Decision Memo

2008-2013 Young Stand Thinning, Pruning, and Bough Projects

USDA Forest Service Mount Adams Ranger District Gifford Pinchot National Forest Skamania, Yakima, and Klickitat Counties, Washington

PURPOSE OF and NEED FOR ACTION

This action would reduce and control stand density by thinning ten to thirty-year old plantations within the Mount Adams Ranger District. This action would also prune western white pine branches to mitigate western white pine blister rust infection, and allow the collection and utilization of special forest products (firewood and boughs).

The purpose of this action is several: 1) to optimize the health and growth of young stands within matrix land allocations; 2) to develop structural diversity and accelerate the development of late successional forest conditions (i.e., herb, shrub, two tree layers, and large crowned trees) within Late Successional Reserve land allocations; 3) to increase or maintain forage production for elk and deer; and 4) create revenues generated by the sale of boughs and fire wood which will be retained by the Forest/District to fund future young stand thinning treatments. Timber stands originating from plantations tend to be too dense for optimum growth. Inter-tree competition for light and moisture can increase susceptibility to disease and insects. Species and structural diversity, often lacking in these types of stands, can be increased with thinning by encouraging the growth of secondary, minor species and varying the tree spacing within each stand. In addition these close-growing plantations will eventually shade out herbaceous and woody forage plants, reducing the values of these areas for elk, deer, and other wildlife species. A total of 13,178 acres of young stands, within Matrix, Late-Successional Reserve (LSR), Managed Late-Successional Reserves, and Administratively Withdrawn Area allocations, are proposed to be treated (Table 1).

Table 1 – Acres of Young Stand Thinning By Northwest Forest Plan Land Allocations

Northwest Forest Plan Allocation	Acres
Matrix	9,118
Late Successional Reserves	2,526
Managed Late Successional Reserves	1,385
Administratively Withdrawn Areas	149
Total	13,178 acres

There is a need to improve health and growth within the Matrix allocation to meet objectives for stand health and a sustainable supply of forest products. There is a need to improve growth within the Late-Successional Reserve to be able to accelerate the development of late-successional stand characteristics. There is also a need to increase forage production forestwide in light of the overall reduced timber harvest on the Gifford Pinchot National Forest since 1994. Desired future conditions stated within the Forest Plan will not be achieved or delayed if young stand thinning plantations are not silviculturally managed.

This action would additionally provide opportunities to diversify species composition within planted stands by retaining hardwood and naturally seeded conifers. Thinning within Riparian Reserves would promote multi-story structure and restore function to riparian zones. Some ridgetop stands along roads would be selected that, when thinned, would open the stands to vistas of the Cascade Range.

BACKGROUND

Funding levels will limit the amount of precommercial thinning acres per year within the next five years. It is estimated that a maximum of 400-500 acres per year will be funded and that this level is expected to remain uncertain during the next 5 years due to an overall drop in domestic federal funding. Several other funding sources are available to help leverage funding for this project. Those are, but not limited to: Title II of the Secure Rural Schools and Community Self-Determination Act (P.L. 106-393, 2000), Stewardship authority, Rocky Mountain Elk Foundation, KV authority, and other State and private grants.

PROPOSED ACTION

Young Stand Thinning

Young stand thinning is proposed on 13,178 acres of overstocked plantations within four land allocations (Table 1). Project sites are distributed throughout the Wind River, Big White Salmon, and Little White Salmon watersheds. Young stand thinning is also proposed within the Riparian Reserves, however no thinning would be done within 25 feet of waterways to provide shading and protect soil stability. Thinning would be done with chainsaws to cut sapling and pole sized trees, limb pruning western white pine trees, and occasional brush cutting to access cut trees.

Slash would be lopped, scattered, left to decompose naturally. Where warranted, slash may be pulled back from heavily traveled roads to reduce the risk of human-caused ignition. For aesthetic and fire potential reasons slash would typically be managed along trail corridors. Handpiling of slash, for subsequent burning, or chipping of hazardous activity fuels would only be done in areas of heavy, continuous fuel loading and only when reviewed, in advance, by a botanist, wildlife biologist, silviculturist, archaeologist,

and fuels specialist. A variable density thinning prescription (un-thinned clumps, gaps, and un-even spacing) would be utilized to thin the plantations.

The proposed candidate stands currently contain an average of approximately 700 trees per acre, mostly dominated with Douglas fir. To maintain secondary species diversity, western red cedar, Pacific yew, and hardwoods would not be cut unless specified in order to meet resource objectives. Other secondary species components such as western hemlock, mountain hemlock, noble fir, Engelmann spruce, and other minor species within the stands would be retained, if it is determined that these species are not a major contributor to the overall stand density condition.

Depending upon resource objectives, residual trees left after thinning would vary from 260 trees/acre (13' x 13') to 130 trees/acre (18' x 18'). All trees, regardless of species, that are over 9 inches in diameter would be left uncut. No dead trees, snags, or large coarse, down, woody debris would be cut or otherwise disturbed. To help reduce the spread of white pine blister rust, western white pine trees in each stand will be pruned to mitigate favorable microclimate conditions for the rust or to remove infected branches. The normal operating season for these activities is between early May to early November. The duration of operations on any given project site/stand is relatively short, normally 3 to 5 days. Off road motorized equipment such as 4-wheel ATVs would not be permitted for this activity except when authorized use is given to operate on specified existing roads, which may be blocked to vehicle use.

An opening, roughly 5,500 square feet (one-eighth acre) would be created in each unit 20 acres or less in size, and two openings would be created in units over 20 acres. The openings would be centered on naturally open areas where possible to minimize the amount of slash created. Shrubs in the created openings would be cut back to promote resprouting.

Firewood Collection

The Gifford Pinchot National Forest requires a permit or contract to remove any firewood products. The proposed action includes the cutting and collection of tree boles that were cut within the young stand thinning stands. There are 2 types of sales that are associated with firewood:

Free Use: Free use may be authorized for incidental amounts of special

forest products that are for personal use only.

Personal Use: These are sales of special forest products to individuals who

have needs for more products than are authorized under

free use, and use the products for personal use.

Incidental amounts of firewood removal would be limited to areas outside of the Riparian Reserves. The normal operating season for these activities is between early April through November. The duration of operations on any given project site/stand is relatively short,

normally 2 to 5 hours. Off road motorized equipment such as 4-wheel ATVs will not be permitted for this activity except when authorized use is given to operate on specified existing roads, which may be blocked to vehicle use.

Special Forest Products Collection (Boughs)

The rules governing Special Forest Products on the Gifford Pinchot National Forest are set forth in "A Desk Guide to Special Forest Products, Gifford Pinchot National Forest". The harevst of boughs would be limited to areas within the proposed 13,178 acres of plantation stands, but outside of any Riparian Reserves boundaries. Bough harvest is strictly for Douglas-fir, noble fir, Pacific silver fir, and western white pine boughs. For all species, bough removal is only permitted on the lower 2/3 of the tree when the tree is 15 feet or greater in height, or on the lower ½ of the tree when the tree is less than 15 feet in height. Bough sales have no associated ground disturbing actions, but may involve the use of a helicopter for the removal of boles in isolated, inaccessable terrain. The normal operating season for these activities is between late September through early December. The duration of operations on any given project site/stand is normally 1 hour (personal use) to 7 days (commercial). The majority of revenues generated by the sale of commercial boughs would retained by the Forest/District to fund future young stand thinning treatments.

FOREST PLAN DIRECTION

The Gifford Pinchot Land and Resource Management Plan (1990), as amended by the Record of Decision for Amendments to Forest Service and Bureau of Land Management Planning Documents within the Range of the Northern Spotted Owl (1994, amended 2004) (Forest Plan) provides management direction for activities on the Gifford Pinchot National Forest. Plantations to be thinned are located within different Management Areas:

Late-Successional Reserve/Managed Late Successional Reserves - The objective of these lands is to restore and enhance conditions of late-successional and old-growth forest ecosystems, which serve as habitat for late-successional and old growth related species, including the northern spotted owl. Thinning young, even-aged stands is considered to be beneficial, bringing the stands closer to the desired future condition by opening up the canopy, thereby increasing diversity of plants and animals and hastening transition to a forest with mature characteristics (Forest Plan, pp. 5-5 and 5-6).

Matrix - These lands are meant to contribute to a predictable supply of timber and other resources while maintaining a healthy ecosystem. The goal of General Forest is to produce a predictable and sustainable level of timber sales other resources that will not degrade the environment (Forest Plan, p. 6-26). Thinning, as proposed will accelerate the growth and vigor of the residual trees by providing additional light and growing space.

Administratively Withdrawn Areas - These areas include wildlife, recreation, visual, and other areas not managed to provide timber outputs, but do not preclude young stand thinning activities provided that Forest Plan Standards and Guidelines are applied.

Within the above allocations, several hundreds of Riparian Reserve acres are interspersed and proposed for treatment. The thinning objective within the Riparian Reserves is to maintain and restore riparian structures and functions of intermittent streams and to serve as connectivity corridors among the Late-Successional Reserves. All activities within the Riparian Reserves must meet the Aquatic Conservation Strategy Objectives.

The proposed project areas are also within Tier 1 and Tier 2 Key Watersheds, under the Northwest Forest Plan, and the proposed action is consistent with the objectives of providing high quality habitat for stocks of anadromous salmonids and resident fish species.

FINDINGS

These actions are not ground-disturbing, thus there would be no effect to aquatic resources from the proposed action, including water quality or Threatened fish species or their Designated Critical Habitat.

The proposed action is covered by the Programmatic Biological Assessment for Threatened and Endangered wildlife species. A Project Consistency Form was completed in March 2001 (available in project file). There would be no direct effects to spotted owls or to suitable habitat. Indirect effects could occur because many of the units to be treated are adjacent to unsurveyed suitable spotted owl nesting habitat, and nesting spotted owls could be disturbed by chainsaw noise and associated activity if owls are present nearby. There would be no effect to other Threatened or Endangered wildlife species.

The proposed action takes place in stands that are less than 80 years old, in habitat that is not suitable for Survey and Manage wildlife species and there are no known sites, thus there would be no impacts to these species.

The Pacific Northwest Region Invasive Plant Program Record of Decision for Preventing and Managing Invasive Plants (USDA 2005) provides invasive plant prevention and treatment/restoration standards and direction on all National Forest Lands within Region 6.

There would be no effect to any Threatened or Endangered plant species and no impact to any Survey and Manage plant species. Golden chinquapin (*Chrysolepis chrysophylla*) is present within the Mt. Adams Ranger District and is included on the Regional Forester's Sensitive Species list. Based on the prefield review, it was determined that the stand improvement activities associated with this project *may impact individuals or habitat, but will not likely contribute to a trend towards federal listing or cause a loss of viability to the population or species* for golden chinquapin.

PROJECT DESIGN FEATURES

The following design features were developed and are included as part of this decision:

1. A limited operating period (LOP) would be implemented for thinning units that are within 60 yards of suitable spotted owl nesting habitat. The LOP prohibits chainsaw use between March 1 and June 30. The following units (vegetation polygon ID #'s) are those stands that are **farther** than 60 yards from nesting habitat and would **not** require implementation of the LOP.

300259	300907	301880	802177	803021	804739
300262	301208	301900	802178	803042	806545
300413	301216	301913	802179	803045	806562
300459	301220	301915	802259	803121	806564
300517	301220	302049	802261	803148	806575
300533	301223	302066	802264	803159	806582
300535	301227	304297	802356	803163	806583
300568	301228	304298	802356	803172	808215
300569	301230	800123	802531	803180	808289
300635	301232	801907	802534	803190	808404
300693	301234	802022	802547	803198	808406
300694	301235	802024	802579	803201	808409
300713	301236	802076	802597	803223	808832
300714	301241	802079	802598	803225	818005
300745	301242	802088	802602	803227	818007
300747	301248	802089	802603	803229	
300749	301251	802101	802606	803237	
300750	301268	802104	802607	803256	
300753	301458	802130	802609	803291	
300801	301582	802133	802610	803323	
300806	301612	802149	802614	803326	
300825	301747	802152	802876	803343	
300833	301770	802155	802919	803880	
300843	301772	802156	802928	803888	
300850	301788	802163	802955	803904	

- 2. Riparian buffers in units with areas of low bank stability, as identified by the Forest Soil Scientist and/or the District Hydrologist, will be expanded to 50 feet on each side of the stream.
- 3. Peeled cedar trees will not be cut or otherwise affected.
- 4. To prevent the introduction of noxious weeds into the project area, all heavy equipment, or other off- road equipment used in the project is to be cleaned to

remove soil, seeds, vegetative matter or other debris that could contain seeds. Cleaning should be done before entering National Forest Lands, and when equipment moves from or between project sites or areas known to be infested into other areas, infested or otherwise. Cleaning of the equipment may include pressure washing. An inspection will be required to ensure that equipment is clean before work can begin. (Equipment cleaning clause Wo-C6.35)

5. If horses or pack animals are used during project activities, clean hooves and groom animals prior to arrival on site. Use weed free feed for 3 days prior to arrival on site and throughout duration of project.

DECISION

I have decided to implement the proposed action to thin selected plantations, allow the cutting/collection of firewood, and bough cutting/collection within the 13,178 aces of plantations, as described above. This decision requires the implementation of all project design criteria that are included in this document.

Young stand thinning and associated projects are activities that fall within a category of actions established by the Chief of the Forest Service which normally do not individually or cumulatively have a significant effect on the quality of the human environment and, therefore, may be categorically excluded from documentation in an environmental impact statement or environmental assessment. This category of actions is identified in Forest Service Handbook 1909.15, Chapter 30, Section 31.2, Category 6 as:

Timber stand and/or wildlife improvement activities which do not include the use of herbicides or do not require more than one mile of low standard road construction.

A categorical exclusion is appropriate since there are no extraordinary circumstances potentially having effects that may significantly affect the environment. Working with the wildlife biologist and botanist I have determined there will be no affect to federally listed species and their designated critical habitat. The archaeologist has conducted surveys and determined no potential for disturbance to American Indians and Alaska Native religious or culturally significant sites, archaeological sites or historic properties or areas. The fisheries biologist and I have determined these activities will have no effects to flood plains, wetlands or municipal watersheds and have established guidelines for stream buffers to protect these resources. Burning activities are limited and would only be done in areas of heavy, continuous fuel loading and only when reviewed, in advance, by a botanist, wildlife biologist, silviculturist, archaeologist, and fuels specialist, therefore air quality would not be degraded. I find that the effect of this action will not result in individually or cumulatively significant impacts on natural research areas, inventoried roadless areas, wilderness areas or national recreation areas.

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I find that this action meets my primary objective for improving stand conditions and providing firewood/special forest products (boughs) and has the potential to achieve my secondary objectives for enhancing wildlife habitat, diversifying species composition in plantations, restoring function within riparian zones, and managing viewsheds.

SCOPING

The proposed action was circulated to interdisciplinary team members for internal review. In addition a scoping letter describing the proposal was sent out to the Gifford Pinchot mailing list. The Forest received 5 letters. From;

The Gifford Pinchot Task Force,

The GPTF is generally in support of the activities. Their concerns are primarily associated with thinning in areas that might have an adverse impact on water quality, and the possibility of construction of temporary roads and reconstruction of forest roads.

The State of Washington Department Of Ecology,

Are supportive of the activities stated above and suggest implimenting alternative methods over piling and burning of slash.

Washington Department Of Fish and Wildlife,

Is generally supportive of thinning young stands to increase elk and deer forest and especially to diversify forested stands.

Jim White,

Is supportive of all activities stated above and would like to *consider* removal of some trees along waterways (within 25 feet) via consultation with a hydrologist or fish biologist.

H.F. Fiscus

Supports all activities and suggest that slash left on the ground be reduced to shorter pieces.

These comments have been addressed and are included as appendix A.

FINDINGS REQUIRED BY NATIONAL FOREST MANAGEMENT ACT AND OTHER LAWS

NATIONAL FORST MANAGEMENT ACT (NFMA)

As required by the National Forest Management Act, this decision is consistent with the Gifford Pinchot National Forest Land and Resource Management Plan (1990) as amended by the Record of Decision for Amendments to Forest Service and Bureau of Land Management Planning Documents Within the Range of the Northern Spotted Owl

(1994). I find that implementation of this project is consistent with standards and guidelines for the identified land allocations and will result in conditions that are closer to the desired future condition. The project was designed in conformance with Forest Plan standards and incorporates appropriate Forest Plan guidelines for activities in Management Areas identified under the Forest Plan Direction section of this document.

Bough sales are activities that will cause the removal of vegetation that may provide habitat for Sensitive epiphytes. Because the vegetation impacted by this project are all from young trees, generally less than 20 years of age, the likelihood that Sensitive epiphytes are present on these substrates is very low.

The botanist confirms this action is consistent with the Forest Service policy concerning Sensitive species or species that are identified as "Survey and Manage" species in the Northwest Forest Plan (2000). The areas identified as potential sites will be reviewed by specialists prior to activity.

ENDANGERED SPECIES ACT (ESA)

I find that this action is consistent with the ESA 1973. There would be no direct effects to federally listed wildlife species, species proposed for federal listing, proposed critical habitat or forest service sensitive species or fish species.

Presently, there are no federally listed (proposed, endangered, threatened) plant species known to occur on the Forest, however one federally threatened species (*Howellia aquatilis*) is suspected. *Howellia aquatilis* has an extremely narrow habitat tolerance, generally confined to palustrine emergent wetlands with seasonal drawdown. No such wetland habitats will be impacted by the implementation of this project, thus this project will have no effect on federally listed plant species.

NATIONAL HISTORIC PRESERVATION ACT (NHPA)

The archaeologist has conducted surveys and considered the potential for disturbance to culturally significant sites therefore; I find that this decision is consistent with the NHPA.

CLEAN AIR ACT (CAA)

There are no proposed burning activities and therefore this decision is consistent with the Federal CAA.

CLEAN WATER ACT

The fisheries biologist and I have considered effects to soil, and water disturbance and have established the guidelines for stream buffers to protect these resources and the therefore this decision is consistent with Clean Water Act. As designed, this action would have no effect to these resources. There are no timing restrictions for this action.

OTHER

This action does not violate other Federal, State, or local laws designed for the protection of the environment.

IMPLEMENTATION DATE

This project may be implemented immediately.

ADMINISTRATIVE REVIEW OR APPEAL OPPERTUNITIES

There is no commercial timber harvest, thus this decision would not be subject to administrative review.

Under 36 CFR 215 this decision is not subject to administrative appeal.

CONTACT

For additional information concerning this decision, contact Erin Black by phone: (509) 395-3411 or email: eblack@fs.fed.us.

Approved by:

/s/ Nancy Ryke

4/25/2008

NANCY RYKE
District Ranger

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Appendix A: 2008-2013 Young Stand Thinning, Pruning, and Bough Projects Response to Comments

Comment Letter from Conservation Northwest and Gifford Pinchot Task Force:

Comment GP Task Force	Our concerns are primarily associated with thinning in areas that might have an adverse impact on water quality, thinning on steep slopes, and the possibility of construction of temporary roads and reconstruction of forest roads.
	There will be no actions involving opening closed roads, construction of temporary roads, and no reconstruction of roads associated with this program. Areas needing treatment beyond closed roads will require the contractor to walk-in. Off road motorized equipment such as 4-wheel ATV's will not be permitted for this activity except when authorized use is given to operate on specified existing roads, which may be blocked to vehicle use. These actions are not ground-disturbing, thus there would be no effect to aquatic resources from the proposed action, including water quality or Threatened fish species or their Designated Critical Habitat.
Comment	We appreciate that no thinning is planned within 25 feet of waterways to provide shading and protect soil stability. However, we remain concerned by any sediment release that may occur due to this thinning project. We oppose the removal of trees that may result in slope instability or erosion, which could result in possible sediment delivery to nearby streams. We hope that the Forest Service will take caution in removing trees on steep slopes to minimize the effects of soil erosion and not remove trees from slopes where a soil evaluation reveals the potential for slope instability.
	Areas than are instable will not be thinned and left as No-thin patch for wildlife. The proposed project areas are also within Tier 1 and Tier 2 Key Watersheds, under the Northwest Forest Plan, and the proposed action is consistent with the objectives of providing high quality habitat for stocks of anadromous salmonids and resident fish species. Riparian buffers in units with areas of low bank stability, as identified by the Forest Soil Scientist and/or the District Hydrologist, will be expanded to 50 feet on each side of the stream. These actions are not ground-disturbing, thus there would be no effect to aquatic resources from the proposed action, including water quality or Threatened fish species or their Designated Critical Habitat.

Comment Letter, page 2	We are also concerned about the spread and control of invasive species in the project area. The scoping letter does not propose an invasive weed prevention and treatment plan for the project. We request that the EA provide a more detailed explanation of how invasive species will be treated both pre and post project.
	To prevent the introduction of noxious weeds into the project area, all heavy equipment, or other off- road equipment used in the project is to be cleaned to remove soil, seeds, vegetative matter or other debris that could contain seeds. Cleaning should be done before entering National Forest Lands, and when equipment moves from or between project sites or areas known to be infested into other areas, infested or otherwise. Cleaning of the equipment may include pressure washing. An inspection will be required to ensure that equipment is clean before work can begin. (Equipment cleaning clause Wo-C6.35)

Comment Letter from State of Washington Department of Ecology:

Comment	The SEPA Checklist for this project describes loping and scattering slash, and leaving it to decompose or chipping it. Ecology acknowledges the strongly supports these methods for disposing of waste from timber clearing and harvesting. The SEPA checklist also describes piling and burning as another disposal method for vegetative debris. Ecology encourages the proponent to use the alternatives they mention over piling.
	Burning activities are limited and would only be done in areas of heavy, continuous fuel loading and only when reviewed, in advance, by a botanist, wildlife biologist, silviculturist, archaeologist, and fuels specialist, therefore air quality would not be degraded.

Comment Letter from Washington Department of Fish and Wildlife:

Comment	
	Thank you for sending us a copy of your plan to thin 10-30 year old forested
	stands throughout the Mt. Adams Ranger District. The Washington
	Department of Fish & Wildlife is generally supportive of thinning young
	stands to increase elk and deer forest and especially to diversify
	Forested stands. We would like to see where these thinning projects would
	occur. If you could send out maps of the project areas, we would much oblige.

Very best wishes,
Bill Weiler WDFW Habitat Biologist
Maps sent on 02/20/2008

Comment Letter from Jim White:

Comment I would think it valuable to consider removal of some trees along waterways (within 25 feet) via consultation with a hydrologist or fish biologist. There may be instances where promotion of large tree development would be valuable. -The proposal mentions not cutting some species, including noble fir, "if it is determined that these species are not a major cause of stand overstocking". That concerns me; noble fir is quite shade-intolerant. If there is a dense patch of noble fir, it would be a benefit to thin it, even though it may not be a major cause of stand overstocking. Hopefully what you mean is that these species would be favored when selecting trees to leave in thinning, which I support. The same concern applies to other shade-intolerant species, such as

Engelmann spruce and to a lesser extent mountain hemlock. If these species occur in dense patches, it would not be to their benefit to leave them unthinned, even if overall they make up a small component of the stand. I suggest wording that favors these species during thinnings be used.

It's good to see Jim still giving input to our projects. He's incredibly knowledgeable about everything! As far as thinning within 25 ft of waterways, I'd have to see each site individually (as Jim suggests), and I'd probably say no to thinning that close to a stream/lake/wetland/etc most of the time because of stream shading, riparian microclimate, LWD and allochthonous input needs, and bank stability issues. However, I can see where thinning would be desirable in dog hair stands that extend to within 25 ft of the waterway AND there are no sediment/bank instability problems. Also, I'm in the "I love streamside alder" club. I don't believe we need to cut down every alder in the riparian to get the next successional stage a jump-start. I know I'm in the minority on this these days - it's good to swim against the current, question authority, etc:) Let me know if you ever want me to go out to the field if you are thinking a thin within 25 ft of the waterway may be warranted. I'll unchain myself from my desk gladly.

Stephanie Maria Caballero Fish Biologist & Civil Rights Representative Mt. Adams Ranger District Gifford Pinchot National Forest (509) 395-3419 scaballero@fs.fed.us

Comment Letter from H.F. Fiscus:

Comment	I suggest that where harvest of by-products (wood cutting, bough cutting) is not an issue, slash to be left on the ground be reduced to shorter pieces with larger limbs cut off so that debris lies flatter on the ground. This will allow for quicker decomposition and reduce the fire hazard of slash left on the forest floor.
	Slash would be lopped, scattered, left to decompose naturally. Where warranted, slash may be pulled back from heavily traveled roads to reduce the risk of human-caused ignition. For aesthetic and fire potential reasons slash would typically be managed along trail corridors. Handpiling of slash, for subsequent burning, or chipping of hazardous activity fuels would only be done in areas of heavy, continuous fuel loading and only when reviewed, in advance, by a botanist, wildlife biologist, silviculturist, archaeologist, and fuels specialist.