

**DRAFT FINDING OF NO SIGNIFICANT IMPACT  
FOR THE  
PICKETT WEST FOREST MANAGEMENT PROJECT  
DOI-BLM-ORWA-M070-2016-0006-EA**

**United States Department of the Interior  
Bureau of Land Management  
Medford District, Grants Pass Field Office**

**I. INTRODUCTION**

The Grants Pass Field Office, Medford District Bureau of Land Management (BLM), Pickett West Forest Management Project Environmental Assessment was made available for public comment from May 30, 2017 to June 29, 2017. The BLM has a statutory obligation under the Federal Land Policy and Management Act which directs that “The Secretary shall manage the public lands...in accordance with land use plans developed by him under Section 202 of this Act...”

The BLM signed a Record of Decision approving the Southwestern Oregon Resource Management Plan (2016 ROD/RMP) on August 5, 2016. Revision of an RMP involves a transition from the application of the old RMP to the application of the new RMP. The planning and analysis of forest management projects require several years of preparation before the BLM can design a site-specific project and reach a Decision. Allowing for a transition from the old RMP to the new RMP avoids disrupting the management of BLM-administered lands and allows the BLM to utilize work already begun on the planning and analysis of projects.

The 2016 ROD/RMP (p. 10) allows the BLM to implement projects consistent with the management direction of either the 1995 ROD/RMP or the approved 2016 ROD/RMP, at the discretion of the decision maker so long as 1) a project-specific Decision was not signed prior to the effective date of the ROD, 2) preparation of NEPA documentation began prior to the effective date of the ROD, and 3) any project-specific Decisions are signed within two years of the effective date of the ROD.

The Grants Pass Field Office began preparation of this project on June 22, 2016 prior to the effective date of the 2016 ROD/RMP. This project was designed to conform to and be consistent with the Medford District’s 1995 Record of Decision and Resource Management Plan (1995 ROD/RMP). For more information, see Chapter 1.5.1: Land Use Management Plans, within the Pickett West Forest Management Project Environmental Assessment (EA).

One of the primary objectives identified in the 1995 ROD/RMP is implementing the O&C Lands Act which requires the Secretary of the Interior to manage O&C lands for permanent forest production in accordance with sustained yield principles.

The purpose and need for the proposed treatments in the Pickett West project is to produce wood volume, improve stand resiliency, enhance or maintain northern spotted owl habitat, and reduce the long-term risk of catastrophic wildfire.

The No Action Alternative - Alternative 1, proposes no silviculture, forest management, wildlife habitat, or fuel maintenance activities. The No Action Alternative would not meet the purpose and need of the project.

The EA analyzes the effects of two Action Alternatives. Action Alternative 2 proposes the treatment of approximately 6,005 acres in the Matrix, Matrix Adaptive Management Area, and Riparian Reserve Land Use Allocations. Commercial treatments include Restoration Thinning (3,025 acres), Density Management (2,226 acres), and Understory Reduction (754 acres). Non-commercial treatments include approximately 11,102 acres of Hazardous Fuels Reduction maintenance.

Action Alternative 3 proposes the treatment of approximately 6,005 acres in the Matrix and Matrix Adaptive Management Area Land Use Allocations. There are no treatments proposed within the Riparian Reserve Land Use Allocation. Commercial treatments include Restoration Thinning (1,028 acres), Density Management (3,185 acres), and Understory Reduction (1,792 acres). Non-commercial treatments include approximately 11,102 acres of Hazardous Fuels Reduction maintenance.

## **II. DETERMINATION OF SIGNIFICANCE**

The discussion of the following significant criteria applies to the intended actions and is within the context of local importance. Chapter 3 of the EA describes the effects of the Action Alternatives. None of the effects identified, including direct, indirect, and cumulative effects, are considered to be significant and do not exceed those effects described in the 1995 Medford District Resource Management Plan/Final Environmental Impact Statement or the Southwestern Oregon Resource Management Plan/Final Environmental Impact Statement. The environmental effects of the Action Alternatives do not meet the definition of significance in context and intensity as defined in 40 CFR § 1508.27. Therefore, an environmental impact statement is not necessary and will not be prepared.

**Context.** The Pickett West Forest Management project analyzes the treatment of approximately 6,005 acres in the Matrix, Matrix Adaptive Management Area, and Riparian Reserve Land Use Allocations. Treatments include Restoration Thinning, Density Management, Understory Reduction prescriptions, and 11,102 acres of Hazardous Fuels Reduction maintenance treatments. The planning area is located within the Hellgate-Rogue River, Deer Creek, and Lower Applegate watersheds in Josephine County including a small portion of Jackson County of Oregon. The Action Alternatives do not have international, national, region-wide, or state-wide importance.

**Intensity.** The following discussion is organized around the Ten Significance Criteria described in 40 CFR § 1508.27(b) as they pertain to the context of the Pickett West Forest Management project Action Alternatives.

**1. Impacts that may be both beneficial and adverse.** The most noteworthy predicated environmental effects of the Action Alternatives include:

- a) **Vegetation.** Restoration Thinning prescriptions have been developed with the Rogue Basin Cohesive Forest Restoration Strategy’s “Ecosystem Resilience” and “Fuel Management” models in mind. Restoration Thinning and Understory Reduction prescriptions would reduce stand density, fuel loadings, increase vigor, and reduce insect and disease mortality similar to levels found in stands that have an intact fire regime. The desired condition is an open growing, structurally diverse stand with openings that allow the natural regeneration or planting of primarily early seral trees such as pines and oaks as well as retaining dense, shaded refugia for wildlife. Underburning would be considered after mechanical operations are completed to further reduce fuel loadings, recycle nutrients, and stimulate plant growth.

Density Management and Understory Reduction treatments would control stand density, influence species dominance, maintain stand vigor, and place stands on developmental paths so that the desired stand characteristics would result in the future. These treatments break up the continuity of fuels, can slow or stop the spread of active crown fire across the mosaic, and can develop high-quality habitat conditions by keeping a cohort of large trees.

The No Action Alternative would not promote the development of late-seral open or closed canopy forest, which is lacking at the landscape, BLM-administered lands, and proposed unit levels. No action is not expected to contribute to the recovery of the northern spotted owl as described in the Recovery Plan and Critical Habitat Rule, or to the resiliency of stands to environmental changes, including drought and catastrophic fire. There would be a cumulative adverse effect of not meeting improved conifer growth and habitat development objectives as described in the 2011 Revised Recovery Plan, the relevant Watershed Analysis, or the 1995 Medford District ROD/RMP, Chapter 3.1 Silviculture.

- b) **Fire and Fuels.** Alternative 2 and 3 would help restore, maintain, and enhance fire-adapted ecosystems by reducing fire hazard within the Pickett West planning area. Implementation of treatments would trend more towards the historical low to mixed severity fire regime enhancing fire-adapted ecosystems by reducing fire hazard. The proposed Hazardous Fuels Reduction maintenance treatments would re-evaluate past Hazardous Fuels Reduction acres within the planning area for potential maintenance

treatments. Continuation of maintenance treatments would provide long-term benefits by maintaining and/or reducing fire hazard on 11,102 acres (EA, p. 141).

The implementation of forest thinning under Alternatives 2 and 3 involving thinning from below to remove suppressed and/or over crowded intermediate and co-dominant trees while retaining the larger co-dominant and dominant trees which would promote fire resilient forest stands. Forest structure alteration that would occur from the thinning prescriptions would result in a reduction in ladder fuels, an increased crown base height, and the reduction of crown bulk density. Treatments would reduce the likelihood of tree-to-tree crown fire; maintaining and promoting large diameter trees with thick fire resistant bark; and improving spatial heterogeneity. This would result in disrupting fuel continuity, uniformity and structure, a reduction to fire hazard, fire size, and potential loss of high value ecosystem components (EA, p. 142).

A short-term increase of fine fuels deposited on the forest floor would result in an immediate increase in fire hazard until activity fuels are treated. Activity fuels treatments are proposed that would reduce this immediate deposition of fuels as described in Chapter 2.4, Best Management Practices and Project Designs Features, and Chapter 3.2 Fire and Fuels Analysis (EA, p. 112).

Under the No Action Alternative, the current trend would continue for surface, ladder, and aerial fuels. Crown base height would decrease due to continued increases in understory density, increasing the potential for crown fire initiation. Crown bulk density and crown continuity would increase, as would the potential for active crown fire events. With the expected increase in flame length, significant torching, crown fire activity, and tree mortality would generally result in the extensive mixed conifer forest (EA, p. 136).

- c) **Soil Compaction and Productivity.** Some units would have higher amounts of disturbance and loss of productivity, but the average amount across the planning area would be below the thresholds of 12% (compaction) and 5% (productivity loss). Pickett West projects would adhere to the aforementioned 12% and 5% thresholds, thus soil resources would not be directly, indirectly, or cumulatively impacted. By limiting soil disturbance to the threshold limit, the potential for accelerated erosion would also be limited. Similar to soil disturbance, loss of soil productivity would be limited to 5% or less with installment of mitigation procedures. Soil disturbance is expected to remain consistent with current levels over the long-term, but may vary annually (EA, p.192).

Decompaction can be accomplished by the use of tool/machinery to reduce the soil bulk density and allow for water infiltration, aeration, and optimal seedling survival. After implementation of Best Management Practices and Project Design Features (Chapter 2.4), the detrimental effects of soil compaction and loss of soil productivity would be mitigated (EA, p.191).

- d) Soil Sedimentation and Erosion.** Inner and Outer Riparian Zone buffers are designed to be protective of the root network of typical trees in this area, mitigate potential impacts to hydric soils, and avoid sedimentation. In addition to the stabilizing effect of the root network, adjacent trees also dissipate stream energy during high or overbank flows, further reducing bank erosion (EA, p. 50). These buffers would be protective of bank erosion and avoid sedimentation (EA, p. 206). Inner Riparian Zone buffers adjacent to and below units would capture and filter sediment from reaching ditches and/or streams at a level that would be similar to that which would occur naturally (EA, p. 206).

The main soil order that presented slope stability and erosion concerns was the Pearsoll-Rock outcrop complexes. Due to the high potential for fire related damage that could lead to soil erosion and loss of productivity, fuels treatment would be avoided on these soils (EA, p. 192 and Appendix XX).

The proper implementation of Best Management Practices and Project Design Features would be protective of water quality by reducing erosion and sedimentation, protecting wood recruitment to streams, and protect riparian shading (EA, p. 195). Road maintenance activities associated with timber sales decrease the likelihood of road failures due to erosion (EA, p. 59). It is expected that the average amount of soil disturbance per unit would be consistent with the impact analysis and conclusions provided by the 1994 Medford RMP EIS (EA, p. 193).

- e) Hydrology.** The Pickett West analysis determined that little to no sedimentation would occur from individual units, landings, and crossings along haul routes. In other words, no measureable sedimentation would occur above natural background levels described for the No Action Alternative. Therefore, water quality measures would not be negatively affected. Some short-term direct and indirect effects to water quality were identified due to pulse increases in sediment and turbidity from road work, generally during the first significant storm event of the wet season. While these effects from sediment could potentially occur, it would still remain within acceptable water quality limits for turbidity, and sediment loads would be difficult to distinguish from background levels (EA, p. 212).

No treatment buffers, Best Management Practices, and specific associated Project Design Features identified in Chapter 2.4, would result in no direct or long-term sediment input to streams and thus no cumulative effects to water quality. In addition to sediment filtering, the no treatment buffers would also retain trees that contribute to the primary shade zone for streams, and thus would maintain stream temperatures (EA, p. 213).

The risk of negative effects to water quality from Alternative 2 is low. There would be no changes to current slope stability or risk of slope failure. The potential for periodic slope failures within the range of natural variability would still remain in association with areas

exhibiting an historic disposition to soil movement, particularly in the event of a major storm (EA, p. 213).

Based on the data analyzed, the risk of peak flow enhancement from roads alone would be low. All roads in the PA currently occupy less than 5% of the land base. Statistically significant increases in peak flows have been shown to occur only when roads occupy at least 12% of the watershed, based on an extensive review of the literature of peak flows in western Oregon (Harr 1976). Alternative 2 would not increase road densities because all temporary routes would be fully decommissioned after use (EA, pp. 31 and 213).

Sediment from larger events would be typical of background conditions and is difficult to separate from natural sources of sedimentation and therefore not considered a pollutant for water quality. The proper application of Best Management Practices typically makes sedimentation downstream from proposed treatment units indistinguishable from background conditions (EA, p. 26)

Any increase in sedimentation associated with the actions described for Alternative 2 are unlikely to be detectable above effects described for the No Action Alternative (EA, p. 209). Any potential increase in sedimentation on a sub-watershed scale is expected to be indistinguishable from background conditions (EA, p. 210).

f) **Northern Spotted Owl.** See #9 below.

g) **Botany.** See Threatened and Endangered plants in #9 below.

There would be no direct or indirect effects that would jeopardize the presence or persistence of Bureau Special Status Species or Survey and Manage vascular and nonvascular plants because sites requiring protection within final planning units would receive protection buffers (EA, p. 255).

In the short-term (0-3 years), proposed management actions would result in soil displacement and erosion, potentially affecting fungi species recolonization efforts within treatment units and along roads. These effects are localized and not expected to remain in the long-term (3+) because mycelial networks are able to re-colonize areas of disturbance (EA, p. 256).

2. **The degree to which the selected alternative will affect public health or safety.** The Pickett West project is expected to maintain the health and safety of the public by utilizing signs during all forest operations as directed by federal and state Occupational Safety and Health Administration (EA, p. 291).

Public health and safety is expected to be maintained because of the use of water or approved road surface stabilizers to control dust during timber hauling to reduce surfacing material loss and buildup of fine sediment (EA, p. 67).

Roads used for hauling during timber sale activities are maintained by the purchaser of the timber sale. Road maintenance activities associated with timber sale decrease the likelihood of road failures due to erosion (EA, p. 59) and removes vegetation along roadsides to improve sight distance for travel (EA, p. 57). Proposed maintenance activities are anticipated to improve the roads within the PA making them safer for use by private entities and the public (EA, p. 31).

All prescribed burning activities on the Medford District BLM are required to be in compliance with the Clean Air Act and the Oregon Smoke Management Plan (OAR 629-048-0010). Prior to conducting prescribed burning activities, the BLM must register prescribed burn locations with Oregon Department of Forestry (ODF). The specific location, size of the burn, fuel loadings, ignition source, time, and duration of ignition are reported prior to ignition. Smoke management advisories or restrictions are generated on a daily basis by the State Meteorologist. This information is used to determine the appropriate time to conduct the planned prescribed burn. There would be negligible direct or indirect effects on air quality within the Pickett West planning area and the Smoke Sensitive Receptor Areas. Effects on air quality from slash burning would be short-term and localized (EA, pp. 32-33).

- 3. Unique characteristic of the geographic area such as proximity to historic or cultural resources, park lands, prime farm lands, wetlands, wild and scenic rivers, or ecologically critical areas.** The BLM completed surveys for cultural resources in the proposed treatment units. Any sites eligible for protection have been buffered and would not be impacted by project activities. The process of surveying, buffering, and communicating project activities ensures that BLM activities would avoid, minimize, and mitigate impacts to cultural resources (EA, p. 19). Project Design Features ensure that the Action Alternatives would not have any direct or indirect effects on cultural resources. There are no eligible properties located within the Area of Potential Effect as defined by Section 106 of the National Historic Preservation Act (EA, p. 235).

There are no park lands or prime farmlands that would be effected by the Pickett West proposal (EA, p. 19).

There are no known wetlands that would be effected by proposed treatment units. Any wetlands that are discovered would be buffered with a 25-foot no treatment buffer (EA, p. 79). Also, there are nineteen Best Management Practices and Project Design Features which are incorporated into the analysis to ensure the protection of wetlands (EA, Chapter 2.4).

To protect river values, there are no treatments proposed within the ¼ mile Rogue River Recreation Corridor. To ensure proposed treatments would not negatively impact the hydrology of the river, units found to be hydrologically connected to the river were dropped or had their

boundaries modified (EA, p. 18). Based on the evaluation described in the EA, there are no anticipated effects to natural scenery, recreation, or fisheries contained within the Rogue River Corridor (EA, pp. 25 - 27).

The Pickett West planning area encompasses a Fritillaria Management Area, 6 Areas of Critical Environmental Concern (ACECs), and a Research Natural Area (RNAs), including the Brewer Spruce RNA, Crooks Creek ACEC Deer Creek ACEC, Eight Dollar Mountain ACEC, Iron Creek ACEC, and Pickett Creek ACEC. With the exception of the Pickett Creek ACEC and the Fritillaria Management Area, there are no proposed commercial or fuels treatments within ACECs and RNAs listed above (EA, p. 19 and 236).

Unit 32-1 totals approximately 10 acres of which approximately 3 acres are within the Pickett Creek ACEC and Fritillaria Management Area. The 2016 ROD/RMP does not preclude timber harvest in these areas so long as the treatments are intended to increase fire resilience and improve and maintain habitat for Gentner's fritillary (EA, p. 236).

The planning area also includes a segment of the Illinois Valley Botanical Area (1995 ROD/RMP) (EA, p. 236). The 1995 ROD/RMP directs the Illinois Valley Botanical Area to be managed as a botanical emphasis area due to the preponderance of special status plants. Actions including timber harvest are allowed if they do not conflict with the habitat needs of the plants (1995 ROD/RMP p. 56) (EA, p. 27).

- 4. The degree to which the effects on the quality of the human environment are likely to be highly controversial.** The effects of the Action Alternatives on the quality of the human environment were adequately understood by the interdisciplinary team to provide analysis in the EA.

Public comments and input have been considered and incorporated throughout the analysis for this project (Chapter 1.6.1 Scoping). Public comments were parsed into substantive and non-substantive comments. Those comments found to be substantive had four outcomes: 1) they were incorporated into the analysis, 2) they were mitigated through the utilization of project design features, 3) they are responded to in Appendix B of the Pickett West EA, or 4) there is an explanation for why they were not incorporated into the Action Alternatives and became Issues and Alternatives Considered but Not Analyzed in Detail (EA, p. 22).

The Action Alternatives analyzed in the Pickett West Forest Management project are within the scope of effects identified in the 1995 Medford District Resource Management Plan and the 2016 Southwest Oregon Resource Management Plan (Chapter 1.5.1: Land Use Management Plans). The interdisciplinary team utilized the best available science to determine the effects of the activities analyzed in the Action Alternatives as disclosed in Chapter 5 References. None of the comments were considered controversial in respect to their context and intensity in determining significance.



5. **The degree to which the possible effects on the human environment are highly uncertain or involve unique or unknown risk.** The effects of the Action Alternatives are not unique or unusual. The BLM has experience with similar forest management projects and have found the effects to be reasonably predictable. The environmental effects to the human environment are fully analyzed in Chapter 3 of the EA. Public concerns and input have been considered throughout the analysis, see Chapter 1.6 Public Involvement and Appendix B of the EA. The activities analyzed in the Action Alternatives are routine in nature, which includes Best Management Practices, Project Design Features, and seasonal restrictions. These effects are well known and do not involve unique or unknown risk to the human environment.
6. **The degree to which the actions may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration.** The Action Alternatives do not set precedent for future actions that might have significant effects nor do they represent a decision about future considerations. The Action Alternatives adhere to the direction provided in the 1995 Medford District Resource Management Plan.

The Pickett West project is a transitional project between the 1995 Medford District Resource Management Plan and the 2016 Southwest Oregon Resource Management Plan. The BLM must sign a project-specific Decision Record within two years of the effective date of the ROD (August 5, 2016). Any future planning efforts within the Grants Pass Field Office management area would adhere to the direction provided in the 2016 Southwest Oregon Resource Management Plan (Chapter 1.5.1: Land Use Management Plans).

7. **Whether the action is related to other actions with individually insignificant but cumulatively significant impacts.** The Interdisciplinary team evaluated the Action Alternatives in context of past, present, and reasonably foreseeable actions. Significant cumulative effects outside of those already disclosed in the 1995 Medford District Resource Management Plan and the 2016 Southwest Oregon Resource Management Plan are not predicted. Complete disclosure of the effects of the Action Alternatives are disclosed in Chapter 3 of the Pickett West environmental assessment.
8. **The degree to which the action may affect districts, sites, highways, structures, or other objects listed in or eligible for listing in the Nation Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historic resources.** There are no eligible properties located within the Area of Potential Effect as defined by Section 106 of the National Historic Preservation Act (EA, p. 235). To ensure the protection of possibly undetected sites during project implementation, the interdisciplinary team designed a Project Design Feature that directs operators to cease operations immediately and contact the project archaeologist if unidentified cultural or paleontological resources are encountered. If cultural resources are discovered during project implementation, the project would be redesigned to protect the cultural resource values present, or evaluation or mitigation procedures would be implemented based on

recommendations from the Resource Area Archaeologist with input from federally recognized Tribes, approval from the Field Manager, and concurrence from the State Historic Preservation Office (EA, p. 87).

**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.**

- a) **Fish.** Stand treatments, yarding, landing construction and rehabilitation, temporary route construction and reconstruction (including route decommissioning), road maintenance, hauling, and activity fuel treatments would have no effect on Southern Oregon Northern California Coast Coho Salmon (ESA-Threatened) and their Critical Habitat. For the Pickett West project, the closest Critical Habitat (Crooks Creek, Stratton Creek, Hog Creek, Pickett Creek, Panther Gulch, Dutcher Creek, Slate Creek, and Jackson Creek) is approximately 120 feet from the closest treatment units (3-6, 5-1, 5-2, 5-3, 11-5, 27-3, 28-2, 28-4, 28-5, 27-3, 33-3, 23-1, 9-4, 21-6, and 21-7). These treatment units would have Riparian Reserves of 190 feet for non-fish bearing and 380 feet for fish bearing streams (EA, p. 223).

Sediment would not be expected to enter Critical Habitat as a result of haul or maintenance of haul roads, with dry condition haul, properly functioning cross drains, and sediment barriers installed, where needed, to prevent sediment delivery into Critical Habitat. Project activities would follow all provisions of the Clean Water Act (40 CFR Subchapter D) and Department of Environmental Quality's (DEQ's) provisions for maintenance of water quality standards (EA, p. 223).

With the implementation of the Best Management Practices, Project Design Features, stream buffers, and seasonality of ground disturbance; there would be no direct or indirect effects from Alternative 2. Therefore, this project is not anticipated to cumulatively effect fish species and habitat within the Pickett West planning area (EA, p. 227).

- b) **Plants.** There are four federally listed plants on the Medford District. The Pickett West planning area contains two federally listed plant species, Cook's lomatium (*Lomatium cookii*) and Gentner's fritillary (*Fritillaria gentneri*) (EA, p. 237). Vascular plant surveys were conducted in the spring of 2016 and 2017. As of the release of the Pickett West EA, no new Threatened and Endangered plant sites were found. There would be no anticipated adverse effect from Action Alternatives 2 or 3 on any federally listed plant (EA, p. 238).

Unit 32-1 totals approximately 10 acres of which approximately 3 acres are within the Fritillaria Management Area. The 2016 ROD/RMP does not preclude timber harvest in

these areas so long as the treatments are intended to increase fire resilience and improve and maintain habitat for Gentner's fritillary (EA, p. 236) The EA concluded that there may be beneficial effects to Gentner's fritillary via habitat modification (canopy reduction and prescribed burning) in some areas within the Fritillary Management Area (EA, pp. 238 and 255).

**c) Northern Spotted Owl.**

*Northern Spotted Owl (NSO)*

Alternatives 2 and 3 are designed to achieve multiple objectives, including: a reduction of vegetation density, reduced risk of high-severity fire, increased growth and vigor of residual trees, and increased heterogeneity in terms of stand and species composition across the landscape (EA, p. 154).

Alternative 2 would result in the downgrade or removal of 151 acres of NRF habitat found within the six high value northern spotted owl sites. Alternative 3 would implement a lighter prescription (i.e. Treat & Maintain) on these same acres and only seven acres of NRF would be removed under Alternative 3 within these six high value northern spotted owl sites. Ultimately, this project must avoid the incidental take of northern spotted owl, and any decision issued from this EA would have a valid Biological Opinion that would support the BLM's determination that the project would not cause incidental take of NSO pairs or resident singles. Consultation with the USFWS is ongoing and the determinations contained within the forthcoming Biological Opinions for this project would have major relevance to which Action Alternative or blend of Alternatives is selected (EA, p. 165).

Effects to spotted owl prey species – All of the treatments proposed under the Action Alternatives were designed to help reduce any negative effects to northern spotted owl prey species by incorporating untreated pockets (leave “islands” or “skips”) throughout the treatment areas. This strategy is expected to provide unaltered portions of the stand throughout the PA that have the potential to serve as refugia for northern spotted owl prey species during project implementation. Residual trees, snags, and down wood retained in the thinned stands would provide some cover for prey species over time and would help further reduce any negative effects to spotted owl prey species (EA, p. 159).

*Northern Spotted Owl Critical Habitat (CHU)*

Alternative 2 would negligibly affect the intended conservation function of the critical habitat subunits in which they occur because at most (under Alternative 2), the proposed treatments would only result in a reduction of 1.4% and 0.7% of the available nesting,

roosting and foraging (NRF) and dispersal habitat within the critical habitat sub-unit KLW 1, respectively (EA, p. 170).

Neither of the Action Alternatives would appreciably reduce the capacity of any of the critical habitat sub-units to facilitate northern spotted owl dispersal. At most, under Alternative 2, the total amount of all Klamath West Habitat Unit 1 dispersal habitat (NRF + dispersal-only) would be reduced by an estimated 0.7%. This small loss of dispersal habitat across the critical habitat Subunit would not noticeably reduce the ability of the Klamath West Habitat Unit 1 Subunit to facilitate the dispersal of northern spotted owls across and between other critical habitat subunits or units. Northern spotted owls are able to disperse through a fragmented mosaic of roads, clear-cuts, non-forest areas, and a variety of forest age classes (Forsman et al. 2002) (EA, p. 170).

#### *Compliance with Northern Spotted Owl Recovery Plan*

During the project planning and development of Pickett West, the interdisciplinary team followed principles in the Recovery Plan Implementation Guidance: Interim Recovery Action 10 Medford Bureau of Land Management/Rogue River-Siskiyou National Forest/U.S. Fish and Wildlife Service Roseburg Field Office (USDA/USDI 2013) while designing the location and intensity of the proposed treatments included in each Action Alternative. Factors that influence this process include: occupancy rates across all known northern spotted owl sites within the planning area, existing habitat types, percentages within the 0.5 mile cores and home ranges of known owl sites, and abiotic factors such as topography, slope position and the Relative Habitat Suitability (MaxEnt) model described in the 2011 Revised Recovery Plan for the Northern Spotted Owl (USDI 2011a) (EA, p. 42 and 151).

Both Action Alternatives address the need to restore, conserve, and enhance NSO habitat as recommended in the 2011 Revised Recovery Plan. However, Alternative 2 was developed to strategically determine objectives in each unit, while Alternative 3 was not developed with a site specific strategy. BLM staff followed the RA-10 process that deferred forested areas already meeting high quality NSO habitat while minimizing impacts to any single NSO homerange (EA, p. 111).

The 2011 Revised Recovery Plan for the Northern Spotted Owl, “Restoring Dry Forest Ecosystems” (USDI 2011, Section III, pp. 32-38). Specifically, the following recommendations were used to reduce and minimize impacts to NSO in the PA: 1) no commercial treatments would occur within the Nest Patch area of any NSO site; 2) no habitat downgrade would occur within any high value owl sites; 3) limit the total amount of commercial treatments to <30% of the available NRF in any 0.5 mile core area; and 4) where habitat downgrade or removal is proposed, it is proposed to occur only in “low value” owl sites and the treatment is designed to emphasize dry forest habitat restoration,

consistent with “Restoring Dry Forest Ecosystems” section of the Revised Recovery Plan for the Northern Spotted Owl (USDI 2011a, pp. III-32-38), and direction included in the 2012 NSO Critical Habitat Rule (USDI 2012) (EA, p. 158).

**10. Whether the action threatens a violation of Federal, State, or local law or requirements imposed for the protection of the environment.** The Action Alternatives do not violate any known federal, state, or local law or requirement imposed for the protection of the environment. Furthermore, the Action Alternatives are consistent with the two applicable land management plans, policies, and programs.

### **III. FINDING**

I have determined that the Action Alternatives do not constitute a major federal action having a significant effect on the human environment. An environmental impact statement is not necessary and will not be prepared. This conclusion is based on my consideration of the Council on Environmental Quality’s criteria for significance (40 CFR §1508.27), the context and the intensity of the impacts described in the Pickett West environmental assessment, my understanding of the project, review of the project analysis, and review of public comments. As previously noted, the analysis of effects has been completed within the context of the 1995 Medford District’s Resource Management Plan and 2016 Southwest Oregon Resource Management Plan. This conclusion is consistent with those plans. The anticipated effects are within the scope, type, and magnitude of effects anticipated and analyzed in those plans. The analysis of project effects has also occurred in the context of multiple spatial and temporal scales as appropriate for different types of impacts. These effects were determined to be insignificant.