

DECISION NOTICE #2  
And  
FINDING OF NO SIGNIFICANT IMPACT

**COLLAWASH THINNING**  
**Natural Second Growth**

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

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

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

- Increase health and vigor and enhance growth that results in larger wind firm trees;
- Enhance biological diversity by variable density thinning that changes vertical and horizontal stand structure and brings more sunlight to the forest floor to establish ground vegetation;
- Provide forest products consistent with the Northwest Forest Plan goal of maintaining the stability of local and regional economies now and in the future.

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

**DECISION and RATIONALE**

**I have decided to implement the natural second growth portion of Alternative B with modifications.** I have received comments from the public expressing concern over the construction of the roads in units 9a, 9b and 10. While the roads would have been located on gentle terrain and would not have crossed any streams or unstable areas, I have decided to not build these roads at this time and to use helicopters where needed to access the timber instead. I recognize that this modification will result in reduced revenue from a timber sale because of the more costly helicopter yarding.

Alternative B as modified meets the purpose and need discussed in the EA (sec. 2.2) by implementing the following:

Thin and harvest wood fiber from approximately 55 acres of natural second growth (EA sec. 3.2). Variable density thinning prescriptions are designed to enhance biological diversity. Thinning will leave approximately 80 to 140 variably spaced trees per acre.

**Riparian** – None of the natural second growth units are in riparian reserves.

**Roads** – The new temporary roads for units 9a, 9b and 10 identified in the EA (0.55 mile) will not be constructed.

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

**Variability** – The proposal is to introduce structural and biological diversity through variable spaced thinning (EA sec. 3.2). Diversity and variability will be introduced in several ways: 1) Leave tree spacing will vary within units and between units, 2) Leave trees will include minor species and hardwoods, 3) Leave trees will include some trees with the elements of wood decay, 4) Leave trees will include some live trees where their crowns touch certain key snags, 5) Some snags and all existing large down logs will be retained and 6) Large legacy trees would be retained.

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

- Alternative B as modified, accomplishes the objectives discussed above.
- **Water Quality and Fisheries** - There is a public concern about ground disturbing activities including road construction and logging in riparian reserves.
  - This issue would be resolved in the natural second-growth units by not constructing any roads. Units 9a, 9b and 10 do not contain any riparian reserves.
- **Harvesting of Natural Second-Growth Forest** – There is a concern that the proposed harvest may impact stands that have not been managed before. Comments have questioned the science behind thinning natural second-growth stands and feel they should be left to grow on their own.
  - Approximately 55 acres of stands (89 to 95 years of age) that grew up naturally after a forest fire will be thinned. The units contain scattered large legacy trees that will be retained. Growth in these stands has slowed and thinning will enhance health and growth (EA sec. 4.3.2).

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

- **Alternative A** is the no-action alternative. It was not selected because it would not provide any of the benefits described in the purpose and need and it would not provide any forest products consistent with the Northwest Forest Plan goal of maintaining the stability of local and regional economies. If no action is taken, stands would become overcrowded resulting in trees with reduced vigor, increased mortality and increased wind damage susceptibility. Trees would stagnate and stay relatively small (EA sec. 4.3 & 4.2).
- **Alternative C** is responsive to issues 1 and 2. It would avoid road construction and logging in riparian reserves (EA sec. 3.3). For the natural second-growth units, the modified Alternative B would be very similar to Alternative C.
- **Alternative D** is responsive to issues 1, 2 and 3. It is similar to Alternative C but in addition it would avoid all of the natural second-growth stands (EA sec. 3.4). Alternative D would partially meet the purpose and need. I have chosen the modified Alternative B over Alternative D because the benefits of thinning natural second-growth stands in terms of health and stand development are long lasting (EA sec. 4.3.2).
- **Other Alternatives Considered** (EA sec. 3.5)
  - An alternative was considered that would create forage enhancement areas. Forage creation was only considered in plantations that are addressed in decision notice #1.
  - An alternative was considered that would include restoration projects such as road closures and road decommissioning. Comments were received suggesting that we not mix restoration projects with timber harvest projects. These restorations are not connected actions and are not included in the range of alternatives for this analysis. Road closure and decommissioning projects have been assessed in a separate Forest-wide Restoration Environmental Assessment.
  - An alternative was considered that would thin dense stands by cutting trees and leaving them on the ground and chipping the limbs. It was not fully developed because it would not meet the objective of providing forest products consistent with the Northwest Forest Plan goal of maintaining the stability of local and regional economies now and in the future. Since there is no source of funding for this type of operation it would be similar to the no-action alternative.
  - The alternative of logging all units in the same manner as the original logging was considered but not fully developed. The natural second growth stands have had no previous logging.
  - An alternative was considered that would protect ecologically important snags by avoiding all harvesting in the hazardous zone around the snags. With the other action alternatives, snags would be saved where safety permits but many that are hazardous would be felled. This alternative would establish a no-harvest safety zone around each snag to keep loggers out of the hazardous area. Survey data shows that there are

approximately 4-10 medium and large snags per acre within the natural second-growth stands. The hazardous zone around just one snag would be approximately one acre in size (assuming an average height of 120 feet). Trying to avoid the hazard zones around these snags would eliminate all of the natural second-growth harvest units. It would be very difficult to develop this alternative because snags are continually changing. In the 2 to 3 years between planning and logging, live trees may die and become hazardous snags. Snags that are a hazard today may fall by the time harvest occurs and no longer present a hazard. There is no way to predict today how many hazardous snags would have to be felled to prevent injuries to forest workers. I have concluded that it would be unfeasible to develop an alternative that would protect these snags within a timber sale that occurs over a 2 to 3 year period.

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

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

- **THREATENED, ENDANGERED, AND SENSITIVE SPECIES** - Formal consultation with U.S. Fish & Wildlife Service concerning the **northern spotted owl** has been completed for this project. The Biological Opinion written by U.S. Fish & Wildlife Service and dated March 30, 2005 concluded that this project is not likely to jeopardize the continued existence of the northern spotted owl or result in the destruction or adverse modification of designated critical habitat. Alternative B would have an effects determination of “May Affect, Likely to Adversely Affect” because of the effect caused by the thinning of natural second-growth stands. Mandatory Terms and Conditions that implement the Reasonable and Prudent Measures specified in the Biological Opinion include a seasonal restriction (Design Criteria #1, EA sec. 3.6).
  - The natural second-growth stands are suitable habitat (Nesting/Roosting/Foraging habitat) partially due to the presence of some large remnant trees. The large remnants would be retained. While there would be a short-term downgrading of suitable habitat to dispersal habitat, stands would recover to suitable habitat again in approximately 15 to 20 years. The variable density thinning would not change the existing large remnant trees but would result in accelerating the growth and increasing the size of second-growth.
  - I have considered the new information that has been recently published about northern spotted owls (documented in Appendix E). The new information would not lead to a change in the effects determination and no additional analysis is needed for this project.

Informal consultation with NOAA Fisheries concerning threatened or endangered **anadromous fish** and Essential Fish Habitat established under the Magnuson-Stevens Fishery Conservation and Management Act has been completed for this project. A Letter of Concurrence from NOAA Fisheries dated January 26, 2005 is in the analysis file. Lower Columbia River Steelhead, Upper Willamette River Spring Chinook, and Lower Columbia

River Coho Salmon have an effects determination of "May affect, Not likely to adversely affect" (NLAA). Other listed fish will have a rating of "No Effect." (EA sec. 4.2.7).

There will be no significant adverse effects to sensitive species (EA sec 4.2.7, 4.2.9, 4.5.3, & 4.8). The project will not jeopardize the continued existence of any listed species nor will it cause a trend to federal listing or loss of viability for any proposed or sensitive species.

- **CONSISTENCY WITH MT. HOOD FOREST PLAN** - The proposed action is consistent with Management Area goals, desired future conditions, and standards and guidelines identified in the Mt. Hood National Forest Land and Resource Management Plan as amended (Forest Plan).
  - **Aquatic Conservation Strategy** - I have considered the relevant information from the watershed analysis (summarized in Appendix E). I have also considered the existing condition of riparian reserves, including the important physical and biological components of the fifth-field watersheds and the effects to riparian resources. I find that Alternative B is consistent with the recommendations of the watershed analysis, is consistent with riparian reserve standards and guidelines, and will contribute to maintaining or restoring the fifth-field watershed over the long term (EA sec. 4.2.11 & EA Appendix E).
  - It is consistent with **late-successional reserve** (LSR) objectives. The project is not in an LSR or any 100-acre LSRs (EA sec. 2.2.5 & 3.2.5).
  - The project is consistent with the 2001 FSEIS to Amend the Survey and Manage Mitigation Measure Standards and Guidelines. Surveys have been completed to the Survey and Manage protocol and no species were found that require the management of known sites (EA p. sec. 4.2.9 & 4.5.3).
  - The project is consistent with the 2004 FSEIS to Remove or Modify the Survey and Manage Mitigation Measure Standards and Guidelines. The Record of Decision moved many species from the requirements of the Survey and Manage Standards and Guidelines to sensitive species. However, it also indicated that projects still in the planning stage that had begun or completed surveys using the Survey and Manage Standards and Guidelines could proceed without conducting a new sensitive species analysis. Surveys have been completed to the Survey and Manage protocol and no species were found that require the management of known sites (EA p. sec. 4.2.9 & 4.5.3).
  - It is consistent with standards for deer and elk management, threatened, endangered and sensitive species protection, noxious weeds, hydrology, air quality, heritage resources, scenery, and timber management (EA sec. 4.0).
  - It is consistent with the National Forest Management Act regulations for **vegetative management**. There will be no regulated timber harvest on lands classified as unsuitable for timber production (36 CFR 219.14) and vegetation manipulation is in compliance with 36 CFR 219.27(b), (EA sec. 4.6.1 & EA Appendix E).

- The natural second-growth stands are not in earthflows and have not been logged before. The units would meet earthflow and soil standards and guidelines (sec. 4.6).
- Snag and down wood standards and guidelines would be met in natural second-growth stands (sec 4.5.4).

**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 will not close any system **roads** that are currently open. Public comments indicated a desire to separate timber sale projects from restoration projects (EA sec. 3.5.2). Many miles of system roads have been closed in recent years on the Clackamas River Ranger District including 66.5 miles of roads decommissioned in the Collawash watershed. Several District-wide and Forest-wide restoration EAs have been developed in recent years to close roads. In the future, additional road closures would be addressed in restoration EAs. I am approving an exception for Forest Plan standard and guideline FW-208. Open road density will continue to be above the standard and guideline level for all alternatives including no action.
- **WATER QUALITY AND FISHERIES** – Alternative B as modified would have minimal impact on water quality and fisheries because it would not build any roads and would not thin riparian reserves.
- **CUMULATIVE EFFECTS** - The analysis considered not only the direct and indirect effects of the projects but also their contribution to cumulative effects. Past, present and foreseeable future projects have been included in the analysis (EA sec. 4.0.2). The analysis considered the proposed actions with BMPs and design criteria. The EA elaborates on cumulative impacts related to resources such as water quality, older forest, soils and wildlife. No significant cumulative or secondary effects were identified.
- **CULTURAL RESOURCES** - Field surveys have been conducted. The heritage resource report concludes that there will be no effect to any properties on or eligible to the National Register of Historic Places (2002-06-06-05-0003). Documentation has been forwarded to the State Historic Preservation Office (EA sec. 4.13).
- **OTHER** –The effects are not likely to be highly controversial and do not involve highly uncertain, unique, or unknown risks. This action will not set a precedent because other similar actions have occurred in the past. The project was not found to threaten a violation of any Federal, State, or local law. The project complies with Executive Order 12898 regarding environmental justice (EA sec. 4.14). No disproportionately high adverse human or environmental effects on minorities and/or low-income populations were identified during the analysis and public information process. No significant irreversible or irretrievable commitments of resources were found (EA sec. 4.16). There will be no effect

to Wild and Scenic Rivers and State Scenic Waterways, wetlands, wilderness areas, research natural areas or any other areas with unique characteristics. The area is not affected by recent wilderness proposals. The project will not affect public health or safety (EA sec. 4.10). Adverse and beneficial impacts have been assessed and found to be not significant. No significant effects to consumers, civil rights, minority groups, women, prime farmland, rangeland, forestland, wetlands, or floodplains were identified.

**Comments:**

The proposed action and a preliminary analysis were available for a 30-day public comment period that began on June 27, 2005. I have considered the substantive comments that were received. The responses to the comments are contained in Appendix A of the EA.

**Appeal Rights:**

This decision is subject to appeal pursuant to Forest Service regulations at 36 CFR 215. Any individual or organization that submitted substantive comments during the comment period may appeal. Any appeal of this decision must be in writing and fully consistent with the content requirements described in 36 CFR 215.14. The Appeal Deciding Officer is Linda Goodman, Regional Forester. An appeal should be addressed to the Regional Forester at any of the following addresses. Postal: ATTN.: 1570 APPEALS, P.O. Box 3623, Portland, OR 97208-3623; Street location for hand delivery: 333 SW 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\(at\)fs.fed.us](mailto:appeals-pacificnorthwest-regional-office(at)fs.fed.us). Electronic appeals must be submitted as part of the actual e-mail message, or as an attachment in Microsoft Word (.doc), rich text format (.rtf), or portable document format (.pdf) only. E-mails submitted to email addresses other than the one listed above, or in formats other than those listed, or containing viruses, will be rejected. It is the responsibility of the appellant to confirm receipt of appeals submitted by electronic mail.

The Appeal, including attachments, must be postmarked or received by the Appeal Deciding Officer within 45 days of the date legal notice of this decision was published in the Oregonian. For further information regarding these appeal procedures, contact the Forest Environmental Coordinator Mike Redmond at 503-668-1776.

**Project Implementation:**

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

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

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

Recommended By:

Responsible Official:

*Andrei Rykoff*

9/5/2005

*Gary L. Larsen*

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**ANDREI RYKOFF**  
District Ranger

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Date Published

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**GARY L. LARSEN**  
Forest Supervisor