in July of 2004. On 12/1/2004, the Service issued a Biological Opinion [BO# 1-7-2005-F-0005] that covered all habitat-modifying projects within the Northern Oregon Coast Range on federal lands in fiscal years 2005 and 2006. This BO concluded that this action and associated actions would not jeopardize the continued existence of any listed wildlife species, and would not result in the adverse modification of critical habitat that has been designated for these species. The selected action would follow all applicable terms and conditions set forth in this Biological Opinion.

The Gold Goose project was sent for informal consultation with the U.S. Department of Commerce, National Marine Fisheries Service (NOAA Fish), NOAA reference number 2005/00833 from NOAA. A letter of concurrence with the determination of "not likely to adversely affect" to listed fish was issued on April 26, 2005 and received by the Salem District on May 3, 2005.

## Conclusion

I have determined it is not necessary to change the Finding of No Significant Impact (FONSI – signed February 2005) for the Gold Goose Thinning for these reasons:

- The Gold Goose/Neuman Road EA, along with additional information contained in this document, fully covers the project. There are no significant new circumstances or facts relevant to environmental concerns and bearing on the modification to the proposed action or its impacts, which were not addressed in the EA.
- The action is within the scope of the alternatives identified in the original EA, and the environmental impacts are within those described in the original EA and are less than or the same as those anticipated for Alternative 2 in that assessment.

**Protests:** In accordance with Forest Management Regulations at 43 CFR 5003.2, the decision for this timber sale will not become effective or be open to formal protest until the Notice of Sale is published "in a newspaper of general circulation in the area where the lands affected by the decision are located". Protests of this sale must be filed within 15 days of the first publication of the notice. For this project, the Notice of Sale will be published in the *Itemizer Observer* newspaper prior to sale. This is planned for June 29, 2005. The current planned sale date is July 27, 2005.

**Contact Person:** For additional information, contact Andy Frazier (503) 315-5979, Marys Peak Resource Area, Salem BLM, 1717 Fabry SE, Salem, Oregon 97306.

Field Manager (ACTING)  
Marys Peak Resource Area

Date / /

# Appendix A: Response to Public Comments on the EA

## Introduction

One letter was received commenting on the Gold Goose/Neuman Road Environmental Assessment. Although the letter communicated a number of issues and opinions on forest management in general, the response to comments below only discusses those specifically directed to the Environmental Analysis which was made available for public review from March 9, 2005 to April 11, 2005. Comments are in *italics*. The BLM response follows each comment.

## *Oregon Natural Resources Council (ONRC)*

This letter was received by mail on April 7, 2005.

1. **Comment:** *“We support the design of placing skips and gaps together and away from roads and landings. As a general rule, no gap should be within 200’ of any road. Heavy retention areas should be left near landings.”*

**Response:** All of the eight gaps are a minimum of 300’ from any road (see attached map). Retention and protection of leave trees is more easily attained utilizing ground based yarding methods than skyline yarding methods. Although the BLM will not pre-designate landing locations within ground based yarding areas, adequate retention of leave trees will be maintained during the administration of the timber sale contract.

2. **Comment:** *“We urge you to lay out yarding corridors before you lay out intentional gaps to avoid not having yarding corridors connect landings and roads ultimately creating very large gaps.”*

**Response:** All of the gaps are located in the aerial yarding portion of the project area. Since there will be no skyline yarding corridors in the project area and the nearest intentional gap will be a minimum distance of 400’ from the ground based yarding areas, large gaps will not be created.

3. **Comment:** *“Our biggest concern with the proposed action for Gold Goose is the extensive road construction that provides access to only a portion of the 104 acres slated for logging. The ecological costs for building the road system far outweigh the ecological benefits from the thinning.”*

**Response:** As stated in the decision rationale the field manager has elected to implement Alternative 2 of the EA. Since this alternative has no new road construction, any short term impacts related to temporary road construction will not occur.

5. **Comment:** *“We are concerned about the loss of snags for safety and operational reasons. BLM must develop design criteria to protect all large diameter legacy snags.”*

**Response:** We agree that large diameter snags are important legacy features that should be retained in treatment units, and we understand your concern that safety/operational issues

should not diminish these structures. It has been our fairly extensive experience that the loss of large diameter snags for operational/safety reasons rarely happens in our units, but is occasionally necessary in close proximity to roads, landings, and yarding corridors. Since the selected action includes a majority of helicopter yarding (87% of total yarding area), the likelihood of having to fell any large diameter snags for operational and safety concerns will be greatly reduced as compared to skyline yarding. We believe the design features for the protection of existing down logs and snags as stated in the EA (page 15) provides the necessary protection for these resources and removes any incentive for needlessly felling or removing them. We have also purposely designed most of our un-thinned clumps (skips) to protect one or more snags. We encourage you to review in the field some of our recently completed projects where retention of larger diameter snags was accomplished without significant loss to this important resource.

6. **Comment:** *“The EA does not discuss the snag retention requirements described in the Northwest Forest Plan or the RMP, but we assume that the guidelines in these plans is what the BLM used to plan this project. BLM is obligated to use the best science available to protect public resources. BLM should use DecAID decisional support tool and consider all of the values of snags and down wood”.*

**Response:** The EA clearly discusses both snag and down log retention on Page 13 and in Table 5 (p. 32). The BLM is not relying on “old out-dated” science concerning snags and down logs. As required by the Northwest Forest Plan, a [Late-Successional Reserve Assessment](#) was completed in January 1998 that covers BLM lands in the project area, and addresses management considerations for retention and creation of coarse woody debris. The prescription for management and enhancement of coarse woody debris for the selected action is designed to meet ecological needs in balance with future recruitment potential for this forest. The DecAID tool and other references listed in your comments have been considered in this prescription and are cited in the wildlife resources report.

