

DECISION NOTICE  
And  
FINDING OF NO SIGNIFICANT IMPACT

**SLINKY**

USDA FOREST SERVICE  
MT. HOOD NATIONAL FOREST  
CLACKAMAS COUNTY, OREGON  
CLACKAMAS RIVER RANGER DISTRICT

An Environmental Assessment (EA) has been prepared for the Slinky Timber Sale. This area is located in T.6 S., R.7 E., Willamette Meridian. The EA evaluates a forest management proposal that regenerates older forest stands that are fragmented and growing slowly, to create young productive forest stands, while providing forest products consistent with the Northwest Forest Plan goal of maintaining the stability of local and regional economies now and in the future. The project area is located in the Oak Grove Fork and Upper Clackamas watersheds.

**DECISION and RATIONALE**

**I have decided to select Alternative B.** Alternative B will meet the purpose and need discussed in the EA (page 2) by implementing the following:

Harvest trees from approximately 184 acres using the reserve shelterwood regeneration method. Approximately 10% of the harvest area would be retained in patches and scattered large trees would be retained at the rate of 10 to 12 per acre. Alternative B would provide forest products consistent with the Northwest Forest Plan goal of maintaining the stability of local and regional economies. It will result in constructing approximately 0.4 mile of temporary roads, which will be obliterated and revegetated upon completion of the project. Reconstruction of the haul route is also included.

**It is my decision to select Alternative B over the other alternatives considered for the following reasons:**

- Alternative B accomplishes the important objectives discussed above while creating minimal adverse impact to the environment.
- Water Quality and Fisheries - Even though the proposed actions have been designed to meet current standards, there is still a public concern (based on comments received) about ground disturbing activities including road construction and logging. This project is consistent with the objectives of the Aquatic Conservation Strategy (ACS) of the Northwest Forest Plan. The analysis shows (EA pages 15-27) that the roads pose minimal risk because they do not cross any streams, and are on stable, dry, gently sloping terrain. The location, road design, seasonal restrictions, and obliteration after project completion, combine to reduce the risk of impacting water quality and fisheries. Similarly the harvest units have been designed to minimize effects to water quality and fisheries by not harvesting in riparian reserves or in

unstable areas. They will use low impact logging systems on slopes over 20% and included are seasonal restrictions and erosion control measures.

- Harvesting of Older Forest –Based on the comments received there is a concern that the proposed harvest may impact the habitat of plants and animals associated with older forest. The Northwest Forest Plan recognized the conflicting desires for management of public lands and reached a compromise between social and biological concerns. Some areas are reserves and other areas, including the Slinky units, are matrix where timber outputs are expected to be achieved while meeting many standards and guidelines including those for green tree retention, snags and down woody debris. This alternative is consistent with the Northwest Forest Plan and its standards and guidelines. Alternative B provides forest products in a cost-effective manner and contributes best to the goal of the Northwest Forest Plan of maintaining the stability of local and regional economies now and in the future (p. 30-49).
- Economic Feasibility – Alternative B has a higher benefit cost ratio compared with the other alternatives. Alternative B provides the greatest economic benefit at the least cost with a benefit/cost ratio of 1.53 compared to 1.19 for Alternative C and 0.38 for Alternative D (EA p. 65).

#### **Description of Other Alternatives and Reasons for Non Selection:**

- Alternative A, the no-action alternative, was not selected because it would not provide any of the benefits described in the purpose and need (it would not convert slow growing fragmented stands to vigorous and productive young stands), and it would not provide any forest products consistent with the Northwest Forest Plan goal of maintaining the stability of local and regional economies.
- Alternative C is responsive to issue 1, which is a concern about the effect road construction could have on water quality. It has the same unit boundaries as Alternative B, it would meet the purpose and need but would build no roads. Helicopters would be used where necessary to remove logs. Approximately 78% of the acreage would be logged by ground based or skyline systems from existing roads, and 22% would be logged with helicopters.

Helicopter is a very high cost logging system (EA p.65-66). In this situation it may have resulted in a timber sale that would not receive any bids. I have chosen Alternative B over Alternative C because the risk of sedimentation from building temporary roads on gentle slopes with no stream crossings is very minimal with Alternative B, while the cost of helicopters is not warranted to achieve a very minimal reduction of sedimentation risk (EA p. 17-27).

- Alternative D is responsive to issue 2, which is a concern about the effect that logging older forest stands would have on the habitat for animal and plant species. Alternative D would partially meet the purpose and need and would also not build any roads. Alternative D has the same unit boundaries as Alternative B but instead of the 10 -12 leave trees per acre with Alternative B, it would leave approximately 30 of the largest and oldest trees per acre. As with Alternative C, Alternative D would build no temporary roads and would use helicopters instead.

Alternative D would have likely resulted in a timber sale that would not receive any bids because it would use high cost helicopters and has ½ the timber outputs of B. I have chosen Alternative B over Alternative D because the risk of sedimentation from building temporary roads on gentle slopes with no stream crossings is very minimal with Alternative B, while the cost of helicopters is not warranted to achieve a very minimal reduction of sedimentation risk (EA p. 17-27). I have also chosen Alternative B over Alternative D because B provides more timber to meet the goals of the Northwest Forest Plan, and because alternative D provides only marginal additional benefit to species associated with older forest (due to leaving an additional 18 to 20 trees per acre).

- Other Alternatives Considered

- An alternative was considered that would build the temporary roads as described in Alternative B and would retain 30 trees per acre as described in Alternative D. This alternative was not developed separately because it is within the current range of alternatives. In other words, I could have selected Alternative B but elected to leave 30 trees per acre. I would not select that strategy because leaving an additional 18 to 20 trees per acre would provide only marginal additional benefit to species associated with older forest.
- An alternative was considered that would include restoration projects such as road closures, road decommissioning and quarry restoration. Restoration projects such as these have already been evaluated in Forest-wide Restoration EAs completed in 2001 and 2003.
- An alternative was considered that would protect all snags. With the other action alternatives, snags would be saved where safety permits but many that are hazardous would be felled. With the other action alternatives, new snags would be created from live trees to replace the ones lost during logging. Another alternative would be to establish a no-harvest safety zone around each snag to keep loggers out of the hazardous area. Survey data shows that there are approximately 13 snags per acre within the proposed harvest units. The hazardous zone around just one snag would be approximately one acre in size (assuming an average height of 120 feet). Trying to avoid the hazard zone around all 13 snags would eliminate all of the harvest units. It would be very difficult to develop this alternative because snags are continually changing. In the 2 to 3 years between planning and logging, live trees may die and become hazardous snags. Snags that are a hazard today may fall by the time harvest occurs and no longer present a hazard. There is no way to predict today how many hazardous snags would have to be felled to prevent injuries to forest workers. I have concluded that it would be unfeasible to develop an alternative that would protect all snags within a timber sale that occurs over a 2 to 3 year period. An alternative that protects all existing snags is essentially the same as the no-action alternative.

## FINDING OF NO SIGNIFICANT IMPACT (40 CFR 1508.27)

Based on the site-specific environmental analysis documented in the EA and the comments received from the public, I have determined that this is not a major Federal action that would significantly affect the quality of the human environment; therefore, an Environmental Impact Statement is not needed. This determination is based on the design of the selected alternative and the following factors:

- **THREATENED, ENDANGERED, AND SENSITIVE SPECIES** - Formal consultation with U.S. Fish & Wildlife Service concerning the northern spotted owl has been completed for this project. The Biological Opinion written by U.S. Fish & Wildlife Service and dated September 29, 1998 concluded that this project is not likely to jeopardize the continued existence of the **northern spotted owl** or result in the destruction or adverse modification of designated critical habitat. Mandatory Terms and Conditions that implement the Reasonable and Prudent Measures specified in the Biological Opinion include a seasonal restriction within ¼ mile of known activity centers and progress reporting. There are no Slinky activities within ¼ mile of known activity centers therefore seasonal restrictions are not needed in this case (EA p. 36).

Consultation with NOAA Fisheries concerning threatened or endangered **anadromous fish** has been completed for this project. They have concurred that this project will have a rating of "No Effect," on listed fish.

There will be no significant adverse effects to sensitive species (EA pages 20, 40 & 58).

Therefore, the project will not jeopardize the continued existence of any listed species nor will it cause a trend to federal listing or loss of viability for any proposed or sensitive species.

- **CONSISTENCY WITH MT. HOOD FOREST PLAN** - The proposed action is consistent with Management Area goals, desired future conditions, and standards and guidelines identified in the Mt. Hood National Forest Land and Resource Management Plan as amended (Forest Plan).

It is consistent with the objectives of the Aquatic Conservation Strategy. Streams will be protected and no treatments will occur in riparian reserves. The project will not harvest trees within any riparian reserves. Water quality and fish habitat will be protected (EA p. 15-27).

It is consistent with late-successional reserve objectives. The project is not in an LSR or any 100-acre LSRs. (EA p. 11).

It is consistent with objectives for down woody debris, snags and green tree retention. The alternative has been designed to meet standards and guidelines for these ecosystem components (EA p. 6, 13, 41-46).

It is consistent with Survey and Manage standards. Surveys have been conducted for Survey and Manage species. No species were found inside harvest units that require

the management of known sites. Adjacent known sites are not affected. (EA p. 40 & 58).

It is consistent with soil protection standards. The design of the logging systems with BMPs will meet Forest Plan standards for soil protection. (EA p. 52) The projected impact for the proposed action when combined with existing impacts would be less than 15% detrimental soil impacts. The Forest Plan Standard of 15% was established to ensure there would be no significant reduction to long-term soil productivity (Forest Plan page Four-16 and Four-49).

It is consistent with standards for wildlife management, threatened, endangered and sensitive species protection, noxious weeds, hydrology, air quality, heritage resources and timber management (EA p. 15 to 72).

It is consistent with scenery objectives. The project would meet the partial retention visual quality objective from road 57 because of the number of green trees retained, the distance of 1.5 miles and the viewer angle. A portion of the landscape around Slinky currently does not meet the modification visual quality objective due to past harvest and road construction. Over time, the landscape will meet this objective as plantations grow. The project would soften straight lines and square corners of the existing checkerboard pattern. From a landscape perspective, the project would result in a softening of visual contrast as young trees planted in the harvest units grow up and blend with the adjacent young trees (EA p. 53-57).

It is consistent with the National Forest Management Act regulations for vegetative management. There will be no regulated timber harvest on lands classified as unsuitable for timber production (36 CFR 219.14) and vegetation manipulation is in compliance with 36 CFR 219.27(b). (EA p.51 & 58)

- **WATER QUALITY AND FISHERIES** - The analysis shows (EA p. 18) that the roads pose minimal risk because they do not cross any streams, and are on stable, dry, gently sloping terrain. The location near ridge tops, seasonal restrictions, the obliteration after logging, and erosion control efforts combine to reduce risk. Sediment, if any, would not occur in quantities great enough to result in harm to downstream fish or change water quality. The proposed action meets the ACS objectives, Riparian Reserve standards and guidelines and state water quality standards and the Clean Water Act. All of these objectives, standards and laws were established to ensure there would be no significant reduction to water quality or fish habitats.
- **HARVESTING OLDER FOREST** - The strategy of regenerating older forest stands that are fragmented and growing slowly is supported by the Mt. Hood Forest Plan as amended by the Northwest Forest Plan and by the watershed analyses (EA p. 30). The project would remove 0.2% of the older forest in the watersheds. After harvest, older forest in the watersheds would be at 37% in the Upper Clackamas and 42% in the Oak Grove. Late-successional reserves and riparian reserves would not be affected. Stands with large intact blocks of interior forest would not be affected. The average cut tree size would be less than approximately 20 inches diameter. The analysis of effects to species that rely on older forest found no significant effects. The retention of 10 to 12 large trees per acre would result in a

multi-aged stand as planted trees grow. Ten percent of the acreage of each stand would be retained in unharvested patches. There would be no significant effects to older forests or the species that rely on older forest.

- **CUMULATIVE EFFECTS** - The analysis considered not only the direct and indirect effects of the projects but also their contribution to cumulative effects. The analysis considered the proposed actions with BMPs and design criteria. No significant cumulative or secondary effects were identified. The EA elaborates on cumulative impacts related to resources such as water quality, older forest, fragmentation, soils and wildlife. These resources are within the standards set in the Forest Plan.
- **CULTURAL RESOURCES** - Field surveys have been conducted and protection measures incorporated. The heritage resource report concludes that there would be no effect to any properties on or eligible to the National Register of Historic Places (99-03-14).
- **OTHER** –The effects are not likely to be highly controversial and do not involve highly uncertain, unique, or unknown risks. This action will not set a precedent because other similar actions have occurred in the past. The project was not found to threaten a violation of any Federal, State, or local law. The project complies with EO 12898 regarding environmental justice. No disproportionately high adverse human or environmental effects on minorities and/or low-income populations were identified during the analysis and public information process. No significant irreversible or irretrievable commitments of resources were found. There will be no affect to Wild and Scenic Rivers and State Scenic Waterways, wetlands, wilderness areas, research natural areas or any other areas with unique characteristics. The project will not affect public health or safety (EA p. 61, 63 & 70). Adverse and beneficial impacts have been assessed and found to be not significant.

### **Comments:**

I considered the substantive comments that were raised. The proposed action was available for a 30-day public comment period that ended on July 30, 2003. The responses to the comments received are contained in Appendix A of the EA.

### **Appeal Rights:**

This decision is subject to appeal pursuant to Forest Service regulations at 36 CFR 215. Any individual or organization who submitted substantive comments during the comment period may appeal. Any appeal of this decision must be in writing and fully consistent with the content requirements described in 36 CFR 215.14. The Appeal Deciding Officer is Linda Goodman, Regional Forester. An appeal should be addressed to the Regional Forester at any of the following addresses. Postal: ATTN.: 1570 APPEALS, P.O. Box 3623, Portland, OR 97208-3623; Street location for hand delivery: 333 SW 1<sup>st</sup> Ave, Portland, OR (office hours: 8-4:30 M-F); fax: 503-808-2255; or Email: [appeals-pacificnorthwest-regional-office@fs.fed.us](mailto:appeals-pacificnorthwest-regional-office@fs.fed.us).

The Appeal, including attachments, must be postmarked or received by the Appeal Deciding Officer within 45 days of the date legal notice of this decision was published in the Oregonian. For further information regarding these appeal procedures, contact the Forest Environmental Coordinator Mike Redmond at (503) 668-1700.

**Project Implementation:**

Implementation of this decision may occur on, but not before, 5 business days from the close of the 45-day appeal filing period described above. If an appeal is filed implementation may not occur for 15 days following the date of appeal disposition (36 CFR 215.10).

The EA can be downloaded from the Forest web site at <http://www.fs.fed.us/r6/mthood> in the Forest Projects section.

For further information contact Jim Rice, Estacada Ranger Station, 595 NW Industrial Way, Estacada, OR 97023. Phone: (503) 630-6861 Email: [jrrice@fs.fed.us](mailto:jrrice@fs.fed.us)

Recommended By:

/S/ *Jeff Walter*  
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