Draft DECISION NOTICE And FINDING OF NO SIGNIFICANT IMPACT

GOAT MOUNTAIN THIN

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

This draft Decision Notice is made available with the Environmental Assessment for the Goat Mountain Thin project pursuant to 36 CFR 218.7(b). The Goat Mountain Thin Environmental Assessment (EA) contains an in-depth discussion of the setting, ecological processes, resource conditions, the purpose and need for action, the proposed action designed to achieve the purpose and need, project design criteria, alternatives considered, the effects and benefits of those alternatives and appendices which include detailed maps and a discussion of comments received.

This project is located in T.4 S., R.5 E.; T.5 S., R.4 E.; T.5 S., R.5 E.; Willamette Meridian. All section (s.) number references are to sections of the EA unless specified otherwise. The EA is incorporated by reference and can be found at: <u>http://www.fs.usda.gov/projects/mthood/landmanagement/projects</u>. Acres and miles are approximate since they are derived from GIS. The Mt. Hood National Forest is referred to as 'the Forest' in this document. The Mt. Hood National Forest Land and Resource Management Plan (1990) and Standards and Guidelines, as amended, are referred to as the Forest Plan in this document.

This draft Decision Notice documents my proposed decision and rationale for the selection of Alternative B, the proposed action, for the Goat Mountain Thin Environmental Assessment. The Forest proposes to thin approximately 2,754 acres of mid-aged stands ranging in age from 30 to 60 years old. Variable density thinning is proposed to remove the smaller trees while creating skips and gaps. The following background section is a brief summary to help understand the context of the Goat Mountain Thin project.

Background (s. 1.5)

The planning area once contained large patches of mature Douglas-fir and noble fir and other younger stands that seeded in after fires. Now the planning area has some areas fragmented by plantations and some areas that are contiguous plantations. Approximately 9,065 acres or 46% of the analysis area has been converted to plantations. There are several electronic sites at the top of Goat Mountain.

Some of the stands included in the project area have been examined and have been found to be overstocked. When trees are too closely spaced they experience a slowing of growth due to competition for sunlight, moisture and nutrients. Suppressed, slow-growing trees have begun to die and have become susceptible to diseases and wind damage.

The project area is heavily used by the public for recreation; some of the uses are unauthorized and are creating resource damage including target shooting and Off-Highway Vehicle (OHV) use.

Purpose and Need (s. 1.3)

The purpose of this project is to enhance the productive capacity of mid-aged stands by thinning and to treat a sufficient number of stands to meet Forest Plan goals related to forest product outputs. For more in-depth discussion, refer to section 1.5 and to the detail described below in the next few pages.

- Health and Growth There is a need to increase health and growth of stands because mid-aged stands within the project area are experiencing a slowing of growth due to overcrowding and some are experiencing suppression related mortality. See sections 1.5.3, 2.2.1 & 3.1.
- Forest Products There is a need to keep forests productive to sustainably provide forest products now and in the future. Actions need to be designed to be economically viable and efficient. See sections 1.5.5, 2.4, 3.1, & 3.16.

While achieving these primary purposes and needs, there are additional opportunities that can be accomplished at the same time, in or adjacent to some of the targeted stands, where existing conditions deviate from desired conditions:

• **Diversity** - There is an opportunity to gain greater variability of vertical and horizontal stand structure in some stands. There is an opportunity to make some of these changes in Riparian Reserves and Late-successional Reserves to promote desired conditions in these land allocations. See sections 1.5.4, 2.4, 3.1, 3.2 & 3.8.

Diversity of forests and stands is a complex topic. During the early stages of this planning effort, the scale of the opportunity to address diversity was considered and I chose to focus on the stands needing thinning and not on a landscape scale.

• **Early-Seral Habitat** - There is an opportunity to enhance forage for deer and elk because forage is declining across the landscape. Thinning techniques can be adjusted in the Matrix where site-specific needs are identified to achieve greater sunlight to the forest floor to release palatable browse plants. See sections 1.5.6, 2.2.1.4, 2.4, 3.8.3.

During the early stages of this planning effort, the scale of the opportunity to address forage enhancement was considered and I chose to focus on the stands needing thinning and not on landscape-scale needs. While the project addresses some of the need for forage it does not attempt to provide all of the forage that deer and elk need.

- Unauthorized Recreation There is an opportunity to manage recreation access points to minimize unauthorized recreational uses that damage resources and are unsafe. There is also an opportunity to enhance recreational features to promote appropriate, safe recreation. See sections 2.2.4 & 1.5.7.
- **Roads** There is an opportunity to accomplish needed road work on the road system to provide for safe access to the forest and to minimize resource impacts. There is the opportunity to change road maintenance levels to reduce maintenance costs and to meet Forest Plan objectives. See sections 1.5.8, 2.2.5, 2.4, 3.3, 3.4 & 3.11.

During the early stages of this planning effort, the scale of the opportunity to address road issues was considered and I chose to focus on the roads needed to access thinning and not on landscape-scale issues. While the project addresses some of the need by repairing some roads and decommissioning others, it does not attempt to examine all of the roads in the broader landscape.

• **Stream Enhancement** - There is an opportunity to enhance streams and aquatic resources by adding woody debris. See section 2.2.1.2.

Draft Decision

I have reviewed the EA and the information contained in the project file. I have also reviewed and considered the public comments submitted on this project (see Appendix B of the EA for response to comments). I have determined that there is adequate information to make a reasoned choice among alternatives. I have decided that I will select Alternative B, the Proposed Action (s. 2.2) as described in the EA.

Alternative B includes the following activities.

- **Thinning** Thin and harvest wood fiber on 2,754 acres of stands to achieve the purposes listed above (the actual acres of thinning would be approximately ¹/₄ less after subtractions for skips and riparian protection buffers). Thinning intensity would be variable from unit to unit and within units and would include skips, riparian protection buffers, gaps, heavy thins, forage enhancements, and the creation of snags and down logs. These treatments are described in greater detail in sections 2.2.1 to 2.2.1.5.
- **Stream Enhancement** Trees would be felled from stream protection buffers into streams and logs that cross above streams would be bucked to drop them into the streams to enhance aquatic conditions (s. 2.2.1.2).
- **Special Forest Products** Areas will be managed for other forest products such as firewood, boughs, beargrass and poles (s. 2.2.2).
- Scenic Vista Management Within the project area there are places where views of the distant landscape are dramatic, and appreciated by the recreating public. Small trees that are growing along the road edge and are beginning to block these vistas would be removed.
- **Target Shooting** Restore shooting areas that are unsafe or have resource damage. Actions include placing boulders along the road, berming, obliterating old temporary roads and user created roads, closing system roads with berms, re-contouring/decompacting, revegetating, placing large quantities of slash and removing trash. The goal is to contain vehicles on the road by blocking places where vehicles pull off the road. Signs would be placed describing more appropriate places for shooting. The proposed action also includes the reshaping of three rock quarries along road 4500 to better accommodate target shooting debris removal, add additional visitor use protection from ricochet by providing a suitable backstop, and utilizing rock material from the quarry to build a barrier separating users from vehicle traffic traveling along road 4500.
- Unauthorized OHV Use Rehabilitate areas damaged by OHV use. The proposed action also includes blocking the entrances of temporary roads and skid trails created by logging to reduce the likelihood that user created OHV routes would develop. Methods generally include constructing blockages to motor vehicles, locating skips along some anticipated entry points, piling slash, logs or

boulders on potential routes, decompacting and stabilizing, using mechanized construction equipment such as excavators, backhoes and truck mounted loaders.

- **Roads** Repair and maintain 60 miles of system roads needed for log haul (s. 2.2.5).
 - Construct 1.4 mile of new temporary roads to access thinning units and rehabilitate them upon completion (s. 2.2.5).
 - Reconstruct 8.4 miles of temporary roads on existing road alignments to access thinning units and rehabilitate them upon completion (s. 2.2.5).
 - Decommission 0.5 mile of system roads (s. 2.2.5).
 - Stormproof 34.8 miles of system roads and close 16 miles of system roads that are currently open (s. 2.2.5).
- Project Design Criteria (PDC) in section 2.2.6 are mandatory. No significant impacts were found that would require further mitigation.

Decision Rationale

I believe that the proposed action meets the Purpose and Need and opportunities discussed in the EA at section 1.3.

Tree Health and Growth – The thinning treatments associated with Alternative B will increase the health and vigor, as well as enhance diameter and height growth (s. 1.3, s. 1.5.3 & s. 3.1).

The stands included in this project have been examined and have been found to be overstocked. When trees are too closely spaced, they experience a slowing of growth due to competition for sunlight, moisture and nutrients. Suppressed, slow-growing trees have begun to die and have become susceptible to diseases and wind damage.

Based upon computer model simulation, the average diameter four decades after thinning would be about 21 inches, compared to about 18 inches with no action. Presently, these stands have an average diameter of about 13 inches. Having larger, healthy trees on the matrix lands suitable for timber production is an important management goal associated with the Northwest Forest Plan's implementation; and, it is also key for land allocations where the objective is to accelerate the development of late-successional stand attributes. As forested stands reach an average diameter of 20 inches or larger, they begin to develop some of the characteristics (e.g., larger tree boles) necessary for late-successional dependent wildlife species.

With Alternative B, simulation modeling shows that in approximately 40 years, average net growth rates would be 1.8 cubic feet per tree per year compared to 0.8 cubic foot per tree per year with no action. These net growth rates include both growth and mortality. With the No-action Alternative, mortality rates increase dramatically in the next few decades. The thinning treatments would cut the smaller, suppressed trees in these dense stands; the ones that would most likely die from competition-induced mortality.

The silvicultural activities associated with my draft decision will reduce the competition for nutrients, moisture, and sunlight, and discriminate against the smaller, overtopped, and/or less vigorously growing trees. As a result, the anticipated growth and developmental rate of the larger trees will

increase in comparison to no action. I also find that it is appropriate to do some stream enhancements where the thinned plantations abut perennial streams with insufficient woody debris.

Wood Products – My draft decision will provide forest products consistent with the Northwest Forest Plan's goal of maintaining the stability of local and regional economies now and in the future (s. 1.3, s. 1.5.5, s. 3.1 & s. 3.16).

As a result of implementing the silvicultural prescriptions, Alternative B will provide approximately 27 million board feet of timber and will support jobs important to local communities. It will also result in vigorously growing stands that would be capable of providing future forest products. The proposed action will also provide special forest products. The No-action Alternative would not provide wood products and would result in stands with reduced growth and productivity.

Diversity - Thinning will improve vertical and horizontal diversity by variable spacing and creating small skips and gaps (s. 1.3, s. 1.5.4, s. 3.2 & s. 3.8.7).

Diversity is the distribution and abundance of different native plant and animal communities and species. At the landscape scale, a mix of forest types and ages can provide habitat for a wide range of plants and animals. At the stand scale other elements become more relevant such as species composition, snag abundance or the number of canopy layers. Plantations sometimes lack certain elements of diversity and complexity. They often do not contain the mix of tree species that were present in the original stand and they are relatively uniform in terms of size and spacing. When the original clearcut harvesting occurred, snags were removed. The stands now have minimal variability of vertical and horizontal stand structure and little sunlight reaches the forest floor resulting in low levels of diversity of ground vegetation.

The silvicultural prescriptions associated with my draft decision will selectively retain some of the minor species within the treated stands, such as western hemlock, noble fir, Pacific silver fir, western redcedar, and alder, rather than exclusively favoring the planted Douglas-fir stock. As a result, the overall species composition within the stand will become (over time) more characteristic of the compositional diversity representative of this stage of stand development under the natural disturbance regime. With no action, most of the stands would continue to be dominated by Douglas-fir.

Under Alternative B, I recognize that there would be no change to the species composition within the stream protection buffers or within the skips. These are important to protect riparian-dependent species, as well as contribute to the overall structural variability within these stands.

The prescriptions will also create gaps allowing more sunlight to reach the forest floor. The resulting open canopy conditions will release the herbaceous understory (e.g., shrubs, forbs) to grow more vigorously. The gaps as well as the areas with heavy thinning are also anticipated to gradually regenerate to young trees, resulting in the establishment of a second age class within the stand. The stream protection buffers and skips would still be comprised of a single-storied canopy. Alternative B would set in motion the establishment of stands with multiple distinct age classes, either mixed or in small groups, greatly improving overall horizontal and vertical (structural) diversity as compared to the current, relatively single-storied Douglas-fir. The determination of whether or not other intermediate treatments may be needed in future years or decades in order to maintain and/or enhance the

development of desired conditions within the treated stands would be evaluated at a future date based upon field monitoring.

Early-Seral Habitat – Deer and elk were selected as management indicator species because they are economically important game animals. With the reduction in timber harvest on the Forest in the past two decades and continued tree growth, openings for forage are becoming scarce. The project will improve forage quantity and quality by creating areas of 3 to 5 acres in size totaling 50 acres that are more open than standard thinning. Gaps and heavy thins would also result in additional sunlight hitting the ground to benefit forage plants (s. 1.5.6 & s. 3.8.3). There is a trend of declining forage across the landscape as management practices have shifted from regeneration harvest to thinning, as a large percentage of the landscape is managed for late-successional species. While the project addresses some of the need for forage, it does not attempt to provide all of the forage that deer and elk need.

Recreation – The project will manage recreation access points to minimize unauthorized recreational uses that damage resources and are unsafe. It will also enhance recreational features to promote appropriate, safe recreation. It will also manage four scenic vistas to remove trees that are growing too tall along roadside viewing areas.

Shooting – The proposed action will restore shooting areas that are unsafe or have resource damage. Actions include placing boulders along the road, berming, obliterating old temporary roads and user created roads, closing system roads with berms, re-contouring/decompacting, revegetating, placing large quantities of slash and removing trash. The goal is to contain vehicles on the road by blocking places where vehicles pull off the road. Signs would be placed describing more appropriate places for shooting. Approximately nine sites are in need of restoration.

The proposed action includes reshaping three rock quarries along road 4500 to better accommodate target shooting debris removal, add additional visitor use protection from ricochet by providing a suitable backstop, and utilizing rock material from the quarry to build a barrier separating users from vehicle traffic traveling along road 4500.

These efforts continue a program that began in 2009 to address shooting issues in collaboration with BLM, Clackamas County and the Clackamas Stewardship Partners. The work accomplished to date has been relatively successful, but other problem areas remain. While I recognize that shooting guns whether for hunting or target practice is a valid recreational use of public lands. There are places where shooting is unsafe and there are practices related to target shooting that can cause resource damage. In the project area target shooting is occurring with no backstop, trees are being felled by bullets, and shooting related trash is common. I have determined that the proposed actions will take important steps to restore some damaged sites while encouraging use of safer appropriate areas.

Unauthorized OHV Use – The proposed action will actively rehabilitate areas damaged by OHV use. The proposed action also includes blocking roads and skid trails created by logging that might become OHV routes. Methods generally include constructing blockages to motor vehicles, locating skips along some anticipated entry points, piling slash, logs or boulders on potential routes, decompacting and stabilizing, using mechanized construction equipment such as excavators, backhoes and truck mounted loaders.

In 2010, the Forest completed an Off-Highway Vehicle Management Plan. Prior to that time, policy allowed OHVs to venture off roads and trails in areas that have not been specifically closed to off-road use. The plan changed that strategy, and now OHVs are only allowed in specific areas that are designated and signed for OHVs. On the Clackamas District, the nearest area where OHV use is allowed is LaDee Flat.

OHV riders and non-motorized recreation visitors share an interest in enjoying outdoor recreation in a natural environment. While OHV recreation is a legitimate activity at LaDee Flat, the unauthorized, unmanaged and inappropriate OHV use occurring at Goat Mountain is a potential threat to ecosystem sustainability. The Forest has already taken several steps to discourage use and to repair damaged areas, including the 2015 Clackamas Restoration Projects EA. I believe additional action is warranted.

Roads - The project will accomplish needed road work on many roads in the project area. This includes road maintenance and repair to provide a more efficient and safe transportation system while reducing effects to natural resources. The project will also decommission, stormproof, and close certain system roads after use to reduce future road maintenance costs and reduce impacts to aquatic resources (s. 1.5.8). The temporary roads constructed or reconstructed will be rehabilitated after use. I have determined that the use and treatments of the roads in the proposed action is prudent and warranted to achieve resource objectives.

Management Direction (s. 1.6.1) - The proposed action has been designed to meet the goals and objectives of the Forest Plan as amended by the Northwest Forest Plan and other amendments. The proposed action would occur on riparian reserves, late-successional reserves and matrix land allocations. While each land allocation has different goals and objectives, I find that variable density thinning is an appropriate tool to use to move the area toward the desired conditions. Further discussion of consistency with standards and guidelines can be found below.

Public Involvement (s. 1.8)

For this project, a collaborative process with the Clackamas Stewardship Partners began in 2013; a process that built on years of collaboration on similar thinning projects dating back to 2004. Through this collaborative process, the Forest Service participated in several meetings and field trips with the collaborative group on this project.

A scoping process to request public input for this project was conducted. A letter describing the proposed project and requesting comments was sent out on March 5, 2014. The Forest publishes a schedule of proposed actions (SOPA) quarterly. The project first appeared in numerous issues since 2013. Public field trips were conducted on July 9, 2013 and June 10, 2014 to visit the project area and discuss the purpose and need and issues. The legal notice for the 30-day comment period for this project was published in The Oregonian on January 29, 2016.

A wide range of comments was received. Responses to comments are included in Appendix B of the EA. The following is a sample of some of the comments that I would like to highlight here and respond to personally.

• Some have expressed concern over **OHV** issues and have made suggestions. While I share many of those concerns, I would like to clarify what I propose to do. The EA contains information at sections 1.5.7.2 and 3.9.1.1 about the OHV situation and section 2.2.4 identifies the suite of actions that will be tailored to site-specific situations. Section 3.0.2 describes concurrent efforts that are part of the 2015 Clackamas Restoration Projects EA that would also tackle some similar issues. Adaptive management strategies to deal with an ever changing situation are addressed at section 2.2.6O.

While the proposed action includes efforts to block temporary roads and skid trails created by logging that might become unauthorized user-created OHV routes, I recognize that this opportunity is limited to feasible and prudent measures and that the contractors we work with to meet our land management objectives do not have the responsibility to prevent the illegal actions of others. Some have suggested that contractors be required to "prevent" OHV use by implementing closures each time they move out of an area even if they are likely to return to complete work later. Unauthorized OHV use can occur at any time including during logging operations or on weekends. Our proposed action is to close temporary roads and main skid trials with berms, slash piled high, rootwads and boulders as needed. I feel that it is not prudent to require this type of intensive closure multiple times; it is my intention that this work be accomplished at the end of operations.

Some work will occur between logging seasons. Just before shutting down operations for the wet season, contractors are responsible for closing native surfaced temporary roads and doing erosion control work on those roads and skid trails. If units are not totally completed and will resume again the following summer, the contractors will still do this work as part of normal erosion control requirements. While most ground-based units are completed in one season and skid trails are not likely to be used in multiple years, occasionally temporary roads are used in multiple seasons because they access multiple units. I am committed to ensuring that contractors and my contract administration staff are aware of the unauthorized OHV uses in the checker board ownership area near Goat Mountain. At prework meetings we will discuss the need for reasonably effective berms on temporary roads particularly if they will be used again the following season.

Again, the types of post-harvest actions proposed in the EA such as bringing in large quantities of slash or boulders from off site to obscure roads and skid trails, are much more intense than would be required of a timber sale operator for erosion control. The intention is to do this work after logging, either by issuing separate contracts funded by KV receipts, or through separate stewardship contract bid items. In either case it is very difficult to coordinate the timing of the actions as closely as some have suggested, particularly given that the source of slash and other debris for blockage has not been identified yet. It is my intention to accomplish this work as near the end of project operations as possible given the limitations of equipment availability, slash and boulder availability, and weather.

Even after the project is implemented fully, it should not be presumed that the proposed actions will totally eliminate unauthorized OHV use. My goal is to reduce the likelihood that the temporary roads and skid trails would become long-term user-created OHV routes. But my expectations are tempered by the realities of human nature expressed by determined OHV users

and limited capacity for law enforcement to maintain a constant presence to prevent all unauthorized uses. Unauthorized uses may gradually decline as the LaDee OHV area becomes fully developed and meets more of the demand for motorized recreation.

• A number of respondents asked that I consider decommissioning more **roads** while others objected to road decommissioning, particularly if the roads were needed again in the future. A number of respondents also expressed concerns about reopening old road alignments and the construction of new temporary roads (s. 1.8.1.2).

In order to avoid any potentially undesirable impacts to aquatic resources, new temporary roads are strategically located on gentle slopes and would not cross any streams. Two of the existing road alignments proposed for reconstruction have seep crossings; however, they are designed to minimize impacts to aquatic resources (s. 2.2.5.4). The proposed action would rehabilitate the temporary road alignments after project completion. Road work included in the proposed action includes only those road segments that do not pose an adverse impact on aquatic resources and are needed to efficiently achieve the vegetation, health and diversity objectives discussed in section 1.3.

Individuals and groups stated that decommissioned, rehabilitated or overgrown roads should never be used again and that roads in general cause inappropriate environmental impact. There is no basis to eliminate all road reconstruction without regard for site-specific circumstances such as road length, landform, proximity to streams, the intensity of actual decommissioning, cost to open and rehabilitate, the impacts of alternate access methods, and the benefits of variable density thinning. The 1.4 miles of new temporary road construction is estimated to impact approximately 2.5 acres of ground, while the 8.4 miles of reconstruction would re-disturb about 15 acres of ground along existing road alignments; all temporary roads would be rehabilitated and covered with slash or other effective ground cover after use.

I find that the environmental impact of reusing existing road alignments has been adequately analyzed and disclosed in Chapter 3; and that the effects are not significant. Section 2.2.5 discusses the details for these roads and sections 3.3 and 3.4 discuss the impacts to aquatic resources. The analysis found the impacts to be sufficiently mitigated by project design criteria (s. 2.2.6). Forest Plan standards and guidelines would be met (s. 3.3.5) and the project would be consistent with the Aquatic Conservation Strategy (s. 3.4.8.1).

• A number of respondent stated that there is too much emphasis on stand health and they want greater attention paid to the value of **dead and down trees** (s. 1.8.1.3 & Appendix B). I agree that these features are important. However, within the stands proposed for treatment, all of the legacy trees, snags, and decayed trees that existed prior to the regeneration harvest were felled; and, in some instances, the large downed logs were either removed or burned along with the activity fuels (s. 3.8.7). Currently, there are some small dead trees from the planted stock that succumbed to insect, disease, and/or competition-induced mortality. This is an expected phase of stand development. Snags this small do not persist for very long, nor are they suitable in size for cavity-nesting for birds, such as pileated woodpeckers. The 36 Pit Fire which burned in part of the project area has created many thousands of snags; many of which are large and would provide for cavity-nesting species for many years to come.

Because there is a public concern about the levels of snags and downed wood, I have carefully considered this situation. I have determined that Alternative B would provide snags, trees with decadence and down logs (considering both quantity and size) at levels sufficient to meet the Forest Plan standards and guidelines (s. 3.8.7.5) and to provide for the species that depend on these structures both at the stand scale and the landscape scale (s. 3.8.7.4).

I considered the comments received and I believe that the proposed action is both appropriate and consistent with relevant management plans (s. 1.2.1, s. 1.6.1) and laws (s. 3.18) and that the environmental assessment clearly explains the effects and benefits to resources. I find that the science used to develop the project and to assess the effects is current and valid. I believe that I have made a draft decision that balances the need for thinning and other actions against any impacts to resources, and I have incorporated adequate design features (s. 2.2), and project design criteria (s. 2.2.6) to minimize impacts to resources and that those impacts have been thoroughly disclosed in the EA.

While I respect the opinions and wishes of commenters and appreciate the dialog that has occurred, I do not consider any of the comments received to warrant the generation of any additional fully developed alternatives in the environmental assessment. The following section describes alternatives that were considered and the rationale for their elimination from detailed study.

Description of Other Alternatives and Reasons for Non Selection (s. 2.1 & s. 2.3)

Alternative A is the no-action alternative (s. 2.1). It was not selected because it would not provide any of the benefits described in the purpose and need. If no action is taken, stands would continue to become overcrowded resulting in trees with reduced vigor and increased mortality (s. 1.5.3 & s. 3.1). Trees would stagnate and stay relatively small resulting in a period of low vertical and horizontal diversity (s. 1.5.4 & s. 3.2). If no action is taken in late-successional reserves or riparian reserves, stands would be very slow in their acquisition of late-successional characteristics (s. 1.5.4, s. 3.4.4.2 & s. 3.7.3.1). If no action is taken, the Forest would forgo the opportunity to provide any forest products consistent with the Northwest Forest Plan goal of maintaining the stability of local and regional economies (s. 1.5.5 & s. 3.16). If no action is taken, roads would deteriorate, become unsafe and impact fish and water quality (s. 3.11 & s. 3.3.3.5). If no action is taken, there would be an abundance of snags; far more than needed to meet standards and guidelines (s. 3.8.7). Selection of Alternative A would not meet the desired condition as stated in the Forest Plan.

Other Alternatives Considered

The EA discusses comments that were received from the public suggesting the consideration of other alternatives. Details of the suggestions and responses are in the EA at s. 2.3 as well as Appendix B. The following has some further elaboration.

Bark submitted six suggestions and requested that the agency review these suggestions as separate alternatives. While Bark's suggestions were considered separately, all of Bark's suggestions when added together would delete approximately 1/3 of the acres of the proposed thinning, leaving approximately 1000 acres to be treated. In addition, Oregon Wild suggested some alternatives to be

considered. Below is a brief summary of the more detailed separate analysis and consideration documented for each alternative in section 2.3.

• One suggested alternative is to plan road decommissioning miles in the Goat Mountain project area that do not include already actively decommissioned roads rebuilt for proposed unit access, and provide a clear implementation timeline.

The proposed action does this. It includes ¹/₂ mile of active decommissioning of roads that have not already been actively decommissioned or rebuilt for unit access (s. 2.3.1.1). Road decommissioning will occur when funding is available. Some will likely be included in stewardship contracts.

• One suggested alternative is to plan a post-implementation restoration project which has a high probability of restricting illegal activities to the degree they are restricted now or greater.

The proposed action does this. It includes reclosing existing closed roads, restoring and blocking target shooting areas, enhancing quarries for safer target shooting, and restoring and blocking OHV routes (s. 2.3.1.2).

• One suggested alternative is to remove units that require new road construction. Oregon Wild and the Clackamas Stewardship Partners also requested the consideration of this alternative.

The suggested alternative was considered, but not fully developed because it would not provide the benefits described in the purpose and need for 116 acres. Wood products would be reduced. It would provide a similar level of water quality protection when compared to the proposed action, and therefore, is not substantially different from the proposed action in that respect (s. 2.3.1.3).

• One suggested alternative is to remove units that would require rebuilding of actively decommissioned roads.

Portions of several units cannot be logged efficiently without temporarily rebuilding some roads that were previously decommissioned. The suggested alternative was considered, but not fully developed because it would not provide the benefits described in the purpose and need for 135 acres (s. 2.3.1.4).

• One suggested alternative is to remove units that would require log haul over rebuilt/reused stream crossings.

The proposed action includes the replacement of several stream crossing culverts on system Road 4510. If these repairs are not made, water would continue to flow across the surface of the road. The suggested alternative was considered, but not fully developed because it would not provide the benefits described in the purpose and need for 512 acres (s. 2.3.1.5).

• An additional suggested alternative is to remove units that directly border the South Fork Clackamas Wilderness area.

When the Wilderness was created, Congress specifically stipulated in the legislation, "Congress does not intend for the designation of wilderness areas in the State under this section to lead to the creation of protective perimeters or buffer zones around each wilderness area." They further asserted, "The fact that non-wilderness activities or uses can be seen or heard from within a wilderness area shall not, of itself, preclude the activities or uses up to the boundary of the

wilderness area." The suggested alternative was considered, but not fully developed because it would not provide the benefits described in the purpose and need for 213 acres (s. 2.3.1.6).

Bark has some valid reasons to be concerned about the effects of roads. The scientific literature recognizes that, across the landscape, roads typically produce the vast majority of sediment particularly where they are unsurfaced, open and used during the rainy season, cross streams at culverts that may be undersized, where they are close to fish bearing streams, or where they are located on steep unstable slopes. These are just a few of the potential impacts that roads can have. The Forest has recognized these issues and has decommissioned most of the roads that create the greatest risks to aquatic resources. However, many roads that have minimal effect to aquatic resources have also been decommissioned to reduce road maintenance costs. Some roads with minimal resource impact were decommissioned using techniques such as entrance management so that they could be efficiently reopened for use.

While the literature shows potential impact for certain types of roads, not all roads are the same. The proposed action was developed by a team of specialists that include a fisheries biologist, soil scientist, water quality specialist, wildlife biologist and geologist. The proposed action includes temporary road reconstruction on old road alignments which incorporates special techniques and project design criteria. After site-specific design, the effects to resources were assessed. These design factors and the results of analysis indicate that the proposed road work to reuse these roads would have much lower effect on the environment than the generic roads evaluated in the scientific literature.

In order to avoid any potentially undesirable impacts to aquatic resources, only those decommissioned roads that had minimal resource risk were considered for reopening. For example, the old road alignment to unit 184 was not proposed for reuse and the unit would be logged with helicopters. In the 2003 Forest-Wide Roads Analysis the roads that were decommissioned and would be reopened were determined to have low to very low aquatic risk. They were decommissioned for the purpose of reducing road maintenance costs and for containing and constraining unauthorized recreation use: the current proposal has identified methods to achieve the same result without decommissioning particularly for roads that are likely to be needed again. There are no stream crossings on these roads and the decommissioning did not recontour the slopes so the original cuts and fills are still intact and fully vegetated. The proposed action would rehabilitate the alignments after project completion and would block them using techniques such as berming and covering them with sufficient slash and debris to prevent unauthorized recreation use.

In order to avoid any potentially undesirable impacts to aquatic resources, new temporary roads were strategically located on gentle slopes and would not cross any streams. The proposed action would rehabilitate the temporary road alignments after project completion. Road work included in the proposed action includes only those road segments that do not pose an adverse impact on aquatic resources and are needed to efficiently achieve the vegetation, health and growth objectives discussed in section 1.3.

FINDING OF NO SIGNIFICANT IMPACT (40 CFR 1508.27)

Context

Based on the documentation in the EA and project file, I have determined the following with regard to the context of this project:

The EA implements direction set forth in the Forest Plan, as amended. The Forest is comprised of about 1.1 million acres; the Clackamas River Ranger District encompasses about 414,700 acres of the Forest. The proposed action authorizes about 2,754 acres of thinning. This equates to approximately 0.3% of the Forest and 0.7% of the Ranger District. Other aspects of the proposed action such as road decommissioning and forage creation are on a similar small scale. Given the area affected by the project at both the District and Forest scale, I find that the effects of the project are not significant as disclosed throughout Chapter 3 of the EA and will have a negligible effect at the District and Forest scale.

Intensity

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 proposed action and the following intensity factors:

- 1. My finding of no significant environmental effect is not biased by the beneficial effects of the action. Impacts can be both beneficial and adverse. For this project, there are no known long-term adverse effects or cumulative effects to resources such as water quality, riparian areas, wildlife or heritage resources. These are documented in Chapter 3 of the EA.
- 2. The project contains design features to protect public health and safety during project implementation including the removal of hazard snags (s. 2.2.6).
- 3. There will be no significant effects on unique characteristics of the area. The project is not located in prime farmland or wetlands, and historic and cultural resources will be protected (s. 3.18). The outstandingly remarkable values associated with scenic and recreational rivers would be protected (s. 3.10).
- 4. The effects on the quality of the human environment are not likely to be highly controversial. While there may be some opposition to thinning in 30-60 year old stands, I have concluded that the science behind this thinning is not highly controversial based on a review of the record that shows a thorough review of relevant scientific information (s. 1.5.4 & s. 3.1). I have also taken into account that opposition to thinning has been fully considered through documentation of the No-action Alternative.
- 5. The possible effects on the human environment are not highly uncertain, nor do they involve unique or unknown risks. The effects analyses discussed in Chapter 3 of the EA are based on sound scientific research and previous experience implementing thinning projects across the Forest.

- 6. The action is not likely to establish a precedent for future actions with significant effects because this action is not unusual in and of itself, nor does it lead to any further actions that are unique. Similar projects have been conducted nearby on the Forest (s. 1.5.2).
- 7. The analysis found no significant cumulative effects. Cumulative effects were assessed in each section of the EA including growth and productivity (s. 3.1.5), diversity (s. 3.2.6), water quantity and quality (s. 3.3.4), fisheries (s. 3.4.5), geologic stability (s. 3.5.5), soils (s. 3.6.6.4), owls (s. 3.7.3.3), deer and elk (s. 3.8.3.4), snags and down logs (s. 3.8.7.4), and air quality (s. 3.15.4). The analysis considered not only the direct and indirect effects of the project, but also its contribution to cumulative effects. Past, present and foreseeable future projects have been included in the analysis (s. 3.0.1 & s. 3.0.2). The analysis considered the proposed actions with project design criteria.
- 8. The action will have no significant adverse effect on districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places and will not cause loss or destruction of significant scientific, cultural, or historical resources (s. 3.18.1).
- 9. My draft decision is consistent with the Endangered Species Act. Formal consultation with U.S. Fish and Wildlife Service concerning the **northern spotted owl** has been completed for this project. The Letter of Concurrence from the U.S. Fish and Wildlife Service found that the project may affect but is not likely to adversely affect the spotted owl. The Biological Opinion for critical habitat from the U.S. Fish and Wildlife Service found that the project may affect critical habitat from the U.S. Fish and Wildlife Service found that the project may affect and is likely to adversely affect critical habitat (s. 3.7.3.2).

Consultation with National Marine Fisheries Service (NMFS) was not required for this project because the project was found to have **no effect** to listed fish or their critical habitat or essential fish habitat (s. 3.4.6).

There will be no significant adverse effects to sensitive species or survey and manage species (s. 3.4.3, s. 3.8.1 & s. 3.12). 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 these species.

10. My draft decision will not violate Federal, State, and local laws or requirements for the protection of the environment. Applicable laws and regulations were considered in the EA (s. 3.18). The action is consistent with the Forest Plan (each part of section 3). The selected alternative 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). The project complies with Executive Order 12898 regarding environmental justice (s. 3.18.2). No disproportionately high adverse human or environmental effects on minorities and/or low-income populations were identified during the analysis or public scoping process.

Other Findings Required by Law or Regulation

Section 3.18 identifies relevant laws and references to documentation in the EA.

Clean Air Act: My draft decision is consistent with the Clean Air Act. Burning would be scheduled in conjunction with the State of Oregon to comply with the Oregon Smoke Implementation Plan to minimize the adverse effects on air quality (s. 3.15 & s. 3.18.5).

Clean Water Act: No streams in the project area are listed as impaired under the Clean Water Act (303(d)) (s. 3.3.3). Implementation of my draft decision will incorporate Project Design Criteria, as described in the EA (s. 2.2.6), which will protect and maintain water quality conditions. It is

anticipated that only minor amounts of sediment would actually enter any stream as a result of implementation (s. 3.3.3.5).

Endangered Species Act (ESA): Consultation has been completed for northern spotted owls. Consultation was not required for listed fish. Listed species are addressed in sections 3.4.6 and 3.7.

Magnuson-Stevens Fishery Conservation and Management Act: The project would not adversely affect essential fish habitat for chinook or coho salmon (s. 3.4.6).

National Forest Management Act: The proposed action was developed to be in full compliance with NFMA via compliance with the Forest Plan, as amended. The project area has been found to be suitable for timber management (s. 3.1.7 & s. 3.18.6). Other requirements are discussed in the Mt. Hood Forest Plan section below.

National Historic Preservation Act: The Forest operates under a programmatic agreement between the Oregon State Historic Preservation Office (SHPO) and the Advisory Council on Historic Preservation for consultation on project determination. Consultation with SHPO was completed for this project (s. 3.18.1).

CONSISTENCY WITH MT. HOOD FOREST PLAN

I find that the selected alternative is consistent with direction found in the Forest Plan as amended. It is consistent with standards and guidelines specific to the relevant land allocations and it is consistent with the applicable Forest-wide standards and guidelines (s. 1.2.1.1, s. 1.6.1 & s. 3).

- Aquatic Conservation Strategy The project will contribute to maintaining or restoring aquatic conditions and is consistent with the Aquatic Conservation Strategy objectives (s. 3.4.8.1).
 - I have considered the relevant information from the watershed analyses completed for the South Fork Clackamas River, Lower Clackamas River, Upper Clear Creek, Lower Molalla River/Milk Creek and Molalla River. This project has adopted the concepts for riparian reserve delineation described in the watershed analyses (s. 1.6.3.3). The site-potential tree height for this project is 180 feet.
 - I find that the Project Design Criteria (s. 2.2.6), such as stream protection buffers and operating restrictions on ground-based machinery, will minimize impacts and maintain the function of key watershed indicators that make up elements of the Aquatic Conservation Strategy. These key indicators for water quality, habitat, flow, channel condition, and watershed condition, will be maintained or enhanced (s. 3.4.8.1).
- Management Indicator Species I have considered the impacts to Forest Management Indicator Species (MIS) (s. 3.8.2). MIS for this portion of the Forest include northern spotted owl (s. 3.7), pileated woodpecker (s. 3.8.4), American marten (s. 3.8.5), deer, elk (s. 3.8.3), salmonid smolts and legal trout (s. 3.4.1). I find that the selected alternative is consistent with the standards and guidelines pertaining to MIS, and that based on the limited effects to any MIS, the proposed action does not contribute towards a negative trend in viability on the Forest.

- **Invasive Plants** I find that the selected alternative is consistent with Pacific Northwest Invasive Plant Program Preventing and Managing Invasive Plants Record of Decision issued in 2005 and the Site-Specific Invasive Plant Treatments for Mt. Hood National Forest Record of Decision issued in 2008 (s. 3.13). Design criteria are included to minimize the spread and establishment of invasive plants (s. 2.2.6H).
- Compliance with the **2001 Record of Decision and Standards and Guidelines for Amendments to the Survey and Manage, Protection Buffer, and other Mitigation Measures Standards and Guidelines** (s. 3.4.3, s. 3.8.6.2 & s. 3.12).

I have reviewed the relevant sections in the Environmental Assessment and I find this draft decision to be consistent with the 2001 Record of Decision. Specifically, I find that no surveys are needed because the Pechman exemption applies to these stands since they are under 80 years of age.

Exceptions - The Forest Plan describes the process for documenting exceptions to "should" standards and guidelines (p. Four-45). The Forest Plan does not require a Forest Plan amendment for project level exceptions to these standards and guidelines. The following documents the rationale for exceptions.

I approve the following earthflow exception documented at section 3.5.6.

B8-031 indicates that on each high risk earthflow, at least 90 percent of the acreage capable of supporting conifer forest should have timber stands with at least 40% of the crop trees at least 8 inches in diameter with at least 70% crown closure.

The B8 land allocation in this area is unusual. Typically earthflows are several hundred acres in size, but here it is 40 acres and is entirely within unit 135. The Forest's slope stability specialist has determined that there was a mapping error and that the area should be considered low risk instead of high risk. As low risk the area would not have qualified for the B8 land allocation because only moderate and high risk earthflows were incorporated into the B8 land allocation.

The trees within the B8 area are well over 8 inches diameter but the crown closure after thinning would be less than 70%, therefore an exception is proposed. The Forest's slope stability specialist has determined that there would be no risk of accelerating earthflow movement with the proposed action.

I approve exceptions for the **soil productivity** standards and guidelines FW-22, FW-28 and B8-040 as documented at section 3.6.8.

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. Most units that were logged with ground-based equipment in the original clear cut harvest would remain above 15% detrimental soil condition (s. 3.6.6). Similarly, most units in earthflows remain above 8% detrimental soil condition.

There was no standard and guideline for limiting the extent of detrimental soil impacts when the original clearcuts were logged prior to the Forest Plan. Back then, ground-based logging was less restricted and

operators were not required to limit their skid-trail system, landings, and temporary roads to a specified extent. Post-harvest activity such as site preparation for reforestation often added to the extent of detrimental ground disturbance after the initial harvest. In more recent years, unauthorized user created OHV trails have also added to the extent of detrimental disturbance.

The Forest will continue to manage soil resources with the goal of maintaining or enhancing its productivity. The proposed action has been designed to minimize additional detrimental soil impacts. The following project design criteria and contractual specifications would be employed that aim to contain the extent of detrimental soil conditions.

- All or portions of 60 thinning units that were originally logged with ground-based equipment would be thinned using skyline machines or helicopters which have lower soil impact.
- Old roads and landings would be reused where appropriate.
- Existing skid trails would be reused where they are not hydrologically connected.
- Where the existing skid trail pattern has far more trails than are needed with today's equipment and logging techniques, only the skid trails that are needed to efficiently operate would be reused and the unused skid trails would be allowed to continue to recover.
- Where new skid trails are needed due to changes in logging system or landing location, they would be spaced 150 feet apart and on appropriate slopes.
- Mechanical harvesters would walk on layers of slash.
- Ground-based operations would occur during the dry season when soil moisture conditions are sufficiently dry to prevent excessive compaction, rutting or erosion.
- Some trees would be felled to create down woody debris.
- New burning would only occur at landings.
- Appropriate erosion control techniques would be used including constructing waterbars on skid trails and placing slash on certain skid trails and OHV routes.
- After operations are completed, temporary roads and landings that were used would be decompacted.
- Some system roads would be decommissioned.
- Unauthorized OHV trails would be blocked and restored.
- Shooting areas would be restored and areas where shooters are pulling their vehicles off the road would be blocked.
- Some system roads would be stormproofed and closed which would reduce unauthorized OHV use.
- In areas not disturbed again, natural recovery would continue to occur, as roots and burrowing animals penetrate and break up compacted soils, as organic matter accumulates, and as soil wetting/drying and freezing/thawing cycles occur.

In dense stands, site and soil resources are used by all the trees to stay alive with little left over for root expansion and stem strength. When high tree density is coupled with the existing extent of detrimental soil conditions, productivity could be considered lower than the sites potential. Conversely, thinning to maintain tree spacing and therefore stand health, results in a reallocation of site and soil resources to the remaining trees, therefore offsetting to some degree, the negative effects of detrimental soil condition. The availability of site and soil resources for growth would increase substantially after thinning.

The objective of maintaining long-term site productivity would still be met. Section 3.6.6.4 describes that site productivity has not been impaired and that the cumulative effects of the proposed actions would not be substantial and trees and other vegetation are expected to continue growing and developing at appropriate rates.

Even though many units already exceed the levels of detrimental soil condition specified in FW-22 and B8-040, it is not possible or practical to rehabilitate all of the impacts at this time.

Temporary roads, landings and skid trails are a key part of the stand management transportation system and where appropriately located, would likely be reused when stand management is proposed. Stand management techniques have evolved over time changing the portion of land used for the stand management transportation system and the portion kept productive and resilient to grow trees and other vegetation at appropriate rates.

Even though there have been advances in the past 50 years in understanding the critical role soil conditions play in forest productivity, it is not always possible to reverse all past impacts so that soils can be returned to the same level of functionality that they once had. For example where severe burning resulted in scorched soils or where duff and the top soil horizon have been moved a great distance, it is not feasible to restore these impacts quickly. Some actions are proposed to restore or minimize impacts to soils including those listed above; they would provide some benefit but they are not likely to fully restore soils.

One technique used in the past to partially restore soils is to use deep soil tillage equipment on skid trails. This has been done before in regeneration harvests where a winged subsoiler pulled by a tractor was used to decompacted soils on skid trails. This technique is recommended by another guideline (FW-030) which suggests that all logging skid trails should be considered for rehabilitation through deep soil tillage techniques as a means to achieve the goals of FW-028. This technique is appropriate in some circumstances such as directly after a regeneration harvest but is not appropriate in other circumstances. This guideline was not a requirement at the time of the initial clearcutting.

While the existing skid trails are still considered to have detrimental soil conditions, there are tree roots that have penetrated into the skid trails. Reusing the skid trails again may add some additional compaction around these roots but they would likely remain intact. Deep soil tillage of skid trails in a thinning unit would break the roots that have penetrated into the trails and lead to reduced growth, increased root disease and tree mortality. Using this technique on skid trails that are not reused at this time, (e.g. where there are more skid trails than needed or where units are changed to skyline or helicopter) would require that trees growing in the trails be cut prior to treatment. This would set back the partial recovery that has occurred on these skid trails.

Deep soil tillage was considered for all skid trails but the technique was not selected for the current proposed action. The project is consistent with FW-030 because serious consideration was given to this technique even though it was not selected. The opportunity to mechanically rehabilitate skid trails by deep soil tillage may come in the future if and when regeneration harvest occurs in these stands. Most units that were logged with ground-based equipment in the original clearcut harvest would remain above the detrimental soil condition specified in FW-22 and B8-040.

Predecisional Administrative Review Process

This project is subject to predecisional administrative review pursuant to 36 CFR 218, Subpart B. Also called the "objection process." The full text of the rule can be found at the following website. http://cfr.regstoday.com/36cfr218.aspx

Only individuals or entities that submitted timely, specific written comments during a designated opportunity for public participation (scoping or the 30-day public comment period) may object (36 CFR 218.5). Notices of objection must meet the requirements of 36 CFR 218.8. Objections must be filed with the Reviewing Officer within 45 days from the date of publication of notice of the opportunity to object in The Oregonian. The publication date is the exclusive means for calculating the time to file an objection. Those wishing to file an objection to this draft decision should not rely upon dates or timeframe information provided by any other source. Objections sent by U.S. Postal Service or other private carrier must be post marked or date stamped before the close of the objection period and must be received before the close of the fifth business day after the objection filing period.

Incorporation of documents by reference is not allowed, except for the following list of items that may be referenced by including date, page, and section of the cited document, along with a description of its content and applicability to the objection: 1) all or any part of a federal law or regulation; 2) Forest Service directives and land management plans; 3) documents referenced by the Forest Service in the subject EA; or 4) comments previously provided to the Forest Service by the objector during public involvement opportunities for the proposed project where written comments were requested by the responsible official. All other documents must be included with the objection.

Issues raised in objections must be based on previously submitted specific written comments regarding the proposed project or activity and attributed to the objector, unless the issue is based on new information that arose after the opportunities for comment. The burden is on the objector to demonstrate compliance with this requirement for objection issues.

Minimum requirements of an objection area described at 218.8(d). An objection must include a description of those aspects of the proposed project addressed by the objection, including specific issues related to the proposed project; if applicable, how the objector believes the environmental analysis or draft decision specifically violates law, regulation, or policy; suggested remedies that would resolve the objection; supporting reasons for the reviewing officer to consider; and a statement that demonstrates the connection between prior specific written comments on the particular proposed project or activity and the content of the objection, unless the objection concerns an issue that arose after the designated opportunities for comment.

The Objection Reviewing Officer is the Forest Supervisor. Objections may be submitted several ways.

- Postal Delivery: Forest Supervisor, Objection Reviewing Officer, Mt. Hood National Forest, 16400 Champion Way, Sandy OR 97055.
- Emailed to: *objections-pnw-mthood@fs.fed.us*. Please put OBJECTION and the project name in the subject line. Electronic objections must be submitted as part of an 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 addresses other than the ones listed above or in formats other

than those listed above or containing viruses will be rejected. It is the responsibility of the objector to confirm receipt of objections submitted by electronic mail. For electronically mailed objections, the sender should normally receive an automated electronic acknowledgement from the agency as confirmation of receipt. If the sender does not receive an automated acknowledgement of receipt, it is the sender's responsibility to ensure timely receipt by other means.

- Hand deliveries: *Mt. Hood National Forest Headquarters Office, 16400 Champion Way, Sandy OR 97055.* Hand deliveries can occur between 8:00 AM and 4:30 PM (closed 11:30 to 12:30), Monday through Friday except legal holidays.
 - or
- Faxed to: Forest Supervisor, Attn: Objections to 503-668-1413

For further information regarding this project, contact Jim Roden at 503-630-8767 or by email at <u>jroden@fs.fed.us</u>. For further information regarding objection procedures, contact Michelle Lombardo at 503-668-1796 or by email at mlombardo@fs.fed.us.

June 22, 2016

Date Published

Jackie Groce District Ranger Clackamas River Ranger District Mt. Hood National Forest

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