

DECISION NOTICE #1
And
FINDING OF NO SIGNIFICANT IMPACT

**COLLAWASH THINNING
Plantations**

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

An Environmental Assessment (EA) has been prepared for the Collawash Thinning. This area is located in T.6 S., R.6 E.; T.7 S., R.6 E.; T.7 S., R.5 E.; Willamette Meridian. The project area is located in the Collawash watershed.

The purpose of this initiative is to manage young forest stands to achieve multiple objectives (EA sec. 2.2):

- Increase health and vigor and enhance growth that results in larger wind firm trees;
- Enhance and/or restore biological diversity by variable density thinning;
- Provide forest products consistent with the Northwest Forest Plan goal of maintaining the stability of local and regional economies now and in the future;
- Enhance riparian reserves by accelerating the development of mature and late-successional stand conditions.

The proposed action involves thinning both plantations and natural second-growth stands. I chose to complete a single EA for both types of thinning and select a course of action based on the analysis in that EA, but implement that action through two decision notices. This decision notice will deal with plantation thinning and will be referred to as Decision Notice #1. The thinning of natural second growth will be referred to as Decision Notice #2. The composite of these two decisions is described in the Collawash EA as Alternative B.

DECISION and RATIONALE

I have decided to implement the plantation portion of Alternative B. Alternative B meets the purpose and need discussed in the EA (sec. 2.2) by implementing the following:

Thin and harvest wood fiber in plantations from approximately 149 acres of matrix land and approximately 88 acres of riparian reserves (EA sec. 3.2). Variable density thinning prescriptions are designed to enhance or restore biological diversity. Thinning will leave approximately 80 to 140 variably spaced trees per acre.

Riparian – Approximately 80 variably spaced trees per acre will be retained in riparian reserves to accelerating the development of mature and late-successional stand conditions. Riparian reserve widths are 180 feet for non-fish-bearing streams and 360 feet for fish-

bearing streams. There will be no-harvest buffers of approximately 30 to 50 feet wide on each side of streams.

Roads - Approximately 0.25 mile of new temporary roads will be constructed. These roads will be obliterated and revegetated after completion of the project. Approximately 0.7 mile of existing closed or overgrown roads will be reopened. Upon project completion, the roads that were opened will be closed. Approximately 2 miles of road reconstruction is included. This includes pavement grinding and two small deep-patch repairs on road 6320.

Best Management Practices (BMPs) and Design Criteria in section 3.6 of the EA are included with this alternative. No significant impacts were found that would require further mitigation.

Variability – The proposal is to introduce structural and biological diversity through variable spaced thinning (EA sec. 3.2). Diversity and variability will be introduced in several ways: 1) Leave tree spacing will vary within units and between units, 2) Leave trees will include minor species and hardwoods, 3) Leave trees will include some trees with the elements of wood decay, 4) Leave trees will include some live trees where their crowns touch certain key snags, 5) Some snags and all existing large down logs will be retained, 6) Leave tree spacing will be wider in riparian reserves, 7) No-harvest buffers will be included along streams and 8) skyline corridors will create gaps.

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

- Alternative B accomplishes the objectives discussed above.
- **Water Quality and Fisheries** - There is a public concern about ground disturbing activities including road construction and logging in riparian reserves.
 - The analysis of Alternative B shows that the temporary roads pose minimal risk because they do not cross any streams, and are on stable dry terrain (EA sec. 4.2). 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 having no-harvest buffers and by thinning in a manner that enhances long-term riparian conditions. Low impact logging systems will be used on steep slopes. Seasonal restrictions and erosion control measures are included.
- **Harvesting of Natural Second-Growth Forest** – There is a concern that the proposed harvest may impact stands that have not been managed before. Comments have questioned the science behind thinning natural second-growth stands and feel they should be left to grow on their own.
 - Approximately 55 acres of stands (89 to 95 years of age) that grew up naturally after a forest fire would be part of Decision Notice #2 (EA sec. 4.3.2).

Description of Other Alternatives and Reasons for Non Selection:

- **Alternative A** is the no-action alternative. It was not selected because it would not provide any of the benefits described in the purpose and need and it would not provide any forest products consistent with the Northwest Forest Plan goal of maintaining the stability of local and regional economies. If no action is taken, stands would become overcrowded resulting in trees with reduced vigor, increased mortality and increased wind damage susceptibility. Trees would stagnate and stay relatively small. If no action is taken in riparian reserves, stands would have reduced capability to produce the size and quantity of coarse woody debris sufficient to sustain desired physical complexity and stability of the riparian reserves and associated streams (EA sec. 4.3 & 4.2).
- **Alternative C** is responsive to issues 1 and 2. It would avoid road construction and logging in riparian reserves (EA sec. 3.3). It would partially meet the purpose and need for matrix. Since it would build no roads, helicopters would be used where necessary to remove logs. Alternative C would avoid all of the riparian reserves resulting in stands that would have reduced capability to produce the size and quantity of coarse woody debris sufficient to sustain desired physical complexity and stability of the riparian reserves and associated streams. 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, if any, reduction of sedimentation risk (EA sec. 4.2). I have chosen Alternative B over Alternative C because rapid growth and large trees are better for riparian reserves than stagnated unhealthy small trees (EA p. 4.2).
- **Alternative D** is responsive to issues 1, 2 and 3. It is similar to Alternative C but in addition it would avoid all of the natural second-growth stands (EA sec. 3.4). Alternative D would partially meet the purpose and need. I have chosen Alternative B over Alternative D for the reasons listed above for Alternative C and I have chosen Alternative B over Alternative D because the benefits of thinning natural second-growth stands in terms of health and stand development are long lasting (EA sec. 4.3.2). The thinning of natural second-growth stands is addressed in Decision Notice #2.
- **Other Alternatives Considered** (EA sec. 3.5)
 - An alternative was considered that would create forage enhancement areas. The decline of forage is still a concern in this and other areas across the Forest, but this alternative was not fully developed because of stability concerns. Forage enhancement will be pursued in appropriate areas elsewhere.
 - An alternative was considered that would include restoration projects such as road closures and road decommissioning. Comments were received suggesting that we not mix restoration projects with timber harvest projects. These restorations are not connected actions and are not included in the range of alternatives for this analysis. Road closure and decommissioning projects have been assessed in a separate Forest-wide Restoration Environmental Assessment.

- An alternative was considered that would thin dense stands by cutting trees and leaving them on the ground and chipping the limbs. It was not fully developed because it would not meet the objective of providing forest products consistent with the Northwest Forest Plan goal of maintaining the stability of local and regional economies now and in the future. Since there is no source of funding for this type of operation it would be similar to the no-action alternative.
- An alternative was considered that would fertilize the matrix portion of plantations to enhance growth. It was not fully developed because of the logistics and operational safety of aerially fertilizing steep slopes while avoiding intermixed riparian areas.
- The alternative of logging all units in the same manner as the original logging was considered but not fully developed. The EA (sec. 3.5.5) contains a unit-by-unit description of the rationale for changing the previous logging methods. While there are some negative consequences for soil resources, I have decided to change the original logging method in certain units to reduce risk to fisheries and water quality.
- An alternative was considered that would protect ecologically important snags by avoiding all harvesting in the hazardous zone around the snags. This is primarily a concern in natural second growth because plantations contain few if any snags. It was not fully developed because it would eliminate all of the natural second growth. Decision Notice #2 addresses the thinning of natural second growth.

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 March 30, 2005 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. Alternative B as a whole would have an effects determination of “May Affect, Likely to Adversely Affect” because of the effect caused by the thinning of natural second-growth stands. The plantations covered by this decision would have an effects determination of “May Affect, Not Likely to Adversely Affect.” Mandatory Terms and Conditions that implement the Reasonable and Prudent Measures specified in the Biological Opinion include a seasonal restriction for the units that are not part of this decision (Design Criteria #1, EA sec. 3.6).
 - The plantation units are dispersal habitat. While there would be a short-term degradation of dispersal habitat, in the long term, stands would develop mature forest characteristics sooner.

- I have considered the new information that has been recently published about northern spotted owls (documented in Appendix E). The new information would not lead to a change in the effects determination and no additional analysis is needed for this project.

Informal consultation with NOAA Fisheries concerning threatened or endangered **anadromous fish** and Essential Fish Habitat established under the Magnuson-Stevens Fishery Conservation and Management Act has been completed for this project. A Letter of Concurrence from NOAA Fisheries dated January 26, 2005 is in the analysis file. Lower Columbia River Steelhead, Upper Willamette River Spring Chinook, and Lower Columbia River Coho Salmon have an effects determination of "May affect, Not likely to adversely affect" (NLAA). Other listed fish will have a rating of "No Effect." (EA sec. 4.2.7).

There will be no significant adverse effects to sensitive species (EA sec 4.2.7, 4.2.9, 4.5.3, & 4.8). 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).
 - **Aquatic Conservation Strategy** - I have considered the relevant information from the watershed analysis (summarized in Appendix E). I have also considered the existing condition of riparian reserves, including the important physical and biological components of the fifth-field watersheds and the effects to riparian resources. I find that Alternative B is consistent with the recommendations of the watershed analysis, is consistent with riparian reserve standards and guidelines, and will contribute to maintaining or restoring the fifth-field watershed over the long term (EA sec. 4.2.11 & EA Appendix E).
 - It is consistent with **late-successional reserve (LSR)** objectives. The project is not in an LSR or any 100-acre LSRs (EA sec. 2.2.5 & 3.2.5).
 - The project is consistent with the 2001 FSEIS to Amend the Survey and Manage Mitigation Measure Standards and Guidelines. Surveys have been completed to the Survey and Manage protocol and no species were found that require the management of known sites (EA p. sec. 4.2.9 & 4.5.3).
 - The project is consistent with the 2004 FSEIS to Remove or Modify the Survey and Manage Mitigation Measure Standards and Guidelines. The Record of Decision moved many species from the requirements of the Survey and Manage Standards and Guidelines to sensitive species. However, it also indicated that projects still in the planning stage that had begun or completed surveys using the Survey and Manage Standards and Guidelines could proceed without conducting a new sensitive species analysis. Surveys have been completed to the Survey and Manage protocol and no species were found that require the management of known sites (EA p. sec. 4.2.9 & 4.5.3).

- It is consistent with standards for deer and elk management, threatened, endangered and sensitive species protection, noxious weeds, hydrology, air quality, heritage resources, scenery, and timber management (EA sec. 4.0).
- 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 sec. 4.6.1 & EA Appendix E).

Exceptions - The Forest Plan describes the process for documenting an exception to “Should” standards and guidelines (p. Four-45). “Action is required; however, case by case exceptions are acceptable if identified during interdisciplinary project planning environmental analyses.”

I approve the following exceptions:

- The project is consistent with Forest Plan objectives for long-term **soil productivity**. However, additional soil impact will occur on areas where there is existing soil disturbance. The analysis shows that three units are currently above 15% detrimental soil condition and they will remain above 15% after project implementation (Units 3, 4 and 6). I am approving an exception for Forest Plan standards and guidelines FW-22, FW-28 and FW-30. The current proposal is to use skyline and helicopter for most of the acres of these units with ground-based systems being used only in small appropriate areas (EA sec. 3.5.5). I considered using helicopters to log all of these units but found the additional cost to be unwarranted. Units that are above 15% will have obliteration of temporary roads and landings that are used by the contractor. Rehabilitation has been considered for old skid trails but the soil scientist does not recommend restoration of old skid trails at this time because of the risk of damaging tree roots and because productivity has not been impaired. The no-action alternative would have areas that remain above 15% with no opportunity for restoration.

The objective of maintaining long-term site productivity will still be met with Alternative B. Surface erosion and runoff from old skid trails is not occurring. Even though there was no standard for long-term soil productivity when the original clearcuts were logged, the stands continue to grow well and are projected to continue to grow well after the proposed thinning. Recent stand exams show that plantations that have detrimental soil conditions above 15% have very similar growth rates compared to nearby similar plantations that are below 15% (EA sec. 4.6.2).

- The project is consistent with Forest Plan objectives for **earthflow** stability. However, additional soil impact will occur on areas where there is existing soil disturbance. The analysis shows that all six of the units on earthflow are currently above 8% detrimental soil condition and they will remain above 8% after project implementation (Units 1, 2, 3, 5, 6 and 8). I am approving exceptions for Forest Plan standards and guidelines B8-36 and B8-40. Ground-based yarding will be used on earthflow plantations where ground-based systems were used in the original logging in units 1 and 8. Skyline and helicopter yarding will be used on earthflow plantations where ground-based systems

were used in the original logging in units 3 and 6. I considered using helicopters to log all of these units but found the additional cost to be unwarranted. The no-action alternative would have areas that remain above 8% with no opportunity for restoration. The objective of earthflow stability will still be met with Alternative B because thinning will result in healthy and vigorous stands with strong well-developed roots (EA sec. 4.3 & 4.6.3). Temporary roads and landings in earthflow units that are used by the contractor will be obliterated. Rehabilitation has been considered for skid trails but the soil scientist does not recommend restoration of skid trails at this time because of the risk of damaging tree roots.

- The project is consistent with Forest Plan objectives for **snags and down logs**. The standard and guideline for snags is FW-215 and the standards and guidelines for down logs are FW-219 through FW-229. I am approving an exception for these Forest Plan standards and guidelines.

Design criteria have been incorporated into the EA to help retain snags (EA sec. 3.6) but it is likely that some snags would have to be felled for safety reasons. There are few if any medium or large snags in the plantation units. Some small suppressed planted trees have died but they are not large enough to provide much snag habitat and they do not last long. None of the alternatives, including no-action, would achieve the snag standard in plantations in the short term. The DecAID advisor is a planning tool for snags and down logs that was considered in the development of design criteria and evaluation of effects (EA sec. 3.6 & 4.5.4). Design Criteria #5 results in leaving live trees with the elements of wood decay which would provide habitat in the interim until trees grow large enough to produce snags of the desired size, (greater than 22 inches diameter). When these trees with elements of wood decay die they would provide small to medium size snags that would benefit some snag dependent species. Alternative B will accelerate the growth and size of plantation trees and would eventually provide large snags much sooner than would be expected with the no-action alternative. The objective of providing long-term snag habitat will be met (EA p. 4.5.4).

In terms of down logs, the project will retain all existing down logs but they are not necessarily at the desired level for quantity, size or decomposition class. Design criteria #6 results in leaving some additional down wood. Alternative B will accelerate the growth and size of trees and would eventually provide large down logs much sooner than would be expected with the no-action alternative. The DecAID advisor was considered in the development of design criteria and evaluation of effects for down logs (EA sec. 3.6 & 4.5.4). The objective of providing long-term down log habitat will be met.

There is potential for an enhancement project within the 2003 Forest-wide Restoration EA that would create additional small snags and down logs in the plantations of the Collawash thinning project, if funded.

- The project will not close any system **roads** that are currently open. Temporary roads that are constructed with this project will be closed upon project completion (EA sec. 4.5.5) and open road density will remain unchanged. Public comments indicated a desire to separate timber sale projects from restoration projects (EA sec. 3.5.2). Many miles of system roads have been closed in recent years on the Clackamas River Ranger District

including 66.5 miles of roads decommissioned in the Collawash watershed. Several District-wide and Forest-wide restoration EAs have been developed in recent years to close roads. In the future, additional road closures would be addressed in restoration EAs. I am approving an exception for Forest Plan standard and guideline FW-208. Open road density will continue to be above the standard and guideline level for all alternatives including no action.

- **WATER QUALITY AND FISHERIES** - The analysis shows that the roads pose minimal risk because they do not cross any streams, and are on stable, dry terrain. The location on gentle terrain, 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 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. Thinning in Riparian Reserves is designed to benefit riparian resources by accelerating the development of mature and late-successional stand conditions (EA sec. 4.2).
- **CUMULATIVE EFFECTS** - The analysis considered not only the direct and indirect effects of the projects but also their contribution to cumulative effects. Past, present and foreseeable future projects have been included in the analysis (EA sec. 4.0.2). The analysis considered the proposed actions with BMPs and design criteria. The EA elaborates on cumulative impacts related to resources such as water quality, older forest, soils and wildlife. No significant cumulative or secondary effects were identified.
- **CULTURAL RESOURCES** - Field surveys have been conducted. The heritage resource report concludes that there will be no effect to any properties on or eligible to the National Register of Historic Places (2002-06-06-05-0003). Documentation has been forwarded to the State Historic Preservation Office (EA sec. 4.13).
- **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 Executive Order 12898 regarding environmental justice (EA sec. 4.14). 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 (EA sec. 4.16). There will be no effect to Wild and Scenic Rivers and State Scenic Waterways, wetlands, wilderness areas, research natural areas or any other areas with unique characteristics. The area is not affected by recent wilderness proposals. The project will not affect public health or safety (EA sec. 4.10). Adverse and beneficial impacts have been assessed and found to be not significant. No significant effects to consumers, civil rights, minority groups, women, prime farmland, rangeland, forestland, wetlands, or floodplains were identified.

Comments:

The proposed action and a preliminary analysis were available for a 30-day public comment period that began on June 27, 2005. I have considered the substantive comments that were received. The responses to the comments 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 that 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 1st Ave, Portland, OR (office hours: 8-4:30 M-F); fax: 503-808-2255. Appeals can also be filed electronically at: appeals-pacificnorthwest-regional-office(at)fs.fed.us. Electronic appeals must be submitted as part of the actual e-mail message, or as an attachment in Microsoft Word (.doc), rich text format (.rtf), or portable document format (.pdf) only. E-mails submitted to email addresses other than the one listed above, or in formats other than those listed, or containing viruses, will be rejected. It is the responsibility of the appellant to confirm receipt of appeals submitted by electronic mail.

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 503-668-1776.

Project Implementation:

The Forest has been working with a group called the Clackamas River Stewardship Partners. This group represents many diverse interests including individuals, associations and agencies interested in resource management, resource preservation, economic development and restoration. This group has been advocating for the use of Stewardship Contracts where the value of the timber in a restoration thinning can be used to offset the costs of other unfunded restoration projects. Some members of this group are proposing to use the plantation portion in a Stewardship Contract. If recommended by the Stewardship Partners, I will be requesting Stewardship Authority from the Regional Forester for this project.

Several design criteria were developed based on comments received from members of the Clackamas River Stewardship Partners. See the EA, section 3.6.14 and Appendix A.

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 Projects & Plans 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

Recommended By:

Responsible Official:

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9/5/2005

Gary L. Larsen

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District Ranger

Date Published

GARY L. LARSEN
Forest Supervisor