

## Decision Memo

### Wildcat Thinning

Mt. Hood National Forest  
Zigzag Ranger District

The purpose of this project is to commercially thin young forest stands to achieve multiple objectives:

- Maintain health, vigor and growth that results in larger wind firm trees  
*This action is needed because second-growth stands are at or are near densities that result in a slowing of diameter growth. Some of the stands are overcrowded and are experiencing suppression caused mortality. If no action is taken to reduce stand densities, these stands would experience a reduction in diameter growth, reduced vigor, increased mortality, reduced diversity, and increased wind damage susceptibility. There is a need for forest stands that are healthy and vigorous with low levels of mortality and wind susceptibility.*
- Enhance and restore diversity  
*Managed stands often lack certain elements of diversity. They may not have the mix of tree species that were present in the original stand and they are relatively uniform in terms of tree size and spacing. This project would use variable density thinning that changes vertical and horizontal stand structure and brings more sunlight to the forest floor.*
- Provide forest products  
*The project would be a commercial thinning that would supply forest products consistent with the Northwest Forest Plan goal of maintaining the stability of local and regional economies. It would result in healthy productive forests that would sustainably provide forest products in the matrix in the future. Not only are forest products needed by society, but also the employment created is important to local and regional economies.*

The project is located in sections 9 and 16 of T. 3 S., R. 6 E., WM, Clackamas County, Oregon. Large portions of the Wildcat area were logged many years ago and a subsequent fire burned through the area. Portions were planted and portions were reforested by aerially seeding from a seed source that originated off-Forest. The units are approximately 65 years old except for unit 3, which is a 45-year-old plantation. The project is in the C1 – Timber Emphasis land allocation. No Riparian Reserves would be thinned.

The proposed action is to do variable density thinning on approximately 70 acres.

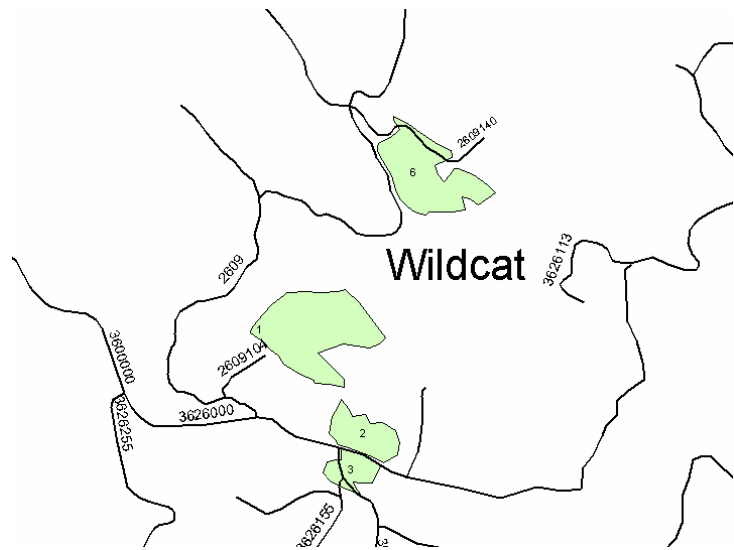
- Trees to be cut are generally smaller than 20 inches in diameter with an average of approximately 16 inches.

- 500 feet of temporary road will be constructed (an extension of road 2609104 into unit 1). The temporary road will be obliterated.
- Ground based logging systems will be used. Site-specific design criteria (5d) will minimize the expansion of Off Highway Vehicle (OHV) use into the thinning units.
- Variability – Thinning will generally remove the smaller trees, but the objective is to introduce structural and biological diversity through variable spaced thinning. Diversity and variability will be introduced in several ways:
  - Leave tree spacing will vary from 80-140 trees per acre.
  - Leave trees will include minor species.
  - Small gaps and skips will be created.
  - Leave trees will include some trees with the elements of wood decay.
  - Leave trees will include some live trees where their crowns touch certain key snags.
  - All non-hazardous snags will be retained.
  - All existing down logs will be retained and key concentrations of woody debris in the older decay classes will be protected.
  - There is an opportunity to enhance habitat for snag dependent species and to provide down logs. If funding is available, live trees would be treated to provide future snags and future cavities and some live trees would be felled to create large woody debris. Five trees per acre would be used to create these structures; the mix of snags and down logs would vary by unit depending on site-specific conditions.

**Project File** – Other details of the project can be found in the project file. This includes a list of standard practices such as seasonal restrictions, snag management, erosion prevention measures, and practices to reduce the risk of spread of invasive plants. The file includes biological evaluations, a silvicultural diagnosis, a heritage resource report, letters and emails received and response to comments.

### **Public Scoping**

A notice was sent to a list of interested groups and individuals. Comments were received offering a diversity of public opinion. Some voiced support for the project while others suggested that the project be cancelled or modified or that an EA should be written. I have considered these comments.



## Reasons for Categorical Exclusion

I find the proposed action can be categorically excluded from documentation in an EA or EIS because it fits category 31.2-12, described in Forest Service Handbook 1909.15-2004-3, July 6, 2004. This category is for “harvest of live trees not to exceed 70 acres, requiring no more than ½ mile of temporary road construction. The proposed action may include incidental removal of trees for landings, skid trails, and road clearing. Examples include but are not limited to: commercial thinning of overstocked stands to achieve the desired stocking level to increase health and vigor.” This proposal is to thin up to 70 acres of second-growth. One tenth of a mile of new temporary roads will be constructed.

No extraordinary circumstances have been identified by the interdisciplinary team of resource scientists that analyzed this proposal.

- The following resources were considered: threatened, endangered or proposed species or their critical habitat or sensitive species; flood plains, wetlands or municipal watersheds; Congressionally designated areas such as wilderness, wilderness study areas or national recreation areas; inventoried roadless areas; research natural areas; American Indian religious or cultural sites; archaeological sites or historic properties or areas. I find that the degree of potential effect to these resources does not warrant further analysis or documentation in an EA or EIS.
- Biological Evaluations were prepared for sensitive, threatened or endangered wildlife, fish and botanical 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 29, 2005 concluded that this type of 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.

- The project is in a Critical Habitat Unit (OR-10). The proposal is not in nesting/roosting/foraging habitat but it is in dispersal habitat, which will be temporarily degraded by thinning. The effects determination for habitat modification will be Not Likely to Adversely Affect.
- The new information that has been recently published about northern spotted owls has been considered. The new information would not lead to a change in the effects determination.

The proposal will have no effect on threatened or endangered **anadromous fish** or Essential Fish Habitat established under the Magnuson-Stevens Fishery Conservation and Management Act. Consultation is not required.

There will be no impacts to sensitive species that would cause a trend to federal listing or loss of viability for any proposed or sensitive species. *Bridgeoporus nobilissimus*, a

botanical sensitive species was found near one of the units. The botanical biological assessment contains recommended buffer distances.

The project will have no adverse effects on flood plains, wetlands or municipal watersheds; Congressionally designated areas such as wilderness, wilderness study areas or national recreation areas; inventoried roadless areas; research natural areas; American Indian religious or cultural sites; archaeological sites or historic properties or areas.

### **Findings of Consistency**

I have determined that the proposed action is consistent with the standards and guidelines of the Mt. Hood National Forest Land and Resource Management Plan as amended by the Northwest Forest Plan (Forest Plan).

- It is consistent with standards and guidelines specific to the relevant land allocation and it is consistent with the applicable Forest-wide standards and guidelines. **Exceptions are noted below.**
- **Aquatic Conservation Strategy** – The project is not in riparian reserves and is therefore consistent with the Forest Plan as amended by the 2004 Record of Decision to Clarify Provisions Relating to the Aquatic Conservation Strategy.
- 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).

**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 units 2 and 3 are currently above 15% detrimental soil condition and they will remain above 15% after project implementation. I am approving an exception for Forest Plan standards and guidelines FW-22, FW-28 and FW-30. I considered using helicopters to log 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 and silviculturist do 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. No-action would have areas that remain above 15% with no opportunity for restoration.

The objective of maintaining long-term site productivity will still be met. 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 stands 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%.

- The project will not close any system **roads** that are currently open. The temporary road constructed for this project will be obliterated and closed upon project completion and open road density will remain unchanged. Public comments indicated a desire to separate timber sale projects from restoration projects. Two 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 for this project and would be the same for no action.

### **Decision and Rationale**

It is my decision to proceed with this project because it will enhance biological diversity, provide forest products and result in increased health and growth.

### **Comments**

The proposed action was available for a 30-day public comment period that began on October 7, 2005. This comment period was provided pursuant to the September 16, 2005, order issued by the U. S. District Court for the Eastern District of California in Case No. CIV F-03-6386JKS. I have considered the substantive comments that were received. The responses to the comments are contained in the project file.

### **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 1<sup>st</sup> 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@fs.fed.us](mailto:appeals-pacificnorthwest-regional-office@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.

**Implementation**

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

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

**Contact Person**

For further information contact Jim Rice.

Address: 595 NW Industrial Way, Estacada OR 97023  
Phone: (503) 630-6861  
Email: [jrrice@fs.fed.us](mailto:jrrice@fs.fed.us)

/s/ *Colleen Pelles Madrid*

12/5/2005

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COLLEEN PELLER MADRID  
District Ranger

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**Date Published**